



**CITY OF
SAN LUIS OBISPO**

**INITIAL STUDY
ENVIRONMENTAL CHECKLIST FORM
ARCH-2193-2015/EID-4091-2016**

November 15, 2016

1. Project Title:

MULTI-FAMILY RESIDENTIAL DEVELOPMENT AT 71 PALOMAR AVENUE

2. Lead Agency Name and Address:

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

3. Contact Person and Phone Number:

Rachel Cohen, Associate Planner
805-781-7574

Prepared By: Oliveira Environmental Consulting LLC & Rincon Consultants, Inc.

4. Project Location:

71 Palomar Avenue (APN 052-161-007)

5. Project Sponsor's Name and Address:

LR Development Group, LLC
400 Continental Boulevard, 6th Floor
El Segundo, CA 90245

Project Representative Name and Address:

Arris Studio Architects
1306 Johnson Avenue
San Luis Obispo, CA 93401

6. General Plan Designation:

Residential

7. Zoning:

R-4 (High Density Residential)

8. Description of the Project:

An initial study was originally prepared for the proposed project on March 18, 2016. The applicant modified the project and an addendum was prepared in June 2016 because no new impacts were identified with the modified project. The City received a significant amount of public input and determined additional information was needed to supplement the original Mitigated Negative Declaration (MND) and the addendum. The MND and the Addendum have been combined into one document – this MND – that has been updated with the modified project description and additional information.

The proposed project is located at 71 Palomar Avenue (APN 052-162-007), in the City of San Luis Obispo, CA. The project parcel is 1.32 acres in size and is zoned “R-4” (High Density Residential). Please refer to Figure 1 (Attachment 1), Site Vicinity/Site Location, for a detailed depiction of the project location. The applicant is proposing the rehabilitation, adaptive reuse, and repositioning of the Master List Historic Sandford House property as part of a 33-unit multi-family residential project.

The project includes:

- Removal of the non-historic additions to the main structure;
- Removal of the non-historic garage, carport and the secondary residential building;
- Repositioning the house approximately 33 feet east and 16 feet south of its current location;
- Rehabilitation of the historic structure and adaptive reuse for the proposed project’s leasing office and amenity space (study room, fitness room, etc.);
- Removal of 55 of the 59 existing trees on the site and replanting 34 trees;
- Construction of six apartment buildings (four, 2-story structures; two 4-story structures built into the hill - all with a maximum height of 35 feet) with a total of 33 residential units (five studios, sixteen two-bedroom apartments, and twelve three bedroom apartments);
- 63 parking spaces and 66 bicycle parking spaces within a two-level garage beneath the two, north apartment buildings, accessed from Palomar Avenue; and
- Road improvements to Luneta Drive including two-way traffic and raised medians.

Please refer to Figure 2 (Attachment 2), First Floor Site Plan/Aerial Overview, for a detailed depiction of the project development footprint.

9. Setting and Surrounding Land Uses:

The subject property is located at the corner of Palomar Avenue and Luneta Drive just south of Foothill Boulevard and west of Broad Street. The project site contains three buildings: a main residence, a secondary residential building, and a remodeled garage with adjacent carport. Expansive lawns and mature trees are present throughout the site. The site is accessed by two driveways along Luneta Drive and a pedestrian access from Palomar Avenue.

Existing uses surrounding the site area are as follows:

West: Developed with multi-family residential uses (Valencia Apartments), zoned R-4-PD, High Density Residential.

North: Developed with multi-family residential uses (Valencia Apartments), zoned R-4-PD, High Density Residential.

East (across Palomar Avenue): Developed with multi-family residences/senior housing, zoned R-4-PD.

South: (across Luneta Drive): Developed with single-family residential homes, zoned R-1-PD, Low Density Residential.

10. Project Entitlements Requested:

The project requires environmental review (this document), architectural review and approval by the Architectural Review Commission (ARC).

11. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):

None.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

FISH AND GAME 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 Wildlife fees pursuant to Section 711.4 of the California Fish and Wildlife Code. This initial study has been circulated to the California Department of Fish and Wildlife for review and comment.

STATE CLEARINGHOUSE

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

11/15/16
Date

Doug Davidson, Deputy Director
Print 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	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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1. AESTHETICS. Would the project:

a) Have a substantial adverse effect on a scenic vista?	1,5, 24, 31			--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?	5, 11, 31			--X--	
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	1,11, 31			--X--	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	10,11, 17, 31			--X--	

Evaluation

The City is located eight miles from the Pacific Ocean and lies at the convergence of two main drainages: The Los Osos Valley which drains westerly into Morro Bay via Los Osos Creek, and San Luis Valley which drains to the south-southwest into the Pacific Ocean at Avila Beach via the San Luis Obispo Creek. The topography of the city and its surroundings is generally defined by several low hills and ridges such as Bishop Peak and Cerro San Luis. These peaks are also known as Morros and provide scenic focal points for much of the City. The Santa Lucia Mountains and Irish Hills are the visual limits of the area and are considered the scenic backdrop for much of the City. The surrounding hills have created a hard urban edge where development has remained in the lower elevations.

The project site vicinity within the residential neighborhoods south of Foothill Boulevard exhibit a more suburban character than those in the downtown core. The street pattern is a rectilinear grid, providing a degree of formality and long visual sightlines along some streets. As elsewhere in the City, these neighborhoods enjoy the benefits of mature street trees and the unique visual backdrop provided by Cerro San Luis Obispo and Bishop Peak. Please refer to the project site plans for elevations showing views of the project development from public vantage points along neighboring streets.

a) The proposed project is in an urbanized section of the City on an elevated site that has generally flat topography, sloping gradually toward the north and east. Although the project site exhibits a fairly open lot configuration dominated by the Sandford House and associated outbuildings, the project site is surrounded by high-density (R-4) multi-family residential development to the north, west, and east and a single-family neighborhood to the south. The site is distinguished from the surrounding area because of the historic Sandford House and many large trees. The site is not located within a designated scenic vista.

Even though the site is not part of a designated scenic vista, public testimony was received during a public meeting on the project conducted by the Cultural Heritage Committee that the removal of trees from the project site would be a substantial change in character of the area when viewed from several offsite locations. This public input and a variety of other factors were evaluated in an aesthetic analysis conducted by Rincon Consultants. The analysis identified that “the project site is aesthetically prominent from adjacent roadways due to the existing historic structure and trees onsite. However, according to Figure 3 of the General Plan Circulation Element and Figure 11 of the General Plan Conservation and Open Space Element the site is not within a City designated scenic vista and, therefore, the threshold for aesthetics impacts is higher than if the site was within a vista protected by additional, specific City policies. When viewed from various other public viewpoints in the vicinity of the site, including public trails on Cerro San Luis and surrounding roadways, the project site blends in with the surrounding uses and vegetation and does not stand out as visually prominent or unique” (Rincon Consultants, Inc., October 2016, Attachment 8). While the project proposes to eliminate tall trees and other vegetation on the site, subject to a replanting plan, these changes will not substantially degrade the quality of the site or its surroundings. Notwithstanding public testimony to the contrary, this assessment is consistent with City policy with respect to scenic vistas. Based on this analysis, the conclusion is that the project would have a less than significant impact on scenic vistas, as there would be no change to existing conditions regarding scenic vistas or scenic resources. Impacts are considered less than significant.

b) Located approximately 0.33 miles to the east, Highway 1 is the closest state-designated scenic highway to the project site. The project site, which contains a historic resource, is not visible from the highway or on/off ramps (see section (c) below and Section 5 – Cultural Resources). There are no state scenic highways in the project area from which the project is visible. Impacts are considered less than significant.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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c) Visual resources in the vicinity of the site are discussed above and include views of Cerro San Luis Obispo and Bishop Peak. The City of San Luis Obispo regulates aesthetics of buildings and public spaces through implementation of adopted policies and programs. The City’s General Plan Land Use and Circulation Element (LUCE) Update, Conservation and Open Space Element, as well as the implementing statutes of the Municipal Code/Zoning Code and Community Design Guidelines are the core of this mechanism.

The applicant proposes development of a multi-family residential apartment complex on a site with a Master List Historic House and accessory structures (discussion of impacts on the Historic Resource are discussed in Section 8 below). Adjacent parcels to the site are developed with multi-family development to the north, east and west and single-family units to the south. Residential structures range in height between one and two-stories. The site is zoned for high-density residential development and was previously disturbed with buildings and site development associated with the Historic Sandford House.

The Aesthetic Analysis identified that “the project site is currently developed with the historic Sandford House and associated outbuildings, and contains 59 mature trees. From the adjacent roadways and viewpoints, the abundance of trees gives the site a somewhat natural appearance amongst single- and multi-family residential development surrounding the site. The project would include development of multi-story apartments with a maximum height of 35 feet, with associated landscaping and parking on the project site. The proposed development would involve more intense structural development on the site than existing conditions, and proposes the removal of most of the existing mature trees from the site.

According to the landscape plan, the project would involve planting of over 30 new landscape trees throughout the proposed apartment development and the retention of two existing trees near the southeast corner of the site along Palomar Drive, one tree in the northeast corner of the site and one existing tree in the southwest corner of the site. Despite retaining some of the existing mature trees on the site, the proposed development and overall amount of trees removed would result in a less natural appearance of the site when compared to existing conditions as newly landscaped trees would be scattered throughout and would be shorter in height than the proposed 35-foot structural development unlike the existing trees which are large, dense, and block existing structures from view.

The project, as proposed, would also involve moving the historic Sandford House, which possesses high aesthetic quality, from the central area to the southeast portion of the site. This would result in the Sandford House being closer to the adjacent roadways, less obstructed by trees, and, thus, more visually prominent in the neighborhood. Although the project would change the aesthetic character of the site, it would not significantly degrade the character as it would include high-density residential development with a maximum height of 35 feet consistent with adjacent high-density development to the east, north, and west of the site would retain the visually prominent Sandford House.

Additionally, the project includes design elements such as peaked roof lines, separate structures to break up the massing of the proposed multi-level residential structures, inclusion of over 30 landscaped trees, four existing trees, and other landscape features, and agrarian style architecture to complement the Sandford House. With these design and landscape features, the project would comply with City General Plan policies aimed at preserving scenic views and the character of prominent visual features within the City, as well as the City’s Community Design Guidelines which are intended to ensure that future development is consistent with the City’s expectations relating to the quality and character of site and building design, and to protect scenic resources and views, from public rights-of-way. However, the project would require a final determination of project consistency with the Community Design Guidelines by the ARC. As such, the project would not result in significant degradation of the visual character of the site and its surroundings, and this impact would be less than significant impact” (Rincon Consultants, Inc., October 2016, Attachment 8).

e) The project is located in an already urbanized area with light sources from neighboring commercial and residential uses as well as light from vehicular circulation along neighboring streets. Existing sources of nighttime lighting in the vicinity of the site include streetlights along Palomar Avenue and Luneta Drive, spillover lighting from surrounding single- and multi-family residential development, and light from the headlights of vehicles traveling on the surrounding roadways. Development of the project site would result in an increase in ambient nighttime lighting through the increased residential development and associated exterior lighting and interior lighting spillover. This would include parking garage and security/safety lighting, and fixtures associated with the proposed structural development. In addition, windows, exterior building materials, and surface paving materials used for the proposed development may generate glare that could affect surrounding residential uses.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project is required to conform to the City’s Night Sky Preservation Ordinance (Zoning Regulations Chapter 17.23) and General Plan Policies 9.2.1 and 9.2.3 which sets operational standards and requirements for lighting installations, including requiring all light sources to be shielded and downward facing. The project applicant would also be required to provide an overall lighting plan that demonstrates that the project complies with the requirements of City of San Luis Obispo Ordinance No. 17.18.030, which prohibits lighting or illuminated devices that would create glare which results in a hazard or nuisance on other properties (City of San Luis Obispo, Zoning Regulations). This plan would be reviewed by the ARC prior to issuance of building permits. Adhering to these existing regulations and ordinances, as well as the City’s Community Design Guidelines, would ensure that exterior lighting and finish is designed to minimize impacts on neighboring properties and other light and glare sensitive uses. As such, impacts associated with the creation of new sources of light and glare would be less than significant.

Conclusion: The project will have a less than significant impact on aesthetics.

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, 19, 31				--X--
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	1, 12, 31				--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?	18				--X--

Evaluation

The city is located in the heart of San Luis Obispo County and the Central Coast Region, both of which are important key agricultural centers within the State of California. The region’s agricultural industry is an important part of the local economy. It provides employment and income directly for those in agriculture, and it helps drive growth in the tourism industry, which in turn generates further economic activity and consumer spending.

a) The project site is not designated as Prime or Unique Farmland or Farmland of Statewide Importance on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, the proposed project would not result in conversion of these agricultural resources to nonagricultural use.

b) The project site is not located on farmland, nor is it under a Williamson Act contract. The Project site is designated for Residential uses in the General Plan and is zoned R-4 (High Density Residential). The project site is surrounded by developed properties and public streets. Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract.

c) Redevelopment of the site will not contribute to conversion of farmland. No impacts to existing on site or off site agricultural resources are anticipated with development of the project site.

Conclusion: No impacts to agricultural resources are anticipated.

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?	9, 21, 13, 31				--X--
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	9, 20, 21, 13, 31		--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	9, 20, 21, 13, 31		--X--		

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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(including releasing emissions which exceed quantitative thresholds for ozone precursors)?					
d) Expose sensitive receptors to substantial pollutant concentrations?	9, 21, 13, 31		--X--		
e) Create objectionable odors affecting a substantial number of people?	9, 21, 13, 31				--X--

Evaluation

Air quality in the San Luis Obispo region of the County is characteristically different than other regions of the County (i.e., the Upper Salinas River Valley and the East County Plain), although the physical features that divide them provide only limited barriers to transport pollutants between regions. The County is designated nonattainment for the one-hour California Ambient Air Quality Standards (CAAQS) for ozone and the CAAQS for respirable particulate matter (PM10). The County is designated attainment for national ambient air quality standards (NAAQS). Measurements of ambient air quality from the monitoring station at 3220 South Higuera Street are representative of local air quality conditions.

a) The San Luis Obispo Air Pollution Control District (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 planning strategies, including locating high density multi-family residential within an urban area proximate to an existing roadway, near transit services and shopping areas. Therefore, potential impacts would be less than significant.

b), c), d) Both the US Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established ambient air quality standards for common pollutants. These ambient air quality standards are levels of contaminants representing safe levels that avoid specific adverse health effects associated with each pollutant. The ambient air quality standards cover what are called "criteria" pollutants because the health and other effects of each pollutant are described in criteria documents. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. As mentioned above, San Luis Obispo is currently designated as nonattainment for the 1-hour and 8-hour State standards for ozone and the 24-hour State standard for PM10.

