

4.14 ISSUES ADDRESSED IN THE INITIAL STUDY

This section addresses the potential environmental effects of the project that were determined to be less than significant or significant but mitigable, as described in the Initial Study for the project (refer to Appendix A). The items listed below are contained in the City's environmental checklist form and the environmental checklist form included in Appendix G of the *State CEQA Guidelines*. Each subsection listed below includes the checklist items from the *State CEQA Guidelines* that are addressed in this section. Any items not addressed in this section have been addressed in Section 4.0, *Environmental Impact Analysis*, of this EIR. Section 4.0 also includes an expanded discussion of the settings under each environmental issue area discussed therein.

The Initial Study determined that the project, with implementation of specified mitigation measures, would not result in adverse impacts related to Geology and Soils (seismic and groundshaking hazards, and liquefaction, settlement, expansion and subsidence hazards). Mitigation measures for the issue areas are discussed below and provided in the Executive Summary.

A summary of the analysis of issue areas for which no significant adverse impacts were identified is provided in this section. Please refer to the Initial Study (Appendix A) for the complete issue area analysis.

4.14.1 Agriculture Resources

Would the project:

- *Conflict with existing zoning for agricultural use, or a Williamson Act contract?*

No Williamson Act contract is in effect on the project site. No impact would occur.

Impacts of the project due to conflict with existing zoning for agricultural use are addressed in detail under Impact AG-2 in Section 4.2, *Agricultural Resources*.

4.14.2 Air Quality

Would the project:

- *Create objectionable odors affecting a substantial number of people?*

The project includes commercial, office, and residential development. None of these uses are anticipated to produce objectionable odors that would affect a substantial number of people in the area. This impact would be less than significant.

4.14.3 Biological Resources

Would the project:

- *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and/or*
- *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*



The project Initial Study concluded that the project would not conflict with applicable local policies or ordinances to protect biological resources (refer to Appendix A). This issue was further analyzed in Section 4.9, *Land Use and Policy Consistency*, which includes detailed discussions of the Specific Plan's compliance with applicable local policies. As described therein, the project would not conflict with local policies or ordinances protecting biological resources. Refer to Section 4.9, *Land Use and Policy Consistency*, for detailed discussion of this issue.

The project site is not part of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with any such plans, and no impact would occur.

4.14.4 Cultural Resources

Would the project:

- *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

According to the Geologic Map of California, San Luis Obispo Sheet published by the California Division of Mines and Geology (CDMG) in 1978, the site vicinity is underlain by Quaternary aged alluvium (unconsolidated deposits of sand, silt, clay, and gravel). The surrounding hills are comprised of the Franciscan and Monterey Formations and Quaternary aged non-marine terrace deposits. These geologic features are not commonly associated with paleontological resources. There are no known unique paleontological resources or sites, or unique geologic features on the project site. Therefore, impacts to such resources would be less than significant.

4.14.5 Geology and Soils

Would the project:

- *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving;*
 - *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;*
 - *Strong seismic ground shaking;*
 - *Seismic-related ground failure, including liquefaction; or*
 - *Landslides;*
- *Result in substantial soil erosion or the loss of topsoil;*
- *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;*
- *Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property; and/or*
- *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?*



Seismic and Groundshaking Hazards. The nearest fault mapped in the vicinity of the project site is the Los Osos Fault, which lies approximately 0.5 mile to the southwest of the project site. According to the California Division of Mines and Geology, the Los Osos Fault is capable of a magnitude 6.8 earthquake. The nearest Alquist-Priolo Earthquake Fault Zone is located approximately 1.5 miles west-northwest of the site, along the Los Osos Fault. Due to the proximity of the site to the Los Osos Fault and Alquist-Priolo Zone, impacts associated with earthquakes and ground shaking would be potentially significant. Compliance with standard engineering requirements, including the 2010 California Building Code (CBC), City of San Luis Obispo Municipal Code as described in the Land Use and Circulation Element Update Environmental Impact Report (LUCE Update EIR), and the most recent California Department of Transportation seismic design standards would be required for the project. In addition, Mitigation Measures GEO-1 and GEO-2 below would be required to reduce potential project impacts associated with earthquakes and ground shaking to a less than significant level.

