CITY OF SAN LUIS OBISPO

INITIAL STUDY
ENVIRONMENTAL CHECKLIST FORM
SBDV-2586-2016 / ER-2586-2016

1. Project Title:

VESTING TENTATIVE TRACT MAP No. 3095 – Imel Ranch Subdivision
Imel Ranch residential development plans including Vesting Tentative Tract Map #3095 (Application SBDV-2586-2016 / ER-2586-2016), which would create 18 residential lots for the development of 18 single-family homes, two lots to support onsite detention basins, and three open space lots. The project would result in the disturbance of approximately five acres, and would require the removal of mature trees. The project includes the following exceptions: road design exception to allow a reduced centerline tangent of 48.25 feet (50 feet is the standard requirement); residential structure height exceptions on non-sensitive lots up to five feet above the standard allowed height (25 feet), resulting in structures up to 30 feet in height; temporary grading (and restoration) and permanent grading and construction of drainage and stormwater treatment basins within the 20-foot creek setback; and reduced rear yard setbacks ranging from approximately 6 to 19 feet for proposed Lots 6, 8, 9, and 10 (residential development standards require a rear setback of 20 feet for residences and five feet for garages/carports).

2. Lead Agency Name and Address:

City of San Luis Obispo
Community Development Department
919 Palm Street
San Luis Obispo, CA 93401

3. Contact Person and Phone Number:

Shawna Scott, Associate Planner
Phone: 805-781-7176; Email: sscott@slocity.org

Prepared By:
David Watson, AICP
Watson Planning Consultants, Inc.
www.watsonplanning.us

4. Project Location:

Within the Orcutt Area Specific Plan; west side of Orcutt Road, immediately southwest of Tiburon Way, approximately 0.26 mile southeast of Johnson Avenue. APN 004-706-002

5. Project Sponsor's Name and Address:

Ambient Communities
Attn: Travis Fuentes
979 Osos Street, Suite E
San Luis Obispo, CA 93401

Project Representative Name and Address:

Todd Smith
Cannon Associates
1050 Southwood Drive
San Luis Obispo, CA 93401

6. General Plan – Orcutt Area Specific Plan Designation:

Low Density Residential

7. Zoning:

R-1-SP (Low Density Residential, Specific Plan)
C/OS-SP (Conservation/Open Space, Specific Plan)

8. Description of the Project:

Ambient Communities is requesting approval of a Vesting Tentative Tract Map (VTM) for the "Imel Ranch" property within the Orcutt Area Specific Plan (OASP). The OASP and an associated Final Environmental Impact Report (FEIR) were approved and certified in March 2010. The OASP designated the property for residential development, and allocated an estimated 16-17 single-family residential homes on the Imel Ranch property. The 5.49-acre subject property (as part of the overall Specific Plan area) was annexed into the City of San Luis Obispo in 2012. This Initial Study/Mitigated Negative Declaration tiers off the certified OASP FEIR and addresses any potential impacts not already addressed in the OASP FEIR.

The proposed plan is to build 18 market rate single-family detached homes on lots that range from 5,000 to 9,372 square feet each (Lots 1 through 18). Lighting is proposed to be limited to primary pedestrian entrances and parking areas as needed for security.

Two lots 0.25 and 0.13 acres each are proposed within the southern and western portions of the project site (Lots 19 and 20), which would support above or below ground detention basins. Two centrally located open space parcels for the existing ("unnamed") creek are proposed within the project, approximately 0.51 and 0.15 acres each (Lots 21 and 22). A third approximately 0.83-acre open space lot (Lot 23) along the Crotalo Creek corridor is provided in the site design. Stormwater basins/easements totaling 0.12 acre would be located within the open space lots. The project includes the removal of three stands of Eucalyptus trees and several other smaller non-native trees; this analysis also assumes the removal of one large sycamore tree near the "I" Road creek crossing. Two oak trees in the southeast corner of the property may require pruning.

Site Disturbance and Grading

The project would result in the disturbance of approximately five acres, including 14,000 cubic yards of cut and 9,500 cubic yards of fill for tract improvements and residential pad grading; approximately 4,500 cubic yards of soils would be exported from the project site to be used in the nearby Righetti Ranch subdivision. Approximately 0.57 acre of area proposed for disturbance would be restored onsite, including graded areas within the 20-foot setback. In addition, residential pad grading along the western property boundary (Lots 1 through 4, 10, and 11) would require a fill slope that will extend into the adjacent "Neighborhood Park" lot. In the event construction of the proposed Imel Ranch subdivision occurs prior to adjacent tracts in the OASP, additional offsite grading associated with B Street and Orcutt Road improvements would result in the disturbance of as many as 1.5 additional acres, and would include approximately 3,000 cubic yards of cut and 2,000 cubic yards of fill; 1,000 cubic yards of soil would be exported. Offsite utility improvements would include extension of the wastewater line serving the property through the Neighborhood Park to "B" Street. The Imel Ranch project will also utilize planned offsite potable and recycled water line improvements. The potable water line improvements are under construction by the Righetti Ranch project, including extending a 12-inch water main from approximately the intersection of Johnson and Tanglewood to the intersection of Orcutt Road and Tiburon Road. The recycled water line that would serve the Imel Ranch property is proposed to be extended from Tank Farm Road along Righetti Ranch Road then northeast to serve both the Jones Ranch and Imel Ranch properties.

Drainage and Stormwater Management

In order to address storm water peak flow management requirements in the OASP, detention for Imel Ranch is proposed using a combination of the following methods:

- Onsite detention facilities sized for the 10-year storm to satisfy Regional Water Quality Control Board (RWQCB) post-construction storm water requirements. This will consist of either above ground shallow detention basins or below ground buried detention chambers. The location of onsite detention and storm water facilities would partially extend into the 20-foot creek setback.

- "Over-detention" within a Regional Basin downstream of Imel Ranch, located within Righetti Tract 3063.

Requested Exceptions

On-site circulation for the proposed VTM includes a "horseshoe" residential street referred to as "I" Street. "I" Street connects to "B" Street (aka. "Tiburon Road") at two (2) intersections. Where "I" Street intersects with "B" Street in the northwestern portion of the project site, the centerline tangent is 48.25 feet, which is slightly less than the 50 feet required by the City Engineering Standards (January 1, 2016). Given site topography and the locations of the creek and drainages, the applicant is requesting a "design exception" to required centerline tangents pursuant to City Subdivision Regulations Chapter 16.23 Exceptions, Appeals, and Applicant Submittal.

Also, "I" Street intersects with "B" Street approximately 85 feet southwest of Orcutt Road, which is less than the 250 feet as required by the Transportation Research Board Access Management Manual. The horseshoe street layout presents superior design; however, given the realignment of "B" Street, the topography and creek locations on the Imel property, and the need for two access points, separation distance between Orcutt Road and the initial "I" Street intersection could not be met. As a result, the applicant has proposed this particular intersection will be restricted to right-turn-in and right-turn-out only, to resolve any vehicular movement issues because of the reduced distance to Orcutt Road. Left-turn restrictions would be accomplished with the construction of a "pork chop" island.

City Zoning Regulations identify a maximum height of 25 feet within the R-1 zone, and structures up to 35 feet are allowed with approval of an administrative use permit. The applicant is requesting allowance of structures up to 30 feet in height. The applicant's proposal does not include a second story on structures within 50 feet of Orcutt Road, consistent with the OASP.

The OASP identifies a 20-foot creek setback, which is applicable to all development. The applicant proposes approximately 0.60 acre of disturbance within the 20-foot setback. Permanent improvements within the creek setback include drainage basins (0.38 acre) and one creek crossing (0.08 acre). Approximately 0.12 acre within the creek setback would be restored for use as stormwater treatment basins and associated easements. The remaining 0.02 acre would be temporarily disturbed and restored.

The project includes a Rear Yard Exception for Lots 6, 8, 9, and 10 due to the presence of two meandering creeks and minimum roadway standards. Residential development standards require 20-foot (house) and up to 5-foot (garage/carport) rear setbacks. The proposed exception would result in rear yard setbacks ranging from approximately 6 to 19 feet.

Summary

In summary, the proposed project will consist of the following significant features:

1) Eighteen (18) proposed single family residential lots/units, including site preparation, grading, construction, and operation.
2) Three (3) open space parcels totaling 1.49 acres, proposed for public dedication, which would remain undeveloped with the exception of a five-foot wide pedestrian trail and four stormwater treatment basins to be located partially within the 20-foot setback from the Unnamed Creek.
3) Site grading to accommodate the residential subdivision, resulting in the need to "export" excess cut material (proposed to be used in the nearby Righetti Ranch subdivision, VTM #3063).
4) Other associated site improvements including "I" Street, on and offsite utility extensions, lighting, and landscaping.
5) Offsite road improvements including B Street and Orcutt Road, as identified in the OASP (in the event these improvements are not constructed in association with previously approved Jones Ranch and Righetti Tract Maps).

9. Setting and Surrounding Land Uses:

The Orcutt Specific Plan Area (OASP) is located in the southeastern portion of the City, bounded by Orcutt and Tank Farm Roads, and the Union Pacific Railroad (UPRR) tracks near Bullock Lane. The OASP planning area is 230.85 acres in size, generally divided into thirteen (13) differing ownerships (and 21 separate parcels) ranging in size from less than 1 acre to the largest holding being just over 143 acres.

Imel Ranch (the subject site) is located within and along the eastern edge of the OASP, immediately west of Orcutt Road, opposite from Tiburon Road. Lands surrounding the property are largely undeveloped within the City (with the few exceptions of sporadic homestead lots and homes). Jones Ranch is located to Imel Ranch's immediate north, Righetti Ranch to its west, the Garay property to the south, and as noted, unincorporated residential larger-lot lands are located to the east of Orcutt Road in San Luis Obispo County.

The Imel Ranch property is 5.49 acres of gently sloping land traversed by two seasonal creeks (one named "Crotalo Creek", the other is unnamed). Onsite vegetation includes non-native annual grassland, eucalyptus stands, sycamore trees, oak trees, pepper trees, and riparian woodland.

10. **Project Entitlements Requested:**

Vesting Tentative Tract Map approval, Architectural Review, Tree Removal

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

California Department of Fish and Wildlife
County of San Luis Obispo Air Pollution Control District
Regional Water Quality Control Board
US Army Corps of Engineers
US Fish and Wildlife Service

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		Hydrology / Water Quality		Recreation
X	Biological Resources		Land Use / Planning	X	Transportation / Traffic
	Cultural and Tribal Cultural Resources		Mineral Resources		Utilities / Service Systems
	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

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

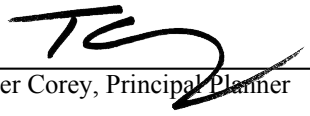
DETERMINATION (To be completed by the Lead Agency):

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that although the proposed project could have a significant effect on the environment, based on the analysis and mitigation requirements of the 2010 Orcutt Area Specific Plan Final EIR, and the specific analysis incorporated herein, 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. A tiered 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.	

David Watson, AICP, Watson Planning Consultants, Inc.

December 20, 2016
Date



Tyler Corey, Principal Planner

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 SBDV-2586-2016 / ER-2586-2016	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Would the project:					
a) Have a substantial adverse effect on a scenic vista?	1,5, 18,19, 28,29			--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?	5,12, 18,19, 27			--X--	
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	18,19, 27			--X--	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	10,12, 18,19			--X--	

Evaluation

As evaluated in the City of San Luis Obispo General Plan Land Use and Circulation Element (LUCE) Update EIR (October 2014), 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 Righetti Hill, 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 exhibits quality views of nearby natural landmarks, including Islay Hill, Righetti Hill and the Coast Range to the northeast and is visually separated from the City core by the Orcutt Area and Broad Street-Highway 227.

a) The primary scenic value from within and around the subject site is the view to the east of the Santa Lucia foothills and Righetti Hill to the south. As a road of "high or moderate scenic value," development along this segment of Orcutt Road would require a design that preserves vistas and views to the maximum extent possible. The OASP FEIR acknowledges that views of the rural residential area to the east would still be maintained from the road, even with proposed development. However, the EIR included programs to fulfill the goal of minimizing impacts to surrounding views. The programs pertinent to this site include:

1. A minimum 20-foot wide landscaped setback along Orcutt Road.
2. A minimum 60-foot setback of residential development from the centerline of Orcutt Road.
3. A minimum 50-foot setback from the property line adjoining Orcutt Road that would restrict buildings to one story. Buildings with more than a single story shall be set back at least 50 feet from Orcutt Road to maintain views.
4. Architectural Review Commission (ARC) review of development plans on sensitive sites to ensure that the site design preserves views while allowing for reasonable development.
5. ARC approval of landscape plans for the street setbacks that screen development in foreground views, but also maintain backdrop views.

Development plans show the dedication of additional street right-of-way along Orcutt Road, the added landscape buffer of 20 feet, and buildings that will comply with the height limitations and setbacks described above. As suggested in 1 above, Program 2.4.1a of the OASP requires a 20-foot landscaped setback/buffer zone along Orcutt Road. The OASP reference is to establishing a minimum 20-foot landscaped zone (or visual "buffer") between Orcutt Road and the project, with two-story buildings to be set back an additional 30 feet for a total of at least 50 feet (OASP Program 2.4.1d). The ARC will review detailed landscaping plans with their final review of project plans after Vesting Tentative Map approval.

Original requests for height limit exceptions on lots and associated building pads located within 50 feet of the eastern property boundary along Orcutt Road have been eliminated from the project. The applicants have submitted a "sight-line" analysis that describes unobstructed views of Righetti Hill in the vicinity of the proposed VTM #3095 (Source 29; Cannon 2016). With the proposed scale and height of planned development and its distance from the main scenic corridors, the project will not create a substantial adverse effect on a scenic vista.

b) The segment of Orcutt Road, which bounds the project site to the east, is considered a local scenic roadway. One of the main objectives of the OASP and companion EIR is to protect natural habitats, including creeks, hills, wetlands, and corridors between these habitats. The subject site currently contains a house, small accessory structures, fencing, and landscaping. The site is mostly sloping grassland, but does contain two degraded riparian corridors (Crotalo Creek and an unnamed creek channel) and stands of eucalyptus and other mature trees. City design policies and the OASP encourage sensitivity to site grading, while acknowledging the need for more landform modifications than might otherwise occur with smaller "infill" projects. In effect, this largely rural area will be developed with urban residential uses. This changes the character and visual backdrop in the immediate neighborhood. While not rising to the level of "potentially adverse environmental impacts", the grading and associated retaining features will be conditioned to address visual and design considerations as part of final architectural design efforts. The new residential units and site improvements will also follow OASP criteria for building design and street improvements. In this manner the appearance of new development will meet the design criteria of the OASP, as well as the City's Community Design Guidelines, and be considered "self-mitigating" in its compliance with established design and appearance standards. Therefore, the impact is considered less than significant for this project.

c) The existing visual character of the site will change from semi-rural to an urbanized area as a result of the proposed project, pursuant to and consistent with the objectives of the OASP. The project is required to be consistent with the distribution of land uses and design standards stated in the OASP to ensure that the appearance of the development is acceptable and that no new buildings block scenic views. As proposed, the project does not result in development that is incompatible with the adopted OASP, surrounding neighborhood development, or planned and approved projects within the OASP, and in this regard is self-mitigating. Ultimately, the design of residential units along Orcutt Road will require the review and approval of the ARC to ensure consistency with the City's Community Design Guidelines as well as the OASP, and must demonstrate compliance with City codes and standards addressing aesthetics and visual character. Regardless, the proposed development would contribute to the project-wide effect on the aesthetic character of the site vicinity through alteration of viewsheds from Orcutt and Tank Farm Roads. The OASP FEIR considered this a cumulative significant and unavoidable impact and considered and approved overriding considerations.

d) The prior OASP FEIR acknowledges that future development pursuant to the OASP will introduce new sources of light, glare and nighttime illumination, as is typical with residential and commercial development. However, the OASP FEIR determined that such light and glare impacts can be mitigated to less-than-significant levels during site specific project review. This is accomplished through compliance with lighting design standards set forth in the OASP and with other adopted City standards including the Night Sky Preservation Ordinance. The new light source will not adversely affect day or nighttime views in the established San Luis Obispo urbanized area because construction and lighting standards require new light to be shielded and directed downward to ensure glare and fugitive light does not leave the OASP site. Therefore, impacts from new sources of light or glare will be less than significant with OASP FEIR Mitigation Measure AES-3(a) Minimize Lighting on Public Areas, which would be implemented through compliance with the OASP Lighting Standards (Program 4.4.3a addressing light spacing and height, shielding and spillover restrictions). Building lighting for the project will also be reviewed and approved by the ARC in compliance with the aforementioned standards of the OASP and Chapter 17.23 of the City's Zoning Regulations (Night Sky Preservation Ordinance).