CEQA Appendix G states the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make significance determinations. Assessment of potential air quality impacts that may result from the proposed project was conducted using the April 2012 CEQA Air Quality Handbook, which is provided by the APCD for the purpose of assisting lead agencies in assessing the potential air quality impacts from residential, commercial and industrial development. Under CEQA, the APCD is a responsible agency for reviewing and commenting on projects that have the potential to cause adverse impacts to air quality.

Construction Significance Criteria:

Temporary impacts from the project, including but not limited to excavation and construction activities, vehicle emissions from heavy duty equipment and naturally occurring asbestos, have the potential to create dust and emissions that exceed air quality standards for temporary and intermediate periods.

Naturally occurring asbestos (NOA) has been identified by the state Air Resources Board as a toxic air contaminant. Serpentine and ultramafic rocks are very common throughout California and may contain naturally occurring asbestos. The SLO County APCD has identified that NOA may be present throughout the City of San Luis Obispo (APCD 2012 CEQA Handbook, Technical Appendix 4.4), and under the ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (93105) are therefore required to provide geologic evaluation prior to any construction activities. As such, impacts are considered significant but mitigable.

The project will include demolition of non-historic additions and extensive grading, which has the potential to disturb

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asbestos that is often found in older structures as well as underground utility pipes and pipelines (i.e. transite pipes or insulation on pipes). Demolition can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos containing material (ACM). As such, the project may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M – asbestos NESHAP). Impacts related to the proposed demolition of existing structures on the subject site are considered to be significant but mitigable.

Construction activities can generate fugitive dust, which could be a nuisance to local residents and businesses in close proximity to the proposed construction site. Because the project is within 1,000 feet of sensitive receptors, impacts related to fugitive dust emissions during proposed construction activities are considered potentially significant.

Construction equipment itself can be the source of air quality emission impacts, and may be subject to California Air Resources Board or APCD permitting requirements. This includes portable equipment, 50 horsepower (hp) or greater or other equipment listed in the APCD’s 2012 CEQA Handbook, Technical Appendices, page 4-4. Truck trips associated with the 16,000 cubic yards of cut material (i.e., soils) that will be cut from the site may also be a source of emissions subject to APCD permitting requirements, subject to specific truck routing selected. The specific requirements and exceptions in the regulations can be reviewed at the following web sites: https://www.arb.ca.gov/msprog/truck-idling/13ccr2485_09022016.pdf and <https://www.arb.ca.gov/msprog/truck-idling/truck-idling.htm>. Impacts related to vehicle and heavy equipment emissions are considered potentially significant.

Operational Screening Criteria for Project Impacts:

Table 1-1 of the SLOAPCD CEQA Air Quality Handbook indicates that the construction of an apartment building (low rise) with less than 109 dwelling units would not exceed the threshold of significance for the APCD Annual Bright Line threshold (MT CO₂e). The threshold for reactive organic gases (ROG) and oxides of nitrogen (NO_x) would not be exceeded by the proposed project (maximum size for exemption stated at 94 dwelling units). Therefore, operational phase air quality impacts are considered less than significant.

e) The project includes the development of a multi-family residential apartment complex, as anticipated in the R-4 High Density Residential zone, and therefore would not include any potential land uses which would have the potential to produce objectionable odors in the area.

Mitigation Measure AQ-1: Prior to grading plan approval, the project proponent shall ensure that a geologic evaluation should 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 applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD. Technical Appendix 4.4 of this Handbook includes a map of zones throughout SLO County where NOA has been found and geological evaluation is required prior to any grading.

More information on NOA can be found at <http://www.slocleanair.org/rules-regulations/asbestos.php>.

Mitigation Measure AQ-2: Any scheduled demolition activities or disturbance, removal, or relocation of utility pipelines shall be coordinated with the APCD Enforcement Division at (805) 781-5912 to ensure compliance with NESHAP, which include, but are not limited to: 1) written notification, within at least 10 business days of activities commencing, to the APCD, 2) asbestos survey conducted by a Certified Asbestos Consultant, and, 3) applicable removal and disposal requirements of identified ACM.

More information on NOA can be found at <http://www.slocleanair.org/rules-regulations/asbestos.php>.

Mitigation Measure AQ-3: During construction/ground disturbing activities, the applicant shall implement the following particulate (dust) control measures. These measures shall be shown on grading and building plans. In addition, the contractor shall designate a person or persons to monitor the dust control program and to order increased watering, modify practices as necessary, to prevent transport of dust off site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Community Development and

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Public Works Departments prior to commencement of construction.

- a. Reduce the amount of disturbed area where possible.
- b. Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the APCD's limit of 20% opacity for no greater than 3 minutes in any 60-minute period. Increased watering frequency will be required whenever wind speeds exceed 15 m.p.h. and cessation of grading activities during periods of winds over 25 m.p.h. Reclaimed (non-potable) water is to be used in all construction and dust-control work.
- c. All dirt stock pile areas (if any) shall be sprayed daily and covered with tarps or other dust barriers as needed.
- d. Permanent dust control measures identified in the approved project revegetation and landscape plans shall be implemented as soon as possible, following completion of any soil disturbing activities.
- e. Exposed grounds that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating, non-invasive, grass seed and watered until vegetation is established.
- f. All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD.
- g. All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible. In addition, building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- h. Vehicle speed for all construction vehicles shall not exceed 15 m.p.h. on any unpaved surface at the construction site.
- i. All trucks hauling dirt, sand, soil, or other loose materials, are to be covered or shall maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code 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 shall be used with reclaimed water where feasible. Roads shall be pre-wetted prior to sweeping when feasible.
- l. All PM10 mitigation measures required shall be shown on grading and building plans.
- 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 the APCD's limit of 20% opacity for no greater than 3 minutes in any 60-minute period. 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.

Mitigation Measure AQ-4: Prior to any construction activities at the site, the project proponent shall ensure that all equipment and operations are compliant with California Air Resource Board and APCD permitting requirements, and shall contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.

Mitigation Measure AQ-5: To reduce the sensitive receptor emissions impact of diesel vehicles and equipment used to construct the project and export soil from the site, the applicant shall implement the following idling control techniques:

1. California Diesel Idling Regulations
 - a. On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:
 1. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and,
 2. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of restricted area, except as noted in Subsection (d) of the regulation.
 - b. Off-road diesel equipment shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use Off-road Diesel regulation.
 - c. Signs must be posted in the designated queuing areas and job sites to remind drivers and operators of the state's 5-minute idling limit.
2. Diesel Idling Restrictions Near Sensitive Receptors (residential homes). In addition to the State required diesel idling requirements, the project applicant shall comply with these more restrictive requirements to minimize

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impacts to nearby sensitive receptors:

- a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors.
 - b. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted.
 - c. Use of alternative fueled equipment is recommended.
 - d. Signs that specify the no idling areas must be posted and enforced at the site.
3. Soil Transport. It is estimated that 16,000 cubic yards of cut material (i.e., soils) will be cut from the site, but the final volume of soil that will be hauled off-site, together with the fleet mix, hauling route, and number of trips per day will need to be identified for the APCD. Specific standards and conditions will apply.

Conclusion: With recommended construction mitigation measures, the project will have a less than significant impact on air quality.

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 Wildlife or U.S. Fish and Wildlife Service?	5,17, 18, 26, 31		--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 Wildlife or U.S. Fish and Wildlife Service?	5,17, 18, 26, 31			--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?	5,17, 18, 26, 31				--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?	5,17, 18, 26, 31		--X--		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	5,17, 18, 26, 31		--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?	5,17, 18, 26, 31				--X--

Evaluation

The urbanized area of the City of San Luis Obispo lies at the convergence of two main geologic features: The Los Osos Valley which drains westerly into Morro Bay via Los Osos Creek, and the San Luis Valley which drains to the south-southwest into the Pacific Ocean at Avila Beach via San Luis Obispo Creek. San Luis Obispo, Stenner, Prefumo, and Brizzolara Creeks, and numerous tributary channels pass through the city, providing important riparian habitat and migration corridors connecting urbanized areas to less-developed habitats in the larger area surrounding the City.

Much of the area outside the city limits consists of open rangeland grazed year round, along with agricultural lands dominated by annual crop rotations and vineyards. A variety of natural habitats and associated plant communities are present within the City, and support a diverse array of native plants and resident, migratory, and locally nomadic wildlife species, some of which are considered as rare, threatened, or endangered species. However, the largest concentrations of natural and native habitats are located in the larger and less developed areas outside the city limits.

The following discussion, as outlined in the LUCE Update EIR, provides a general overview of the habitat type found on the project site:

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Urban/Developed Habitats: Based on a project site visit and observations of the property, the site exhibits the characteristics associated with the “Urban/Developed” habitat commonly found concentrated within and adjacent to the developed portions of the City, and in discrete areas adjacent to Highway 1 and Broad Street/Highway 227. The LUCE update EIR discussed that these areas typically provide low potential to support native plant or animal species occurrences. Within the City limits, occurrences of sensitive natural habitats are present in low-lying areas (riparian and wetland areas), and on undeveloped hills and steep slopes above the Urban Reserve or development limit lines (coastal scrub, chaparral, woodlands, and grasslands). Wildlife occurrences within urban/developed areas typically consists primarily of urban- adapted avian species such as house sparrow (*Passer domesticus*) and Eurasian collared dove (*Streptopelia decaocto*) utilizing the abundant tree canopy and concentrated food sources, common animal species adapted to human presence such as raccoon (*Procyon lotor*), opossum (*Didelphis virginiana*), and striped skunk (*Mephitis mephitis*), and aquatic, semi-aquatic, and terrestrial species resident in or utilizing riparian areas.

(a-d) The project site was visited by Oliveira Environmental Consulting (February 10, 2016) and by Rincon Consultants, Inc. (September 20, 2016) and observations indicated that the site does not support riparian or wetland areas, undeveloped hills or steep slopes associated with a higher potential for the presence of native plant or animal species. It is not anticipated that any areas meeting the criteria for jurisdictional wetlands will be disturbed by the project. The project site is void of undisturbed native habitat and open spaces across the site are dominated by mature landscaping including trees, shrubs and lawns, including a stand of mature eucalyptus trees near the existing Sandford House. The mature landscaping present at the project site provides tree and shrub habitats that have the potential to support wildlife habitat for urban-adapted avian species as discussed above as well as listed species or species of local concern (Conservation and Open Space Element Appendix A). A Biological Assessment provided by Rincon Consultants (October 2016, Attachment 5) identifies that several large trees on the site are suitable habitat for various raptor species such as the Cooper’s hawk (*Accipiter cooperii*) (on the Federal Watch List and a species of local concern), the common red-tailed hawk and the barn owl. Additionally, the State Fully Protected and local species of concern white-tailed kite (*Elanus leucurus*) could also nest at the site while foraging in the open grasslands located less than 1,000 feet to the south. White-tailed kite has been documented by the CNDDDB within 3.5 miles of the proposed project site. Most of the mature landscaping would be removed prior to construction of the project, and impacts to nesting birds are considered potentially significant but mitigable.

The project site also contains potential roosting habitat for pallid bat (*Antrozous pallidus*) (a State and Local Species of Special Concern). Pallid bat has been documented by the CNDDDB approximately one mile south of the project site and this species may utilize the structures on the project site as roosting areas. Structures that occur within the project site that can be utilized by special status bats include the Sandford house, sheds, enclosed carports, and other living areas. The demolition of existing structures and the movement of the Historic Sandford house and the removal of the mature landscaping would happen prior to the construction of the project, and impacts to pallid bats are considered potentially significant but mitigable.

(e) No designated heritage trees exist on the portion of the site to be developed. 55 small to fully mature native and non-native landscaping trees would be removed as part of the proposed project development. This includes trees such as mulberry, pine, olive, decorative palms, oak, ash, eucalyptus and redwood (see attachments 5 & 8, Arborist Reports). The proposed project includes a conceptual landscape plan showing the removal of all of the existing vegetation with the exception of four trees: a 38-inch Canary Island Pine, a 19-inch Mexican Fan Palm, an 18-inch Painted Eucalyptus, and a 29-inch Norfolk Island Pine. The landscape plan indicates a robust planting scheme that includes evergreen shade trees, landscape median trees (Luneta Drive median), deciduous flowering shade trees, hedges, shrubs, lawns and ground cover species. In total the project proposes to plant 37 new trees; 9 of these will be larger 36” box specimens. Multiple shrubs and ground cover are also included in the landscape plan which will provide some greenery and other environmental benefits. Please refer to the project Conceptual Landscape Plan for a detailed list of proposed landscaping scheme and planting palette. The City Arborist has reviewed the tree removals and determined that there will be a less than significant impact in the total tree canopy for the area with mitigation.

f) The project site is not part of a local, regional, or state habitat conservation plan and therefore would have not have an impact.

Mitigation Measure BIO-1: Prior to commencement of construction, BIO-1, to avoid conflicts with nesting birds, construction activities shall not be allowed during the nesting bird season (February 1 to September 15). For construction activities

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occurring during the nesting season, surveys for nesting birds of local concern or covered by the California Fish and Game Code and the Migratory Bird Treaty Act shall be conducted by a qualified biologist no more than 14 days prior to vegetation removal. The surveys shall include the disturbance area plus a 500-foot buffer around the site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of 50 feet for non-raptor bird species and at least 300 feet for raptor species. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer.

Mitigation Measure BIO-2: Prior to construction, a qualified biologist shall conduct a survey of existing structures within the project site to determine if roosting bats are present. The survey shall be conducted during the non-breeding season (November through March). The biologist shall have access to all interior attics, as needed. If a colony of bats is found roosting in any structure, further surveys shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.) If the bats are not part of an active maternity colony, passive exclusion measures may be implemented in close coordination with CDFW. These exclusion measures must include one-way valves that allow bats to exit the structure but are designed so that the bats may not re-enter the structure. If a bat colony is excluded from the project site, appropriate alternate bat habitat as determined by a qualified biologist shall be installed on the project site or at an approved location offsite. Prior to removal of any trees over 20-inches in diameter-at-breast-height (DBH), a survey shall be conducted by a qualified biologist to determine if any of the trees proposed for removal or trimming harbor sensitive bat species or maternal bat colonies. If a non-maternal roost is found, the qualified biologist, in close coordination with CDFW shall install one-way valves or other appropriate passive relocation method. For each occupied roost removed, one bat box shall be installed in similar habitat and should have similar cavity or crevices properties to those which are removed, including access, ventilation, dimensions, height above ground, and thermal conditions. Maternal bat colonies may not be disturbed.

