

Appendix A

Notice of Preparation and Initial Study



Notice of Preparation

To: EIR & Notice of Preparation Mailing List

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report

Lead Agency:

Agency Name: City of San Luis Obispo

Department Name: Community Development

Street Address: 919 Palm Street

City/State/Zip: San Luis Obispo, CA 93401

Contact: John Rickenbach, 805-610-1109/fax 805-781-7173

Consulting Firm: (if applicable)

EIR to be prepared by:

Firm Name: Rincon Consultants, Inc.

Street Address: 1530 Monterey Street, Suite D

City/State/Zip: San Luis Obispo, CA 93401

Contact: Richard Daulton

The City of San Luis Obispo will be the Lead Agency and will prepare an environmental impact report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information, which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for this project.

The project description, location, and the potential environmental effects are summarized in the attachment. A copy of the Initial Study is not attached, but is available upon request from the Lead Agency (see above contact). Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but **not later than 30 days** after receipt of this notice.

Please send your response to the attention of John Rickenbach, AICP, Senior Planner, in the City of San Luis Obispo Community Development Department at the address shown above. We will need the name of a contact person in your agency.

Project Title: San Luis Ranch Project

Project Location: The site is composed of approximately 131 contiguous acres in unincorporated San Luis Obispo County, surrounded by areas within the City of San Luis Obispo, and within the City's Sphere of Influence, generally bounded by Madonna Road, Dalidio Drive and U.S. Highway 101. (APN 067-121-022)

Project Description:

The project is a Specific Plan, General Plan Amendment, and related actions that would allow for the development of the San Luis Ranch (Dalidio) area as identified in the City's General Plan. The project includes a mix of residential, commercial, and office uses while preserving substantial areas of open space and agriculture on a 131.3-acre property. The intent is for the project to be consistent with the development parameters described in the City's recently updated Land Use Element, which envisions up to 500 residential units, 200,000 square feet of commercial uses, 150,000 square feet of office, 200 hotel rooms, at least 5.8 acres of parks, while preserving 50% of the site in agriculture and open space.

Date: 10-8-15

Signature: [Handwritten Signature]

Title: Interim Deputy Director - Development Review

NOTICE OF PREPARATION ATTACHMENT SAN LUIS RANCH PROJECT

The City of San Luis Obispo, as Lead Agency under the California Environmental Quality Act (CEQA), is requesting comments on the environmental impact report (EIR) scope of work for the proposed project, described below and in the Notice of Preparation, and commonly referred to as the Chinatown Project. The Initial Study and detailed scope of work for issue areas identified as potentially significant are available for review upon request. Please contact Project Manager John Rickenbach at (805) 610-1109.

Project Location and Setting

The site is composed of approximately 131 contiguous acres in unincorporated San Luis Obispo County, surrounded by areas within the City of San Luis Obispo, and within the City's Sphere of Influence, generally bounded by Madonna Road, Dalidio Drive and U.S. Highway 101. (APN 067-121-022)

Project Description

The project is a Specific Plan, General Plan Amendment, and related actions that would allow for the development of the San Luis Ranch (Dalidio) area as identified in the City's General Plan. The project includes a mix of residential, commercial, and office uses while preserving substantial areas of open space and agriculture on a 131.3-acre property. The intent is for the project to be consistent with the development parameters described in the City's recently updated Land Use Element, which envisions up to 500 residential units, 200,000 square feet of commercial uses, 150,000 square feet of office, 200 hotel rooms, at least 5.8 acres of parks, while preserving 50% of the site in agriculture and open space.

Discretionary Permits

In order to pursue development consistent with the mix of land uses shown in the project application, the following entitlements will need to be processed in order to implement development on the site:

1. General Plan Amendment/Pre-Zoning
2. Specific Plan
3. Processing Memorandum of Understanding (outlining a framework for process, fees, and a methodology for determining a fair share for Prado Road improvements)
4. Development Agreement
5. Annexation
6. Development Plan/Tentative Tract Map(s)
7. Architectural Review

1. **General Plan Amendment and Pre-Zoning.** The project site would require a General Plan Amendment to accommodate some aspects of future development under the Specific Plan, although in general it is intended to be consistent with the general development parameters currently envisioned in the General Plan. Because the site is currently unincorporated, it will need to be pre-zoned prior to annexation to the City could be approved.
2. **Specific Plan.** The LUCE identifies the San Luis Ranch property as a Special Focus Area that requires the adoption of a Specific Plan prior to any development. The applicant is preparing a Specific Plan to accommodate the proposed development consistent with

guidance for development contained in Section 8.1.4 of the Land Use Element.