Grading and Topsoil. Refer to Section 4.8, *Hydrology and Water Quality*, for detailed discussion of potential impacts associated with erosion. Refer to Section 4.2, *Agricultural Resources*, for detailed discussion of potential impacts to topsoil.

Liquefaction, Settlement, Expansion, and Subsidence. According to the Safety Element of the City's General Plan, the project site has been identified as being located in an area of very high liquefaction potential, moderate to high expansion potential, and high settlement potential. In addition, during historical drought years, groundwater levels in the site vicinity were lowered enough to cause subsidence. In response to these potential impacts, Mitigation Measures GEO-3 through GEO-8 from the Initial Study were developed and required the preparation of a site specific geotechnical study to determine the potential for a variety of soil hazards on the project site including, liquefaction, settlement, expansion, and subsidence. These measures required that the geotechnical study provide suitable measures to reduce identified potentially significant impacts related to potentially hazardous characteristics of on-site soils.

In compliance with Mitigation Measures GEO-3 through GEO-8 from the Initial Study, a site specific investigation of on-site soils and Soils Engineering Report were prepared for the project by GeoSolutions, Inc. on May 29, 2015. Based on the investigation of on-site soils, it was determined that the presence of sandy soils, the relative density of in-situ soils, the depth to groundwater, and the expected ground acceleration caused by an earthquake provide high potential for seismic liquefaction on the project site. Liquefaction would be likely to occur in the sandy soil layers between the depths of 13 to 50 feet below ground surface and may manifest at the surface as seismically induced settlements. Seismically induced settlements were estimated to be on the order of 1.0 to 3.5 inches. The site specific investigation also identified the presence of expansive soil materials in the soil zone within the upper two to three feet of the site. The geotechnical investigation recommended measures to reduce these impacts to a less than significant level.

In addition, on July 15, 2014 the California State Water Resources Control Board adopted emergency drought regulations, which apply to the City of San Luis Obispo's urban water supplier. These regulations would be applicable during any future drought conditions and include measures which would also implement Mitigation Measure GEO-3 of the Initial Study and prevent soil subsidence on the project site.



Mitigation Measure GEO-3 below has been adapted from recommended measures in the Soils Engineering Report and would be required to reduce the project's potential impacts related to on-site geology and soils to less than significant levels.

Mitigation Measures.

GEO-1 Earthquake and Ground Acceleration Design and Construction Measures. Design and construction of the buildings, roadway infrastructure and all subgrades shall be specifically proportioned to resist Design Earthquake Ground Motions (Design a_{max}) of $S_{D1}=0.481$ and $S_{D5}=0.832$ and engineered to withstand Maximum Considered Earthquake (MCE) peak ground acceleration (PGA_M) equal to $0.519 g$, as described in the Soils Engineering Report for the project (GeoSolutions, Inc., 2015). The design should take into consideration the soil type, potential for liquefaction, and the most current and applicable seismic attenuation methods that are available.

GEO-2 Operational Seismic Safety Requirement. For retail stores included in the project, goods for sale may be stacked no higher than 8 feet from the floor in any area where customers are present, unless provisions are made to prevent the goods from falling during an earthquake of up to 7.5 magnitude. The stacking or restraint methods shall be reviewed and approved by the City before approval of occupancy permits, and shall be a standing condition of occupancy.

GEO-3 Geotechnical Design. The project plans and specifications shall include the geotechnical recommendations included in the Soils Engineering Report, prepared by GeoSolutions, Inc. on May 29, 2015. Recommendations therein that shall be incorporated into the final project building plans include specification for the following components of development preparation and design:

- Building Pad Preparation
- Paved Areas Preparation
- Pavement Design
- Interlocking Concrete Pavers
- Conventional Foundations
- Post-Tensioned Slabs
- Slab-On-Grade Construction
- Retaining Walls
- Exterior Concrete Flatwork

Residual Impact. With implementation of the mitigation described above, impacts related to geology and soils would be less than significant.