Conclusion: With the subdivision, building design, and lighting requirements discussed above and incorporated into the project proposal, the project will have a less than significant impact on aesthetics. OASP FEIR-required Mitigation Measure AES-3(a) ensures compliance with city regulations in minimizing lighting and glare impacts to less than significant.

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, 18, 19				--X--
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	1, 12, 18, 19				--X--
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	1,12, 18, 19				--X--

Issues, Discussion and Supporting Information Sources SBDV-2586-2016 / ER-2586-2016	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

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. The site has not been actively farmed and is not zoned for agricultural use. Therefore, the proposed project would not result in conversion of such agricultural resources to nonagricultural use.

b) The project site is not located on active farmland, nor is it under a Williamson Act contract. The project site is designated for residential uses in the General Plan and Orcutt Area Specific Plan. 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 active 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?	1,2, 9,11, 13,19, 20,22			--X--	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	1,2, 19,20		--X--		
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	1,2, 19,20			--X--	
d) Expose sensitive receptors to substantial pollutant concentrations?	1,2 19,20		--X--		
e) Create objectionable odors affecting a substantial number of people?	1,2, 19,20			--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 (PM_{10}). 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-e) The San Luis Obispo Air Pollution Control District (SLO APCD) adopted the 2001 Clean Air Plan (CAP), which is a comprehensive planning document intended to provide guidance to the SLO APCD and other local agencies, including the City, on how to attain and maintain the state standards for ozone and PM10. Conservation and Open Space Element Policy 2.3.2 states that the City will help the SLO APCD implement the CAP. 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 OASP FEIR determined

that the OASP is consistent with the population assumptions of the CAP, and identified Land Use and Transportation Control Measures that would be implemented through the OASP, including but not limited to a pedestrian and bicycle path and traffic flow improvements on Tank Farm Road and Orcutt Road. The OASP FEIR identified a significant and unavoidable air quality impact due to the OASP's inconsistency with the CAP (development outside of the 2010 City Limits and Urban Reserve Line [URL] and resulting rate of increase in vehicle trips and miles traveled), and associated adopted findings included a statement of overriding considerations. At the time OASP was approved, the Imel Ranch property was located within the URL. The Imel Ranch subdivision is consistent with the approved OASP, and is currently located within the City Limits and URL; therefore, no new impacts would occur that were not addressed in the OASP FEIR.

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 state and federal ambient air quality standards for ground-level ozone and $PM_{2.5}$ as well as the state standards for PM_{10}.

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. The April 2012 CEQA Air Quality Handbook is provided by the SLO APCD for the purpose of assisting lead agencies in assessing the potential air quality impacts from residential, commercial and industrial development, and includes thresholds of significance and mitigation measures specific to criteria pollutants and impacts to sensitive receptors. Under CEQA, the SLO APCD is a responsible agency for reviewing and commenting on projects that have the potential to cause adverse impacts to air quality.

According to the 2010 OASP FEIR, project construction will generate short-term emissions of air pollutants. Construction-related emissions would primarily be dust (particulates) generated from soil disturbance and combustion emissions generated by construction equipment. Such dust generation was determined to be a short-term potentially significant impact on air quality that could exceed established state and federal thresholds for regional or local air quality or otherwise conflict with City and County air quality plans or programs. In addition, the project site is situated near existing residential units thereby potentially exposing sensitive receptors to substantial pollutant concentrations. The project will be required by OASP mitigation measures to submit final tract construction plans to SLO APCD for comment and/or approval prior to grading and construction of the project.

The OASP FEIR also noted long-term ("operation") air quality impacts that would result from on-going emissions generated by the project-related vehicular trips, as well as additional natural gas combustion for space and water heating and additional fuel combustion at power plants for electricity consumption. To reduce vehicular trips associated with the project, the design includes many sustainable features and is not auto-centric. The project includes a network of pedestrian pathways internally throughout that will connect to the property to the south as well as Orcutt Road.

Construction Significance Criteria:

Temporary impacts from the project, including but not limited to excavation and construction activities, hauling, vehicle emissions from heavy duty equipment, and exposure to naturally occurring asbestos and asbestos containing materials, has the potential to create dust and emissions that exceed air quality standards for temporary and intermediate periods. The project is subject to OASP FEIR Mitigation Measure AQ-3(a) Application of CBACT (Best Available Control Technology for construction related equipment), which would mitigate potential construction-related impacts to less than significant.

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 APCD has identified that NOA may be present throughout the City of San Luis Obispo (APCD 2012 CEQA Handbook, Technical Appendix 4.4). Pursuant to SLO APCD requirements and ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (93105), the applicant is required to provide geologic evaluation prior to any construction activities and comply with existing regulations regarding NOA, if present. Based on

compliance with identified mitigation (AIR-1) and existing regulations, this potential impact would be less than significant.

The project will include extensive grading and demolition, which has the potential to disturb 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). Based on compliance with identified mitigation (AIR-2) and these existing regulations, potential impacts would be less than significant.

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 would require approximately five acres of ground disturbance (and an additional potential 1.5 acres of ground disturbance for off-site road improvements), and is within 1,000 feet of sensitive receptors, OASP FEIR Mitigation Measures AQ-3(a) Application of CBACT, AQ-3(b) Dust Control, AQ-3(c) Cover Stockpiled Soils, and AQ-3(d) Dust Control Monitor related to fugitive dust emissions during proposed construction activities are required.

Construction equipment itself can be the source of air quality emission impacts, including sensitive receptor exposure to diesel particulates and other air pollutants, and may be subject to California Air Resources Board or SLO APCD permitting requirements. This includes portable equipment, 50 horsepower (hp) or greater or other equipment listed in the SLO APCD's 2012 CEQA Handbook, Technical Appendices, page 4-4. Truck trips associated with the proposed excavated site material (i.e., soils) that will be cut from the site may also be a source of emissions subject to SLO APCD permitting requirements, subject to a specifically selected truck route. The specific requirements and exceptions in the regulations can be reviewed at the following web sites: www.arb.ca.gov/msprog/truck-idling/2485.pdf and www.arb.ca.gov/react/2007/ordiesl07/frooal.pdf. Impacts related to vehicle and heavy equipment emissions are considered mitigable under the OASP FEIR subject to SLO APCD review and/or approval of project plans, and compliance with Best Available Control Technologies (BACT) identified in OASP FEIR Mitigation Measure AQ-3(a) Application of CBACT.

Operational Screening Criteria for Project Impacts:

Table 1-1 of the SLO APCD CEQA Air Quality Handbook indicates that the construction of 18 single family residences would not exceed the threshold of significance for reactive organic gases (ROG) and oxides of nitrogen (NOx). Therefore, operational phase air quality impacts are considered less than significant. In addition, the project would incorporate required operational mitigation measures identified in the OASP FEIR; refer to AQ-1(a) Energy Efficiency, AQ-1(d) Telecommuting, and AQ-1(e) Pathways.

Based on the project's consistency with the OASP and incorporation of OASP FEIR mitigation measures, the project would not result in a cumulatively considerable net increase of any criteria pollutant.

The project includes the development of a residential project, as anticipated by the OASP R-1 zoning, and does not include any land uses which would have the potential to produce objectionable odors in the area. There are no uses in the area that generate objectionable odors that may significantly affect future residents, employees, or visitors. Therefore, potential impacts would be less than significant.

Conclusion: With implementation of OASP FEIR-required and supplemental construction and operational mitigation measures as referenced above, 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?	1,5, 15,17, 19,27, 33,35, 36,37			--X--	
b) Have a substantial adverse effect, on any riparian habitat or	1,5,			--X--	

Issues, Discussion and Supporting Information Sources SBDV-2586-2016 / ER-2586-2016	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	15,17, 19,27, 33,35, 36,37				
c) Have a substantial adverse effect on federally protected wetlands as defined in Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	1,5, 15,17, 19,27, 33,35, 36,37				--X--
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	1,5, 15,17, 19,27, 33,35, 36,37			--X--	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	1,5, 15,17, 19,27, 33,35, 36,37		--X--		
f) Conflict with the provisions of an adopted habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	1,5, 15,17, 19,27, 33,35, 36,37				--X--

Evaluation

The urbanized area of the City of San Luis Obispo lies at the convergence of two main geologic features: 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 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 area outside the city limits consist 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 EIR prepared for the OASP included programmatic biological resource impact analyses of special species of plants and animals, and different habitat values, including riparian corridors and wetlands. The OASP incorporated recommended EIR policies and programs. Appendix C of the OASP incorporates mitigation measures to be applied to project approvals consistent with the Specific Plan as applicable. The most significant sensitive natural resource features on the project site are the creek corridors and associated wetland and woodland areas. As required by OASP FEIR Mitigation Measures B-2(a) Seasonally-Timed Botanical Surveys, B-2(g) Bunchgrass Survey, and B-5(b) Burrowing Owl Survey, the applicant provided a Biological Resources Assessment (BRA) (Rincon 2014, Source 37), which includes seasonal botanical surveys, burrowing owl surveys, and delineation of jurisdictional waters. The results of the BRA are incorporated into the discussion and analysis below.

a)-d) As described in the OASP FEIR, and confirmed by site visits and the BRA, habitats present within the project site include non-native annual grassland, eucalyptus, and riparian woodland. Based on the results of the BRA, Cambria morning-glory (*Calystegia subacaulis* ssp. *episcopalis*) and purple needlegrass (*Stipa pulchra*) are present onsite and would be impacted by proposed grading and development. At the time the OASP FEIR was certified, Cambria morning-glory was a California Native Plant Society (CNPS) List 1B (rare, threatened, endangered in California and elsewhere); this species is currently included on the updated CNPS Rare Plant Rank 4.2 (Watch List; uncommon and fairly endangered in California).

Plants with Rare Plant Rank 4 are not defined as "rare" statewide. Cambria morning-glory is identified as a Species of Local Concern in the City's Conservation and Open Space Element. Pursuant to the OASP FEIR, the project is subject to Mitigation Measures: B-2(b) Special-Status Plant Buffer and B-2(d-g) Special-Status Species CDFG-Approved Mitigation Plan, Monitoring Frequency, Habitat Replacement and Bunchgrass Survey. Based on compliance with mitigation identified in the OASP FEIR, potential impacts to special-status plant species would be less than significant.

The OASP FEIR notes that grassland habitat and large trees onsite provide suitable habitat for a variety of special status avian species and monarch butterfly (*Danaus plexippus*). On-site eucalyptus may provide autumnal/winter aggregation sites for monarchs; however, this species is not known to overwinter in the trees within the OASP. Based on the results of the BRA, the following special-status species have the potential to occur onsite:

- Cooper's hawk (*Accipiter cooperii*), California Species of Special Concern (CSSC)
- Sharp shinned hawk (*Accipiter striatus*), CSSC
- Burrowing owl (*Athene cunicularia*), CSSC
- Ferruginous hawk (*Buteo regalis*), CSSC
- White-tailed kite (*Elanus leucurus*), Federal Species of Concern (FSC)/State Fully Protected (FP)
- California horned lark (*Eremophila alpestris actia*), CSSC
- Merlin (*Falco columbarius*), CSSC
- Loggerhead shrike (*Lanius ludovicianus*)

Implementation of the project has the potential to result in direct and indirect impacts to these species and their habitat (in addition to other common and migratory wildlife) as a result of construction activities and long-term use of the site. Prior to and during construction, the project is subject to OASP FEIR Mitigation Measures B-5(a) Bird Pre-Construction Survey and B-5(c) Monarch Pre-Construction Survey. The project incorporates required creek buffer and open space requirements (no residence or garage would be located within the creek buffer), as required by the OASP, which will preserve riparian woodland habitat present onsite for continued use by wildlife. The project is also subject to the following OASP FEIR Mitigation Measures: B-6(a) Minimized Roadway Widths; B-6(b) Culvert Design; B-6(c) Educational Pet Brochure; B-6(d) Landscaping Plan Review. Based on compliance with the OASP and mitigation measures identified in the OASP FEIR, potential impacts to special-status and native wildlife and their habitat would be less than significant.

Crotalo Creek and an unnamed creek flow through the project site on a seasonal basis. Based on the BRA, the jurisdictional areas associated with these two creeks within the project site include approximately 0.17 acre (1,458 linear feet) of U.S. Army Corps of Engineers (USACE)/Regional Water Quality Control Board (RWQCB) Other Waters and Drainages and 1.04 acres (1,458 linear feet) of California Department of Fish and Wildlife (CDFW) streambed and riparian habitat is present within the project site. Sheet C2 of the VTM shows that the two creek corridors and adjoining riparian habitat will be located within proposed Open Space Lots 21, 22 and 23. The lot configurations were specifically developed to include the channel area, creek banks, and appropriate setbacks, based on the project engineer's consultation with the City, including the Natural Resources Manager, and other regulatory agencies. Consistent with OASP policies and development guidance, the creek corridors will be protected as open space and enhanced with native plantings as appropriate. Proposed "I" Street would cross the unnamed creek in one location, which would result in temporary and permanent impacts to jurisdictional habitat, which may include grading, vegetation removal, and placement of structures within areas under the jurisdiction of the USACE and/or CDFW. Implementation of the project would include grading and construction within the identified 20-foot creek setback; all areas temporarily disturbed would be restored. Permanent development within the 20-foot setback, aside from the road crossing, would consist of drainage and stormwater basins. All grading and construction is subject to compliance with the following OASP FEIR Mitigation Measures, which will protect water quality and creek habitat in the short- and long-term: B-4(a) Trail Setbacks; B-4(b) Development Setbacks; B-4(c) Riparian/Wetland Mitigation; D-1(a) Erosion Control Plan; D-1(b) Storm Water Pollution Prevention Plan; D-2(a) Vegetative and Biotechnical Approaches to Bank Stabilization; and D-2(c) Riparian Zone Planting. In addition to protection of jurisdictional areas, the proposed configuration of the open space lots will create a riparian corridor with an improved high habitat value for wildlife species. The residential component of the project would occupy just less than half of the project site (47%), with open space and detention basin lots covering about 34% or about 1.8 acres. The remainder of the site (approximately 1.03 acres, or 19% of the site acreage) would consist of roads. Therefore, it is not expected that the development would interfere substantially with the movement of any native wildlife species in the long-term.

e) VTM Sheet C3 is the project demolition plan which includes the locations of existing trees and their proposed status with development. Limited native vegetation exists in the form of trees and native grasses over small portions of the site to be developed. An Arborist Letter Report (Rincon 2016; Source 33) is included for reference. The report includes a site survey and analysis of the health and safety of the trees located on the project site. Several varieties of ornamental trees are located in the vicinity of the existing house. There are no designated significant specimen or heritage trees on the property.
The Rincon Report in part states:

> *"…Rincon documented 54 trees and 7 groves on the Imel Property. In general, trees on the Imel Property are concentrated along Crotalo Creek and Tanglewood Creek (also referred to as Unnamed Creek), two ephemeral creeks that run east to west across the Imel Property. The trees are generally ornamentals associated with the existing residence, however, some native and nonnative trees are associated with the creeks and some trees are scattered throughout the remainder of the Imel Property."*

The project includes the removal of three stands of Eucalyptus trees, a sycamore tree, and several other mostly smaller non-native trees. There are some larger oaks that will be retained as part of the project design. The large sycamore tree proposed for removal is identified as tree #548, and occurs at the western convergence of the unnamed creek in Lot 22 and the proposed westerly extension of "I" Street. Rincon indicates that this tree is a large sprawling tree with a diameter at breast height (dbh) of 61 inches, with several major branches that flair out of main trunk. Rincon goes on to state that the trunk is in poor health, visible rot damage, poor health within the canopy and its foliage is much more sparse than other sycamore trees on the Imel property. However, sycamore trees can live for many years under such conditions, especially with proper care and maintenance.