Mitigation Measure BIO-3: The project is required to plant two trees for every one tree that is removed (the “replacement trees”). The developer shall plant as many of the replacement trees on the site as feasible. The remaining required replacement trees shall be planted and/or distributed as follows in order of priority: a) trees shall be planted offsite in the neighborhood in existing City tree wells, City parks, and/or City property; and/or b) the developer shall make a financial donation to the Urban Forest Tree Bank for the purchase of 15 gallon trees to be used in local tree planting projects. The final tree planting and replacement plan shall be included as part of the building plans and approved by the City Arborist.

Conclusion: With the recommended mitigation measures, the project will have a less than significant impact on biological resources.

5. CULTURAL RESOURCES. Would the project:

a) Cause a substantial adverse change in the significance of a historic resource as defined in §15064.5.	5, 23, 24,26, 31		--X--		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5)	23, 24, 26, 31		--X--		
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	5, 26, 31			--X--	
d) Disturb any human remains, including those interred outside of formal cemeteries?	5, 24, 31		--X--		

Evaluation

Pre-Historic Setting: As outlined in the City’s LUCE Update EIR, 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 of San Luis Obispo is located within the area historically occupied by the Obispeño Chumash, the northernmost of the Chumash people of California. The Obispeño Chumash occupied much of San Luis Obispo County, including the Arroyo Grande area, and from

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the Santa Maria River north to approximately Point Estero. The earliest evidence of human occupation in the region comes from archaeological sites along the coast.

Historic Resource Setting: The area of San Luis Obispo became colonized by the Spanish Incursion initially in 1542, with the first official settlement on Chumash Territory occurring in 1772, when the Mission San Luis Obispo de Tolosa was established. By the 1870's (after the earliest arrivals of Chinese immigrants in 1869), a Chinatown district had been established in the downtown area near Palm and Morro Street. By 1875, 2,500 residents were documented in a 4-square mile area around what is now the City of San Luis Obispo. By 1901, the City was served by the Pacific Coast Railway and mainline Southern Pacific, and in 1903 the California Polytechnic State University was established. The last era of growth generally lasted from 1945 to the present. Many of the residential subdivisions in the Foothill and Laguna Lake area were developed between 1945 and 1970 and the city's population increased by 53% during this time.

According to the City's Master List of Historic Resources, the subject property at 71 Palomar Drive is referred to as the historic Sandford House. A cultural resources evaluation was provided by Applied Earthworks (October 2015). Historical research identified that the subject property was originally patented in 1870.

a) The proposed project is located on a site which is designated locally as a Master List Historic property, specifically the main two-story residence. The Historic Sandford House, located at 71 Palomar, was added to the Master List of Historic Resources on the basis of architectural significance as an excellent example of the Colonial Revival style of American architecture. Public comment provided during a Cultural Heritage Committee (CHC) hearing included statements that the Sandford House was an example of Italian Renaissance style and not Colonial Revival. The CHC determined that the Historic Evaluation (Applied Earthworks, Inc., October 2015, Attachment 4) provided sufficient evidence that the House is an example of Colonial Revival architecture.

A historic and archaeological evaluation identified the period of significance for the structure as circa 1895-1930 (Applied Earthworks, Inc., October 2015, Attachment 4). Additions and accessory structures were added to the site in the 1950s and 1970s and are not considered historic resources (Applied Earthworks, Inc., October 2015, Attachment 4). The applicant is proposing an adaptive reuse and rehabilitation of the Master List Historic Sandford house as part of a 33-unit multi-family residential project. The project proposal includes repositioning of the Historic Sandford House approximately 33 feet east and 16 feet south of its current location, removing non-original rear additions and accessory structures and construction of new structures around the Historic Sandford House. The Applied Earthworks Evaluation (Attachment 4) reviewed the proposed project under the Rehabilitation treatment of the Secretary of Interior Standards (SOI) for the Treatment of Historic Properties and under local City of San Luis Obispo Historic Preservation Program Guidelines and found the project to be in conformance with the recommended mitigation.

The proposed project and the Applied Earthworks Evaluation was reviewed by the City of San Luis Obispo Cultural Heritage Committee (CHC) on March 28, 2016 and on June 27, 2016 for compliance with the City Historic Preservation Ordinance (City Ordinance; Municipal Code Chapter 14.01), the Historic Preservation Program Guidelines, and the Secretary of the Interior's Standards for the Treatment of Historic Properties. The CHC determined that the proposed repositioning, rehabilitation and adaptive reuse, and the construction of the new residential units (described below) with incorporation of the recommended actions included herein as mitigation measures, to be in conformance with SOI Standards for the Treatment of Historic Properties and City standards. Therefore, impacts are considered to be mitigated to a less than a significant level under CEQA Guidelines. (CEQA Guidelines Section 15064.5(b)(3)).

Repositioning

The original setting of the site has experienced substantial change since construction of the house in 1895 with the development of Palomar Avenue, Luneta Drive and the adjacent homes and apartments. The historic character of the subject property is expressed today in the prominence of the Sandford House within the parcel. The Applied Earthworks evaluation found that the proposed repositioning of the house on the site will preserve the prominence of the structure on the site and its historic orientation on a slope facing east overlooking the City of San Luis Obispo. The Sandford House will retain the ability to convey its historical significance and repositioning of the Sandford House will not materially alter the physical characteristics or immediate surroundings such that its historic significance would be materially impaired.

Rehabilitation and Adaptive Reuse

The overall visual character of the residence, and historically significant features, which includes building shape, the principal and secondary entries to the building, roof and related features, prominent portico projection, two-story solarium,

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and historic-age materials such as stucco cladding, will remain intact. The stucco cladding of the Sandford House will be repaired and painted an appropriate color and reroofed with appropriate composition shingle material. Prominent architectural elements, such as the distinctive portico with its Tuscan columns, entablature, original multi-light wood-framed sash windows, and wood paneled front door with fanlights and sidelights will be maintained. The deteriorated two-story solarium addition will be repaired and its windows and door replaced with appropriate in kind materials. With incorporation of recommendations of the Applied Earthworks Evaluation (Mitigation Measures CR1-6) the proposed rehabilitation and adaptive reuse will not result in adverse impacts to the historical significance of the Sandford House.

New Development

As noted above, the surrounding setting of the Historic Sandford House has experienced significant urbanization with the development of apartment buildings and modern single-family residences all around the property. The new apartment buildings on the site are designed to assume a secondary position to the Master List Structure. The buildings are clearly differentiated from the Master List Sandford House through their low-profile hipped roofs, subdued neutral colors, and lower heights. The new apartment buildings share similar architectural features, such as the rhythm of their facades and use of stucco finishes and multi-light windows. The new buildings would not overwhelm the scale of the Sandford House and would not obscure views of the primary elevations of the structure. As discussed in the Applied Earthworks Report while spatial relationships would be altered, the distinctiveness of the Historic Sandford House would remain intact and would continue to convey its historic significance.

b, d) The property does not contain any known prehistoric or historic archaeological resources identified on City maintained resource maps, but is considered an archaeologically and historically sensitive area. A cultural resources inventory prepared for the project included a Phase I archaeological survey of the subject property to determine the presence or likelihood of archaeological historical resources. The surface survey resulted in no evidence of prehistoric or historic archaeological materials or of human remains. The Phase 1 archaeological survey found that in order to reduce potential impacts to cultural resources which could be impacted during ground disturbance activities that monitoring should be conducted. Less than significant impact with mitigation incorporated.

c) The geologic formation underlying the project site is Franciscan Complex Melange (KJfm) (Cretaceous to Jurassic), which has the potential to produce fossils. Based on the limited area of disturbance, and past grading and development that has occurred in the areas proposed for grading, the potential for significant paleontological discovery is low. Therefore, potential impacts to paleontological resources would be less than significant.

Mitigation Measure CR-1: Preservation of Archeological Resources. A formal monitoring plan shall be prepared in compliance with the City’s Archeological Resource Preservation Program Guidelines and approved by the City prior to building permit approval. The plan will need to include a summary of the project and expected ground disturbances, purpose and approach to monitoring, description of expected materials, description of significant materials or features, protocols for stoppage of work and treatment of human remains, staff requirements, and a data recovery plan to be implemented in case significant deposits are exposed.

Mitigation Measure CR-2: Removal of Non-Original Additions. Extreme care shall be taken during the removal of the non-original additions to avoid damaging the original building walls. Any non-repairable or missing materials revealed upon removal of the addition directly attached to the Sandford House shall be replaced in-kind to match existing stucco. Any historical wood-sash windows found during demolition shall be preserved for reuse on the Sandford House where appropriate.

Mitigation Measure CR-3: Relocation of the Sandford House. The elevation of the existing Sandford House on the site shall be maintained as closely as possible to the historic siting of the original house. The reconstructed foundation and platform porch on the house in its new location shall retain the amount of height and exposure that the existing house exhibits. A stair height similar to that which currently exists shall also be maintained.

Mitigation Measure CR-4: Sandford House Window Replacement. Modern replacements for the first-floor solarium windows shall minimally consist of window sash that is of the appropriate proportion to fit into the original openings. Multi-light versions which replicate the original multi-light windows located throughout other areas of the residence should be used to the maximum extent feasible in the event that the original window design for the solarium cannot be confirmed.

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Mitigation Measure CR-5: Low Impact Cleaning and Paint Removal. Only the gentlest methods of paint removal, and stucco cleaning or removal shall be used on or around the Sandford House. High-pressure water blasting; sand or other hardened material blasting; or chemical paint strippers that damage wood grain or erode metals shall not be used.

Mitigation Measure CR-6: Massing, Location, and Architectural Features of the Proposed New Construction. The applicant shall maintain the architectural relationship between the new construction and historic residence and the design for the new apartment buildings shall respect the dominance of the Sandford House on the property using scale and massing. New construction shall not be over-detailed or designed to draw attention away from the Sandford House.

Conclusion: With recommended mitigation measures, the project will have a less than significant impact on cultural resources.

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:	4,10, 14, 29, 31				
I. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	4,10, 14, 29, 31			--X--	
II. Strong seismic ground shaking?	4,10, 14, 29, 31			--X--	
III. Seismic-related ground failure, including liquefaction?	4,10, 14, 27, 29, 31			--X--	
IV. Landslides?	4,10, 14, 29, 31			--X--	
b) Result in substantial soil erosion or the loss of topsoil?	4,10, 14, 29, 31			--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?	4,10, 14, 29, 31			--X--	
d) Be located on expansive soil, as defined in Table 1802.3.2 [Table 1806.2) of the California Building Code (2007) [2010], creating substantial risks to life or property?	4,10, 14, 29, 31			--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?	4,10, 14, 29, 31				--X--

Evaluation

As discussed in the recent City LUCE Update EIR, San Luis Obispo lies within the southern Coast Range Geomorphic Province. This province lies between the Central Valley of California and the Pacific Ocean and extends from Oregon to northern Santa Barbara County. The Coast Range province is structurally complex, and is comprised of sub-parallel northwest-southeast trending faults, folds, and mountain ranges.

Rock types in the San Luis Obispo area are mainly comprised of volcanic, metavolcanics, and a mixture of serpentinite and greywacke sandstone. These rocks are highly fractured and are part of the Mesozoic aged Franciscan Formation. Intrusive and extrusive volcanic deposits of Tertiary age and marine sedimentary deposits of the Miocene aged Monterey Formation are also found in the area. The most distinctive geomorphological feature of the San Luis Obispo area is the series of Tertiary aged volcanic plugs (remnants of volcanoes) which extend from the City of San Luis Obispo northwesterly to Morro Bay.

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Hollister Peak, Bishop Peak, Cerro San Luis Obispo, Islay Hill, and Morro Rock are all comprised of these volcanic plugs.

Faulting and Seismic Activity: The predominant northwest-southeast trending structures of the Coast Range Province are related to the San Andreas Fault Transform Boundary. Other faults in the San Luis Obispo area that are considered active or potentially active include the San Juan Fault, the East and West Huasna Faults, the Nacimiento Fault Zone, the Oceano Fault, the Oceanic Fault, Cambria Fault, the Edna Fault, the Hosgri Fault, and the Los Osos Fault. The East and West Huasna Faults, the Nacimiento Fault Zone, the Cambria Fault, and the Edna Fault have not yet been officially classified by the California Division of Mines and Geology.

The Alquist-Priolo Earthquake Fault Zone (formerly known as a Special Studies Zone) is an area within 500 feet from a known active fault trace that has been designated by the State Geologist. Per the Alquist-Priolo legislation, no structure for human occupancy is permitted on the trace of an active fault. The portion of the Alquist-Priolo fault zone closest to the city is located near the southern flank of the Los Osos Valley, northwest of Laguna Lake, but lies just outside of the city limits.

Seismically Induced Ground Acceleration: Seismically induced ground acceleration is the shaking motion that is produced by an earthquake. Probabilistic modeling is done to predict future ground accelerations, taking into consideration design basis earthquake ground motion, applicable to residential or commercial, or upper-bound earthquake ground motion, applied to public use facilities like schools or hospitals.

Landslides: Landslides occur when the underlying support can no longer maintain the load of material above it, causing a slope failure. Ground shaking and landslide hazards are mapped by the City and are shown in the General Plan. Much of the development in San Luis Obispo is in valleys, where there is low potential for slope instability. However, the city contains extensive hillsides. Several are underlain by the rocks of the Franciscan group, which is a source of significant slope instability. The actual risk of slope instability is identified by investigation of specific sites, including subsurface sampling, by qualified professionals. The building code requires site-specific investigations and design proposals by qualified professionals in areas that are susceptible to slope instability and landslides.

Liquefaction: Liquefaction is defined as the transformation of a granular material from a solid state to a liquefied state as a consequence of increased pore water pressure. As a result, structures built on this material can sink into the alluvium, buried structures may rise to the surface or materials on sloped surfaces may run downhill. Other effects of liquefaction include lateral spread, flow failures, ground oscillations, and loss of bearing strength. Liquefaction is intrinsically linked with the depth of groundwater below the site and the types of sediments underlying an area.