3. **Processing Memorandum of Understanding** - The applicant team and staff have prepared a permit processing agreement due to the complex nature of the project that entails multiple entitlements and actions prior to development, including annexation, where the process may take a substantial amount of time. This agreement provides a framework for the planning process and related activities with respect to the project application, even conceptually describing a framework for evaluating and implementing fees and mitigation measures. It should be noted that approval of this agreement in no way implies or obligates the Council to approve the project. Instead, it provides the “ground rules” under which the project application will be processed, and the conditions under which an annexation request would be taken to the San Luis Obispo Local Agency Formation Commission (LAFCo) should the project be approved. The Processing Memorandum of Understanding also authorizes a Development Agreement application, which if approved would bind the applicant to a series of specific conditions under which development would be allowed, subject to approval of a General Plan Amendment, Specific Plan, and certification of related studies, and an Environmental Impact Report (EIR).

In summary, the Processing Memorandum of Understanding is intended to achieve the following objectives:

- Develop a mutual understanding in terms of the planning process to ensure the orderly development of the project;
- Ensure a desirable and functional community environment;
- Provide effective and efficient development of public facilities, infrastructure, and services appropriate for the development of the project;
- Assure the most effective use of resources within the City, and provide other significant public benefits to City and its residents.

4. **Development Agreement** - Development Agreement establishes certain development rights, but also commits the developer to construct or pay for certain amenities for the City’s public benefit that are greater than the infrastructure and mitigations that are required to facilitate the development. These are also known as “public benefits” and can include but not be limited to public infrastructure and services such as bike facilities, endowments to support public services such as open space, and/or other items of value. In that context, a Development Agreement is an important tool that can be used when a site is considered for annexation. The Development Agreement is intended to reduce uncertainty in planning and to provide for the orderly development of the Project, consistent with LAFCo guidelines.
5. **Annexation.** If the project is approved, the City would initiate the annexation process with the San Luis Obispo Local Agency Formation Commission (LAFCo). This application would be based in part on the Processing Memorandum of Understanding and Development Agreement, which the City Council would need to approve. Annexation will also depend on the City’s ability to address key issues to LAFCo, including agricultural preservation, the ability to provide public services to the site (including water), and the nature of a tax-sharing arrangement with San Luis Obispo County.
6. **Development Plan/Tentative Tract Maps.** The applicant will submit tract maps to implement the provisions of the Specific Plan and Development Agreement. The Tract Map establishes the proposed lot lines to allow individual ownership of properties and

to layout the required infrastructure and utilities.

7. **Architectural Review** – Ultimately final architectural review of housing, commercial buildings, and some site facilities will be needed. The ARC will take an early look at design guidance in the development plan and provide comments.

In addition, the project will need to be formally reviewed by the Airport Land Use Commission (ALUC) for consistency with the Airport Land Use Plan. Other advisory bodies that will weigh in on aspects of the project development include the Parks & Recreation Commission reviewing park proposals, and the Bicycle Advisory Committee advising on the proposed bicycle trail network.

Probable Environmental Effects/Issues Scoped for EIR

Issue areas that may be determined to be potentially significant include:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use/Planning
- Noise
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

Issues Determined Not to be Significant under CEQA Thresholds of Significance include:

- Geology and Soils (with prescribed mitigation)
- Mineral Resources
- Population and Housing
- Public Services (with prescribed mitigation)

Development of a Reasonable Range of Alternatives

Factors determining alternative project configurations include considerations of project objectives, site suitability, economic viability, availability of infrastructure, General Plan consistency, and a proponent's control over alternative sites. The EIR will discuss the rationale for selection of alternatives that are feasible and therefore, merit in-depth consideration, and which are infeasible (e.g., failed to meet Project objectives or did not avoid significant environmental effects) and therefore rejected. Project alternatives have yet to be finalized.