At this location the extension of "I" Street as designed would effectively destroy the sycamore. The City Arborist and Natural Resources Manager have suggested that the tree be retained, leading to the need for a redesign of the roadway and creek crossing in this area. It is clear that preserving this tree would be a preferred policy solution. Conservation and Open Space Element, Policy 7.5.1 states that significant trees, as defined during City Council review, that make a substantial contribution to the natural habitat of its localized environment shall be protected. This policy also acknowledges that in the event that removal of significant trees does occur, that such removal must be addressed through supplemental plantings and improvements in the localized area. In this instance, the City Arborist would review final project plans and evaluate the trimming and retention of this tree as a matter of City policy priority (including reasonable techniques such as roadway narrowing, repositioning, slope steepening and/or retaining - in concert with Engineering and Public Works staff analysis) versus other new compensatory tree planting alternatives as a part of extension of the "I" Street roadway in this immediate vicinity. If the tree cannot be retained, OASP FEIR Mitigation Measure B-3(a) Construction Requirements would apply, which requires replacement of removed trees at a minimum 1:1 ratio, and B-4(c) Riparian/Wetland Mitigation, which requires compensatory mitigation at a minimum 2:1 ratio. For the purposes of this analysis, it is assumed that the tree would be removed, resulting in a potentially significant impact that would require onsite in-kind mitigation (4:1 replacement ratio) (see OASP FEIR Mitigation Measures B-2(d), B-2(e) and B-3(a)). In addition, tree removal within the City is, along with other related guides and standards, specifically governed by the Municipal Code:

> *12.24.090 Tree removal.*
> *B. Permits for Removal. Removing any tree in the city shall require a tree removal permit, except as otherwise provided in this chapter.*
>
> *E. Tree Removal with a Development Permit.*
> *2. Review of the application to remove a tree with a development permit shall proceed as follows:*
> *a. The city arborist shall inspect the property and recommend approving or denying the application;*
> *b. If no architectural review is required for the development, the tree committee shall approve or deny the application…*

Therefore, based on consistency with the OASP, compliance with the Municipal Code, and implementation of identified mitigation measures, potential impacts would be mitigated to less than significant.

f) The project site is not part of a local, regional, or state habitat conservation plan.

Conclusion: The 2010 OASP FEIR included various biological mitigation measures that would be applicable to this project. These are included at the conclusion of this report, and address special-status plant species (B-2(b) and B-2(d-g), tree measures coordinated through the City Arborist (B-3a), riparian and development setbacks (B-4(a-b), and riparian and wetland mitigation pursuant to any resource agency requirements that may be imposed independently of the city (B-4(c)), vegetation clearing and bird nesting and monarch pre-construction surveys (B-5(a,c)). While potential impacts to wildlife are not considered significant, OASP FEIR mitigations B-6(a-d) are also included to provide for addressing wildlife and landscape design measures as part of project planning and construction. With recommended project features as designed, and implementation of identified mitigation, 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.	12,19, 23,24, 25,31			--X--	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5)	12,19, 23,25, 31			--X--	
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	12,19, 23,31			--X--	
d) Disturb any human remains, including those interred outside of formal cemeteries?	12,19, 23,25			--X--	
e) Have a significant adverse effect on a Tribal Cultural Resource?	19,23, 25,31			--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 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 colonialized 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 1870s (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.

Impact Analysis

a-e) The 2010 OASP FEIR did not analyze the Imel property as part of the Specific Plan process. As a result, the EIR required that a Phase 1 surface survey (Mitigation Measure CR-1a) be performed prior to consideration of a development project, in order to adequately analyze possible environmental impacts.

Site-Specific Cultural and Historic Resource Evaluation: In order to assess the subject property Rincon Consultants was commissioned by the applicant to prepare a site evaluation assessment and historic/cultural resources recommendations (March 4, 2016; Source 31). The Rincon analysis concludes that the property does not contain any known prehistoric or historic archaeological resources identified on City maintained resource maps. No tribal cultural resources have been identified within this project site by local Native American tribes during consultation or in response to the City's invitation to consultation pursuant to Assembly Bill 52. Following a Phase 1 site investigation, the Rincon report indicates that

archaeological resources are not expected to be identified in the project site. However, if any archaeological material and/or human remains are encountered during project construction activities, OASP FEIR Mitigation Measure CR-1(d) is provided to ensure proper handling of said material and discoveries.

Rincon also analyzed the possible historic significance of the existing residential building (slated for demolition). It was concluded that this 1961 building did not meet city criteria for designating the building as historically important or significant; therefore, removal of this structure would not result in any impacts to historic resources.

Regarding paleontological resources, the underlying geologic formations include Qa and Qoa, alluvial floodplain deposits. Based on the limited area of development and amount of cut and fill, the potential for discovery of a significant paleontological resource is low. In addition, any unanticipated discoveries would be addressed through compliance with OASP FEIR Mitigation Measures CR-1(d) and CR-3(a). Therefore, the potential impacts to paleontological resources is considered less than significant.

Conclusion: Based on the results of the Phase I cultural resources survey and compliance with previously adopted OASP FEIR Mitigation Measures CR-1(d) and CR-3(a), the project will have a less than significant impact on cultural and tribal 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:					
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.	1, 4, 9,14, 19,32			--X--	
II. Strong seismic ground shaking?	1,4, 14,19			--X--	
III. Seismic-related ground failure, including liquefaction?	1,4 14, 19			--X--	
IV. Landslides?	1,4, 14,19			--X--	
b) Result in substantial soil erosion or the loss of topsoil?	1,4, 19,27, 32			--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?	1, 4, 9,14, 19,32			--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?	1, 4, 9,14, 19,32			--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?	1, 4, 9,14, 19,32				--X--

Evaluation

As discussed in the 2010 OASP FEIR, 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. 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 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 California Building Code (CBC) 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 construction), the geologic materials become more dense. 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.

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.

2010 OASP FEIR: Regional studies indicated that there are no active or potentially active faults within the Specific Plan area. However, ground shaking associated with nearby faults could damage or destroy property, structures and transportation infrastructures. In addition, site soils are reported to have a high liquefaction potential, a moderate to high expansion potential and a potential for subsidence. The FEIR concluded these impacts can be mitigated to less than significant levels through the application of standard CBC and geotechnical/soils investigation recommendations (OASP FEIR Mitigation Measures G-2(a), G-3(a), and G-4(a)), which are included in the applicant's proposed VTM.

a)-d) Although there are no fault lines on the project site or within close proximity, 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 CBC. To minimize this potential impact, the CBC 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. Incorporation of required CBC, City Codes, and development in accordance with the General Plan Safety Element will reduce impacts related to seismic hazards to less than significant levels.

The most significant source of potential erosion of on-site soils would be during initial site ground disturbance/construction and from stormwater runoff. However, compliance with the City's Stormwater Management Plan (SWMP) will ensure that the creation of additional impervious areas will not increase the amount of runoff within the watershed, and will not affect percolation to the groundwater basin or adversely alter drainage patterns. In addition, OASP FEIR Mitigation Measures addressing potential impacts to drainage and surface waters would be required, including the following: D-1(a) Erosion Control Plan; D-1(d) Storm Water Pollution Prevention Plan; D-2(a) Vegetative and Biotechnical Approaches to Bank Stabilization; D-2(c) Riparian Zone Planting; D-4(a) Compliance with the City's Drainage Design Manual; D-4(b) Final Drainage Detention System Verification; D-5(a) Biofilters; D-5(b) SWPPP Maintenance Guidelines; D-5(c) Pervious Paving Material; and D-5(d) Low Impact Development Practices. Based on compliance with existing regulations and previously adopted mitigation measures, potential impacts related to drainage and stormwater would be less than significant.

As discussed in the OASP FEIR, potential impacts may occur as a result of development in areas having a high potential for settlement, and moderate to high potential for expansion or contraction of soils; these impacts would be mitigated to less than significant by standard engineering practices in compliance with existing regulations and OASP FEIR Mitigation Measures G-3(a) Soil Settlement Engineering and G-4(a) Expansive Soils Grading.

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.

Conclusion:. The 2010 OASP FEIR included various mitigation measures that would be applicable to this project. These are included at the conclusion of this report, and would mitigate potential drainage and erosion impacts (see D-1(a, b), D-2(a, c), D-4(a, b), D-5(a-d). In addition to compliance with the CBC and local building code requirements, the applicant would comply with OASP FEIR mitigation measures to address underlying geologic and soil conditions (see G-2(a), G-3(a), and G-4(a)). With recommended project features as designed, compliance with existing regulations, and implementation of identified mitigation, the project will have a less than significant geology and soils impacts.

Issues, Discussion and Supporting Information Sources SBDV-2586-2016 / ER-2586-2016	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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, 26			--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, 26			--X--	

Evaluation

Prominent greenhouse gas (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 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 of 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), 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 SLO APCD's CEQA Air Quality Handbook includes guidance on GHG emission thresholds and supporting evidence, that may be applied by lead agencies within San Luis Obispo County (APCD 2012, Source 20). 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 (refer to Source 13). The CAP also includes measures and actions to help the city build resiliency and adapt to the effects of climate change.

a-b) Air quality impacts resulting from the buildout of the City's General Plan have been analyzed in detail under the LUCE Update EIR. Specifically, in 2009 the City conducted a GHG emissions inventory of annual emissions for the baseline year 2005. The City's CAP also included forecasted business-as-usual (BAU) emissions for 2010, 2020 and 2035. The CAP BAU forecast supersedes forecasted emissions included in the original 2009 inventory. According to the emissions forecast, communitywide BAU emissions would increase by approximately 9 percent in 2020 compared to 2005 levels, and would further increase by approximately 21 percent in 2035 compared to 2005 levels. However, projected growth assumed under the LUE and OASP is equal to or slightly less than the growth projections used to estimate worst case future GHG emissions in the CAP. Therefore, expected long-term operational GHG emissions generated by new development is consistent with the land use and zoning evaluated under the LUCE Update and would be consistent with forecasted BAU communitywide emissions in the CAP.

The CAP includes a communitywide GHG emissions reduction target of 15 percent below 2005 levels by 2020. In order to address the forecasted increase in long-term operational emission impacts, the CAP includes specific GHG reduction measures that are designed to achieve this target, in combination with state and federal legislative reductions. As shown in the LUCE Update EIR, with implementation of the GHG reduction measures, communitywide emissions would be reduced to 16

percent below 2005 levels by the year 2020, exceeding the 15 percent target. Please refer to LUCE EIR Table 4.7-3 (titled "Consistency of Proposed LUCE Update Policies and Programs with Climate Action Plan Measures and Actions") for a detailed review of LUE policies and their consistency with applicable CAP measures.

The emissions from project-related vehicle exhaust comprise the vast majority of the total project CO_2 emissions. Construction activities would generate GHG emissions through the use of on- and off-road construction equipment in new development. Long-term CO_2 and GHG emissions are primarily from building heating systems, electricity usage, and increased regional power plant electricity generation due to the project's electrical demands.
Table 1-1 of the CEQA Air Quality Handbook indicates that the construction and operation of 18 single-family residences would not exceed the threshold of significance for the APCD Greenhouse Gas (GHG) Annual Bright Line threshold (1,150 MT CO2e/year from operational and amortized construction impacts).

The OASP FEIR includes mitigation that would further reduce the generate of GHG during construction and operation of the project, including: Mitigation Measure AQ-1(a), which requires implementation of energy efficiency measures; Mitigation Measures AQ-1(b)(d-f) and AQ-4(a) which would reduce vehicle miles traveled during operation; and AQ-3(a), which addresses vehicle and equipment exhaust during construction. In addition, State Title 24 regulations for building energy efficiency are routinely enforced with new construction.

Therefore, the proposed project development would be consistent with the communitywide GHG emissions reductions assumed in the CAP and the incremental contribution of GHG emissions associated with implementation of the proposed project would not result in significant impacts.

Conclusion: Based on review of the CEQA Air Quality Handbook and incorporation of required OASP FEIR mitigation measures and Title 24 regulations, 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?	4,18, 19,27, 28			--X--	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	4,18, 19,27, 28			--X--	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	4,18, 19,27, 28				--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?	4,18, 19,27, 28				--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?	4,18, 19,27, 28			--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?	4,18, 19,27, 28				--X--
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	4,18, 19,27, 28				--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	4,18, 19,27, 28				--X--

with wildlands?					

Evaluation

a-b) The OASP FEIR determined no hazardous materials, substances or waste exist on the subject site. 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. Therefore, potential impacts would be less than significant.

c) The project site is not located within one-quarter mile of an existing or proposed school. Thus there is no impact.

d) The project site is not 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 not create a significant hazard to the public or the environment. Thus, there is no impact.

e-f) The project site is located in the vicinity of the San Luis Obispo County Regional Airport, and is subject to the County Airport Land Use Plan (ALUP). In its adoption of the OASP, the City Council found the OASP to be consistent with the ALUP, and ultimately received the endorsement of the Airport Land Use Commission. The OASP includes performance standards for avigation easements for tracts (Program 3.5.2g) and real estate disclosures to potential owners and renters (OASP FEIR Mitigation Measures S-2(b)). VTM#3095 conditions of approval are recommended to be included to address these requirements. Therefore, because the subject project and proposed uses and densities are compliant with the OASP, and the project will be conditioned per the OASP performance standards; there is not a significant impact.

g) The OASP project and its proposed circulation and land use plan has been reviewed by the Fire Marshal who has recommended conditions of approval which will assure compliance with adopted fire/emergency-related codes. The project as designed will not impair implementation of, or physically interfere with, the adopted emergency response plan or emergency evacuation plans of the City. Thus there is no impact.

h) The project site is not in an area identified as subject to wildland fire hazards. Thus there is no impact.