The soils in the San Luis Obispo area that are most susceptible to ground shaking, and which contain shallow ground water, are the ones most likely to have a potential for settlement and for liquefaction. The actual risk of settlement or liquefaction is identified by investigation of specific sites, including subsurface sampling, by qualified professionals. Previous investigations have found that the risk of settlement for new construction can be reduced to an acceptable level through careful site preparation and proper foundation design, and that the actual risk of liquefaction is low.

Differential Settlement: Differential settlement is the downward movement of the land surface resulting from the compression of void space in underlying soils. This compression can occur naturally with the accumulation of sediments over porous alluvial soils within river valleys. Settlement can also result from human activities including improperly placed artificial fill, and structures built on soils or bedrock materials with differential settlement rates. This phenomenon can alter local drainage patterns and result in structural damage. Portions of the City have been identified as possibly being underlain by soft organic soils, resulting in a high potential for settlement (General Plan Safety Element).

Subsidence: Ground subsidence occurs where underlying geologic materials (typically loosely consolidated surficial silt, sand, and gravel) undergo a change from looser to tighter compaction. As a result, the ground surface subsides (lowers). Where compaction increases (either naturally, or due to human activity), the geologic materials become denser. As a result, the ground surface overlying the compacting subsurface materials subsides as the underlying geologic materials settle. Ground subsidence can occur under several different conditions, including:

- Ground-water withdrawal (water is removed from pore space as the water table drops, causing the ground surface to settle)
- Tectonic subsidence (ground surface is warped or dropped lower due to geologic factors such as faulting or folding); and
- Earthquake-induced shaking causes sediment liquefaction, which in turn can lead to ground-surface subsidence.

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Expansive Soils: Expansive soils are soils that are generally clayey, swell when wetted and shrink when dried. Wetting can occur in a number of ways (i.e., absorption from the air, rainfall, groundwater fluctuations, lawn watering, broken water or sewer lines, etc.). Soil expansion can cause subtle damage that can reduce structural integrity. Portions of the city are known to exhibit the soil types (refer to General Plan Safety Element) identified as having a moderate to high potential for expansion.

a, c, d) Although there are no fault lines on the project site or within close proximity, the site is located in an area of “High Seismic Hazards,” specifically Seismic Zone D, which means that future buildings constructed on the site will most likely be subjected to excessive ground shaking in the event of an earthquake. Structures must be designed in compliance with seismic design criteria established in the California Building Code for Seismic Zone D. To minimize this potential impact, the California Building Code and City Codes require new structures be built to resist such shaking or to remain standing in an earthquake.

The Safety Element of the General Plan indicates that the project site has a high potential for liquefaction, which is true for most of the City. Development will be required to comply with all City Codes, including Building Codes, which require proper documentation of soil characteristics for designing structurally sound buildings to ensure new structures are built to resist such shaking or to remain standing in an earthquake. The underlying soil map units include: 160 Los Osos loam, 15 to 30 percent slopes. Soil types with clay composition typically have a low liquefaction risk; and due to the presence of shallow bedrock, the potential for liquefaction to affect the site is considered negligible. Based on the geotechnical evaluation of the project site, seismically induced settlement is considered to be very low. Based on the gently to moderately sloping topography of the project site, and lack of evidence of slope failure or slope breaks within or proximate to the proposed development area, this risk is not considered significant. Incorporation of required California Building Code, City Codes, and development in accordance with the General Plan Safety Element will reduce impacts related to seismic hazards to less than significant levels.

b) This is a previously developed infill site, located in an urbanized area of the City. The most significant source of potential erosion of on-site soils would be during initial site ground disturbance/construction and from stormwater runoff. The project applicant has prepared a Stormwater Control Plan (Ashley and Vance Engineering, Inc., October 12, 2015) and a Conceptual Landscape Plan. Development in accordance with the Stormwater Control Plan will address stormwater flow across the site, and landscaping planting will help ensure the natural retention of stormwater and help address potential erosion. Additionally, the dust reduction measures of Mitigation Measure AQ 3 will also minimize soil erosion. Therefore, erosion impacts are considered less than significant.

e) The proposed project will be required to connect to the City’s sewer system. Septic tanks or alternative wastewater systems are not proposed and will not be used on the site. No impact.

Conclusion: With proposed development in accordance with applicable CBC and local Building Code requirements, and implementation of the project Stormwater Control Plan and Conceptual Landscape Plan, impacts are considered less than significant.

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?	1,13, 20,21, 31			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	1,13, 20,21, 31			X	

Evaluation

As outlined in the recent City LUCE Update EIR, prominent GHG emissions contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Anthropogenic (human-caused) GHG emissions in excess of natural ambient concentrations are responsible for intensifying the greenhouse effect and have led to a trend of unnatural warming of the earth’s climate, known as global climate change or global warming. Global sources of GHG emissions include fossil fuel combustion in both

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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stationary and mobile sources, fugitive emissions from landfills, wastewater treatment, agricultural sources, deforestation, high global warming potential (GWP) gases from industrial and chemical sources, and other activities.

The major sources GHG emissions in the City are transportation-related emissions from cars and trucks, followed by energy consumption in buildings. These local sources constitute the majority of GHG emissions from community-wide activities in the city, and combine with regional, statewide, national, and global GHG emissions that result in the cumulative effect of global warming, which is causing global climate change. A minimum level of climate change is expected to occur despite local, statewide, or other global efforts to mitigate GHG emissions. The increase in average global temperatures will result in a number of locally-important adverse effects, including sea-level rise, changes to precipitation patterns, and increased frequency of extreme weather events such as heat waves, drought, and severe storms.

Statewide legislation, rules and regulations that apply to GHG emissions associated with the Project Setting include the Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32), Climate Pollution Reduction Beyond 2020 Healthier Communities and a Stronger Economy (Senate Bill [SB] 32), the Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375), Advanced Clean Cars Rule, Low Carbon Fuel Standard, Renewable Portfolio Standard, California Building Codes, and recent amendments to the California Environmental Quality Act (CEQA) pursuant to SB 97 with respect to analysis of GHG emissions and climate change impacts.

Plans, policies and guidelines have also been adopted at the regional and local level that address GHG emissions and climate change effects in the City. The San Luis Obispo County Air Pollution Control District (APCD) adopted a CEQA Review Handbook, as well as guidance on GHG emission thresholds and supporting evidence, that may be applied by lead agencies within San Luis Obispo County (APCD 2012a, 2012b). The City also adopted a Climate Action Plan (CAP) that includes a GHG emissions inventory, identifies GHG emission reduction targets, and includes specific measures and implementing actions to both reduce community-wide GHG emissions and help the city build resiliency and adapt to the effects of climate change.

a, b) The proposed project will result in infill development, located in close proximity to transit, services and employment centers. City policies recognize that compact, infill development allows for more efficient use of existing infrastructure and aids Citywide efforts to reduce greenhouse gas emissions. The City’s CAP also recognizes that energy efficient design will result in significant energy savings, which result in emissions reductions.

The emissions from project-related vehicle exhaust comprise the vast majority of the total project CO₂ emissions. The remaining project CO₂ emissions are primarily from building heating systems and increased regional power plant electricity generation due to the project’s electrical demands.

Short Term Construction-Related GHG Emissions: Construction activities would generate GHG emissions through the use of on- and off-road construction equipment in new development. Mitigation Measures AQ 3, AQ 4, and AQ 5 address vehicle and equipment exhaust, and include provisions for reducing those impacts to below a level of significance.

Long-Term Operational GHG Emissions: Additional long-term emissions associated with the project relate to indirect source emissions, such as electricity usage. State Title 24 regulations for building energy efficiency are enforced with new construction. Table 1-1 of the SLOAPCD CEQA Air Quality Handbook indicates that the construction of an apartment building (low rise) with less than 109 dwelling units would not exceed the threshold of significance for the APCD Annual Bright Line threshold (MT CO₂e). Therefore, operational phase air quality impacts are considered less than significant.

Conclusion: With the incorporation of required mitigation measures (see Air Quality impact analysis), Title 24 regulations and CAP consistency requirements, impacts are considered less than significant.

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?	4, 31			--X--	
b) Create a significant hazard to the public or the environment	4, 31			--X--	

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through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?					
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	12			--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?	30, 31			--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?	1, 4				--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?	1, 4				--X--
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	4, 17			--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?	4, 17, 31			--X--	

Evaluation

As outlined in the recent City LUCE Update EIR, the analysis of hazards and hazardous material impacts relates to hazards regarding safety risks posed by airport flight patterns, impeding of adopted emergency response/evacuation plans, and wildland fires where wildlands are adjacent to urbanized areas; and hazardous materials or substances regarding routine transport or disposal of substances, explosion or release of substances, and emissions or handling of substances within one-quarter mile of an existing or planned school. The following is a brief outline of the primary identified hazards:

Fire Hazards: Fires have the potential to cause significant losses to life, property, and the environment. Urban fire hazards result from the materials that make up the built environment, the size and organization of structures, and spacing of buildings. Additional factors that can accelerate fire hazards are availability of emergency access, available water volume and pressure for fire suppression, and response time for fire fighters. Fire hazard severity in rural areas, including areas on the edge between urban and rural land (commonly called the wildland interface), are highly influenced by the slope of the landscape and site vegetation and climate. This risk is somewhat amplified by the native, Mediterranean vegetation common to the rural setting in which the City is located that has evolved to rely on wildfires for its ecological sustainability. Where wildland fires may be a threat, plant fuels are often managed by replacement planting, grazing, plowing, or mechanical clearing.

Hazardous Materials: Hazardous materials are defined as substances with physical and chemical properties of ignitability, corrosivity, reactivity, or toxicity which may pose a threat to human health or the environment. This includes, for example, chemical materials such as petroleum products, solvents, pesticides, herbicides, paints, metals, asbestos, and other regulated chemical materials. Additionally, hazards include known historical spills, leaks, illegal dumping, or other methods of release of hazardous materials to soil, sediment, groundwater, or surface water. If a historical release exists, then there is a risk associated with disturbing the historical release area. The potential for risks associated with hazardous materials are varied regionally. The primary risk concerns identified by the City, as stipulated in the City's General Plan Safety Element, include radiation hazards and the transportation of hazardous materials in and around the city. Most of these incidents are related to the increasing frequency of transport of chemicals over roadways, railways or through industrial accidents. Highway 101 and a rail corridor are major transportation corridors through the San Luis Obispo area.

Airport Hazards: The San Luis Obispo County Airport provides commuter, charter, and private aviation service to the area.

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The primary hazard associated with land uses near the airport is the risk of aircraft incidents on approach and take-off. Aircraft flight operations are determined largely by the physical layout of the airport and rules of the Federal Aviation Administration. The County manages activities on the airport property through the Airport Land Use Commission (ALUC). As the means of fulfilling these basic obligations, the ALUC must prepare and adopt Airport Land Use Plans (ALUPs) for each airport within their jurisdiction. The policies in the ALUP are intended to minimize the public’s exposure to excessive noise and safety hazards while providing for the orderly expansion of airports (Public Utility Code Section 21670(a)(2)). The ALUC has developed an ALUP for the San Luis Obispo County Regional Airport that was first adopted in 1973, was updated in May 2005 and is currently being updated. The ALUP has identified safety zones with associated land use density and intensity restrictions. The ALUP defines these as:

- Runway Protection Zones – Areas immediately adjacent to the ends of each active runway, within which the level of aviation safety risk is very high and in which, consequently, structures are prohibited and human activities are restricted to those which require only very low levels of occupancy.
- Safety Areas S-1 a through c– The area within the vicinity of which aircraft operate frequently or in conditions of reduced visibility at altitudes less than 500 feet above ground level (AGL).
- Safety Area S-2 – The area within the vicinity of which aircraft operate frequently or in conditions of reduced visibility at altitudes between 501 and 1000 feet above ground level (AGL). Because aircraft in Area S-2 are at greater altitude and are less densely concentrated than in other portions of the Airport Planning Area, the overall level of aviation safety risk is considered to be lower than that in Area S-1 or the Runway Protection Zones.

a) The proposed project would not create a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous materials. Construction of the proposed project would be required to comply with applicable building, health, fire, and safety codes. Hazardous materials would be used in varying amounts during construction and occupancy of the project. Construction and maintenance activities would use hazardous materials such as fuels (gasoline and diesel), oils, and lubricants; paints and paint thinners; glues; cleaners (which could include solvents and corrosives in addition to soaps and detergents); and possibly pesticides and herbicides. The amount of materials used would be small, so the project would not create a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous materials, as such uses would have to comply with applicable federal, state, and local regulations, including but not limited to Titles 8 and 22 of the CCR, the Uniform Fire Code, and Chapter 6.95 of the California Health and Safety Code.

With respect to operation of the project, apartment buildings do not generate significant amounts of hazardous materials, and only a minimal amount of routine “household” chemicals would be stored on-site. These materials would not create a significant hazard to the public or to the environment. This impact would be less than significant.

b) As discussed in Impacts a and c, the proposed project would not result in the routine transport, use, disposal, handling, or emission of any hazardous materials that would create a significant hazard to the public or to the environment. Implementation of Title 49, Parts 171–180, of the Code of Federal Regulations and stipulations in the General Plan Safety Element would reduce any impacts associated with the potential for accidental release during construction or occupancy of the proposed project or by transporters picking up or delivering hazardous materials to the project site. These regulations establish standards by which hazardous materials would be transported, within and adjacent to the proposed project. Where transport of these materials occurs on roads, the California Highway Patrol is the responsible agency for enforcement of regulations.

The project also includes demolition of existing structures on the property including portions of the Historic Sanford House, which, given the age of the structures, could contain asbestos and lead. Asbestos, a naturally occurring fibrous material, was used as a fireproofing and insulating agent in building construction before being banned by the US Environmental Protection Agency (EPA) in the 1970s. Because it was widely used prior to discovery of its negative health effects, asbestos can be found in a variety of building materials and components including sprayed-on acoustic ceiling materials, thermal insulation, wall and ceiling texture, floor tiles, and pipe insulation. Asbestos is classified into two main categories: friable and non-friable. Friable asbestos can release asbestos fibers easily when disturbed and is considered Regulated Asbestos-Containing Material (RACM). Friable (easily crumbled) materials are particularly hazardous because inhalation of airborne fibers is the primary mode of asbestos entry into the body, which potentially causes lung cancer and asbestosis. Non-friable asbestos will release fibers less readily than RACM and is referred to as Category I or Category II, non-friable. Non-friable asbestos and encapsulated friable asbestos do not pose substantial health risks. The California Occupational Safety and Health

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Administration (Cal/OSHA) considers asbestos-containing building materials (ACBM) to be hazardous when a sample contains more than 0.1 percent asbestos by weight; Cal/OSHA requires it to be handled by a licensed, qualified contractor.