These alternatives will be general in nature since further environmental issue area analyses would be necessary before more specific project alternatives can be identified. The need for project redesign would be determined during the course of environmental review.

Public Scoping Meeting

A public scoping meeting has been scheduled to allow for any interested persons to supply input on

issues to be discussed in the EIR:

Date: Wednesday, October 14, 2015

Time: 6:00 p.m.

Place: 990 Palm Street (City Council Chamber upstairs)

The meeting is an opportunity for City and consultant staffs to gather information from the public regarding the potential environmental impacts of the project that need to be evaluated in the EIR. It is not intended to be a hearing on the merits of the project. Therefore, members of the public should keep their comments focused on potential significant changes to the environment that may occur as a direct result of project development.

From: "Fukushima, Adam J@DOT" <adam.fukushima@dot.ca.gov>
Date: November 2, 2015 at 11:28:54 AM PST
To: John Rickenbach <jfrickenbach@aol.com>
Cc: "Newland, Larry C@DOT" <larry.newland@dot.ca.gov>
Subject: **comments on the San Luis Ranch NOP**

Hello John,

Thank you for the opportunity to review the City's Notice of Preparation for the San Luis Ranch draft EIR. We appreciate the opportunity to comment and wish to reiterate the points we made on the topics of aeronautics, hydrology, and surface transportation in the letter we submitted on June 16, 2014. Please enter this letter into the record for the draft EIR. Thank you.

Regards,

Adam Fukushima, PTP
Caltrans - District 5
50 Higuera Street
San Luis Obispo CA
(805) 549-3131

DEPARTMENT OF TRANSPORTATION

50 HIGUERA STREET
SAN LUIS OBISPO, CA 93401-5415
PHONE (805) 549-3101
FAX (805) 549-3329
TTY 711
www.dot.ca.gov/dist05/



*Serious drought.
Help save water!*

June 16, 2014

Mr. Timothy Bochum
Deputy Director of Public Works
City of San Luis Obispo
919 Palm Street
San Luis Obispo, CA 93401

SAN LUIS RANCH DEVELOPMENT

Dear Mr. Bochum:

In anticipation of the San Luis Ranch development proposal, for which the city is beginning to consider, this letter is provided for early guidance on traffic circulation and infrastructure needs related to the state highway system. We recognize the importance of this project to the city and offer this in a spirit of partnership and in support of mutual goals for a safe and efficient transportation system.

The San Luis Ranch project is located on the former Dalidio property adjacent and west of US 101, between the Madonna Road and Los Osos Valley Road interchanges. Although some information developed for the former San Luis Marketplace project may still be relevant, many factors and circumstances have changed over the decades of time since passed. As we discussed at a February 27, 2014 meeting together with staff from the San Luis Obispo Council of Governments and the Regional Transit Authority, the city should not regard past decisions or any implied commitments related to US 101 as foregone conclusions, including but not limited to constructing a new interchange at Prado Road.

Central to this discussion is access to US 101. For traveler safety and operational integrity of the freeway, a new interchange in an urban location such as this must be no closer than one mile to the next interchange. Because the Madonna Road and Los Osos Valley Road interchanges are less than two-miles apart now, this requirement cannot be met for a new Prado Road interchange. Recognizing the city's stated desire to pursue new access as an option, however, it is critical for the city to establish a clear purpose and need for any new proposal. In support of that pursuit, we offer these suggestions:

- Conduct a thorough subarea traffic analysis of the circulation across, along and including the US 101 corridor between Los Osos Valley Road and Madonna Road.
- Evaluate a full range of options to mitigate the traffic impacts of the new development in a progressive sequence, to include: (1) making local circulation improvements only, (2) establishing new local access only across US 101, without connections, eliminating the existing northbound ramps, (3) modifying access at the two existing full access

Timothy Bochum, Deputy Director of Public Works
June 16, 2014
Page 2

interchanges, and (4) establishing a new connection with a full or partial access interchange at Prado Road.