Conclusion: Impacts are considered less than significant (in the case of the airport disclosures required pursuant to OASP FEIR Mitigation Measure S-2(b) referenced above) or there is no impact from the project as proposed.

9. HYDROLOGY AND WATER QUALITY. Would the project:					
a) Violate any water quality standards or waste discharge requirements?	1,7, 15,18, 19,34			--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)?	1,7, 15,18, 19,34				--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?	1,7, 15,18, 19,34			--X--	
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream	1,7, 15,18,			--X--	

Issues, Discussion and Supporting Information Sources SBDV-2586-2016 / ER-2586-2016	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?	19,34				
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?	1,7, 15,18, 19,34			--X--	
f) Otherwise substantially degrade water quality?	1,7, 15,18, 19,34			--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?	1,7, 15,18, 19,27, 34				--X--
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	1,15, 18,19 27,34				--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?	1,15, 18,19, 27,34				--X--
j) Inundation by seiche, tsunami, or mudflow?	4,18, 19,27				--X--

Evaluation

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. The OASP is located within the watershed of the East Branch of San Luis Creek and encompasses about 12.6 square miles. 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.

As discussed in the 2010 OASP FEIR, the project site will, as it develops, increase sediment transport downstream and increase the potential for inundation based on increasing impervious surfaces. The FEIR established requirements to meet city standards and regulations, as well as RWQCB specifications, for implementing Best Management Practices (BMPs) and the use of detention and retention basins, as appropriate means to mitigate any adverse impacts from development in the OASP.

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 OASP FEIR Mitigation Measures D-4(a) Compliance with City's Drainage Design Manual and D-4(b) Final Drainage Detention System Verification, the Interim Low Impact Development Standards, and City Engineering Standards in effect at the time of original entitlements. Storm drainage systems will provide water quantity and water quality controls. The system design will limit the post development runoff to that of the pre-development condition for the 2, 10, 25, 50, & 100-year storm events. The project will treat runoff in accordance with the Interim Low Impact Development Standards and City Engineering Standard 1010.B. City Engineering Standard for Source Control of Drainage and Erosion Control, page 7 and 8 Standard 1010.B clarifies that "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 (CASQA) Stormwater BMP Handbook for New Development/Redevelopment." In addition, the project is subject to OASP FEIR Mitigation Measures D-1(a) Erosion Control Plan, D-1(b) Storm Water Pollution Prevention Plan, which will protect water quality during grading and construction of the project.

The proposed project will include the construction of on-site detention facilities to collect and manage runoff, as well as promote on-site infiltration through design of associated hardscape and landscape. The site is also designed under the OASP to discharge ultimate runoff into the larger (regional-serving) "west basin" located on the Righetti Ranch property, which then proceeds into the Arbors basin and beyond.

Based on the VTM storm drainage design, and its integration into the larger regional basin located downstream of the Imel property as discussed above and in the relevant Source Documents, water quality impacts would be considered less than significant.

b) The project will be served by the City's sewer and water systems and will not deplete groundwater resources 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. Thus, there is no impact.

c-e) Implementation of the project would create additional impervious surfaces, which has the potential to generate run-off resulting in erosion and sedimentation. Physical improvement of the project site will be required to comply with the drainage requirements of the City's Drainage Design Manual (OASP FEIR Mitigation Measure D-4(a-b)) and Waterways Management Plan. This plan was adopted for the purpose of insuring water quality and proper drainage within the City's watershed. The project is also subject to OASP FEIR Mitigation Measures D-5(a) Biofilters and D-5(b) SWPPP Maintenance Guidelines, D-5(c) Pervious Paving Material, and D-5(d) Low Impact Development Practices.

The Waterways Management Plan and LID stormwater treatment requires that site development be designed so that post-development site drainage does not significantly exceed pre-development run-off. The proposed project retains the amount of stormwater to reduce discharge to pre development rates, and provides treatment and infiltration for the volume of water required by the RWQCB. OASP FEIR Mitigation Measure D-2(a), to be applied to all development projects, fosters a vegetative and biotechnical approach to creek bank stabilization within the OASP. Based on the proposed drainage and stormwater management system and compliance with OASP policies, FEIR mitigation measures, and City and RWQCB regulations, implementation of the project would not result in significant impacts related to erosion, sedimentation, pollution of ground and surface waters, or flooding.

g-i) The proposed project as proposed would not include development located in flood waters during a 100-year storm event per the Federal Emergency Management Agency (FEMA) Flood Hazard Boundary or Flood Insurance Rate Map (reference constraints sheet of VTM; Source 27). The project will not impede or re-direct the flow of any waters. Therefore, no impact would occur.

j) The proposed development is outside the zone of impacts from seiche or tsunami, and the existing upslope projects do not generate significant storm water runoff such to create a potential for inundation by mudflow. Therefore, no impact would occur.

Conclusion: The 2010 OASP FEIR included various hydrology and water quality mitigation measures that would be applicable to this project. These are included at the conclusion of this report, and address stormwater and water quality (OASP FEIR Mitigation Measures D-1(a, b), D-2(a, c), D-4(a, b), D-5(a-d)). Based on the proposed preliminary drainage plan, including construction and operation of drainage basins approved by the City Public Works Department, and compliance with RWQCB SWPPP regulations and mitigation measures identified above, potential impacts would be less than significant.

10. LAND USE AND PLANNING. Would the project:

a) Physically divide an established community?	1,6, 18, 29				--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?	1,6, 18, 19				--X--
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	1,6, 18, 19				--X--

Evaluation

a) The project density established under the OASP anticipated a range of 16-17 single-family residences. This assumption was predicated on future, detailed project assessments and acknowledged that these ranges were subject to refinement during

application processing. The potential density for the site based on the OASP's range of 3-6 units/acre under Table A-2, multiplied by 3.0 net acres on the Imel site, yields up to 18 single-family residences. The proposed density is consistent with the OASP standards noted.

The proposed development project is consistent with the development anticipated for the project site under the 2010 OASP, and the General Plan and zoning designations for the site, and is designed to fit among OASP developing projects. Imel development will not physically divide an established community.

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. The project is proposed to be consistent with the 2010 OASP, as well as all city regulations and development standards, and incorporates all adopted OASP FEIR mitigation measures.

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 conservation plan or natural community conservation plan.

Conclusion: Based on the project's consistency with the OASP, no impacts to land use planning are anticipated with this project.

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				--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				--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 impacts are anticipated.

12. NOISE. Would the project result in:					
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	2,3,9, 18,19			--X--	
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	2,3,9, 18,19				--X--
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	2,3,9, 18,19			--X--	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	2,3,9, 18,19			--X--	
e) For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	2,3,9, 18,19			--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?	2,3,9, 18,19				--X--

Issues, Discussion and Supporting Information Sources SBDV-2586-2016 / ER-2586-2016	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Evaluation

a) According to the 2010 OASP FEIR, the proposed project is located in an area zoned for residential land uses that are predicted to be exposed to traffic noise levels that exceed the Noise Element standard of 60 decibels (dB). This is particularly true for lots adjacent to Orcutt Road, which functions as a major north-south arterial, connects Johnson Avenue and Tank Farm Road, and carries large volumes of traffic. Based on noise modeling results included in the LUCE FEIR, residential development on proposed Lots 14 through 18 would be subjected to transportation-related noise ranging between 65 to 70 dB. Consequently, to reduce the effects of such traffic related noise to sensitive residential receptors, the OASP established goals, policies and programs to reduce noise exposure of new sensitive receptors within the Orcutt Area to meet City Standards. Specifically, the project complies with OASP noise programs as follows:

1) Outdoor activity areas are located internally to the project and are set back from the centerline of Orcutt Road by more than 80 feet.
2) Residential portions of dwellings are set back more than 60 feet from the centerline of Orcutt Road.
3) New construction will comply with requirements for 45 dB interior sound levels through standard construction techniques, consistent with Building Code requirements.

Implementation of the noise program must occur prior to home occupancy for development pursuant to the Specific Plan. Regardless, cumulative noise impacts were determined significant and unavoidable impact in the OASP FEIR and corresponding overriding considerations were considered and approved. The IMEL subdivision is consistent with the approved OASP; therefore, no new noise impacts would occur that were not addressed in the OASP FEIR.

b) The project will not expose people to the generation of excessive ground-borne noise levels or vibrations. Thus, there is no impact.

c) Site development will result in increases in ambient noise levels, but not to significant levels, since by operation of mitigation requirements set forth in a) above, noise increases that would affect ambient levels are to be reduced to thresholds determined to be acceptable in residential areas. In addition, based on noise modeling presented in the OASP FEIR (refer to Table 4.8-4 Projected Noise Levels along Area Roadways), the project would not result in a significant increase in transportation-related noise along Orcutt Road, Tank Farm Road, or Johnson Avenue. Thus, impacts to permanent ambient noise levels are less than significant.

d) Project construction or other temporary or periodic noise generation may result in temporary increases (spikes) in ambient noise levels. Since there is no way to predict the origin or duration of these types of noise sources for this development, it can only be regulated if found to be a nuisance by the City's Noise Ordinance. The project by reference acknowledges that it will comply with FEIR Mitigation Measure N-1(a) which references the City's Noise Ordinance in terms of construction hours and techniques to reduce temporary impacts from noise levels. Thus, the impact is less than significant.

e, f) The project is located in the vicinity of the San Luis Obispo County Regional Airport, and is subject to the County Airport Land Use Plan (ALUP). According to the ALUP and prior OASP FEIR, the project is not within the 60 or 65 dBA-CNEL contour line. Some residents may be exposed to noise generated by airport operations but the noise levels are not expected to exceed thresholds established by the ALUP and the City General Plan; therefore, consistent with the OASP FEIR, this impact is considered less than significant.

Conclusion: Based on the location of the project and compliance with OASP policies and FEIR Mitigation Measure N-1(a), potential noise impacts would be less than significant.

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)?	1,2,6, 18, 19			--X--	
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	1,2,6, 18, 19			--X--	

Issues, Discussion and Supporting Information Sources SBDV-2586-2016 / ER-2586-2016	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	1,2,6, 18, 19				--X--

Evaluation:

a) The proposed project consists of a residential development of up to eighteen (18) single-family residences. The project site is designated for residential development under the General Plan, OASP and Zoning Ordinance. According to the 2010 OASP, the proposed project includes development consistent with the anticipated use of the site under the Specific Plan and Land Use Element. The proposed project would not involve any other components that would induce further growth not already anticipated under the OASP, General Plan and envisioned under the current site zoning designation. Therefore, potential impacts would be less than significant.
b) The proposed project includes the demolition of one unoccupied residence and an accessory structure to accommodate 18 new residential lots, which would not be considered a substantial loss of housing, and does not necessitate construction of replacement housing elsewhere. Therefore, potential impacts would be less than significant.

c) The proposed project would not displace substantial numbers of people or necessitate the construction of replacement housing elsewhere. No impact would occur.

Conclusion: Based on the project's consistency with the OASP and General Plan, no significant impacts would occur.

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, 6,19			--X--	
b) Police protection?	1, 4, 6,19			--X--	
c) Schools?	1, 4, 6,19			--X--	
d) Parks?	1, 4, 6,19			--X--	
e) Roads and other transportation infrastructure?	1, 4, 6,19			--X--	
f) Other public facilities?	1, 4, 6,19				--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. The proposed development is consistent with the anticipated land use and zoning for the site and is consistent with the neighboring uses. The project is required to comply with the Uniform Fire Code and OASP FEIR Mitigation Measures PS-2(a-c), which require Fire Department-approved road widths, fire hydrants, non-combustive exteriors, and defensible space. The OASP FEIR determined that implementation and build-out of the OASP will not result in any significant impacts related to any of the above-listed services due to the ability to offset service needs through the City's Development Impact Fee program established via the City General Plan and augmented by the development fee program in the OASP; therefore, the conclusion was that no further mitigation was necessary. Based on the project's compliance with the OASP, potential impacts would be less than significant.

b) The project site is served by the City of San Luis Obispo Police Department for police protection services. Development 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. 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 Section 65995 (3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the applicant will be required to pay developer fees to the SLCUSD. 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.

Note: The OASP provides for the possibility of a school site being located in the Planning Area, but to date SLCUSD has not indicated the need for, or a desire to locate, a school in the Orcutt Planning Area. It is incumbent on SLCUSD to identify the need for a new site and initiate discussions with property owners, and failing that avenue, instead opting to collect school impact fees. As noted above, authority to collect fees at the time of building is deemed by State law to provide adequate mitigation for school facility requirements. Thus, based on compliance with OASP FEIR Mitigation Measures PS-3(a) Buildout Date Notification and PS-3(b) Statutory School Fees, potential impacts are less than significant.

d) Because the proposed project would participate in development of the public park facilities within the OASP Planning Area, localized parks will not be impacted by the project. Further, deterioration at parks and recreation-oriented public facilities from the proposed project on a city-wide basis is not expected. The proposed project would have a less than significant impact on parks.

e-f) Please refer to Section 16, Transportation/Traffic, below for a detailed assessment of required transportation improvements required. The proposed project would have a less than significant impact on transportation infrastructure and public facilities with the incorporation of the required transportation improvements discussed under the OASP.

Conclusion: The OASP FEIR determined that implementation and build out of the OASP will not result in any significant impacts related to any of the above-listed services due to the ability to offset service needs through the City's Development Impact Fee program established via the City General Plan and augmented by the development fee program in the OASP, and would comply with OASP FEIR Public Services Mitigation Measures PS-2(a-c), PS-3(a, b); therefore, the conclusion was that no further mitigation was necessary. 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?	1,18, 19, 27			--X--	

Issues, Discussion and Supporting Information Sources SBDV-2586-2016 / ER-2586-2016	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	1,18, 19,27			--X--	

Evaluation:

As discussed in the City LUCE Update EIR and the 2010 OASP FEIR, 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 is 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-b) The project will be participating in an extensive neighborhood park development plan under the OASP, and is not expected to add to the demand for city-wide parks or other recreational facilities. The project includes outdoor amenities and common areas, including limited creek corridor open space and access trails within the site (please refer to the project site plans for a detailed depiction of outdoor amenity spaces). No significant recreational impacts are expected to occur with development of the site. Impacts are considered less than significant.

Conclusion: Based on the project's compliance with the OASP, potential impacts would be less than significant.

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?	2,4, 9,18, 19,21			--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?	2,4, 18,19, 21			--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?	2,4, 18,19, 21				--X--
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	2,4, 18,19, 21		--X--		
e) Result in inadequate emergency access?	4,18, 19,27				--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?	2,4, 18,19, 21				--X--

Evaluation

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.

In accordance with the City General Plan Circulation Element Section 6.1,2 Multimodal Level of Service (LOS) Objectives, Service Standards, and Significance Criteria, acceptable vehicle traffic operating conditions are LOS E in the Downtown and LOS D outside of the Downtown. Level of Service (LOS) is a qualitative measure of the effect of a number of factors, including speed and travel time, traffic interruptions, freedom to maneuver, driving comfort and convenience. LOS are

designated A through F from best to worst, which cover the entire range of traffic operations that might occur. LOS A represents essentially free-flow conditions, and LOS F indicates substantial congestion and delay.