Lead can be found in paint, water pipes, plumbing solder, and in soils around buildings and structures with lead-based paint. In 1978, the federal government required the reduction of lead in house paint to less than 0.06 percent (600 parts per million [ppm]). However, some paints manufactured after 1978 for industrial uses or marine uses legally contain more than 0.06 percent lead. Exposure to lead can result in bioaccumulation of lead in the blood, soft tissues, and bones. Children are particularly susceptible to potential lead-related health problems because lead is easily absorbed into developing systems and organs.

Prior to any building demolition, CCR Title 8 Section 5208 requires that a state-certified risk assessor conduct a risk assessment and/or paint inspection of all structures constructed prior to 1978 for the presence of asbestos. If such hazards are determined to exist on site, the risk assessor would prepare a site-specific hazard control plan detailing ACBM removal methods and specific instructions for providing protective clothing and gear for abatement personnel. If necessary, the project sponsor would be required to retain a state-certified ACBM removal contractor (independent of the risk assessor) to conduct the appropriate abatement measures as required by the plan. Wastes from abatement and demolition activities would be disposed of at a landfill(s) licensed to accept such waste. Once all abatement measures have been implemented, the risk assessor would conduct a clearance examination and provide written documentation to the City that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

Several regulations and guidelines pertain to abatement of and protection from exposure to lead-based paint. These include Construction Safety Order 1532.1 from Title 8 of the CCR and lead-based paint exposure guidelines provided by the US Department of Housing and Urban Development (HUD). In California, lead-based paint abatement must be performed and monitored by contractors with appropriate certification from the California Department of Health Services. Compliance with existing regulations would ensure impacts related to hazardous materials exposure would be less than significant.

c) The proposed project is a multi-family residential apartment development with parking and associated amenities, and is approximately 1/3 of a mile south of Pacheco Elementary School. As discussed in Impacts a and b, the proposed project is a multi-family apartment use that would not result in the routine transport, use, disposal, handling, or emission of any hazardous materials that would create a significant hazard to the public or to the environment, including at the existing school, and this impact would be less than significant.

d) The project site is not on a parcel included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (DTSC 2012). The closest listed site is located at 795 Foothill Boulevard, a leaking underground storage tank cleanup site at the Unocal Station, approximately ¼ mile from the subject property. That site is listed on the Cortese State Water Resources Control Board GEOTRACKER database due to the presence of permitted underground storage tanks. Construction of the proposed project is not connected to 795 Foothill Boulevard and therefore would not create a significant hazard to the public or to the environment related to an existing hazardous materials site.

e, f) The project site is not located within an airport land use plan area or within 2 miles of a public use airport or airstrip. There are no private airstrips in the vicinity of the project site that would result in a safety hazard for people residing or working in the project area. No impact.

g), h) The project site is an infill site and plans have been reviewed by the Fire Marshal (December 2015) who determined that the project will not conflict with any emergency response plan or evacuation plan. The project would be subject to the requirements contained in the City's emergency response and evacuation plans. Therefore, impacts related to impaired implementation or physical interference with an adopted emergency response or evacuation plan are considered less than significant. The project site is located in the City of San Luis Obispo and is not located within a wildland hazard area. The surrounding land is developed with urban and residential uses. The proposed project will have no impact on the placement of people or structures next to wildland areas that could result in loss, injury, or death involving wildland fires. The site is not directly adjacent to any wildlands. This impact would therefore be less than significant.

Conclusion: Impacts are considered less than significant.

9. HYDROLOGY AND WATER QUALITY. Would the project:

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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a) Violate any water quality standards or waste discharge requirements?	5, 15,16, 27, 31		--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)?	5, 15,16, 27, 31				--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?	5, 15,16, 27, 31		--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?	5, 15,16, 27, 31		--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?	5, 15,16, 27, 31		--X--		
f) Otherwise substantially degrade water quality?	5, 27, 31		--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?	5, 15,16, 27, 31				--X--
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	5, 27, 31				--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?	4, 5, 27, 31				--X--
j) Inundation by seiche, tsunami, or mudflow?	4, 31				--X--

Evaluation

As discussed in the City's LUCE Update EIR, the project site is located within the San Luis Obispo Creek Hydrologic Subarea of the Estero Bay Hydrologic Unit, an area that corresponds to the coastal draining watersheds west of the Coastal Range. The Estero Bay Hydrologic Unit stretches roughly 80 miles between the Santa Maria River and the Monterey County line and includes numerous individual stream systems. Within the Estero Bay Hydrologic Unit, the San Luis Obispo Creek watershed drains approximately 84 square miles.

The City of San Luis Obispo is generally located within a low-lying valley centered on San Luis Obispo Creek. San Luis Obispo Creek is one of four major drainage features that create flood hazards in the city, with the others being Stenner Creek, Prefumo Creek, and Old Garden Creek. In addition, many minor waterways drain into these creeks, and these can also present flood hazards. Because of the high surrounding hills and mountains in the area, the drainage sheds of these creeks are relatively small, but the steep slopes and high gradient can lead to intense, fast moving flood events in the city.

According to the Central Coast Regional Water Quality Control Board (Central Coast RWQCB), water quality in the San Luis Obispo Creek drainage system is generally considered to be good. However, the water quality fluctuates along with seasonal changes in flow rates. In summer months, when the flows decrease and dilution is reduced, water quality decreases. According to the RWQCB Total Maximum Daily Load (TMDL) Project for San Luis Obispo Creek, the creek has been reported to exceed nutrient and pathogen levels.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Groundwater within the San Luis Obispo Valley Sub-basin flows toward the south-southwest, following the general gradient of surface topography. Groundwater within the San Luis Obispo area is considered suitable for agricultural water supply, municipal and domestic supply, and industrial use.

In order to evaluate the specific nature of the hydrology and water quality issues for the subject property, the project proponents have initiated a Stormwater Control Plan (Ashley and Vance Engineering, Inc., October 12, 2015). The intent of this report is to address the stormwater requirements set forth by the Central Coast RWQCB's Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region.

a, f) The project site is located within the San Luis Obispo Creek watershed area. Due to its size and location, the project is subject to the Drainage Design Manual (DDM) of the Water Way Management Plan (WWMP) and newly adopted Post Construction Requirements for storm water control. Under these standards, projects where Impervious Area \geq 22,000 SF and in Watershed Management Zone 1 shall meet Post Construction Requirements 1 – 4 as follows: 1) Site Design and Runoff Reduction, 2) Water Quality Treatment, 3) Runoff Retention, and 4) Peak Management. For the SLO City/WWMP drainage criteria to be accommodated, Special Floodplain Management Zone Regulations require the analysis to verify that there will be: 1) No change in the 100, 50, 25, 10, 5 & 2 year peak flow runoff exiting the property, 2) Use of Best Management Practices (BMP's) to minimize potential release of sediments and clarify storm flows in minor storm events to reduce pollutants moving downstream into San Luis Creek, and 3) City Standard Criteria for Source Control of Drainage and Erosion Control, page 7 and 8 Standard 1010, "Projects with pollution generating activities and sources must be designed to implement operation or source control measures consistent with recommendations from the California Stormwater Quality Association.

The proposed project will include the construction of residential units and associated hardscape and landscape. The performance requirements discussed above will be met by using underground chambers which will retain stormwater and infiltrate it back into the ground onsite, and as a result contain pollutants onsite as well. These chambers will retain the 95th percentile storm and allow that volume of water to receive filtration as it percolates back into the ground. Additionally, these chambers will provide adequate volume of storage to reduce the peak runoff rates to pre development rates. The site will continue to slope to the North and East where runoff will be discharged offsite and ultimately outlet to Stenner Creek.

Water Quality Analysis

The proposed project would create and replace over 34,000 square feet of impervious area and thus is required to comply with the Construction Stormwater Management Requirements of the Central Coast RWQCB. The site was analyzed using HydroCAD and the Santa Barbara Urban Hydrograph Method.

Performance Requirement 1-Site Design and Runoff Reduction

This project minimizes the amount of pervious surface to the maximum extent practicable. Runoff will be directed to underground chambers prior to discharging offsite, which will allow for filtration and percolation.

Performance requirement 2-Water Quality Treatment

Based on the HydroCAD analysis of the Post Construction condition, this site is required to provide treatment for 6,300 cubic feet of water. This will be accomplished by using underground infiltration chambers. These chambers will contain the 95th percentile storm and infiltrate it back into the ground. The pollutants within the stormwater will be filtered out of the stormwater as it percolates into the ground. The outlet for the chambers will be set above the water surface elevation that holds the 95th percentile storm.

Performance requirement 3-Runoff Retention

Based on the HydroCAD analysis of the Post Construction conditions, this project is required to provide infiltration for 6,300 cubic feet of water. This will be accomplished by using underground infiltration chambers. These chambers will contain the 95th percentile storm and infiltrate it back into native ground.

Performance requirement 4-Peak Management

The underground chambers will be sized so as to detain stormwater from the site and release it at pre development rates for all design storms. The following table summarizes the pre and post construction runoff rates and shows that the runoff rate

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has been reduced for all design storms. Full calculations from HydroCAD for the underground system are included with the project stormwater control plan.

	95th	2 yr	5 yr	10 yr	25 yr	50 yr	100 yr
Pre-Construction (cfs)	0.60	0.60	1.42	2.01	2.32	2.94	3.26
Post Construction (cfs)	0	0	0.44	0.67	0.79	1.09	1.21
Percent Reduction	100	100	69	67	66	63	63

(Stormwater Control Plan. Ashley & Vance Engineering, Inc. October 12, 2015)

Site activities and identification of potential sources of pollutants

The proposed project will include the construction of residential units and associated hardscape and landscape. Potential sources of pollutants include chemicals and fertilizers to maintain the landscaping, fuels, oils and other chemicals from vehicles, trash, dust and debris from roofs and flatwork. The following table provides the project pollutant and source control information.

Potential Source of Runoff Pollutants	Permanent Source Control BMPs	Operational Source Control BMPs
Landscape/ Outdoor Pesticide Use/Building and Grounds Maintenance	Design Landscaping to minimize irrigation and runoff, to promote surface infiltration and to minimize the use of fertilizers and pesticides that can contribute to stormwater pollution. Maintain landscaping using minimum or no pesticides. Where landscaped areas are used to retain or detain stormwater, specify plants that are tolerant of saturated soil conditions	Maintain landscaping using minimum or no pesticides. See applicable operational BMPs in Fact Sheet CS-41 "Building and Grounds Maintenance" in the CASQA Stormwater Quality Handbook Provide Integrated Pest Management (IPM) information to new owners, lessees and operators
Plazas, Sidewalks and Parking Lots		Sweep plazas, sidewalks and parking lots regularly to prevent accumulation of litter and debris. Collect debris from pressure washing to prevent entry into the storm drain system. Collect washwater containing any cleaning agent or degreaser and discharge to the sanitary sewer not to a storm drain.
Refuse Areas	Dumpster will be covered. Sign will be posted on or near the dumpster with the words "Do not dump hazardous material here"	Receptacles will be inspected and repaired if a leak is observed. Receptacles to be covered. Inspect and pick up litter daily and clean up spills immediately. Keep spill control materials on site.
Catch Basins		Remove trash, debris or other materials that may be covering the grates. Inspect basin to ensure there is no sediment in the box or blocking the outlet pipe. Remove grates and clean out sediment and other debris as needed.

(Stormwater Control Plan. Ashley & Vance Engineering, Inc. October 12, 2015)

Based on the analysis discussed above, and implementation of the BMPs identified in the project Stormwater Control Plan, water quality impacts will be reduced. With the required incorporation of these measures, and adherence to the stormwater facilities operations and maintenance recommendations provided in the Stormwater Control Plan (see Mitigation Measure HWQ-1), impacts will be reduced to less than significant levels.

b) The project will be served by the City’s sewer and water systems and will not deplete groundwater resources.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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c, d, e) Physical improvement of the project site will be required to comply with the drainage requirements of the City's Waterways Management Plan. This plan was adopted for the purpose of ensuring water quality and proper drainage within the City's watershed. The Waterways Management Plan and Low Impact Development (LID) stormwater treatment requires that site development be designed so that post-development site drainage does not significantly exceed pre-development runoff. The proposed project creates and replaces over 34,000 square feet of impervious area and thus is required to treat the 95th percentile storm per performance requirement 4 of the Post-Construction Stormwater Management Requirements of the Central Coast RWQCB. Based on the analysis in the Stormwater Control Plan, and with the required implementation of the stormwater retention and water quality recommendations (see Mitigation Measure HWQ-1) the proposed project would retain the amount of stormwater to reduce discharge to pre development rates, and provides treatment and infiltration for the volume of water required by the Central Coast RWQCB and impacts would be considered reduced to less than significant levels with mitigation incorporated.

g, h) The proposed project ultimately drains to Stenner Creek, however, the project is not within an identified 100-year flood zone and is not subject to inundation from flood waters in a 100-year storm event per the Federal Flood Hazard Boundary or Flood Insurance Rate Map. The project will not impede or re-direct the flow of any flood waters.

i, j) The site is not located in a flood zone nor near any dams or levees. The proposed development is outside the zone of impacts from seiche or tsunamis, and the existing upslope properties do not generate significant storm water runoff such to create a potential for inundation by mudflow. Therefore, potential impacts would be less than significant.

Mitigation Measure HWQ-1: The Stormwater Control Plan prepared for the proposed project (Ashley and Vance Engineering, Inc. October 12, 2015) prepared for the proposed project includes design features, recommended BMPs for water quality control, and operations and maintenance standards for maintaining stormwater quality via the proposed underground storage chambers for on-site stormwater detention. These measures shall become required components of project development and the project proponent shall be required to implement these design features and recommendation as set forth.

Conclusion: With the implementation of the project Stormwater Control Plan designs and recommendations, impacts are considered less than significant.