4.14.6 Hazards and Hazardous Materials

Would the project:



- *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?*
- *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; and/or*
- *Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

The project Initial Study concluded that the project would result in a less than significant impact associated with hazards to the public or the environment due to listed hazardous materials sites. This issue has been further analyzed in Section 4.7, *Hazards and Hazardous Materials*, based on an updated search of applicable databases and reports for records relating to any known hazardous materials contamination within the San Luis Ranch Specific Plan Area. ~~Based on the updated search results, the project was found to result in a potentially significant impact associated with hazardous materials sites, and would require mitigation to reduce potential impacts to a less than significant level. Refer to Section 4.7, *Hazards and Hazardous Materials*, for analysis detailed discussion of this issue.~~

In November 2014, Cleath-Harris Geologists, Inc. (Cleath-Harris) prepared a Hydrogeologic Description and PCE Characterization for Dalidio Laguna Ranch, San Luis Obispo County, California report (Hydrogeology Report; refer to Appendix H), which identified tetrachloroethylene (also called perchloroethylene, or PCE) contamination in groundwater in the vicinity of the San Luis Ranch Specific Plan Area. The project site is located adjacent to commercial uses to the northeast and residential uses to the southwest. Dry cleaning facilities have been recorded present to the north of the site as early as the 1930s. According to the Hydrogeology Report, the identified PCE groundwater contamination is attributed to spills at these hydrologically upgradient dry cleaning facilities. Shallow groundwater at the site generally flows towards the south-southwest, and wells on the project site have exhibited PCE groundwater contamination above the United States Environmental Protection Agency (U.S. EPA)/Central Coast Regional Water Quality Control Board (RWQCB) Maximum Contaminant Level (MCL) for drinking water of 5 micro grams per liter ($\mu\text{g}/\text{L}$). Cleath-Harris Analyzed PCE concentrations in four on-site wells and two off-site City wells to the south and the east of the site. The highest concentrations of PCE were detected at wells near U.S. 101 along the eastern side of the project site. PCE contamination is within the shallow aquifer groundwater (refer to Appendix H for detailed PCE characterization results). Groundwater within the deep aquifer could not be isolated in existing wells on the project site. Therefore, the PCE concentration in the deep aquifer is unknown. The domestic water well has a PCE concentration of 1.0 $\mu\text{g}/\text{L}$, which is within the U.S. EPA/RWQCB MCL for drinking water of 5.0 $\mu\text{g}/\text{L}$. The irrigation groundwater well has a PCE concentration of 9.5 $\mu\text{g}/\text{L}$, which exceeds the U.S. EPA MCL.

In July 2015, EnviroAssets, Inc. and GeoSolutions, Inc. prepared a Shallow Soil Vapor Assessment Report (Appendix H), to summarize active soil gas sampling conducted at the project site in November 2014, and February and March 2015. Concentrations of volatile organic compounds identified in soil vapor samples collected during the vapor assessment were compared with Environmental Screening Levels (ESLs) provided by the RWQCB. The RWQCB provides ESLs for residential and commercial property use scenarios because land use is a consideration in the types of exposure that are possible when environmental risks are



evaluated. No chemicals were detected in soil vapor samples above ESLs applicable to the proposed use of the sampled areas. PCE was detected in 36 of 47 analyzed samples (77 percent). All detections for PCE except from location SV-46, located at the southern tip of the project site in the proposed Agricultural area, were below residential ESLs. The maximum concentration of PCE detected in the sample collected at location SV-46 of 382.71 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) is below the commercial ESL. Additionally, sampling results were not indicative of an on-site source for PCE and were consistent with passive migration of a dilute groundwater plume beneath the project site from off-site sources.

In September 2015, the RWQCB reviewed the Shallow Soil Vapor Assessment Report. Based on the review of the Shallow Soil Vapor Assessment Report and the data therein, the RWQCB concludes that the project site does not pose a major threat to human health from vapor intrusion to any of the proposed development included in the project and no further action is necessary regarding solvents detected on the project site. Therefore, impacts associated with hazardous materials sites located in the vicinity of the project site are less than significant.

The project site is not within the vicinity of a private air strip which could cause a potential safety hazard for people residing or working in the project area. Therefore, the project would not result in any safety impact to people living or working in the project area.

The project site is an infill site, and not directly adjacent to any wildlands. Development would not interfere with any emergency evacuation routes in the event of a disaster. Project plans would be required to be evaluated by the Fire Marshal and comply with applicable Uniform Fire Code, CBC, and General Plan policies. Compliance with these requirements would ensure that the risk of injury or damage from wildland fires and impacts would remain less than significant.