The City of San Luis Obispo considers roadways operating at LOS D or better to be acceptable, excepting segments downtown where LOS is allowed to drop to E. The only segment noted to be deficient under existing conditions is Broad Street south of Buckley Road, which is under State of California and County jurisdiction. Five study intersections operate at unacceptable levels of service (LOS), E or F, during the AM, Noon, or PM peak hours.

a-b) The subject project, as well as all other development that occurs in the future pursuant to the OASP and the City General Plan, will increase traffic in the area warranting improvements to several affected intersections. OASP build-out is estimated to generate 8,342 net new daily trips and 887 net new PM peak-hour trips (518 inbound and 369 outbound). Based on the traffic study prepared for the OASP FEIR, development of the Orcutt Area is expected to add 772 Average Daily Trips (ADT) to Orcutt Road between Johnson Avenue and Tank Farm Road at build-out.

Applying the trip generation factor used in the OASP FEIR, the 18 proposed single-family residences would generate approximately 164 daily trips (9.085 daily trips per residence). The Circulation Plan of the OASP (as well as the Circulation Element of the City General Plan) identifies the essential primary road system that will be needed to accommodate development within the plan area and surrounding growth areas of the City. The OASP FEIR determined that the roadway plans of these planning documents are for the most part self-mitigating in that 1.) Roadway alignments, road extensions, and new intersections are designed and will be built in response to traffic projected at build-out and, 2.) Development projects in the OASP areas will also contribute their fair share either through adopted Traffic Impact Fees, OASP development impact fees, assessments or dedications to specified roadway improvements, and a combination of one or more of these measures. OASP FEIR Mitigation Measures T-1(a) Orcutt Road/Tank Farm Road Intersection Improvements, T-2(d) Orcutt Road/Tank Farm Road Intersection Signalization, T-3 Street E-2 & Hanson Lane Alignment, T-4 Street B & Tiburon Way Alignment, T-5 Tank Farm & Orcutt Frontage Improvements, and T-6 Traffic Calming & Safety Measures, will be implemented prior to issuance of building permits for Phase 1 of previously approved Tract 3063. Based on compliance with the OASP and OASP FEIR, potential impacts would be less than significant.

c) The project is located in the vicinity of the San Luis Obispo County Airport but will not result in any changes to air traffic patterns. Please refer to Section 8, Hazards and Hazardous Materials, for a discussion on project consistency with the adopted Airport Land Use Plan.

d) The project would not modify existing intersections or roadways. Proposed on-site circulation includes “I” Street, which connects to “B” Street (aka. “Tiburon Road”) at two (2) intersections. Where “I” Street intersects with “B” Street in the northwestern portion of the project site, the centerline tangent is 48.25 feet, which is slightly less than the 50 feet required by the City Engineering Standards (January 1, 2016). Given site topography and the locations of the creek and drainages, the applicant is requesting a “design exception” to required centerline tangents pursuant to city Subdivision Regulations Chapter 16.23 Exceptions, Appeals, and Applicant Submittal. Also, “I” Street intersects with “B” Street approximately 85 feet southwest of Orcutt Road, which is less than 250 feet as required by the Transportation Research Board Access Management Manual design standards. The horseshoe street layout presents superior design. However, given the realignment of “B” Street, the topography and creek locations on the Imel property, and the need for two access points, separation distance between Orcutt Road and the initial “I” Street intersection could not be met. As a result, the applicant has proposed this particular intersection will be restricted to right-turn-in and right-turn-out only, to resolve any vehicular movement issues because of the reduced distance to Orcutt Road. Permanent left-turn restrictions would be accomplished with the construction of a “pork chop” island, as recommended by the City Public Works Department based on their review of the project. Therefore, based on review and approval by the City Public Works Department and implementation of identified mitigation measure TR-1, granting these exceptions would not result in a significant impact.

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.

e) The project has been reviewed by the City Fire Marshal to ensure adequate emergency access has been provided. Based compliance with the OASP and approval by the City Fire Marshal, no impact would occur.

f) The project site is served by the Regional Transit Authority (RTA), and the OASP identifies transit facilities within walking distance on Orcutt Road and Tank Farm Road. As noted in the OASP FEIR, the pedestrian and bicycle circulation network identified in the OASP is generally consistent with the City's Circulation Element and Bicycle Transportation Plan and is designed to adequately serve new demand generated by build-out of the OASP. The project is consistent with the OASP, which provides opportunities for alternative transportation; therefore, no impact would occur.

Conclusion: In summary, the proposed project would add vehicular trips to streets that serve as entry/exit routes to the project site. These streets with the given improvements specified in the OASP and OASP FEIR will serve to accommodate the added vehicular traffic. Transportation/circulation impacts are considered less than significant with OASP standards incorporated in the tract design. Thus, the impact from this project with incorporation of the OASP circulation standards, implementation of mitigation identified by the Public Work Department (TR-1), the imposition of traffic improvement fees for city-wide improvements, and compliance with OASP FEIR Mitigation Measure S-2(b) will render transportation and circulation impacts less than significant.

17. UTILITIES AND SERVICE SYSTEMS. Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	1,16, 19,30, 38			--X--	
b) Require or result in the construction or expansion of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	1,16, 18,19, 30,38			--X--	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	1,16, 18,19, 30,34			--X--	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed?	1,16, 18,19, 38			--X--	
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	1,18, 19,30			--X--	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	1,8, 18,19			--X--	
g) Comply with federal, state, and local statutes and regulations related to solid waste?	1,8, 18,19			--X--	

Evaluation

The OASP FEIR determined that implementation and build-out of the OASP will not result in any significant impacts related to delivery of domestic water, wastewater collection or treatment, or storm water drainage/retention and concluded that such impacts related to build-out of the OASP were less than significant and no mitigation was deemed necessary. Build-out under the OASP will be similar to that anticipated and projected in the City General Plan. The project proposes to provide all water (both potable and recycled), sewer, and storm drain facilities necessary to adequately serve the subject project, including distribution, collection and other infrastructure capacity as required by the OASP facility master plan and the City's Storm Drain Master Plan/Waterway Management Plan. There is no new evidence that the subject project, as delineated by the OASP, will exceed RWQCB wastewater treatment requirements, with the potential exceptions described below.

Related to delivery of domestic water to the project, new information developed after the FEIR was certified and after the OASP was adopted (in 2010) is now available from the City's *2015 Water Master Plan* and hydraulic model related to the provision of water service to the Orcutt Specific Plan Area. To serve the area with adequate fire flow (1,500 gpm for residential areas), and average daily storage requirements, a 12-inch water main needs to be extended from the Terrace Hill pressure zone at the intersection of Johnson and Tanglewood Drive in a south/southeast direction to the intersection of Orcutt Road and B Street. A 12-inch water main will also need to be extended west to Orcutt and A Street. Under City fire and safety standards, these improvements will be required prior to occupancy of any new residential uses. Adequate fire flow and

storage, based on the extension into the project, is available for the development of the Orcutt Specific Plan area. Conditions and mitigation measures of the nearby Righetti (VTM3063) and Jones (VTM3066) were adopted to require these extensions in coordination with Utility Department requirements. These conditions are replicated in the proposed VTM3095 requirements to address these off-site improvements in conjunction with the project.

Water: 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. The City also uses recycled water for all approved uses consistent with the City's Master Permit and Title 22. With the update of the City's Water and Wastewater Element 2010, the City Council reaffirmed the policy for a multi-source water supply. The full allocation of Nacimiento Reservoir approved by Council in March 2016 added an additional 2,102 acre feet (AF) to the City's annual contractual limit.

- 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 in 2015.

Recycled Water: The project will be required to utilize recycled water as appropriate within the OASP.

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, Cal Poly San Luis Obispo, and the County of San Luis Obispo Airport. There are approximately 15,200 service connections. The City's WRRF processes wastewater in accordance with the standards set by the State. In 2016, the WRRF has an average dry weather flow capacity of 5.1 MGD and a peak wet weather flow capacity of 22 MGD. Based on average daily influent flow records for 2015 average flows to the WRRF are approximately 2.74 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-c, e) 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 project, and a water supply plan is required for all OASP Final Maps (see OASP Mitigation Measure USS-1 Off-site Water Main Line Extensions to the OASP to meet Fire Flow and Storage Standards). The City wastewater treatment plant and existing and proposed sewer lines in the vicinity have sufficient capacity to serve the project site. The developer will be required to construct on -site sewer facilities according to City and Uniform Plumbing Code standards. The project proposal includes internal collection lines; off-site utility construction is currently proposed as a part of the Righetti Ranch #3063 subdivision to the west, which would connect the Planning Area to existing main line facilities at Tank Farm Road. From Tank Farm Road, generated wastewater will follow existing conveyance facilities to the City's Water Resource Recovery Facility. Existing storm water facilities are present in the vicinity of the project site, please refer to Section 9, Hydrology and Water Quality, for additional discussion regarding proposed improvements. This project has been reviewed by the City's Public Works and Utilities Departments and no resource/infrastructure deficiencies have been identified.

d) The proposed project would result in an incremental increase in demand on potable and recycled water supplies, as anticipated under the recent General Plan Update and OASP FEIR; the incremental demand from the 18 residences is not considered to be significant.

Provisions in the City General Plan, specifically the Water and Wastewater Management Element and the OASP, ensure that increased water use by new development will not cause inadequate water service to existing and future customers. The

project is subject to water impact fees which were adopted to ensure that new development pays its share of constructing additional infrastructure needed to support additional facilities. More specifically, the projects are subject to the citywide water impact fees. This project has been reviewed by the City's Utilities Department and no resource/infrastructure deficiencies have been identified. Thus, compliance with the City and State standards and requirements will assure that impacts related to water supplies are less than significant.

f-g) The proposed project will be served by San Luis Garbage Company, which maintains standards for residential access to ensure that collection is feasible. 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/utilities/download/binstandards08.pdf). A solid waste reduction plan for recycling discarded construction 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.

Conclusion: Based on compliance with the OASP and OASP FEIR Mitigation Measure USS-1, impacts are considered to be less than significant.

18. MANDATORY FINDINGS OF SIGNIFICANCE.

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

The project is an infill residential development in an urbanizing area of the city. Without incorporation of the OASP development standards and the "self-mitigation" design features called for in the OASP, the project would have the potential to create significant impacts to the community. As discussed above, potential impacts to aesthetics, air quality, biological and cultural resources, geology and soils and hydrology and water quality will be less than significant with the VTM features included in the proposed plans and compliance with adopted 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--	

The impacts of the proposed project are individually limited and not considered "cumulatively considerable." Although incremental changes in certain issue areas can be expected as a result of the proposed project, 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 recommended in this Initial Study for the following resource areas: aesthetics, air quality, biological and cultural resources, geology and soils and hydrology and water quality.

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

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 recommended in this Initial Study.

Issues, Discussion and Supporting Information Sources SBDV-2586-2016 / ER-2586-2016	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

19. EARLIER ANALYSES.

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

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

City of San Luis Obispo Land Use and Circulation Element (LUCE) Update EIR, Orcutt Area Specific Plan Amendment and Final Environmental Impact Report (2010) are available for review at the City Community Development Department (919 Palm Street, San Luis Obispo, CA 93401). The LUCE Update EIR can also be found at the following website: http://www.slocity.org/government/department-directory/community-development/planning-zoning/general-plan

The OASP and OASP FEIR can also be found at the following website: http://www.slocity.org/government/department-directory/community-development/planning-zoning/specific-area-plans/orcutt-area

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 referenced documents 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 OASP and FEIR, original analysis has been provided to analyze 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.

Please refer to Initial Study and OASP FEIR Required Mitigation and Monitoring Program.

20. SOURCE REFERENCES.

1.	City of SLO General Plan Land Use Element, December 2014 and Final EIR, October 2014
2.	City of SLO General Plan Circulation Element, December 2014 and Final EIR, October 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, June 2016
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.	California Building Code
15.	City of SLO Waterways Management Plan
16.	Final Potable Water Distribution System Operations Master Plan, December 2015
17.	Site Visit
18.	Orcutt Area Specific Plan 2010
19.	Orcutt Area Specific Plan Final EIR 2010
20.	CEQA Air Quality Handbook, SLO APCD, April 2012
21.	Institute of Transportation Engineers, Trip Generation Manual, 9th Edition, on file in the Community Development Department
22.	2001 Clean Air Plan San Luis Obispo County, SLO APCD, December 2001
23.	City of San Luis Obispo, Archaeological Resource Preservation Guidelines, on file in the Community Development Department

24.	City of San Luis Obispo, Historic Site Map
25.	City of San Luis Obispo Burial Sensitivity Map
26.	Greenhouse Gas Thresholds and Supporting Evidence, SLO APCD, March 28, 2012
27.	Vesting Tentative Tract Map (Imel Subdivision) #3095 Project Plans
28.	Applicant project statement/description, October 5, 2016
29.	Imel Property Line of Sight to Righetti Hill Analysis, Cannon, June 8, 2016
30.	Imel Gravity Sewer Analysis, Cannon, February 28, 2016
31.	Imel Property Cultural Resources Study, Rincon Consultants, March 4, 2016
32.	Existing Slopes Analysis, Cannon, May 2, 2016
33.	Certified Arborist Letter Report, Rincon Consultants, April 26, 2016
34.	Storm Water Analyses, Cannon; On-site June 20, 2016 and Off-site March 11, 2016
35.	Imel Grading and Constraints Overlay, Cannon, August 26, 2016
36.	Imel Grading in Creek Setbacks, Cannon, August 29, 2016
37.	Jones and Imel Properties Biological Resources Assessment, Rincon Consultants, August 2014
38.	2015 Urban Water Management Plan, June 14, 2016

Attachments:

1. Vicinity Map
2. Project Site Plan/Aerial Photo Overlay
3. Vesting Tentative Tract Map #3095
4. Applicant PD and Statements
5. Additional Plans and Exhibits
6. Biological Resources Assessment, Rincon Consultants, August 2014
7. Arborist Letter Report, Rincon Consultants, April 26, 2016
8. Onsite Detention Capacity, Cannon, June 20, 2016; Offsite Detention Strategy and Feasibility, Cannon, March 11, 2016

OASP FEIR REQUIRED MITIGATION and MONITORING PROGRAM

Applicable mitigation measures carried forward from the certified Orcutt Area Specific Plan Final EIR and Mitigation and Monitoring Program are listed below. Additional clarifications and new mitigation measures applicable to the proposed project are also listed below, and are presented in *italics* for distinction from the originally adopted measures.

AESTHETICS

AES-3(a) Minimize Lighting on Public Areas. Lighting shall be shielded as shown in the Specific Plan and directed downward. Lighting shall not be mounted more than 16 feet high. Streetlights, where they are included, shall be primarily for pedestrian safety, and shall not provide widespread illumination unless necessary to comply with safety requirements, as determined by the Public Works Director. Street lighting should focus on intersections and should be placed between intersections only when it is necessary to comply with safety requirements, as determined by the Public Works Director. Trail lighting shall be at a scale appropriate for pedestrians, utilizing bollards, although overhead lighting may be used where vandalism of bollard lights is a concern. Prior to development of individual lots, proposed lighting shall be indicated on site plans and shall demonstrate that spill-over of lighting would not affect nearby residential areas.

AES-3(a) Monitoring Program: Compliance with lighting standards shall be shown on all tract and residential construction drawings, to the satisfaction of the Public Works and Community Development Directors.