10. LAND USE AND PLANNING. Would the project:

a) Physically divide an established community?	1, 10, 31			--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, 9, 25, 31				--X--
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	5, 12, 31				--X--

Evaluation

a) The proposed infill development project is consistent with the development anticipated for the project site under the site's General Plan and zoning designation, since the site is designated for High Density Residential land uses and is designed to fit among existing multi-family and single family residential development surrounding it, and will not physically divide an established community. Impacts are considered less than significant.

b) The proposed project will not conflict with applicable land use plans, policies, or regulations for the purpose of avoiding or mitigating an environmental effect. As discussed above, the proposed project is consistent with the City's High Density Residential General Plan Designation and zoning for the project site, as well as corresponding regulations and development standards.

c) As discussed in subsection 4, Biological Resources, the proposed project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat

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conservation plan or natural community conservation plan. No impact.

Conclusion: Impacts are considered less than significant.

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?	5, 31				--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?	5, 31				--X--

Evaluation

a, b) No known mineral resources are present at the project site. Implementation of the proposed project would not result in the loss of availability of a known mineral resource. The project site is not designated by the general plan, specific plan, or other land use plans as a locally important mineral recovery site.

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?	3, 9, 10, 31			--X--	
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	3, 9, 10, 31			--X--	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	3, 9, 10, 31			--X--	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	3, 9, 10, 31			--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?	1, 3, 9, 10, 31				--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?	12, 31				--X--

Evaluation

As analyzed in the City's LUCE Update EIR, a number of noise-sensitive land uses are present within the City, including various types of residential, schools, hospitals and care facilities, parks and recreation areas, hotels and transient lodging, and place of worship and libraries. Based on ambient noise level measurements throughout the City, major sources of noise include traffic noise on major roadways, passing trains, and aircraft overflights.

a) Residences are designated as noise sensitive by the Noise Element. The Noise Element indicates that noise levels of up to 60 dB are acceptable for outdoor activity areas and noise levels of up to 45 dB are acceptable for indoor areas. Exterior noise levels will be less than 60 dB when attenuation afforded by building features and elevation is taken into account. As discussed above, the project location has not been identified as an area subject to noise sources above the City's thresholds. In addition, interior noise levels of less than 45 dB will be achievable with standard building materials and construction techniques. Impacts associated with 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, would be less than significant.

b) Long-term operational activities associated with the proposed project would be from residential uses, which would not involve the use of any equipment or processes that would result in potentially significant levels of ground vibration. Increases in groundborne vibration levels attributable to the proposed project would be primarily associated with short-term

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construction-related activities. Construction activities would likely require the use of various types of heavy equipment, such as forklifts, concrete mixers, and haul trucks. Because construction activities are restricted to the days, hours, and sound levels allowed by City ordinance (Chapter 9.12 of the Municipal Code), impacts associated with groundborne vibration and noise would be less than significant.

c) As discussed above, long-term operation of the project involves residential use, which is consistent with existing uses in the project vicinity. Residential uses would not result in substantial changes to the existing noise environment. Operation of the project would be consistent with the existing uses in the vicinity of the project site and would not result in substantial changes to the existing noise environment. Other noise sensitive uses in the vicinity include other neighboring residential developments. These uses will be partially shielded from noise generated by residential uses by distance (over 50 feet from the single family units to the south of the site) and by the structures themselves. The proposed project would therefore have a less than significant impact related to producing a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

d) Noise generated by the project would occur during short-term construction of the proposed multi-family residential project. Noise levels during construction would be higher than existing noise levels, but only for the duration of construction. Although there would be intermittent construction noise in the project area during the construction period, noise impacts would be less than significant because the construction would be short term and restricted to the hours and noise levels allowed by City ordinance (Chapter 9.12 of the Municipal Code).

e, f) The project site is not located within an airport land use plan area or within 2 miles of a public use airport or private airstrip. Implementation of the proposed project would not expose individuals to excessive noise levels associated with aircraft operations.

Conclusion: Less than significant impact

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)?	1, 31			--X--	
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	1, 31			--X--	
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	1, 31			--X--	

Evaluation:

a) The proposed project includes construction of a multi-family residential development, which would have the potential to add to the population of the City. However, it is important to note that Land Use Element policy 1.10.2 (Residential Growth Rate) indicates that the City shall manage its housing supply so that it does not exceed a growth rate of one percent per year, on average, excluding dwellings affordable to residents with extremely low, very low or low incomes as defined by the State Department of Housing and Community Development for the City and County of San Luis Obispo and reflected in the City's Housing Element. The project site is designated for multi-family residential development under the General Plan, and is zoned R-4 (high density residential). The proposed project includes development consistent with the anticipated use of the site and in accordance with the housing needs identified for the City under anticipated community development under the recently updated Land Use Element.

New employment generated by the proposed project would not be considered substantial. Considering the project area is currently developed, and the proposed project would utilize existing infrastructure at the subject location, the project would not induce additional growth that would be considered significant. The proposed project would not involve any other components that would induce further growth not already anticipated under the General Plan. Impacts are considered less than significant.

b) The project proposes to demolish the outbuildings and non-historic additions of the historic Sanford House. Removal of the additions and accessory residential structures would not be considered a substantial loss of housing since new housing is

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proposed for development. Impacts are considered less than significant.

c) The site contains the Historic Sandford house and associated outbuilding which were converted into living quarters for a Fraternity. As noted above, the outbuildings and non-historic additions will be replaced by higher density multi-family residential development. Therefore, the proposed project would not displace substantial numbers of people or necessitate the construction of replacement housing elsewhere, and this impact is considered less than significant.

Conclusion: Less than significant impact.

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?	1, 4, 9,31			--X--	
b) Police protection?	1, 4, 9,31			--X--	
c) Schools?	1, 4, 9,31			--X--	
d) Parks?	1, 4, 9,31			--X--	
e) Roads and other transportation infrastructure?	1, 4, 9,31			--X--	
f) Other public facilities?	1, 4, 9,31			--X--	

Evaluation

Fire Protection: The San Luis Obispo Fire Department (SLOFD) provides fire and emergency services to the City of San Luis Obispo. The Fire Department is organized into five divisions: Emergency Operations, Fire Prevention and Life Safety, Training and Equipment, Administrative, and Support Services. In addition to providing fire and emergency services to the city, SLOFD maintains an Emergency Services Contract with Cal Poly. Under the current contract, SLOFD provides fire and emergency services to the university in return for a set annual fee.

Police Protection: The San Luis Obispo Police Department (SLOPD) provides police protection services within the city limits. SLOPD is responsible for responding to calls for service, investigating crimes and arresting offenders, enforcing traffic and other laws, and promoting community safety through crime prevention and school-safety patrols. The Police Department consists of two bureaus, Administration and Operations, each of which has four divisions. The Police Department operates out of one main facility located at 1042 Walnut Street and a small additional office at 1016 Walnut Street.

Public Schools: The San Luis Coastal Unified School District (SLCUSD) serves an area between the coast and the Los Padres National Forest, and from Morro Bay to the north and Arroyo Grande to the south. In total, the District operates ten elementary schools, two middle schools, two high schools, one continuation high school, and an adult education facility. In addition to the K-12 educational program, the SLCUSD offers a variety of additional educational programs, including: cooperative preschool, preschool early education, and parent participation. Within the San Luis Obispo LUCE Planning Subarea, the District operates six elementary schools, one middle school, one high school, and one continuation high school.

a) The proposed project site is served by the City of San Luis Obispo Fire Department. Implementation of the proposed project would increase the intensity of use of the site and would marginally increase the demand for fire protection services over existing conditions. The project would be similar to the land uses on surrounding properties, and the site is already served by the City for fire protection. Although the project would have the potential to alter the number of housing units and population in the City, the development of the site is consistent with the anticipated land use for the site and proposed development would be consistent with the high density residential zoning for the site and consistent with the neighboring residential uses. As stated in the recent City LUCE Update EIR, adherence to the Safety Element Policy 3.0 (Adequate Fire

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Services) will reduce impacts related to increased fire protection needs. This impact is considered less than significant.

b) The project site is served by the City of San Luis Obispo Police Department for police protection services. The subject property is currently developed with residential uses and redevelopment of the site would not result in the need for increased patrols or additional units such that new police facilities would need to be constructed. The project site is designated for multi-family residential development under the General Plan, and is zoned R-4 (high density residential). The proposed project includes development consistent with the anticipated use of the site and in accordance with anticipated community development in accordance with the recently updated Land Use Element. There would be no physical impacts related to the construction of new police facilities, and impacts related to police protection would be less than significant.

c) Consistent with SB 50, the proposed project will be required to pay developer fees to the SLOCUSD. These fees would be directed toward maintaining adequate service levels, which include incremental increases in school capacities. Implementation of this state fee system would ensure that any significant impacts to schools which could result from the proposed project would be offset by development fees, and in effect, reduce potential impacts to a less than significant level.

d) Because the proposed project would result in a minor increase in the number of people utilizing park facilities relative to the City's existing population, and significant deterioration or accelerated deterioration at parks and recreation-oriented public facilities from possible increased usage is not expected. In addition, the project includes outdoor common space for residents, including the use of the remodeled Sandford House as amenity space for residents. The proposed project would have a less than significant impact on parks.

e, f) As noted above, because the proposed use is similar to surrounding uses and would result in a relatively minor increase in users relative to the City's existing population, significant deterioration or accelerated deterioration of transportation infrastructure and other public facilities from possible increased usage is not expected. The proposed project would have a less than significant impact on transportation infrastructure and other public facilities.

Conclusion: Impacts are considered less than significant.

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?	1, 10, 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?	1, 10, 31			--X--	

Evaluation:

As discussed in the recent City LUCE Update EIR, there are 26 parks in the city, consisting of eight community parks, 10 neighborhood parks, and eight mini parks. There are also six joint use facilities, and several recreation centers and special facilities (e.g., Damon Garcia Sports Fields and the SLO Swim Center). There are currently approximately 151.65 acres of parkland in the City, of which 33.53 acres are neighborhood parks. In addition to developed parks, the City owns or manages over 6,970 acres of open space within and adjacent to San Luis Obispo, some of which provide trails that accommodate hiking and mountain biking.

a) The project will add incrementally to the demand for parks and other recreational facilities. However, no significant recreational impacts are expected to occur with redevelopment of the site. Park Land In-Lieu fees will be required to be paid to the City to help finance additional park space, maintenance or equipment in the vicinity, per existing City policy. Collection of these fees helps offset the impacts of new projects on the City's recreational facilities. Impacts are considered less than significant.

b) The project includes outdoor recreational common areas, including the use of the remodeled Sandford House for amenity space for residents. The environmental impacts of these facilities are included in the analysis of the project's impacts as a whole, and have been found to be either less than significant or less than significant with mitigation incorporated. This impact is considered less than significant.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Conclusion: Less than significant impact

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?	2,12, 21,31			--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 county congestion management agency for designated roads or highways?	1, 2, 4, 31			--X--	
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?	12, 31				--X--
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	2, 21, 28, 31				--X--
e) Result in inadequate emergency access?	4, 31				--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?	2,31				--X--

Evaluation

As discussed in the recent City LUCE Update EIR, the City is accessed primarily by roadways including US 101, State Route (SR) 1 and SR 227. Routes of regional significance providing access include Los Osos Valley Road, Foothill Road, Broad Street, O'Connor Way, Prefumo Canyon Road, South Higuera Street and Orcutt Road. The local roadway system is characterized by a regular street grid in the downtown area and neighborhood street patterns in other parts of the City.

The City's Circulation Element defines street classifications for all City roadways and establishes maximum ADT and LOS thresholds. Most of the streets in the immediate project area are identified as Local Residential Streets with the exception of Ramona which is classified as a Residential Collector Street.

a, b) Regional access to the project site is provided by Highway 1, located east of the project site, and Highway 101, located southeast of the project site. Local access to the project site is provided by Palomar Avenue. All roadways in the immediate project vicinity have curbs, gutters, sidewalks, and on-street parking.

Based on ITE Trip Generation Rates, the project is estimated to generate 220 daily trips and 20 pm peak hour trips. This is consistent with the City's General Plan EIR which evaluated traffic conditions assuming this level of development. No impacts to the immediate area were identified during that evaluation. The LUCE Update EIR evaluated LOS for the residential and collector streets as shown in Table 1 below. The estimated number of daily trips and peak hours for the project do not exceed the maximum LOS of the updated Circulation Element and therefore did not trigger a separate traffic study.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Table 1. Street Classification Descriptions and Standards (City of San Luis Obispo General Plan)		
Descriptions of Street Types	Maximum ADT/LOS	Desired Maximum Speeds
Local Residential Streets directly serve residential development that front them and channel traffic to residential collector streets.	1,500	25 mph
Residential Collector Streets collect traffic from residential areas and channel it to arterials.	3,000	25 mph

As prescribed by the General Plan and required by zoning regulations the project would complete its Luneta Street frontage improvements allowing the road to be open to through traffic. The project and its required frontage improvements would have no significant impacts as defined under the City’s Circulation Element. It is important to note that the project will also contribute to overall impact mitigation for transportation infrastructure by participating in the Citywide Transportation Impact Fee program, further reducing impact levels.

Currently the City is evaluating an amendment to the General Plan eliminating the Luneta Street connection. Therefore, the required Luneta frontage improvements would be deferred until that amendment comes to resolution.

c) The project is not located in the vicinity of any public or private airports and will not result in any changes to air traffic patterns, nor does it conflict with any safety plans of the Airport Land Use Plan. No impact.

d) The project would not modify existing intersections or roadways, with the exception of completing the Luneta Drive connection per code requirement and as prescribed by the General Plan, and the addition of a landscaped median in the portion of the Luneta Drive fronting the subject parcel for traffic calming and aesthetic purposes. The project driveways would be consistent with City code requirements for ingress/egress to safely and adequately serve the project. Because the project is a similar use to those in the immediate vicinity, the project would not introduce any incompatible uses. No impact.

e) The project has been reviewed by the City Fire Marshal (December 2015) to ensure adequate emergency access has been provided. As proposed, the project would not alter the existing travel flow of vehicles, bicyclists, or pedestrians or substantially increase traffic on local streets in a way that would negatively affect emergency access. In fact, the completing the Luneta Drive connection would increase access to the site and connectivity in the local street system. Therefore, the proposed project would not have a negative effect on emergency access. No impact.

f) The project is consistent with policies supporting alternative transportation due to the site’s location within an urbanized area, and its proximity to shopping, parks and services. Ramona Street is served by SLO Transit, the City bus agency and bus lines are located within walking distance (Ramona and Broad Streets) that allows public transportation services to the Downtown and Cal Poly campus. City standards for an R-4 zone require provisions of on-site bicycle storage to be provided at a rate of 5% of required auto spaces. The proposed project includes 66 long term bicycle parking spaces and 22 short term bicycle parking spaces, consistent with City policy. No impact.