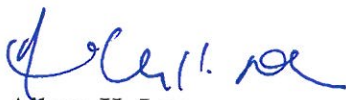
Should the analysis support new access at this location, the city should also anticipate the potential for numerous exceptions to design standards for a project on the State Highway system. While interchange spacing will be among the more critical factors to address, a variety of other features and standards must be considered together and will be equally important to ensure that a safe and effective product design will result.

In addition, other features unique to the project site will require careful consideration:

- **Floodplain** - The drainage characteristics of the project location are well documented. The addition of impervious surface to the ranch property has significant implications for San Luis Creek and US 101. A revised flood plain map may be required by FEMA. Caltrans cannot approve any improvements or modifications to State Highway facilities until FEMA requirements are satisfied. In addition to coordinating with Caltrans' experts and FEMA, we suggest the city also coordinate with San Luis Obispo County and other agencies when approaching this subject. For more detailed information regarding hydrology and flooding with respect to the State Highway please contact Mr. Ben Erchul of the District Hydraulics Department at (805) 549-3391.
- **Aviation safety and Airport Impacts** - The San Luis Ranch property is proximal to take-off and landing approaches for all runways at the San Luis Obispo County Regional Airport. Locating new residential and commercial development within and around these flight paths raises questions regarding airport operations and safety. We suggest that the city consult directly with the Caltrans Division of Aeronautics prior to issuing an RFP. Please contact Mr. Terry Barrie, Caltrans Division of Aeronautics, at (916) 654-4151 to initiate a dialog on this topic.

In conclusion, Caltrans values our partnership with the city of San Luis Obispo, and we look forward to participating in the upcoming scoping meeting regarding the development proposal. If you need to discuss these issues further with Caltrans please contact Mr. Larry Newland of my staff at (805) 549-3103.

Sincerely,



Aileen K. Loe
Deputy District Director
Planning and Local Assistance

From: Manuel Azevedo <azevedo.manuel@yahoo.com>
Date: November 4, 2015 at 12:54:59 PM PST
To: "rcohen@slocity.org" <rcohen@slocity.org>
Cc: "jfrickenbach@aol.com" <jfrickenbach@aol.com>
Subject: San Luis Ranch EIR
Reply-To: Manuel Azevedo <azevedo.manuel@yahoo.com>

Hello

I am not sure if this type of question will be addressed in the EIR or not, but my question/ concern would be with the affordability of the housing within the development.

This question would also apply to the Avila Ranch EIR, although I know the deadline for comments was 9/14 for Avila Ranch.

Several newspaper articles have recently stated that the housing is being targeted for families with 80% to 160% of median family income of \$45,032, so that would mean that families making between \$36,026 up to \$72,051 could afford to buy a home in the new development(s).

Can you please write me back and let me know whether or not this can and/ or will be evaluated in the EIR?

Thank you.

Manuel Azevedo



Air Pollution Control District
San Luis Obispo County

October 16, 2015

John Rickenbach
City of San Luis Obispo
Community Development
919 Palm Street
San Luis Obispo CA 93401

SUBJECT: APCD Comments Regarding the San Luis Ranch Project formerly Dalidio Ranch Project NOP Program Level

Dear Mr. Rickenbach,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the proposed project located at Madonna Road in San Luis Obispo.

The project is a Specific Plan, General Plan Amendment, and related actions that would allow for the development of the San Luis Ranch (Dalidio) area as identified in the City's General Plan. The project includes a mix of residential, commercial, and office uses while preserving substantial areas of open space and agriculture on a 131.3 acre property. The intent is for the project to be consistent with the development parameters described in the City's recently updated Land Use Element, which envisions up to 500 residential units, 200,000 square feet of commercial uses, 150,000 square feet of office, 200 hotel rooms, at least 5.8 acres of parks, while preserving 50% of the site in agriculture and open space

The following are APCD comments that are pertinent to this project.

GENERAL COMMENTS

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each. **Please address the action items contained in this letter that are highlighted by bold and underlined text.**

The following are APCD comments that are pertinent to this project.