AIR QUALITY MITIGATION

Operational Phase Mitigation

AQ-1(a) Energy Efficiency. The building energy efficiency rating shall be 10% above what is required by Title 24 requirements for all buildings within the Specific Plan Area. The following energy-conserving techniques shall be incorporated unless the applicant demonstrates their infeasibility to the satisfaction of City Planning and Building Department staff: increase walls and attic insulation beyond Title 24 requirements; orient buildings to maximize natural heating and cooling; plant shade trees along southern exposures of buildings to reduce summer cooling needs; use roof material with a solar reflectance value meeting the Environmental Protection Agency/Department of Energy Star rating; build in energy efficient appliances; use low energy street lighting and traffic signals; use energy efficient interior lighting; use solar water heaters; and use double-paned windows. *Final building construction plans will include needed solar conduits required for each residential unit for installing a roof-mounted solar system, at the option of each owner.*

AQ-1(d) Telecommuting. All new homes within the Specific Plan area shall be constructed with internal wiring/cabling that allows telecommuting, teleconferencing, and tele-learning to occur simultaneously in at least three locations in each home.

AQ-1(e) Pathways. Where feasible, all cul-de-sacs and dead-end streets shall be links by pathways to encourage pedestrian and bicycle travel.

AQ-1(a, d, e) Monitoring Program: Compliance will be reviewed with the subdivision plans and accompanying architectural review plans and ultimately shown on improvement plans and construction drawings, and confirmed by the Public Works and Community Development Directors.

Construction Phase Mitigation

AQ-3(a) Application of CBACT (Best Available Control Technology for construction related equipment). The following measures shall be implemented to reduce combustion emissions from construction equipment where a project will have an area of disturbance greater than 1 acre, or for all projects, regardless of the size of ground disturbance, when that disturbance would be conducted adjacent to sensitive receptors.

- Specific Plan applicants shall submit for review by the Community Development Department and Air Pollution Control District (APCD) staff a grading plan showing the area to be disturbed and a description of construction equipment that will be used and pollution reduction measures that will be implemented. Upon confirmation by the Community Development Department and APCD, appropriate CBACT features shall be applied. The application of these features shall occur prior to Specific Plan construction.
- Specific Plan applicants shall be required to ensure that all construction equipment and portable engines are properly maintained and tuned according to manufacturer's specifications.
- Specific Plan applicants shall be required to ensure that off-road and portable diesel powered equipment, including but not limited to bulldozers, graders, cranes, loaders, scrapers, backhoes, generator sets, compressors, auxiliary power units, shall be fueled exclusively with CARB motor vehicle diesel fuel (non-taxed off-road diesel is acceptable).
- Specific Plan applicants shall be required to install a diesel oxidation catalyst on each of the two pieces of equipment projected to generate the greatest emissions. Installations must be prepared according to manufacturer's specifications.
- Maximize, to the extent feasible, the use of diesel construction equipment meeting ARB's 1996 and newer certification standard for off-road heavy-duty diesel engines.
- Maximize, to the extent feasible, the use of on-road heavy-duty equipment and trucks that meet the ARB's 1998 or newer certification standard for on-road heavy-duty diesel engines.
- All on and off-road diesel equipment shall not be allowed to idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and on job sites to remind drivers and operators of the 5 minute idling limit.

AQ-3(b) Dust Control. The following measures shall be implemented to reduce PM10 emissions during all Specific Plan construction:

- Reduce the amount of the disturbed area where possible.
- Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Water shall be applied as soon as possible whenever wind speeds exceed 15 miles per hour. Reclaimed (nonpotable) water should be used whenever possible.
- All dirt-stock-pile areas shall be sprayed daily as needed.
- Permanent dust control measures shall be identified in the approved Specific Plan

revegetation and landscape plans and implemented as soon as possible following completion of any soil disturbing activities.

- Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast-germinating native grass seed and watered until vegetation is established.
- 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.
- 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.
- Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.
- All trucks hauling dirt, sand, soil or other loose materials shall 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 CVC Section 23114.
- Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site.
- Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water shall be used where feasible.

AQ-3(c) **Cover Stockpiled Soils.** If importation, exportation, or stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting material shall be tarped from the point of origin.

AQ-3(d) **Dust Control Monitor.** On all projects with an area of disturbance greater than 1 acre, the contractor or builder 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.

AIR-1 ***Naturally Occurring Asbestos.*** *Naturally Occurring Asbestos (NOA) has been identified as a toxic air contaminant by the California Air Resources Board (ARB). Under the ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations, prior to any grading activities a geologic evaluation 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/business/asbestos.asp.*

AIR-2 ***Asbestos Material in Demolition.*** *Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos containing material (ACM). Asbestos containing materials could be encountered during demolition or remodeling of existing buildings. Asbestos can also be found in utility pipes/pipelines (transite pipes or insulation on pipes). If utility pipelines are scheduled for*

removal or relocation or a building(s) is proposed to be removed or renovated, various regulatory requirements may apply, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M - asbestos NESHAP). These requirements include but are not limited to: 1) notification to the APCD, 2) an asbestos survey conducted by a Certified Asbestos Inspector, and, 3) applicable removal and disposal requirements of identified ACM. More information on Asbestos can be found at http://www.slocleanair.org/business/asbestos.php.

AQ-3(a-d), AIR-1, and AIR-2 Monitoring Program: These conditions shall be noted on all project grading and building plans. The applicant will also be required to comply with existing regulations and secure necessary permits from the Air Pollution Control District (APCD) before the onset of grading or demolition activities including, but not limited to additional dust control measures, evaluation for Naturally Occurring Asbestos. The applicant shall present evidence of a plan for complying with these requirements prior to issuance of a grading or building permit from the City. The applicant shall provide the City with the name and telephone number of the person responsible for ensuring compliance with these requirements. The Building Inspector and Public Works Inspectors shall conduct field monitoring.

BIOLOGICAL RESOURCES MITIGATION

B-2(b) **Special-Status Plant Buffer**. Where special-status plants are found, site development plans shall be modified to avoid such occurrences with a minimum buffer of 50 feet. The applicant seeking entitlement shall establish conservation easements for such preserved areas, prior to issuance of the first building permit for subsequent tracts. The Specific Plan shall be amended at that time to place these areas formally into open space, possibly as an overlay area. If total avoidance is economically or technologically infeasible then plants shall be salvaged and relocated under direction of an approved botanist, in accordance with Mitigation Measures B-2(c) through B-2(f). If total avoidance can be achieved, Mitigation Measures B-2(c) through B-2(f) would not be required. (It should be noted that avoidance is likely to be more cost effective in the long run compared to mitigation in the form of salvage and relocation). If total avoidance of special-status plant species can be achieved through Mitigation Measure B-2(b), Mitigation Measures B-2(c) through B-2(f) would not be required.

B-2(c) **Incidental Take Permit**. In the event that state listed species are discovered, the applicant seeking entitlements shall submit to the City signed copies of an incidental take permit and enacting agreements from the CDFG regarding those species as necessary under Section 2081 of the California Fish and Game Code prior to the initiation of grading. If a plant species that is listed under the federal Endangered Species Act is discovered, the applicant seeking entitlements shall provide proof of compliance with the federal Endangered Species Act, inclusive as necessary of signed copies of incidental take permit and associated enacting agreements, to the City prior to the initiation of grading.

B-2(b, c) Monitoring Program: Compliance with mitigation measures will be reviewed with plans as part of the architectural review submittal and ultimately shown on improvement plans and construction drawings. As applicable, the Natural Resources Manager will confirm receipt of required resource

agency permits and approvals. Compliance will be verified by the Natural Resources Manager in consultation with the Community Development Director.

B-2(d) **Special-Status Species CDFG-Approved Mitigation Plan**. If total avoidance of the species occurrences is economically or technologically infeasible, a mitigation program shall be developed by the City in consultation with CDFG as appropriate. A research study to determine the best mitigation approach for each particular species to be salvaged shall be conducted. The special-status plant species mitigation program may include the following:

- The overall goal and measurable objectives of the mitigation and monitoring plan;
- Specific areas proposed for revegetation and their size.
- Potential sites for mitigation would be any suitable site within proposed open space depending on the species that is appropriately buffered from development. For a list of suitable habitats for the mitigation of each species refer to the list in Mitigation Measure B-2(a).
- Specific habitat management and protection concepts to be used to ensure long-term maintenance and protection of the special-status plant species to be included, *including 4:1 in-kind replacement of removed native (i.e. oak and sycamore) trees,* (i.e.: annual population census surveys and habitat assessments; establishment of monitoring reference sites; fencing of special-status plant species preserves and signage to identify the environmentally sensitive areas; a seasonally timed weed abatement program; and seasonally-timed seed and/or topsoil collection, propagation, and reintroduction of special-status plant species into specified receiver sites);
- Success criteria based on the goals and measurable objectives to ensure a viable population(s) on the project site in perpetuity;
- An education program to inform residents of the presence of special-status plant species and sensitive biological resources on-site, and to provide methods that residents can employ to reduce impacts to these species/resources in protected open space areas;
- Reporting requirements to ensure consistent data collection and reporting methods used by monitoring personnel; and
- Funding mechanism.

B-2(e) **Special-Status Plant Monitoring Frequency**. Monitoring shall occur annually and shall last at least five years to ensure successful establishment of all re-introduced or salvaged plants and no-net-loss of the species or its habitat. In the case of annual plants it is difficult to determine if there has been a net loss or gain in a five year period. Therefore an important component of the mitigation and monitoring plan shall be adaptive management. The adaptive management program shall address both foreseen and unforeseen circumstances relating to the preservation and mitigation programs. The plan shall include follow up surveys every five years in perpetuity or until a qualified biologist can demonstrate that the target special-status species has not experienced a net loss. It shall also include remedial measures to address negative impacts to the special-status plant species and their habitats (i.e.: removal of weeds, addition of seeding/planting efforts) if the species is suffering a net loss at the time of the follow up surveys.

B-2(f) **Special-Status Species Habitat Replacement**. The primary goal of the mitigation and monitoring plan is to ensure a viable population and no-net-loss of special-status species habitat within the project site. To ensure the no-net-loss of a species, the applicant shall create two acres of occupied special-status species habitat for every one acre of habitat impacted by project development. If resource agencies require a higher replacement ratio than 2:1, their requirements would prevail. The creation of habitat can occur in conjunction with the mitigation/relocation of wildflower field habitat if the research study indicates that the wildflower field and specific special-status plant species can be relocated and cohabitate.

B-2(g) **Bunchgrass Survey**. If occurrences of native perennial bunchgrass habitat of 0.5 acre or greater containing at least 10% or greater coverage of native perennial bunchgrass are found that area shall be placed in open space and a deed restriction placed over the area to protect it in perpetuity. If the area cannot be avoided for economical or technological reasons, then native grasses including perennial bunchgrasses shall be incorporated into the landscaping plant palette and the erosion control plan to replace the lost habitat. The most effective areas to receive native grass seed are graded areas that will be revegetated adjacent to open space. The acreage ratio of lost native perennial bunchgrass habitat to habitat replaced shall be no less than 1:1. Native perennial bunchgrass material shall come from locally collected seed stock to avoid contamination of the local gene pool. Because perennial bunchgrasses grow slowly at first, a "nurse" crop consisting of Nuttall's fescue (*Vulpia microstachys*), California brome (*Bromus carinatus*), and pinpoint clover (*Trifolium gracilentum*) shall be added to the mix to stabilize any graded areas while the bunchgrasses become established. No non-native invasive plant species shall be used in landscaping. California Invasive Plant Council (Cal-IPC) maintains a list of the most important invasive plants to avoid. This list shall be used when creating a plant palette for landscaping. Planting equipment (i.e.: hydroseeding tank and dispensing mechanism) shall be cleaned of remaining seed from previous applications prior to use on-site. The hydroseed applicator shall be responsible for ensuring tanks have been properly cleaned of any seed that is not a part of the specified mix.

Additional clarifying mitigation as recommended by applicant's biologist (Rincon August 2014): Pertinent and logistic details regarding the creation of valley needlegrass grassland habitat shall be outlined in a Habitat Mitigation and Monitoring Plan for this sensitive resource. This Plan will be approved by the City prior to its implementation and shall include the following:

- *Overall goals and measurable plan objectives,*
- *Identification of specific areas for mitigation,*
- *Specific habitat management and protection concepts that will be used to ensure the long term maintenance and continued protection of valley needlegrass grassland habitat,*
- *Success criteria to be met,*
- *An education program for residents,*
- *Reporting requirements, and*
- *Identification of funding mechanisms.*

The valley needlegrass grassland habitat mitigation areas shall be monitored annually for at least five years to ensure successful establishment and that no-net-loss of this sensitive

habitat has been achieved. To ensure no-net-loss of valley needlegrass grassland habitat, the applicant shall create one acre of mitigation habitat for every one acre of valley needlegrass grassland habitat impacted by implementation of the project. A copy of all permits, or other correspondence stating that no permit is necessary, shall be filed with the City prior to project implementation. The City shall ensure that all the required documentation is received prior to initiation of construction activities and shall oversee implementation of the Valley Needlegrass Grassland Habitat Mitigation and Monitoring Plan. Likewise, the City shall ensure that all the avoidance, minimization, and/or mitigation measures prescribed are fully implemented.

B-2(d-g) Monitoring Program: The Special-Status Species Mitigation Plan shall be submitted and approved by the Natural Resources Manager and Community Development Director prior to issuance of any grading and construction permits. As applicable, the Natural Resources Manager will confirm receipt of required resource agency permits and approvals. Compliance with the Mitigation Plan and submittal of required Monitoring Reports will be verified by the Natural Resources Manager in consultation with the Community Development Director.

Trees (OASP)

B-3(a) **Construction Requirements.** Development under the Specific Plan shall abide by the requirements of the City Arborist for construction. Requirements shall include but not be limited to: the protection of trees with construction setbacks from trees; construction fencing around trees; grading limits around the base of trees as required; and a replacement plan for trees removed including replacement at a minimum 2:1 ratio. *Removal of native trees, including sycamore and oak trees, shall require a minimum 4:1 replacement ratio, to be incorporated into the Special-Status Species Mitigation Plan and Five-Year Monitoring Plan.*

B-3(a) Monitoring Program: The Special-Status Species Mitigation Plan shall be submitted and approved by the Natural Resources Manager and Community Development Director prior to issuance of any grading and construction permits. As applicable, the Natural Resources Manager will confirm receipt of required resource agency permits and approvals. Compliance with the Mitigation Plan and submittal of required Monitoring Reports will be verified by the Natural Resources Manager in consultation with the Community Development Director.

Riparian Woodland and Wetland Habitat (OASP)

B-4(a) **Trail Setbacks.** Trails shall be setback out of riparian habitat and out of the buffer area. The trail shall be a minimum distance of 20 feet from top of bank or from the edge of riparian canopy, whichever is farther. Trails shall be setback from wetland habitat at a minimum distance of 30 feet and shall not be within the buffer. Native plant species that will deter human disturbance shall be planted in the area between the trail and the wetland/riparian habitat including plants such as California rose (*Rosa californica*) and California blackberry (*Rubus ursinus*). No passive recreational use shall be allowed in the riparian or wetland habitats or drainage corridors.

B-4(b) **Development Setbacks.** Development that abuts riparian and wetland mitigation areas shall also be setback at least 20 feet, and be buffered by an appropriately-sized fence and/or plants that deter human entry listed in BIO-4(a).