Conclusion: Transportation/circulation impacts are considered less than significant.

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

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Section 5020.1(k)?				--X--	
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency					--X--

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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shall consider the significance of the resource to a California Native American tribe.					
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Evaluation

On February 22, 2016 local Native American tribal groups that have a cultural and traditional affiliation to the area of the City of San Luis Obispo were formally notified that the project application for 71 Palomar was deemed complete and invited to provide consultation on the proposed project.

a) The project site is identified as a City Master List of Historic Resource and referred to as the historic Sanford House. A cultural resources evaluation was provided by Applied Earthworks (October 2015) for the site and the impacts of the proposed project and subsequent mitigation measures are discussed in Section 5 of this document. The Historic Evaluation included a record search of the site and the surrounding area and found that no significant materials were recorded (Applied Earthworks, October 2015). No tribal groups requested a consultation on the project, however Applied Earthworks received comments that locations near downtown can be sensitive and that sensitively training be mandatory for all construction personal as well as the project provide an onsite archaeological monitor during ground disturbance. Mitigation Measure CR 1 has been included as part of Section 5 above which states that a formal monitoring plan shall be prepared consistent with the City's Archeological Resource Preservation Program Guidelines and approved by the City prior to building permit approval. Therefore, the project will have less then significant impact.

b) Applied Earthworks (October 2015) conducted a records search, archival research, field surveys and outreach to Native American groups with interest and knowledge about the area. No information was presented or records were found that identified that the site as a significant resource to a California Native American tribe. No impact.

Conclusion: Tribal Cultural Resource impact are considered to be less then significant.

18. UTILITIES AND SERVICE SYSTEMS. Would the project:

c) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	7,16, 31			--X--	
d) 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?	7,16, 27, 31, 32, 33			--X--	
e) 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?	7,16, 27, 31			--X--	
f) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed?	7,16, 31			--X--	
g) 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?	5, 7,16, 31, 32, 33		--X--		
h) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	5, 8, 31			--X--	
i) Comply with federal, state, and local statutes and regulations related to solid waste?	5, 8, 31			--X--	

Evaluation

Water: As discussed in the City's LUCE Update EIR, the City of San Luis Obispo Utilities Department provides potable and recycled water to the community and is responsible for water supply, treatment, distribution, and resource planning. The City is the sole water provider within the city limits and most of the City's water is supplied from multiple surface water sources. However, the City also uses groundwater to supplement surface water supplies and recycled water is used to supplement irrigation demand. With the update of the City's Water and Wastewater Element in 2016, the City Council reaffirmed the policy for a multi-source water supply. Consistent with the multi-source water supply concept, the City obtains water from

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five sources:

- Salinas Reservoir (Santa Margarita Lake) and Whale Rock Reservoir: Combined Safe Annual Yield 6,940 AF/year
- Nacimiento Reservoir: 5,482 AF/year dependable yield/ contractual limit
- Recycled water from the City’s Water Resource Recovery Facility (WRRF): 187 AF/year

Wastewater: The wastewater system for the City includes facilities for wastewater collection and treatment. The City’s collection system serves residential, commercial, and industrial customers. Sewer service is provided only to properties within the city limits, with the exception of a few residential properties located just outside of the city limits, Cal Poly San Luis Obispo, and the County of San Luis Obispo Airport. There are approximately 14,400 service connections.

The City’s Water Resource Recovery Facility (WRRF) processes wastewater in accordance with the standards set by the State’s RWQCB. The WRRF removes solids, reduces the amount of nutrients, and eliminates bacteria in the treated wastewater, which is then discharged to San Luis Obispo Creek. The WRRF is designed for an average dry weather flow capacity of 5.1 million gallons per day (MGD) and a peak wet weather flow capacity of 22 MGD. In 2015, average flows to the WRRF were approximately 3.5 MGD.

Solid Waste: The City’s Utilities Department is responsible for administering an exclusive franchise agreement with San Luis Garbage Company to collect and dispose solid waste generated by residential, commercial, and industrial customers in San Luis Obispo. This agreement also includes curbside recycling, and green waste service. There are three solid waste disposal facilities within San Luis Obispo County. Most solid waste collected in the city is disposed of at the Cold Canyon Landfill. Cold Canyon Landfill is currently (2016) permitted to receive up to 1,650 tons of solid waste per day, with an estimated remaining capacity of 14,500,000 cubic yards (60.1 percent remaining capacity). In 2015, the Cold Canyon Landfill operator estimated the landfill is expected to reach capacity in 2040.

a), b), c) The proposed project would result in an incremental increase in demand on City infrastructure, including water, wastewater and storm water facilities. Development of the site is required to be served by City sewer and water service, which both have adequate capacity to serve the use. Existing storm water facilities are present in the vicinity of the project site, and it is not anticipated the proposed project will result in the need for new facilities or expansion of existing facilities which could have significant environmental effects. This project has been reviewed by the City’s Utilities Department and no resource/infrastructure deficiencies have been identified. These impacts would be less than significant.

d) The proposed project would result in an incremental increase in demand on water supplies, as anticipated under the recent General Plan Update. As analyzed in the LUCE Update EIR, the City has sufficient water supplies for build-out of the City’s General Plan. The incremental change created by the proposed project would be less than significant. This project has been reviewed by the City’s Utilities Department and no resource/infrastructure deficiencies have been identified.

e) The City completed a *Sanitary Sewer Flow Monitoring and Inflow/Infiltration Study* in 2012 and the *Wastewater Collection System Infrastructure Renewal Strategy (WCSIRS)* in January 2016. The WCSIRS identified capacity deficiencies in the collection system during peak wet weather downstream of the project and have been identified as at risk for potentially surcharging which could result in sanitary sewer overflows. Replacement and rehabilitation of private sewer laterals in poor condition will reduce inflow and infiltration in the collection system and peak flow rates. With the required incorporation of Mitigation Measure USS-1, impacts will be reduced to less than significant levels.

f), g) The proposed project will be served by San Luis Garbage Company, which maintains standards for size and access to ensure that collection is feasible, both of which will be reviewed by the Architectural Review Commission. The location and size of trash enclosures proposed for the project have been reviewed by the City and it has been determined that the trash enclosures are sufficient in size to handle the demands of the proposed project.

The Integrated Waste Management Act of 1989 (AB 939) requires each city and county in California to reduce the flow of materials to landfills by 50% (from 1989 levels) by 2000. The proposed project is required to reduce the waste stream generated by development consistent with the City’s Conservation and Open Space Element policies to coordinate waste reduction and recycling efforts (COSE 5.5.3), and Development Standards for Solid Waste Services (available at <http://www.slocity.org/home/showdocument?id=4384>). A solid waste reduction plan for recycling discarded construction

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materials is a submittal requirement with the building permit application. The incremental additional waste stream generated by this project is not anticipated to create significant impacts to solid waste disposal. This impact would be less than significant.

Mitigation Measure USS-1: The project proposes additional wastewater flow in a wet weather capacity constrained portion of the City’s wastewater collection system which is identified in the City’s Wastewater Collection System Infrastructure Renewal Strategy as sub-basin B.2. Prior to issuance of a certificate of occupancy, the developer is required to identify, demonstrate or implement off-site sewer rehabilitation that results in quantifiable inflow and infiltration reduction in the City’s wastewater collection system in sub-basin A1, A2, A3, A4, B.2 or B.3 in an amount equal to offset the project’s wastewater flow increase. This may be satisfied by: (A) Sufficient reductions in wastewater flow within sub-basins A1, A2, A3, A4, B.2 or B.3, commensurate with the additional wastewater flow contributed by the project, to be achieved by the verified replacement of compromised private sewer laterals, or public sewer mains, either by the developer, the City, or any property owner located within the basins; (B) Participation in a sewer lateral replacement program or similar inflow and infiltration reduction program to be developed by City, which is in place prior to issuance of certificate of occupancy; or (C) Any other off-site sewer rehabilitation proposed by the developer approved by the Utilities Director, which will achieve a reduction in wastewater flow commensurate with the additional wastewater flow contributed by the project. The final selection of the inflow and infiltration reduction project will be approved by the Utilities Director.

Conclusion: Impacts are considered to be less than significant with mitigation incorporated.

19. 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?			--X--		
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The project is an infill residential development in an urbanized area of the city. Without mitigation, the project could have the potential to have adverse impacts on all of the issue areas checked in the Table on Page 3. As discussed above, potential impacts to aesthetics, air quality, biological and cultural resources, geology and soils and hydrology and water quality, and utilities will be less than significant with incorporation of mitigation measures.

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)?			--X--		
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The impacts of the proposed project are individually limited and not considered “cumulatively considerable.” The proposed project is consistent with the existing Land Use Element and Zoning for high density residential development and the cumulative impacts of developing this site were analyzed as a part of the Land Use and Circulation Element (LUCE) EIR. All environmental impacts that could occur as a result of the proposed project would be reduced to a less than significant level through compliance with existing regulations discussed in this Initial Study and/or implementation of the mitigation measures in this Initial Study for the following resource areas: aesthetics, air quality, biological and cultural resources, geology and soils and hydrology and water quality, and utilities.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			--X--		
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Implementation of the proposed project would result in no environmental effects that would cause substantial direct or indirect adverse effects on human beings with incorporation of the mitigation measures in this Initial Study.

20. 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

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should identify the following items:

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

City of San Luis Obispo Land Use and Circulation Element (LUCE) Update EIR, available for review at the City Community Development Department (919 Palm Street, San Luis Obispo, CA 93401), or at the following web site:

<http://www.slocity.org/government/department-directory/community-development/planning-zoning/general-plan>

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.

Applicable excerpts, analysis and conclusions from the LUCE Update EIR have been added to each impact issue area discussion. Where project specific impacts and mitigation measures have been identified that are not addressed in the LUCE Update EIR, original analysis has been provided and mitigation has been recommended to reduce impact levels as needed.

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

N/A

20. SOURCE REFERENCES.

1.	City of SLO General Plan Land Use Element, December 2014
2.	City of SLO General Plan Circulation Element, December 2014
3.	City of SLO General Plan Noise Element, May 1996
4.	City of SLO General Plan Safety Element, March 2012
5.	City of SLO General Plan Conservation & Open Space Element, April 2006
6.	City of SLO General Plan Housing Element, January 2015
7.	City of SLO Water and Wastewater Element, July 2010
8.	City of SLO Source Reduction and Recycling Element, on file in the Utilities Department
9.	City of San Luis Obispo Municipal Code
10.	City of San Luis Obispo Community Design Guidelines, June 2010
11.	City of San Luis Obispo, Land Use Inventory Database
12.	City of San Luis Obispo Zoning Regulations March 2015
13.	City of SLO Climate Action Plan, August 2012
14.	2013 California Building Code
15.	City of SLO Waterways Management Plan
16.	Water Resources Status Report, July 2012, on file with in the Utilities Department
17.	Site Visit
18.	City of San Luis Obispo Staff Knowledge
19.	Website of the Farmland Mapping and Monitoring Program of the California Resources Agency: http://www.consrv.ca.gov/dlrp/FMMP/
20.	CEQA Air Quality Handbook, Air Pollution Control District, April 2012
21.	Institute of Transportation Engineers, Trip Generation Manual, 9 th Edition, on file in the Community Development Department
22.	City of San Luis Obispo, Archaeological Resource Preservation Guidelines, on file in the Community Development Department
23.	City of San Luis Obispo, Historic Site Map
24.	City of San Luis Obispo Burial Sensitivity Map
25.	Ordinance No.1130 (1989 Series)
26.	Archeological Resource Inventory, Applied Earthworks, Inc. October 2015
27.	Stormwater Control Plan. Ashley & Vance Engineering, Inc. October 12, 2015
28.	Project Plans
29.	Applicant project statement/description
30.	Website of the California Environmental Protection Agency, Cortese List: http://calepa.ca.gov/sitecleanup/corteselist/default.htm
31.	San Luis Obispo Land Use and Circulation Element Update EIR. June 13, 2014.

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32.	2012 Sanitary Sewer Flow Monitoring and Inflow/Infiltration Study
33.	2016 Wastewater Collection System Infrastructure Renewal Strategy
Note	All of the above reference sources that are not attached as appendices to this Initial Study are available upon request in the Community Development Department, City of San Luis Obispo

Attachments:

1. Site Vicinity/Project Location Map (Figure 1)
2. Project Site Plan/Aerial Photo Overlay (Figure 2)
3. Project Plans
4. Historic Evaluation Report by Applied Earthworks
5. Arborist Report by A&T Arborists
6. Aesthetic Analysis by Rincon Consultants, Inc.
7. Biological Peer Review by Rincon Consultants, Inc.
8. Arborist Report by Rincon Consultants, Inc.
9. Letter from Applied Earthworks regarding modified project design

REQUIRED MITIGATION AND MONITORING PROGRAMS

Air Quality

Mitigation Measure AQ-1: Prior to grading plan approval, the project proponent shall ensure that a geologic evaluation should 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 applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD. Technical Appendix 4.4 of this Handbook includes a map of zones throughout SLO County where NOA has been found and geological evaluation is required prior to any grading.

More information on NOA can be found at <http://www.slocleanair.org/rules-regulations/asbestos.php>.

- **Monitoring Plan, AQ-1:** All mitigation measures shall be shown on grading and building plans. In addition, the contractor shall designate a person or persons to monitor compliance with APCD requirements. The name and telephone number of such persons shall be provided to the APCD, Community Development and Public Works Departments prior to commencement of construction. The applicant shall provide documentation of compliance with APCD requirements to City staff prior to issuance of any grading or building permits.

Mitigation Measure AQ-2: Any scheduled disturbance, removal, or relocation of utility pipelines shall be coordinated with the APCD Enforcement Division at (805) 781-5912 to ensure compliance with NESHAP, which include, but are not limited to: 1) written notification, within at least 10 business days of activities commencing, to the APCD, 2) asbestos survey conducted by a Certified Asbestos Consultant, and, 3) applicable removal and disposal requirements of identified ACM.

More information on NOA can be found at <http://www.slocleanair.org/rules-regulations/asbestos.php>.

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➤ **Monitoring Plan, AQ-2:** All mitigation measures shall be shown on grading and building plans. In addition, the contractor shall designate a person or persons to monitor compliance with APCD requirements. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD, Community Development and Public Works Departments prior to commencement of construction.