As discussed in the summary of potential hazards and hazardous materials in Section 4.7.1(d), there are overhead transmission lines in the vicinity of the project site. However, these lines are elevated such that they are not close enough to pose a risk to residents and other users of the project site associated with electromagnetic fields. Additionally, the project site is located approximately 10 miles east-northeast of the Diablo Canyon Nuclear Power Plant. Radiation hazards associated with Power Plant are region-wide, and not specific to this site. As such, potential radiation hazards to development in the City of San Luis Obispo are addressed in the Land Use and Circulation Element Update of the City's General Plan. Therefore, potential impacts associated with electromagnetic fields or radiation would be less than significant.

4.14.7 Hydrology and Water Quality

Would the project:

- *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 preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted);*
- *Expose people or structure to a significant risk of loss, injury, or death involving flooding, including flooding as the result of failure of a dam or levee; and/or*
- *Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?*



The project Initial Study concluded that the project would result in no impact related to flooding as the result of failure of a levee or dam. This issue is also discussed in Section 4.8, *Hydrology and Water Quality*. Based on the discussion therein, adapted from the *Final SB610 Water Supply Assessment (WSA)* for the project (refer to Appendix M) and information in the City's 2015 Urban Water Management Plan (UWMP), the project would not result in a significant impact from flooding as a result of dam or levee failure. Refer to Section 4.8, *Hydrology and Water Quality*, for a detailed discussion of this issue.

The project would be consistent with the buildout parameters included in the General Plan, for which adequate water supply has been planned. The project would be served by the City's sewer and water systems and would not deplete groundwater resources. This impact would be less than significant.

According to the Safety Element of the General Plan, the City and the proposed development are not subject to inundation 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, there would be no impact related to the potential for inundation by seiche, tsunami, or mudflow at the project site.

4.14.8 Land Use and Planning

Would the project:

- *Physically divide an established community; and/or*
- *Conflict with any applicable habitat conservation plan or natural community conservation plan?*

Proposed development under the project would be designed to fit among existing surrounding urban development and would not physically divide an established community. Therefore no impacts would result with regards to dividing an established community. There are no applicable natural community conservation plans that include the site, or are affected by development at that location.

4.14.9 Mineral Resources

Would the project:

- *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; and/or*
- *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?*

Mining is not permitted within the City, pursuant to Section 17.08.070 of the Zoning Regulations.

There are no known mineral resources on the project site. The project site is not designated by the General Plan, the proposed Specific Plan, or other land use plans as a locally important mineral recovery site. Therefore, no impacts related to mineral resources would occur.



4.14.10 Noise

Would the project result in:

- *A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;*
- *A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;*
- *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; and/or*
- *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?*

Based on the program analysis for the LUCE Update EIR, the project Initial Study concluded that the project would not result in substantial increases in ambient noise levels in the project vicinity. This issue was further examined in the project-level analysis in Section 4.10, *Noise*, based on the specific types and level of development proposed for the San Luis Ranch Specific Plan Area under the project. Based on the project-level analysis therein, the project would result in potentially significant impacts relative to ambient noise increases due to project-related construction as well as siting new residential units in close proximity to new commercial development. Implementation of Mitigation Measures N-1(a) through N-1(g) would reduce the potential construction noise impact to the maximum extent feasible, but this impact would remain significant and unavoidable. However, Mitigation Measures N-4(a) and N-4(b) would ensure that noise levels at residences on the project site would not exceed the City's standards for intermittent noise and, thus, reduce this potential impact to a less than significant level. Refer to Section 4.10, *Noise*, for the full, project-level analysis of these issues.

The project would occur within the projected 50-55 dB contour from the San Luis Obispo County Regional Airport, based on the Airport Land Use Plan. Table 1 of the General Plan Noise Element states that the maximum normally acceptable noise exposure for outside residential activities is 60 dB. Residential uses included in the project would not experience noise sources that exceed significance thresholds and this impact would be less than significant.

The project is not within the vicinity of a private airstrip. Therefore, there would be no impact associated with exposure to excessive noise from a private airstrip.