B-4(c) **Riparian/ Wetland Mitigation.** If riparian and/or wetland habitat are proposed for removal pursuant to development under the Specific Plan, such development shall apply for all applicable permits and submit a Mitigation Plan for areas of disturbance to wetlands and/or riparian habitat. The plan shall be prepared by a biologist familiar with restoration and mitigation techniques. Compensatory mitigation shall occur on-site using regionally collected native plant material at a minimum ratio of 2:1 (habitat created to habitat impacted) in areas shown on FEIR Figure 4.4-2 as directed by a biologist.

The resource agencies may require a higher mitigation ratio. If the Orcutt Regional Basin is necessary as a mitigation site for waters of the U.S. and State it shall be designed as directed by a biologist taking into consideration hydrology, soils, and erosion control and using the final mitigation guidelines and monitoring requirements (U.S. Army Corps of Engineers, 2004). As noted above, the trail shall be setback out of the buffer area for riparian and wetland habitat.

The plan shall include, but not be limited to the following components:

1) Description of the project/impact site (i.e.: location, responsible parties, jurisdictional areas to be filled/impacted by habitat type);
2) goal(s) of the compensatory mitigation project (type(s) and area(s) of habitat to be established, restored, enhanced, and/or preserved, specific functions and values of habitat type(s) to be established, restored, enhanced, and/or preserved);
3) description of the proposed compensatory mitigation-site (location and size, ownership status, existing functions and values of the compensatory mitigation-site);
4) implementation plan for the compensatory mitigation-site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan);
5) maintenance activities during the monitoring period (activities, responsible parties, schedule);
6) monitoring plan for the compensatory mitigation-site (performance standards, target functions and values, target hydrological regime, target jurisdictional and nonjurisdictional acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports);
7) completion of compensatory mitigation (notification of completion, agency confirmation); and
8) contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism).

In addition, erosion control and landscaping specifications included in the mitigation plan shall allow only natural-fiber, biodegradable meshes and coir rolls, to prevent impacts to the environment and to fish and terrestrial wildlife.

B-4(a-c) Monitoring Program: Compliance with mitigation measures will be reviewed with plans as part of the architectural review submittal and ultimately shown on improvement plans and construction

drawings. As applicable, the Natural Resources Manager will confirm receipt of required resource agency permits and approvals. The Mitigation Plan shall be submitted and approved by the Natural Resources Manager and Community Development Director prior to issuance of any grading and construction permits. As applicable, the Natural Resources Manager will confirm receipt of required resource agency permits and approvals. Compliance with the Mitigation Plan and submittal of required Monitoring Reports will be verified by the Natural Resources Manager in consultation with the Community Development Director.

Impacts to Wildlife (OASP)

B-5(a) **Bird Pre-Construction Survey**. To avoid impacts to nesting special-status bird species and raptors including the groundnesting burrowing owl, all initial ground-disturbing activities and tree removal shall be limited to the time period between September 15 and February 1. If initial site disturbance, grading, and tree removal cannot be conducted during this time period, a pre-construction survey for active nests within the limits of grading shall be conducted by a qualified biologist at the site no more than 30 days prior to the start of any construction activities (for ground-nesting burrowing owl survey [OASP FEIR]). If active nests are located, all construction work must be conducted outside a buffer zone of 250 feet to 500 feet from the nests as determined in consultation with the CDFG. No direct disturbance to nests shall occur 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 the start of construction.

B-5(c) **Monarch Pre-Construction Survey**. If initial ground-breaking is to occur between the months of October and March a preconstruction survey for active monarch roost sites within the limits of grading shall be conducted by a qualified biologist at the site two weeks prior to any construction activities. If active roost sites are located no ground-disturbing activities shall occur within 50 feet of the perimeter of the habitat. Construction shall not resume within the setback until a qualified biologist has determined that the monarch butterfly has vacated the site.

B-5(a, c) Monitoring Program: Mitigation measures shall be shown on improvement plans and construction drawings. The Natural Resources Manager will confirm receipt of required pre-construction survey reports. Compliance will be verified by the Natural Resources Manager in consultation with the Community Development Director.

B-6(a) **Minimized Roadway Widths.** Roadway widths adjacent to riparian and wetland habitats may be reduced to the minimum width possible, while maintaining Fire Department Requirements for emergency access, with slower speed limits introduced. Posted speed limits should be 25 mph.

B-6(b) **Culvert Design.** Although closed culverts are to be the drainage conveyance method of last resort per the City Waterways Management Plan, where they are required, culverts connecting the Plan Area drainage corridors with upstream and downstream drainage corridors shall be evaluated during the suitability analysis pursuant to Mitigation Measure B-5(e) to determine their importance to wildlife who could use them to travel to and from the

site. If culverts are found to be of importance to wildlife, the culverts shall be evaluated for their potential for improvement (i.e. retrofitting, maintenance, or specific improvements depending on the types of species using them). The development pursuant to the Specific Plan and the City shall develop a plan for the improvement of the culverts. Preservation of the wildlife corridors that are present on the project site can be achieved with sufficient setbacks from riparian and wetland habitats. Refer to B-4 for mitigation regarding riparian and wetland habitat setbacks.

B-6(c) **Educational Pet Brochure.** Any development pursuant to the Specific Plan shall prepare a brochure that informs prospective homebuyers and Home Owners Association (HOA) members about the impacts associated with non- native animals, especially cats and dogs, to the project site; similarly, the brochure must inform potential homebuyers and all HOA members of the potential for coyotes to prey on domestic animals.

B-6(a-c) Monitoring Program: Mitigation measures shall be shown on improvement plans and construction drawings. Compliance will be verified by the Natural Resources Manager in consultation with the Community Development Director.

B-6(d) **Landscaping Plan Review.** To ensure that project landscaping does not introduce invasive non-native plant and tree species to the region of the site, the final landscaping plan shall be reviewed and approved by a qualified biologist. The California Invasive Plant Council (Cal-IPC) maintains several lists of the most important invasive plants to avoid. The lists shall be used when creating a plant palette for landscaping to ensure that plants on the lists are not used. The following plants shall not be allowed as part of potential landscaping plans pursuant to development under the Specific Plan:

- African sumac (Rhus lancea)
- Australian saltbush (Atriplex semibaccata)
- Black locust (Robinia pseudoacacia)
- California pepper (Schinus molle) and Brazilian pepper (S. terebinthifolius)
- Cape weed (Arctotheca calendula)
- Cotoneaster (Cotoneaster pannosus), (C. lacteus)
- Edible fig (Ficus carica)
- Fountain grass (Pennisetum setaceum)
- French broom (Genista monspessulana)
- Ice plant, sea fig (Carpobrotus edulis)
- Leafy spurge (Euphorbia esula)
- Myoporum (Myoporum spp.)
- Olive (Olea europaea)
- Pampas grass (Cortaderia selloana), and Andean pampas grass (C. jubata)
- Russian olive (Elaeagnus angusticifolia)
- Scotch broom (Cytisus scoparius) and striated broom (C. striatus)
- Spanish broom (Spartium junceum)
- Tamarix, salt cedar (Tamarix chinensis), (T. gallica), (T. parviflora), (T. ramosissima)
- Blue gum (Eucalyptus globulus)
- Athel tamarisk (Tamarix aphylla)

With the exception of poison oak, only those species listed in the Specific Plan's Suggested Plant List [Orcutt Area Specific Plan Appendix E] shall not be planted anywhere on-site because they are invasive non-native plant species. Poison oak is a native plant species and could be used to deter human entrance to an area such as a mitigation/enhancement area.

B-6(d) Monitoring Program: Compliance with mitigation measures will be reviewed with landscaping plans as part of the architectural review submittal and ultimately shown on improvement plans and construction drawings. Compliance will be verified by the Natural Resources Manager in consultation with the Community Development Director.

CULTURAL RESOURCES MITIGATION

CR-1(d) Archaeological Resource Construction Monitoring. At the commencement of project construction, an orientation meeting shall be conducted by an archaeologist for construction workers associated with earth disturbing procedures. The orientation meeting shall describe the possibility of exposing unexpected archaeological resources and directions as to what steps are to be taken if such a find is encountered. In the event that prehistoric or historic archaeological resources are exposed during project construction, constructional earth disturbing work within 50 meters (164 feet) of the find must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated (e.g., curation, preservation in place, etc), work in the area may resume. The City should consider retaining a Chumash representative to monitor any field work associated with Native American cultural material.

If human remains are exposed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98.

CR-3(a) Prohibition of Archaeological Site Tampering. Off-road vehicle use, unauthorized collecting of artifacts, and other activities that could destroy or damage archaeological or cultural sites shall be prohibited. Signs shall be posted on the property to discourage these types of activities and warn of trespassing violations and imposed fines.

CR-1(d), CR-3(a) Monitoring Program: Requirements for cultural resource mitigation, in the event of unforeseen encounter of materials, shall be clearly noted on all plans for project grading and construction. Compliance will be verified by the Community Development Director.

DRAINAGE AND WATER QUALITY MITIGATION

D-1(a) Erosion Control Plan. Prior to issuance of the first Grading Permit or approval of improvement plans, the applicant shall submit to the Directors of Community Development and Public Works for review and approval a detailed erosion control plan (ECP) to mitigate erosion and sedimentation impacts during the construction period. The detailed ECP shall be accompanied by a written narrative and be approved by the City Engineer. At a minimum, the ECP and written narrative should be prepared according to the guidelines outlined in the DDM and should include the following:

- A proposed schedule of grading activities, monitoring, and infrastructure milestones in chronological format;
- Identification of critical areas of high erodibility potential and/or unstable slopes;
- Soil stabilization techniques such as short-term biodegradable erosion control blankets and hydroseeding should be utilized. Silt fences should be installed downslope of all graded slopes. Straw bales should be installed in the flow path of graded areas receiving concentrated flows, as well as around storm drain inlets;
- Description of erosion control measures on slopes, lots, and streets;
- Contour and spot elevations indicating runoff patterns before and after grading;
- Filter systems at catch basins (drop inlets) in public streets as a means of sediment control; and
- The post-construction inspection of all drainage facilities for accumulated sediment, and the clearing of these drainage structures of debris and sediment.

D-1(b) **Storm Water Pollution Prevention Plan**. The applicant shall comply with NPDES General Construction Activities Storm Water Permit Requirements established by the CWA. Pursuant to the NPDES Storm Water Program, an application for coverage under the statewide General Construction Activities Storm Water Permit (General Permit) must be obtained for project development. It is the responsibility of the project applicant to obtain coverage prior to site construction. The applicant can obtain coverage under the General Permit by filing a Notice of Intent (NOI) with the State Water Resource Control Board's (SWRCB) Division of Water Quality. The filing shall describe erosion control and storm water treatment measures to be implemented during and following construction and provide a schedule for monitoring performance. These BMPs will serve to control point and non-point source (NPS) pollutants in storm water and constitute the project's SWPPP for construction activities. While the SWPPP will include several of the same components as the ECP, the SWPPP will also include BMPs for preventing the discharge of other NPS pollutants besides sediment (such as paint, concrete, etc.) to downstream waters.

- Notice of Intent. Prior to beginning construction, the applicant shall file a Notice of Intent (NOI) for discharge from the proposed development site.
- Storm Water Pollution Prevention Plan. The applicant shall require the building contractor to prepare and submit a SWPPP to the City forty-five (45) days prior to the start of work for approval. The contractor is responsible for understanding the State General Permit and instituting the SWPPP during construction. A SWPPP for site construction shall be developed prior to the initiation of grading and implemented for all construction activity on the project site in excess of one acre. The SWPPP shall include specific BMPs to control the discharge of material from the site. BMP methods may include, but would not be limited to, the use of temporary detention basins, straw bales, sand bagging, mulching, erosion control blankets, silt fencing, and soil stabilizers. Additional BMPs should be implemented for any fuel storage or fuel handling that could occur on-site during construction. The SWPPP must be prepared in accordance with the guidelines adopted by the State Water Resources Control Board (SWRCB). The SWPPP shall be also submitted to the City along with grading/development plans for review and approval.
- Notice of Completion of Construction. The applicant shall file a notice of completion of construction of the development, identifying that pollution sources were controlled during the construction of the project and implementing a closure SWPPP for the site.

D-2(a) **Vegetative and Biotechnical Approaches to Bank Stabilization.** Vegetative or biotechnical (also referred to as soil bioengineering) approaches to bank stabilization are preferred over structural approaches. Bank stabilization design must be consistent with the SLO Creek Stream Management and Maintenance Program Section 6. Streambank stabilization usually involves one or a combination of the following activities:

- Regrading and revegetating the streambanks to eliminate overhanging banks and create a more stable slope;
- Deflecting erosional water flow away from vulnerable sites;
- Reducing the steepness of the channel bed through installation of grade stabilization structures;
- Altering the geometry of the channel to influence flow velocities and sediment deposition;
- Diverting a portion of the higher flow into a secondary or by-pass channel;
- Armoring or protecting the bank to control erosion, particularly at the toe of slopes.

The bank stabilization design will:

- Be stable over the long term;
- Be the least environmentally damaging and the "softest" approach possible;
- Not create upstream or downstream flooding or induce other local stream instabilities;
- Minimize impacts to aquatic and riparian habitat.
- Specify that only natural-fiber, biodegradable meshes and coir rolls be used, to prevent impacts to the environment and to fish and terrestrial wildlife.

D-2(c) **Riparian Zone Planting.** The OASP proposes riparian enhancement of creek corridors. Section 11 guidelines of the SLO Creek Drainage Design Manual shall be followed for riparian areas that are modified, created and/or managed for flood damage reduction, stream enhancement, and bank repair. Linear park terrace vegetation, streambank repair and channel maintenance projects may require stream channel modifications that include shaping, widening, deepening, straightening, and armoring. Many channel management projects also require building access roads for maintenance vehicles and other equipment. These construction activities can cause a variety of impacts to existing sensitive riparian and aquatic habitat that, depending on the selected design alternative, range from slight disturbances to complete removal of desirable woody vegetation and faunal communities. In urban areas within the SLO creek watershed, riparian vegetation often provides the only remaining natural habitat available for wildlife populations.