Mitigation Measure AQ-3: During construction/ground disturbing activities, the applicant shall implement the following particulate (dust) control measures. These measures shall be shown on grading and building plans. In addition, the contractor shall designate a person or persons to monitor the dust control program and modify practices, as necessary, to prevent transport of dust off site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Community Development and Public Works Departments prior to commencement of construction.

- a. Reduce the amount of disturbed area where possible.
- b. Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site, and from exceeding the APCD’s limit of 20% opacity for no greater than 3 minutes in any 60-minute period. Increased watering frequency will be required whenever wind speeds exceed 15 m.p.h. and cessation of grading activities during periods of winds over 25 m.p.h. Reclaimed (non-potable) water is to be used in all construction and dust-control work.
- c. All dirt stock pile areas (if any) shall be sprayed daily and covered with tarps or other dust barriers as needed.
- d. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible, following completion of any soil disturbing activities.
- e. Exposed grounds that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating, non-invasive, grass seed and watered until vegetation is established.
- f. All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD.
- g. All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible. In addition, building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- h. Vehicle speed for all construction vehicles shall not exceed 15 m.p.h. on any unpaved surface at the construction site.
- i. All trucks hauling dirt, sand, soil, or other loose materials, are to be covered or shall maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code 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 shall be used with reclaimed water should be used where feasible. Roads shall be pre-wetted prior to sweeping when feasible.
- l. All PM10 mitigation measures required shall be shown on grading and building plans.

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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 the APCD’s limit of 20% opacity for no greater than 3 minutes in any 60-minute period. 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 Plan, AQ-3:** All mitigation measures shall be shown on grading and building plans. In addition, the contractor shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust off site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD, Community Development and Public Works Departments prior to commencement of construction.

Mitigation Measure AQ-4: Prior to any construction activities at the site, the project proponent shall ensure that all equipment and operations are compliant with California Air Resource Board and APCD permitting requirements, by contacting the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.

- **Monitoring Plan, AQ-4:** All mitigation measures shall be shown on grading and building plans. In addition, the contractor shall designate a person or persons to monitor compliance with APCD requirements. The name and telephone number of such persons shall be provided to the APCD, Community Development and Public Works Departments prior to commencement of construction. The applicant shall provide documentation of compliance with APCD requirements to City staff prior to issuance of any grading or building permits.

Mitigation Measure AQ-5: To reduce sensitive receptor emissions impact of diesel vehicles and equipment used to construct the project and export soil from the site, the applicant shall implement the following idling control techniques:

1. California Diesel Idling Regulations
 - a. On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:
 1. Shall not idle the vehicle’s primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and,
 2. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of restricted area, except as noted in Subsection (d) of the regulation.
 - b. Off-road diesel equipment shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board’s In-Use Off-road Diesel regulation.

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- c. Signs must be posted in the designated queuing areas and job sites to remind drivers and operators of the state’s 5-minute idling limit.
- 2. Diesel Idling Restrictions Near Sensitive Receptors (residential homes). In addition to the State required diesel idling requirements, the project applicant shall comply with these more restrictive requirements to minimize impacts to nearby sensitive receptors:
 - a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors.
 - b. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted.
 - c. Use of alternative fueled equipment is recommended.
 - d. Signs that specify the no idling areas must be posted and enforced at the site.
- 3. Soil Transport. It is estimated that 16,000 cubic yards of cut material (i.e., soils) will be cut from the site, but the final volume of soil that will be hauled off-site, together with the fleet mix, hauling route, and number of trips per day will need to be identified for the APCD. Specific standards and conditions will apply.

➤ **Monitoring Plan, AQ-5:** All mitigation measures shall be shown on grading and building plans. In addition, the contractor shall designate a person or persons to monitor that idling control techniques are being implemented to reduce sensitive receptor emissions impact of diesel vehicles and equipment during construction. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD, Community Development and Public Works Departments prior to commencement of construction. The applicant shall provide documentation of compliance with APCD requirements to City staff prior to issuance of any grading or building permits.

Biological Resources

Mitigation Measure BIO-1: Prior to commencement of construction, to avoid conflicts with nesting birds, construction activities shall not be allowed during the nesting bird season (February 1 to September 15). For construction activities occurring during the nesting season, surveys for nesting birds covered by the California Fish and Game Code and the Migratory Bird Treaty Act shall be conducted by a qualified biologist no more than 14 days prior to vegetation removal. The surveys shall include the disturbance area plus a 500-foot buffer around the site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of 50 feet for non-raptor bird species and at least 300 feet for raptor species. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer.

➤ **Monitoring Plan, BIO-1:** Grading and building plans shall show and outline all details and requirements of the Migratory bird monitoring plan per the mitigation measure above. The plans shall call out the name and contact information of the qualified biologist that will survey the project site. Grading and building plans will be reviewed by City’s Natural Resources Manager for compliance with the mitigation measure to ensure sufficient details are clearly visible for contractors

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and City inspectors. City staff will periodically inspect the site for continued compliance with the above mitigation measures.

Mitigation Measure BIO-2: Prior to construction, a qualified biologist shall conduct a survey of existing structures within the project site to determine if roosting bats are present. The survey shall be conducted during the non-breeding season (November through March). The biologist shall have access to all interior attics, as needed. If a colony of bats is found roosting in any structure, further surveys shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.) If the bats are not part of an active maternity colony, passive exclusion measures may be implemented in close coordination with CDFW. These exclusion measures must include one-way valves that allow bats to exit the structure but are designed so that the bats may not re-enter the structure. If a bat colony is excluded from the project site, appropriate alternate bat habitat as determined by a qualified biologist shall be installed on the project site or at an approved location offsite. Prior to removal of any trees over 20-inches in diameter-at-breast-height (DBH), a survey shall be conducted by a qualified biologist to determine if any of the trees proposed for removal or trimming harbor sensitive bat species or maternal bat colonies. If a non-maternal roost is found, the qualified biologist, in close coordination with CDFW shall install one-way valves or other appropriate passive relocation method. For each occupied roost removed, one bat box shall be installed in similar habitat and should have similar cavity or crevices properties to those which are removed, including access, ventilation, dimensions, height above ground, and thermal conditions. Maternal bat colonies may not be disturbed.

- **Monitoring Plan, BIO-2:** Grading and building plans shall show and outline all details and requirements of bat monitoring plan per the mitigation measure above. The plans shall call out the name and contact information of the qualified biologist that will survey the project site. Grading and building plans will be reviewed by City’s Natural Resources Manager for compliance with the mitigation measure to ensure sufficient details are clearly visible for contractors and City inspectors. City staff will periodically inspect the site for continued compliance with the above mitigation measures.

Mitigation Measure BIO-3: The project is required to plant two trees for every one tree that is removed (the “replacement trees”). The developer shall plant as many of the replacement trees on the site as feasible. The remaining required replacement trees shall be planted and/or distributed as follows in order of priority: a) trees shall be planted offsite in the neighborhood in existing City tree wells, City parks, and/or City property; and/or b) the developer shall make a financial donation to the Urban Forest Tree Bank for the purchase of 15 gallon trees to be used in local tree planting projects. The final tree planting and replacement plan shall be included as part of the building plans and approved by the City Arborist.

- **Monitoring Plan, BIO-3:** Grading and building plans shall show and outline all details and requirements of the tree replanting and replacement plan per the mitigation measure above. Grading and building plans will be reviewed by City’s Arborist for compliance with the mitigation measure to ensure sufficient details are clearly visible for contractors and City inspectors. City staff will periodically inspect the site for continued compliance with the above mitigation measures.

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Cultural Resources

Mitigation Measure CR-1: Preservation of Archeological Resources. A formal monitoring plan shall be prepared and approved by the City prior to building permit approval. The plan will need to include a summary of the project and expected ground disturbances, purpose and approach to monitoring, description of expected materials, description of significant materials or features, protocols for stoppage of work and treatment of human remains, staff requirements, and a data recovery plan to be implemented in case significant deposits are exposed.

- Monitoring Plan, CR-1: Grading and building plans shall show and outline all details and requirements of the formal monitoring plan of the rehabilitation of the Historic Sandford House and the new construction per the mitigation measure above. Grading and building plans will be reviewed by City staff for compliance with the mitigation measure, the City’s Archaeological Resource Preservation Guidelines, and project conditions to ensure sufficient details are clearly visible for contractors and City inspectors. City staff will periodically inspect the site for continued compliance with the above mitigation measure, including all requirements of the formal monitoring plan.

Mitigation Measure CR-2: Removal of Non-Original Additions. Extreme care shall be taken during the removal of the non-original additions to avoid damaging the original building walls. Any non-repairable or missing materials revealed upon removal of the addition directly attached to the Sandford House shall be replaced in-kind to match existing stucco. Any historical wood-sash windows found during demolition shall be preserved for reuse on the Sandford House where appropriate.

- Monitoring Plan, CR 2: Grading and building plans shall show and outline all details of the removal of the non-original additions of the Historic Sandford House per the mitigation measure above. Grading and building plans will be reviewed by City staff for compliance with the mitigation measure for removals to ensure sufficient details are clearly visible for contractors and City inspectors. City staff will periodically inspect the site for continued compliance with the above mitigation measure.

Mitigation Measure CR-3: Relocation of the Sandford House. The elevation of the existing Sandford House on the site shall be maintained as closely as possible to the historic siting of the original house. The reconstructed foundation and platform porch on the house in its new location shall retain the amount of height and exposure that the existing house exhibits. A stair height similar to that which currently exists shall also be maintained.

- Monitoring Plan, CR-3: Grading and building plans shall show and outline all details of the relocation of the Historic Sandford House per the mitigation measure above. Grading and building plans will be reviewed by City staff for compliance with the mitigation measure to move the house to ensure sufficient details are clearly visible for contractors and City inspectors. City staff will periodically inspect the site for continued compliance with the above mitigation measure.

Mitigation Measure CR-4: Sandford House Window Replacement. Modern replacements for the first-floor solarium windows shall minimally consist of window sash that is of the appropriate proportion to fit into the original openings. Multi-light versions which replicate the original multi-light windows

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located throughout other areas of the residence should be used to the maximum extent feasible in the event that the original window design for the solarium cannot be confirmed.

- **Monitoring Plan, CR-4:** Building plans shall show and outline all details of replacing the first floor solarium windows of the Historic Sandford House per the mitigation measure above. Building plans will be reviewed by City staff for compliance with the mitigation measure to replace the windows to ensure sufficient details are clearly visible for contractors and City inspectors. City staff will periodically inspect the site for continued compliance with the above mitigation measure.

Mitigation Measure CR-5: Low Impact Cleaning and Paint Removal. Only the gentlest methods of paint removal, and stucco cleaning or removal shall be used on or around the Sandford House. High-pressure water blasting; sand or other hardened material blasting; or chemical paint strippers that damage wood grain or erode metals shall not be used unless specifically approved by the City.

- **Monitoring Plan, CR-5:** Building plans shall show and outline all details of the method in which the historic Sandford House will be cleaned and paint removed per the mitigation measure above. Building plans will be reviewed by City staff for compliance with the mitigation measure to clean and remove paint to ensure sufficient details are clearly visible for contractors and City inspectors. City staff will periodically inspect the site for continued compliance with the above mitigation measure.

Mitigation Measure CR-6: Massing, Location, and Architectural Features of the Proposed New Construction. The applicant shall maintain the architectural relationship between the new construction and historic residence and the design for the new apartment buildings shall respect the dominance of the Sandford House on the property using scale and massing. New construction shall not be over-detailed or designed to draw attention away from the Sandford House.

- **Monitoring Plan, CR-6:** Grading and building plans shall show and outline all architectural details, location and massing of the new construction per the mitigation measure above. Building plans will be reviewed by City staff for compliance with the mitigation measure and the approved architectural plans to ensure sufficient details are clearly visible for contractors and City inspectors. City staff will periodically inspect the site for continued compliance with the above mitigation measure.

Hydrology and Water Quality

Mitigation Measure HWQ-1: The Stormwater Control Plan (Ashley and Vance Engineering, Inc. October 12, 2015) prepared for the proposed project includes design features, recommended BMPs for water quality control, and operations and maintenance standards for maintaining stormwater quality via the proposed underground storage chambers for on-site stormwater detention. These measures shall become required components of project development and the project proponent shall be required to implement these design features and recommendation as set forth.

- **Monitoring Plan, HWQ-1:** All mitigation measures shall be shown on grading and building plans. Community Development Planning and Public Works staff shall review the Stormwater Control Plan as part of the Building Permit application package prior to issuance of grading or construction

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permits. City staff will periodically inspect the site during construction for continued compliance with the above mitigation measure.

Utilities and Service Systems

Mitigation Measure USS-1: The project proposes additional wastewater flow in a wet weather capacity constrained portion of the City’s wastewater collection system which is identified in the City’s Wastewater Collection System Infrastructure Renewal Strategy as sub-basin B.2. Prior to issuance of a certificate of occupancy, the developer is required to identify, demonstrate or implement off-site sewer rehabilitation that results in quantifiable inflow and infiltration reduction in the City’s wastewater collection system in sub-basin A1, A2, A3, A4, B.2 or B.3 in an amount equal to offset the project’s wastewater flow increase. This may be satisfied by: (A) Sufficient reductions in wastewater flow within sub-basins A1, A2, A3, A4, B.2 or B.3, commensurate with the additional wastewater flow contributed by the project, to be achieved by the verified replacement of compromised private sewer laterals, or public sewer mains, either by the developer, the City, or any property owner located within the basins; (B) Participation in a sewer lateral replacement program or similar inflow and infiltration reduction program to be developed by City, which is in place prior to issuance of certificate of occupancy; or (C) Any other off-site sewer rehabilitation proposed by the developer approved by the Utilities Director, which will achieve a reduction in wastewater flow commensurate with the additional wastewater flow contributed by the project. The final selection of the inflow and infiltration reduction project will be approved by the Utilities Director.

- Monitoring Plan, USS-1: A sewer rehabilitation plan shall be developed in cooperation with Utilities Staff per the mitigation measure above. The rehabilitation plan shall be shown on the public improvement plans and reviewed by Utilities staff as part of the Building Permit application package prior to issuance of grading and construction permits. City staff will periodically inspect the site for continued compliance with the above mitigation measure, including all requirements of the sewer rehabilitation plan.