1. Contact Person:

Melissa Guise
Air Pollution Control District
3433 Roberto Court
San Luis Obispo, CA 93401
(805) 781-4667

Permit(s) or Approval(s) Authority:

Portable equipment used during construction activities may require statewide registration or an APCD permit. Additionally, some future developments (i.e. portable generators and equipment with engines that are 50 hp or greater, electrical generation plants or the use of standby generator, etc.) may require APCD permits and applicants will need to apply for an Authority to Construct. Please contact our Engineering Division at (805) 781-5912 prior to final permit approval of these types of projects by your agency.

Demolition/Asbestos

Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, abatement, and disposal of asbestos containing material (ACM). Asbestos containing materials could be encountered during the demolition or remodeling of existing buildings or the disturbance, demolition, or relocation of above or below ground utility pipes/pipelines (e.g., transite pipes or insulation on pipes). **If this project will include any of these activities, then it 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).** These requirements include, but are not limited to: 1) written notification, within at least 10 business days of activities commencing, to the APCD, 2) asbestos survey conducted by a Certified Asbestos Consultant, and, 3) applicable removal and disposal requirements of identified ACM. Please contact the APCD Enforcement Division at (805) 781-5912 and also go to slocleanair.org/business/asbestos.php for further information. To obtain a Notification of Demolition and Renovation form go to the "Other Forms" section of: slocleanair.org/business/onlineforms.php.

Naturally Occurring Asbestos

Naturally occurring asbestos (NOA) has been identified by the state Air Resources Board as a toxic air contaminant. Serpentine and ultramafic rocks are very common throughout California and may contain naturally occurring asbestos. The SLO County APCD has identified areas throughout the County where NOA may be present (see the APCD's 2012 CEQA Handbook, Technical Appendix 4.4). If the project site is located in a candidate area for Naturally Occurring Asbestos (NOA), the following requirements apply. Under the ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (93105), prior to any construction activities at the site, the project proponent shall ensure that a geologic evaluation is conducted to determine if the area disturbed is exempt from the regulation. An exemption request must be filed with the APCD. If the site is not exempt from the requirements of the regulation, 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. More information on NOA can be found at slocleanair.org/business/asbestos.php.

Developmental Burning

Effective February 25, 2000, the APCD prohibited developmental burning of vegetative material within San Luis Obispo County. If you have any questions regarding these requirements, contact the APCD Enforcement Division at 781-5912.

Construction Permit Requirements

Based on the information provided, we are unsure of the types of equipment that may be present during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities may require California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit.

The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendices, page 4-4, in the APCD's 2012 CEQA Handbook.

- Power screens, conveyors, diesel engines, and/or crushers;
- Portable generators and equipment with engines that are 50 hp or greater;
- Electrical generation plants or the use of standby generator;
- Internal combustion engines;
- Rock and pavement crushing;
- Unconfined abrasive blasting operations;
- Tub grinders;
- Trommel screens; and,
- Portable plants (e.g. aggregate plant, asphalt batch plant, concrete batch plant, etc).

To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.

Operational Permit Requirements

Based on the information provided, we are unsure of the types of equipment that may be present at the site. Operational sources may require APCD permits. The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendix, page 4-4, in the APCD's 2012 CEQA Handbook.

- Portable generators and equipment with engines that are 50 hp or greater;
- Electrical generation plants or the use of standby generator;
- Food and beverage preparation (primarily coffee roasters);
- Dry cleaning;
- Boilers;
- Internal combustion engines;

Most facilities applying for an Authority to Construct or Permit to Operate with stationary diesel engines greater than 50 hp, should be prioritized or screened for facility wide health risk impacts. A diesel engine-only facility limited to 20 non-emergency operating hours per year or that has demonstrated to have overall diesel particulate emissions less than or equal to 2 lb/yr does not need to do additional health risk assessment. **To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.**

2. Environmental Information:

The potential air quality impacts from construction and operational phases of the San Luis Ranch Project should be assessed in the EIR. The development has the potential for significant impacts to local air emissions, ambient air quality, sensitive receptors, and the implementation of the Clean Air Plan (CAP). A complete air quality analysis should be included in the DEIR to adequately evaluate the overall air quality impacts associated with implementation of the proposed General Plan amendment. This analysis should address both short-term (construction) and long-term (operational) emissions impacts (including traditional air pollutants and greenhouse gas emissions). The following is an outline of items that should be included in the analysis:

- a) A description of existing air quality and emissions in the impact area, including the attainment status of the APCD relative to State and Federal air quality standards and any existing regulatory restrictions to development. The most recent CAP should be consulted for applicable information and the APCD should be consulted to determine if there is more up to date information available.
- b) A qualitative analysis of the air quality impacts should be conducted. A consistency analysis with the CAP will determine if the emissions resulting from development under the Community Plan will be consistent with the emissions projected in the CAP, as described in item 6 of this letter. The qualitative analysis should be based upon criteria such as prevention of urban sprawl and reduced dependence on automobiles. A finding of Class I impacts could be determined qualitatively. All assumptions used should be fully documented in an appendix to the DEIR.
 - To aid in the air quality analysis, the traffic study should include the total daily traffic volumes projected. The traffic study results can be used in the qualitative analysis by providing a tool for comparing trip generation between different alternatives and evaluating effectiveness of mitigation methods for reducing traffic impacts.
- c) The DEIR should include a range of alternatives that could effectively minimize air quality impacts. A consistency analysis should be performed for each of the proposed alternatives identified, as described above. A qualitative analysis of the air quality impacts should be generated for each of the proposed alternatives. Examples include but are not limited to:
 - Flexible zoning to promote mixed use and design standards that protect mixed use.
 - Increase the amount of neighborhood scale mixed use.
 - Additional density beyond proposed zoning allowances.
 - Design standards that require narrow streets and minimum front setbacks on structures.
 - Limiting the size of each arterial through the development. This reduces the need for noise barriers such as cinder block walls along roadways, decreases roadway widths, and slows the speed of traffic, creating an atmosphere that encourages walking and bicycling.

- d) Mitigation measures to reduce or avoid significant air quality impacts should be recommended to reduce air quality impacts from construction and operational phases to a level of insignificance.

The initial study (page 15) concludes that operational phase emissions from the project would not be consistent with the APCD Clean Air Plan and therefore would result in a Class 1 significant and unavoidable impact. While APCD acknowledges that the Land Use and Circulation Element (LUCE) update policies and existing City policies may not bring the project below a Class I impact, actual emissions can be mitigated, as outlined in the APCD Air Quality Handbook Section 3.8. If necessary, off-site mitigation could be implemented to reduce the long-term impacts from the operations of the project. **The APCD recommends mitigation, including off-site mitigation, be addressed in the DEIR.**

- e) Greenhouse gases should be evaluated in the DEIR and mitigation should be proposed as appropriate.

The initial study (page 29) indicates the Land Use and Circulation Element Update (LUCE) would be consistent with the City's Climate Action Plan and incorporates applicable CAP policies and program that would reduce GHG, thus resulting in a Class III impact.

The DEIR should demonstrate compliance and consistency with the City's Climate Action Plan. Generally, only projects that are consistent with the General Plan, and SLOCOG population and employment projections (upon which the GHG emission modeling and Climate Action Plan is based), can apply for a determination of consistency with the Climate Action Plan. The population and employment projections should be clearly delineated in the DEIR and consistency with these projections demonstrated.

In addition, all action/measures identified in the Climate Action Plan must be incorporated as binding and enforceable components of the project for it to be found consistent with the CAP. If an action is not applicable to the project, please identify and explain. If one or more of the mandatory actions cannot be met, substitution may be allowed along with a demonstration of how the substituted action would achieve equivalent reduction. The EIR should also demonstrate that the project would not substantially interfere with implementation of the mandatory Climate Action Plan measures or achieving the City's climate reduction targets.

3. Permit Stipulations/Conditions:

It is recommended that you refer to the "CEQA Air Quality Handbook" (the Handbook). If you do not have a copy, it can be accessed on the APCD web page (www.slocleanair.org) in the Business Assistance section, listed under Regulations, or a hardcopy can be requested by contacting the APCD. The Handbook provides information on mitigating emissions from development (Section 5) which should be referenced in the DEIR.