D-4(a) **Compliance with City's Drainage Design Manual.** All drainage improvements must be constructed in accordance with Section 9 of the City's Drainage Design Manual. Either subregional facilities shall be constructed with the first phase of development or interim (on-site) drainage control shall be constructed. Interim facilities can be abandoned once regional facilities are available. The applicant shall submit a detention system plan to the Director of Public Works for review and approval. The detention basins shall be designed to comply

with applicable City drainage design standards and at a minimum have the following features:

- Each basin should include an outlet structure to allow the basin to drain completely within 48 hours. The amount of outflow can be regulated with a fixed outfall structure. Such a structure must include an outfall pipe of a size and length that will give positive control on the outfall head. The principal outlet regulates the design discharge from the watershed above at a water level in the basin that does not exceed a certain maximum elevation.
- Regional, or larger on-site facilities can pose significant hazards to public safety in the event of failure. In addition to the outlet control structure, an emergency overflow spillway (secondary overflow) must be provided. This spillway must satisfy the following requirements:
  - The spillway must be designed to pass the 100-year design storm event if the outlet works fail or if a runoff event exceeds the design event. The spillway design will be based on peak runoff rates for developed site conditions, assuming that the basins fill to the crest of the spillway prior to the beginning of the design event.
  - The spillway must be located so overflow is conveyed safely to the downstream channel.
- Each basin shall be designed with an emergency spillway that can pass the 100-year storm event with 2-foot freeboard between the design water surface elevation and the top of the embankment. At a minimum the basin must contain the 10-year flow without release to emergency spillway. If flows over the emergency spillway do occur, provisions must be made or be in place that will convey such flows safely.
- The design volume of the basin must be sized to include the capacity for a five (5) year accumulation of sediment. Generally, the basin should be cleared out when it is half-full, as determined on a marked staff in the bottom of the basin, or a mark on a riser pipe. The amount of potential sedimentation in the basin shall be determined by a soils engineer or hydrologist, using the procedures such as those outlined in the Association of Bay Area Government's (ABAG) Manual of Standards for Erosion and Sediment Control (May 1995) or as approved by the City Engineer or County Public Works Director.
- The basin and its outfall must be sized so that approximately 85% of the total stormwater storage, excluding sediment storage in the basin, can be recovered within twenty-four hours of the peak inflow. A basin overflow system must provide controlled discharge (emergency spillway) for the 100-year design event without overtopping the basin embankment and maintain adequate freeboard. The design must provide controlled discharge directly into the downstream conveyance system or safe drainage way. The principal outlet must be able to drain the detention facility within 48 hours of the end of the 100-year storm by gravity flow through the principal outlet.
- Any detention basin design must be accompanied by a soils report. This report should address allowable safe basin slopes with respect to liquefaction, rapid draw down, wave action and so forth. Additionally, the report should also address sedimentation transport from areas above the basin and allowable bearing pressures where structures are to be placed. The soils report must address the level of the water table and the effects of the basin excavation on the water table.

D-4(b) **Final Drainage Detention System Verification**. Final detention basin system designs for project-specific EIRs within the Orcutt Plan Area shall be submitted to the Public Works Department. Per the Wastewater Management Plan, the project shall not cause more than a 5% increase of peak run off rates for the 2-, 50-, and 100-year 24 hour storm event. Final

basin designs shall provide stage-storage-outflow curves and outfall structure details for all detention basins. The San Luis Obispo SLO/Zone 9 HEC-HMS hydrology model may be used to model final detention basin system cumulative downstream impacts should specific projects propose substantial changes to conceptual design, at the discretion of the City Engineer.

D-5(a) **Biofilters.** The applicant shall submit to the Director of Community Development for review and approval a plan that incorporates grassed swales (biofilters) into the project drainage system where feasible for runoff conveyance and filtering of pollutants. A preferred alternative to concrete drainage swales to transport the runoff to roadside ditches, these swales shall be lined with grass or appropriate vegetation to encourage the biofiltration of sediment, phosphorus, trace metals, and petroleum from runoff prior to discharge into the formal drainage network. General design guidelines relevant to optimizing the pollutant removal mechanisms of grassed swales are: 1) a dense, uniform growth of fine-stemmed herbaceous plants for optimal filtering of pollutants; 2) vegetation that is tolerant to the water, climatological, and soil conditions of the project site is preferred; 3) grassed swales that maximize water contact with the vegetation and soil surface have the potential to substantially improve removal rates, particularly of soluble pollutants; and 4) pollutant removal efficiency is increased as the flow path length is increased. General maintenance guidelines for biofilters are discussed in Mitigation Measure D-5(b). A Best Management Practice (BMP) filter device shall be installed to intercept water flowing off of proposed parking lot and roadway surfaces. Water quality BMPs shall be those identified in the California Stormwater Quality association's BMP handbook. Whenever feasible, the preferred approach to treating surface runoff will be the use of drainage swales rather than mechanical devices. The chosen method for treating runoff shall be a proven and documented pollution prevention technology device that removes oil and sediment from stormwater runoff, and retains the contaminants for safe and easy removal. The chosen device shall possess design features to prevent resuspension of previously collected contaminants and materials, and contain a built-in diversion structure to divert intense runoff events and prevent scouring of the previously collected sediments. The filter devices shall be designed and sized to treat the run off from the first 25 mm (1 inch) of rainfall. The storm water quality system must be reviewed and approved by the City Director of Public Works.

D-5(b) **SWPPP Maintenance Guidelines**. Prior to issuance of the first grading permit or approval of improvement plans, the applicant shall submit to the Director of Community Development and Director of Public Works for review and approval a long-term storm water pollution prevention plan (SWPPP) to protect storm water quality after the construction period. The SWPPP shall include the following additional BMPs to protect storm water quality:

- Proper maintenance of parking lots and other paved areas can eliminate the majority of litter and debris washing into storm drains and thus entering local waterways. Regular sweeping is a simple and effective BMP aimed at reducing the amount of litter in storm drain inlets (to prevent clogging) and public waterways (for water quality). The project applicant shall enter into an agreement with the City of San Luis Obispo to ensure this maintenance is completed prior to approval of improvement plans or final maps.
- Proper maintenance of biofilters is essential to maintain functionality. The maintenance of biofilters on the project site will be the responsibility of a homeowner's association for the proposed project. Biofilter maintenance would include: 1) Regular mowing to promote growth and increase density and pollutant uptake (vegetative height should be no

more than 8 inches, cuttings must be promptly removed and properly disposed of); 2) Removal of sediments during summer months when they build up to 6 inches at any spot, cover biofilter vegetation, or otherwise interfere with biofilter operation; and 3) Reseeding of biofilters as necessary, whenever maintenance or natural processes create bare spots.

- Proper maintenance of detention basins is necessary to ensure their effectiveness at preventing downstream drainage problems and promoting water quality. Necessary detention basin maintenance includes: 1) regular inspection during the wet season for sediment buildup and clogging of inlets and outlets; 2) regular (approximately every 2-3 years) removal of basin sediment; and 3) if an open detention basin is used, mowing and maintenance of basin vegetation (replant or reseed) as necessary to control erosion. A maintenance plan must be developed and provided along with the design documents. Long-term detention basin maintenance plans must clearly delineate and assign maintenance and monitoring responsibilities for local and regional detention basins. Maintenance reports shall be submitted annually to City's Public Works Department.
- For basins greater than 5,000 m3 (4 ac-ft) storage (i.e. the Upper Fork regional detention basin), vehicular access for maintenance of the basin and outlet works, removal of sediment, and removal of floating objects during all weather conditions must be provided. An access road must be provided to the basin floor of all detention facilities. This road must have a minimum width of 3.7 m (12 ft) and a maximum grade of 20%. Turnarounds at the control structure and the bottom of the basin must have a 12-m (40-ft) minimum outside turning radius.
- The applicant shall prepare informational literature and guidance on residential BMPs to minimize pollutant contributions from the proposed development. This information shall be distributed to all residences at the project site. At a minimum the information should cover: 1) general information on biofilters and detention basins for residents concerning their purpose and importance of keeping them free of yard cuttings and leaf litter; 2) proper disposal of household and commercial chemicals; 3) proper use of landscaping chemicals; 4) clean-up and appropriate disposal of yard cuttings and leaf litter; and 5) prohibition of any washing and dumping of materials and chemicals into storm drains.
- The stormwater BMP devices shall be inspected, cleaned and maintained in accordance with the manufacturer's maintenance specifications. The devices shall be cleaned prior to the onset of the rainy season (i.e. November 1st) and immediately after the end of the rainy season (i.e. May 1st). All devices will be checked after major storm events. The results of the inspection and maintenance report shall be submitted to the City of San Luis Obispo Public Works Department.

D-5(c) **Pervious Paving Material.** Consistent with Land Use Element Policy 6.4.7, the applicant shall be encouraged to use pervious paving material to facilitate rainwater percolation. Parking lots and paved outdoor storage areas shall, where feasible, use pervious paving to reduce surface water runoff and aid in groundwater recharge.

D-5(d) **Low Impact Development Practices**. In addition to the low impact development (LID) practices described in the above measures, the Specific Plan shall incorporate the following as requirements of future development within the area, to the extent appropriate for type and location of development:

- Reduced and disconnected impervious surfaces
- Preservation of native vegetation where feasible
- Use of tree boxes to capture and infiltrate street runoff

- Roof leader flows shall be directed to planter boxes and other vegetated areas
- Soil amendments shall be utilized in landscaped areas to improve infiltration rates of clay soils.
- Incorporate rain gardens into landscape design These LID practices shall be utilized wherever feasible and appropriate to ensure that the pre-development stormwater runoff volume and pre-development peak runoff discharge rate are maintained, and that the flow frequency and duration of post development conditions are identical (to the extent feasible) to those of pre-development conditions. LID practices are subject to the review and approval of the Regional Water Quality Control Board, as part of the City's National Pollution Discharge Elimination System Permit compliance.

D-1(a, b), D-2(a, c), D-4(a-b), D-5(a-d) Monitoring Program: Mitigation measures shall be shown on grading and construction plans. Monitoring will include Natural Resources Department staff consultation and implementation at time of landscaping construction plan review and Engineering-Public Works staff at the time of tract construction. Compliance will be verified by the City Public Works Department in consultation with the Natural Resources Manager.

GEOLOGY AND SOILS MITIGATION

G-2(a) **Geotechnical Study Parameters**. As stated in Program 3.4.1.a. of the proposed Specific Plan, a geotechnical study shall be prepared by a State-registered engineering geologist for the project site prior to site development. This report shall include an analysis of the liquefaction potential of the underlying materials according to the most current liquefaction analysis procedures. This study shall also:

- evaluate the potential for soil settlement beneath the project site;
- evaluate the potential for expansive soils beneath the project site; and
- assess the stability of all slopes in the areas where construction is to occur. This evaluation shall determine the potential for adverse soil stability and discuss appropriate mitigation techniques. Appropriate setbacks from unstable slopes and areas below potential rockfall zones shall be implemented. No development of residential structures is to occur in areas where rockfall hazards could damage buildings.

The following suitable measures to reduce liquefaction impacts could include but need not be limited to:

- specialized design of foundations by a structural engineer;
- removal or treatment of liquefiable soils to reduce the potential for liquefaction;
- drainage to lower the groundwater table to below the level of liquefiable soil;
- in-situ densification of soils or other alterations to the ground characteristics; or
- other alterations to the ground characteristics.

G-3(a) **Soil Settlement Engineering**. If the project site is identified to be in a high potential for settlement zone (through the Geotechnical Study required in Mitigation Measure G-2(a)) the building foundations, transportation infrastructure and subgrades shall be designed by a structural engineer to withstand the existing conditions, or the site shall be graded in such a manner as to address the condition. Suitable measures to reduce settlement impacts could include but need not be limited to:

- excavation and recompaction of on-site or imported soils;

- treatment of existing soils by mixing a chemical grout into the soils prior to recompaction; or
- foundation design that can accommodate certain amounts of differential settlement such as posttensional slab and/or ribbed foundations designed in accordance with Chapter 18, Division III of the Uniform Building Code(UBC).

G-4(a) **Expansive Soils Grading**. If the project site is identified as having expansive soils (through the Geotechnical Study required in Mitigation Measure G-2(a)), the foundations and transportation infrastructure shall be designed by a structural engineer to withstand the existing conditions, or the site shall be graded in such a manner as to address the condition. Suitable measures to reduce impacts from expansive soils could include but need not be limited to:

- excavation of existing soils and importation of non-expansive soils; and
- foundation design to accommodate certain amounts of differential expansion such as posttensional slab and/or ribbed foundations designed in accordance with Chapter 18, Division III of the UBC.

G-2(a), G-3(a), G-4(a) Monitoring Program: Monitoring will include review and approval by City Engineering staff and building inspectors. Compliance will be verified by the Community Development Director.

NOISE MITIGATION

N-1(a) **Compliance with City Noise Ordinance.** Construction hours and noise levels shall be compliant with the City Noise Ordinance [Municipal Code Chapter 9.12, Section 9.12.050(6)]. Methods to reduce construction noise can include, but are not limited to, the following:

- Equipment Shielding. Stationary construction equipment that generates noise can be shielded with a barrier.
- Diesel Equipment. All diesel equipment can be operated with closed engine doors and equipped with factory-recommended mufflers.
- Electrical Power. Whenever feasible, electrical power can be used to run air compressors and similar power tools.
- Sound Blankets. The use of sound blankets on noise generating equipment.

N-1(a) Monitoring Program: Requirements for construction noise mitigation shall be clearly noted on all plans for project grading and construction. Compliance will be verified by the Community Development Director.

PUBLIC SAFETY MITIGATION

S-2(b) **Disclosure**. Prior to recordation of final map, the applicant shall develop Covenants, Codes, and Restrictions (CC&Rs) that disclose to potential buyers or leasers that aircraft over-flights occur, and that such flights may result in safety hazard impacts should an aircraft accident occur. In addition, prior to recordation of final map, avigation easements shall be recorded over the entire project site for the benefit of the SLO County Regional Airport.

S-2b Monitoring Program: Monitoring will include Community Development, City Attorney and Engineering staff approvals of the Disclosure(s) prior to recordation of a final tract map.

PUBLIC SERVICES MITIGATION

PS-2(a) Road Widths, Fire Hydrants. Road widths and internal circulation, as well as the placement of fire hydrants, shall be designed with the guidance of the Fire Department. A road system that allows unhindered Fire Department access and maneuvering during emergencies shall be provided. The San Luis Obispo Fire Department shall review all improvement plans for proposed development in the Orcutt Area to ensure compliance with City standards and the Uniform Fire Code.

PS-2(b) Non-combustible exteriors. Buildings that are in areas of moderate fire hazard and which are close to areas of high or extreme fire hazard shall have non-combustible exteriors.

PS-2(c) Defensible Space. Accessible space free of highly combustible vegetation and materials shall be provided in the area 30 feet around all structures located within the moderate wildland fire hazard areas.

PS-3(a) Buildout Date Notification. The applicant shall notify the San Luis Coastal Unified School District of the expected buildout date of each phase of the project to allow the District time to plan in advance for new students.

PS-3(b) Statutory School Fees. The applicant shall pay the statutory school fees in effect at the time of issuance of building permits to the appropriate school districts.

PS-2(a-c) and PS-3(a-b) Monitoring Program: Requirements shall be clearly noted on all plans for project grading and construction, to be verified by the City Fire Marshal and Community Development Department.

TRANSPORTATION AND CIRCULATION MITIGATION

TR-1 *Prior to issuance of grading and construction permits, the applicant shall submit plans showing the construction of a "pork chop" island at the intersection of "I" Street and "B" Street", which would restrict this intersection to right-turn-in and right-turn-out movements. The plan shall be reviewed and approved by the City Public Works Department.*

TR-1 Monitoring Program: Requirements shall be clearly noted on all plans for project grading and construction, to be verified by the City Public Works Department.

UTILITIES AND SERVICE SYSTEMS MITIGATION

USS-1 **Off-site Water Main Line Extensions to the OASP To Meet Fire Flow and Storage Standards**. Concurrent with applications for Final Map(s), the applicant shall submit a water supply plan to meet adequate fire flow standards for all lots within each Final Map. Implementation of such a water line extension plan shall be included as a part of public improvement plans for the subdivision, and approved by Utilities, Public Works and the City

Engineer. This implementation plan may include a financing plan, including reimbursement provisions, approved by the City Council at the time of considering any Final Map. Required water main line extension(s) to the subdivision shall be completed and operational to the satisfaction of the Utilities Director, prior to issuance of any building permits for any of the residential and/or commercial uses.

USS-1 Monitoring Program: Compliance will be reviewed and implemented by the City Engineer' s office with the subdivision plans and shall be completed prior to issuance of any building permits for Tract 3095.