4.14.11 Population and Housing

Would the project:

- *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);*
- *Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; and/or*
- *Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*



The City of San Luis Obispo has a population of 45,802 (DOF 2015). Development of the project would add an estimated 1,293 residents to the City (546 new single family and multi-family dwelling units x 2.29 people/unit and 34 new affordable units x 1.25 people/unit).¹ When added to the existing population within the City of approximately 46,117 (California Department of Finance 2016), buildout of the Specific Plan Area would increase the City's total population to an estimated 47,410 residents, an increase of 2.8 percent. The population projections in the City's General Plan Land Use Element account for development of the San Luis Ranch Specific Plan Area and potential impacts have been addressed in the LUCE Update EIR. As such, the increase in the City's population resulting from the project would be consistent with the population projections expected under the General Plan. Furthermore, the potential number of dwelling units (25,601) that could be located in the City after buildout of the Land Use Element (which includes development of the project site), would not exceed the one percent per year maximum number of dwelling units (25,762) specified by Land Use Element Policy 1.11.2 (Residential Growth Rate). Therefore, population growth that may result from the project would not conflict with local growth management policy or result in exceedance of local and regional growth projections, and impacts would be less than significant. In addition, no existing homes or residents would be displaced within the San Luis Ranch Specific Plan area as a result of project implementation. Therefore, no impacts related to the displacement of housing or people would occur.

4.14.12 Public Services

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

- *Fire protection;*
- *Police protection;*
- *Schools;*
- *Parks; and/or*
- *Other public facilities?*

By increasing the population and the number of structures in the City of San Luis Obispo, buildout of the project site would increase the demand for fire and police protection services, and increase users of area roadways and other transportation infrastructure such that new or expanded facilities may be necessary. The project applicant would be required to pay fair share development impact fees that would provide for improved services as necessary. The proposed San Luis Ranch development is consistent with the City's LUCE and service facilities have been planned to meet the additional service demand. The environmental impacts of such facilities were addressed in the LUCE Update EIR. Additionally, a Fire Flow Analysis was prepared for the project on March 18, 2016 by Cannon and determined that the San Luis Ranch water system would be able to meet the required fire flow and pressures throughout the site. Therefore,

¹ Population growth rate from City's Land Use and Circulation Element Appendix I Water Supply Assessment (page 9), as referred to in SB610 Water Supply Assessment – San Luis Ranch prepared by Cannon (2016; Appendix M).



impacts to fire and police protection services associated with the project would be less than significant.

The San Luis Coastal Unified School District provides educational services for the City of San Luis Obispo, City of Morro Bay, and the communities of Los Osos, Baywood, and Avila Beach. The District 2015-2016 K-12 enrollment is 7,640 students (San Luis Coastal Unified School District, *Developer Fee Justification Study*, 2016). Table 4.14-1 provides a summary of the number of students generated by the residential component of the project based on the District student yield rates from the 2016 *Developer Fee Justification Study*.

**Table 4.14-1
 San Luis Ranch Student Generation**

Grade Level	Student Yield Rates ¹		Proposed Development		Student Generation
	SFD/SFA	MF	SFD/SFA	MF	
K-6	0.302	0.116	200	380	60.4 + 44.1 = 105
7-8	0.064	0.032			12.8 + 12.2 = 25
9-12	0.119	0.066			23.8 + 25.1 = 49
Total for K-12	0.485	0.214			97 + 81.3 = 179

1. Totals may vary slightly due to rounding.
 Source: San Luis Coastal Unified School District, 2015

Based on Table 4.14-1, the project would add an estimated 179 students to public schools in the City of San Luis Obispo.

The District’s existing school enrollments and capacities are shown in Table 4.14-2 alongside projected enrollments and capacities upon buildout of the project.

**Table 4.14-2
 District Enrollment and Capacity**

Grade Level	2015/16 Capacity	2015/16 Enrollments	2014/15 Utilization of School	Enrollments with Students Generated by the Project	Utilization with Student Generated by the Project
K-5/6	4,868	4,020	82.6%	4,125	84.7%
6/7-8	2,114	1,313	62.1%	1,338	63.3%
9-12	3,366	2,307	68.5%	2,356	70%

Source: San Luis Coastal Unified School District, 2015

As shown in Table 4.14-2, buildout of the project would not result in exceedance of District school capacities.