4. Alternatives:

Any alternatives described in the DEIR should involve the same level of air quality analysis as described in bullet items 3.c and 3.d listed above.

5. Reasonably Foreseeable Projects, Programs or Plans:

The most appropriate standard for assessing the significance of potential air quality impacts is the preparation of a consistency analysis where the proposed project is evaluated against the land use goals, policies, and population projections contained in the CAP. The rationale for requiring the preparation of a consistency analysis is to ensure that the attainment projections developed by the APCD are met and maintained. Failure to comply with the CAP could result in long term air quality impacts. Inability to maintain compliance with the state ozone standard could bear potential negative economic implications for the county's residents and business community. The APCD's CEQA Air Quality Handbook provides guidance for preparing the consistency analysis and recommends evaluation of the following questions:

- a) Are the population projections used in the plan or project equal to or less than those used in the most recent CAP for the same area?
- b) Is the rate of increase in vehicle trips and miles traveled less than or equal to the rate of population growth for the same area?
- c) Have all applicable land use and transportation control measures from the CAP been included in the plan or project to the maximum extent feasible?

The land use and circulation policy areas contained in Appendix E of the APCD's CAP are crucial to the consistency analysis and should be specifically addressed in the DEIR. Implementation of these land use planning strategies is the best way to mitigate air quality impacts at the Community Plan scale.

These land use planning strategies are:

- Planning Compact Communities
- Providing for Mixed Land Use
- Balancing Jobs and Housing
- Circulation Management Policies and Programs
 - Promoting Accessibility in the Transportation System
 - Promoting Walking and Bicycling
 - Parking Management
 - Transportation Demand Management
 - Communication, Coordination and Monitoring

The formation of compact, pedestrian friendly and more economically self-sufficient communities will reduce automobile trip generation rates and trip lengths.

6. Relevant Information:

As mentioned earlier, the Handbook should be referenced in the EIR for determining the significance of impacts and level of mitigation recommended.

7. Further Comments:

No further comments at this time.

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 781-5912.

Sincerely,



Melissa Guise
Air Quality Specialist

MAG/arr

San Luis Ranch EIR

In the project alternative section, an evaluation of a property exchange between the City of San Luis Obispo and SLO Ranch should be investigated.

The City's Laguna Lake Golf Course has a very awkward routing plan, is difficult to access and offers minimal visual benefit in its present location. It clearly is more suited for a variety of residential density development.

Similarly, portions of the SLO Ranch property that lie under the flight path and power lines, and abut the commercial areas and Highway 101 corridor, may be more suitable for public use development. Relocating the golf course to the SLO Ranch property, coupled with the "U-pick" farm proposed by the developer, would accomplish the "Gateway" visual amenity desired by the City and avoid the airport, noise, commercial area, easement and traffic hazard conflicts.

The displaced residential density and unit count proposed by the developer could then be transferred to the golf course property, where all infrastructure is in place and proximity to schools and shopping exists.

Thank you for considering this in the environmental analysis of the SLO Ranch proposal.

Joseph Boud
1645 Corona Court
San Luis Obispo, CA 93401
805.543.0522



**INITIAL STUDY
ENVIRONMENTAL CHECKLIST FORM
For ER # 202-13**

1. Project Title:

San Luis Ranch

A mix of residential, commercial, and office uses while preserving substantial areas of open space and agriculture on the 131.3-acre Dalidio property; City File A/ARC/TR/ER 202-13.

2. Lead Agency Name and Address:

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

3. Contact Person and Phone Number:

Doug Davidson, Deputy Director
805-781-7177

John Rickenbach, Contract Consulting Project Planner
805-610-1109

4. Project Location:

A 131.3-acre site located in unincorporated San Luis Obispo County, surrounded by areas within the City of San Luis Obispo, and within the City's Sphere of Influence, generally bounded by Madonna Road, Dalidio Drive and U.S. Highway 101. (APN 067-121-022)

5. Project Sponsor's Name and Address:

Coastal Community Builders c/o Marshall Ochylski (Project Representative)
867 Pacific Street, Suite 210
San Luis Obispo, CA 93401