Senate Bill 50 (Government Code Section 65970) implemented school impact fee reforms in 1998 by amending the laws governing developer fees and school mitigation. Pursuant to SB 50, development projects are required to pay school impact fees established to offset potential impacts on school facilities. The project would not result in additional students that would contribute to over-capacity at public schools, and the collection of state-mandated fees under SB 50 is considered full and complete mitigation for impacts to public schools. The project applicant would be required by State law to pay the fair share of impact mitigation fees, and impacts to public schools would be less than significant.



Impacts related to the provision of park services and facilities are discussed in Section 4.11, *Recreation*.

4.14.13 Transportation/ Traffic

Would the project:

- *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; and/or*
- *Result in inadequate emergency access?*

The LUCE Update EIR found that City-wide development, including the project, could result in deteriorated safety conditions due changes in airline traffic volumes or traffic patterns. However, as determined in the LUCE Update EIR, the City is required to ensure that buildout under the General Plan is in compliance with Circulation Element Policies 11.0.1 Interstate Air Service, 11.0.2 County Aircraft Operations, and 11.0.3 Public Transit Service. Compliance with such policies would ensure that potential impacts of the project, as well as other planned development in the City, due to changes in air traffic patterns would remain at a less than significant level.

The project site is surrounded by existing City roadways and development. Circulation within the project site would be developed to allow for emergency access to the site from Dalidio Drive and a proposed extension to Froom Ranch Way. Therefore, the project would result in a less than significant impact to emergency access.

4.14.14 Utilities and Service Systems

Would the project:

- *Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;*
- *Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;*
- *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;*
- *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;*
- *Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; and/or*
- *Comply with federal, state, and local statutes and regulations related to solid waste?*

The project would result in an incremental increase in demand on City infrastructure, including water and wastewater treatment facilities, and storm water drainage facilities. With the proposed annexation to the City, development of the site is required to be served by City sewer and water service. As described in Section 2.0, *Project Description*, the project includes development of water, wastewater, and storm water infrastructure to connect the project to existing City infrastructure. With the proposed infrastructure, the project would be adequately served by the City's sewer and water systems. Existing storm water facilities exist in the vicinity



of the project site, and it is not anticipated the project would result in the need for new off-site facilities or expansion of existing facilities which could have significant environmental effects. Impacts associated with new water and wastewater treatment facilities would be less than significant.

The City's Water Resource Recovery Facility (WRRF) processes wastewater in accordance with the standards set by the Regional Water Quality Control Board (RWQCB). The WRRF is designed for an average dry weather flow capacity of 5.1 million gallons per day (MGD) and a peak wet weather flow capacity of 22 MGD. In 2015, average flows to the WRRF were approximately 3.5 MGD. The LUCE Update EIR determined that the project, in combination with other specific plan development in the City, would generate approximately 0.32 MGD of wastewater or approximately 20 percent of the WRRF dry weather flow capacity and 1.7 percent of the WRRF wet weather flow capacity.

The developer would be required to construct private sewer facilities to convey wastewater to the nearest public sewer. The on-site sewer facilities would be required to be constructed according to the standards in the Uniform Plumbing Code and City standards. Impact fees are collected at the time building permits are issued to pay for capacity at the City's WRRF. The fees are set at a level intended to offset the potential impacts of each new residential unit included in the project. Additionally, the project would generate wastewater within the capacity of the City's WRRF. This impact would be less than significant.

The project would be served by San Luis Garbage Company, which maintains access and standards for access and to ensure that collection is feasible, both of which would be reviewed by the Architectural Review Commission. Solid waste generated by new development in the project area would be delivered to Cold Canyon Landfill. This landfill has been recently expanded and currently has capacity to accept waste for at least 20 years at the current rate of disposal. The landfill has a total permitted capacity of 23,900,000 cubic yard (CY) with a remaining capacity of 14,500,000 CY or 61 percent (California Department of Resources Recycling and Recovery, 2016). Consistent with the City's Source Reduction and Recycling Element, recycling facilities must be accommodated on the project site and a solid waste reduction plan for recycling discarded construction materials is required be submitted with the building permit application. The project would also be required by ordinance to include facilities for recycling to reduce the waste stream generated by operation of the project. With incorporation of recycling and reduction measures, the project would not be expected to generate waste in exceedance of the Cold Canyon Landfill remaining capacity. Additionally, compliance with the Source Reduction and Recycling Element is considered sufficient to avoid significant environmental effects related to solid waste. Therefore, impacts related to solid waste disposal would be less than significant.