6. General Plan Designation:

Specific Plan (various land uses; consistent parameters shown in LUCE Update)

7. Zoning:

Currently unincorporated; would require pre-zoning for Specific Plan

8. Description of the Project:

The project is a Specific Plan, General Plan Amendment, and related actions that would allow for the development of the San Luis Ranch (Dalidio) area as identified in the City's General Plan. The intent is for the project to be consistent with the development parameters described in LUCE update. Guidance for the project is found in Chapter 8, Section 8.1.4 of the update of the Land Use Element. This section states the following (in added italics):

8.1.4 SP-2, San Luis Ranch (Dalidio) Specific Plan Area

***Location:** This specific plan area is located in the southwest quarter of the city at the corner of Madonna Road and Dalidio Drive. The site is approximately 132 acres and is currently used for agricultural purposes. The site is primarily flat topographically. The entire site is within the City's Planning Area, but is outside the current city limits.*

***Purpose:** This project site should be developed as a mixed use project that maintains the agricultural heritage of the site, provides a commercial / office transition to the existing commercial center to the north, and provides a diverse housing experience. Protection of the adjacent creek and a well-planned integration into the existing circulation system will be required. The specific plan for this area should consider and address the following land use and design issues.*

- a. Provide land and appropriate financial support for development of a Prado Road connection. Appropriate land to support road infrastructure identified in the EIR (overpass or interchange) at this location shall be dedicated as part of any proposal.*
- b. Circulation connections to integrate property with surrounding circulation network for all modes of travel. Connection to Froom Ranch and Calle Joaquin, if proposed, shall not bifurcate on-site or neighboring agricultural lands. Any connection to Calle Joaquin shall be principally a secondary / emergency access by design.*
- c. Development shall include a transit hub. Developer shall work with transit officials to provide express connections to Downtown area.*
- d. Maintain agricultural views along Highway 101 by maintaining active agricultural uses on the site, and maintain viewshed of Bishop Peak and Cerro San Luis.*
- e. Maintain significant agricultural and open space resources on site. Land dedicated to Agriculture shall be of size, location and configuration appropriate to maintain a viable, working agricultural operation.*
- f. Where buffering or transitions to agricultural uses are needed to support viability of the agricultural use, these shall be provided on lands not counted towards the minimum size for the agriculture / open space component. Provide appropriate*

- transition to agricultural uses on-site.*
- g. Integrate agricultural open space with adjacent SLO City Farm and development on property.*
 - h. Site should include walkable retail and pedestrian and bicycle connections to surrounding commercial and residential areas.*
 - i. Commercial and office uses shall have parking placed behind and to side of buildings so as to not be a prominent feature.*
 - j. Neighborhood Commercial uses for proposed residential development shall be provided.*
 - k. Potential flooding issues along Prefumo Creek need to be studied and addressed without impacting off-site uses.*
 - l. All land uses proposed shall be in keeping with safety parameters described in this General Plan or other applicable regulations relative to the San Luis Obispo Regional Airport.*
 - m. Historic evaluation of the existing farm house and associated structures shall be included.*

Performance Standards: *This specific plan shall meet the following performance standards.*

<i>Type</i>	<i>Designations Allowed</i>	<i>% of Site</i>	<i>Minimum</i>	<i>Maximum</i>
<i>Residential</i>	<i>LDR MDR MHDR HDR</i>		<i>350 units</i>	<i>500 units</i>
<i>Commercial</i>	<i>NC CC</i>		<i>50,000 SF</i>	<i>200,000 SF</i>
<i>Office/High Tech</i>	<i>O</i>		<i>50,000 SF</i>	<i>150,000 SF</i>
<i>Hotel/Visitor-Serving</i>				<i>200 rooms</i>
<i>Parks</i>	<i>PARK</i>		<i>5.8 ac</i>	
<i>Open Space/ Agriculture</i>	<i>OS AG</i>	<i>Minimum 50%</i>	<i>65.5 ac</i>	<i>No maximum</i>
<i>Public</i>	<i>n/a</i>			
<i>Infrastructure</i>	<i>n/a</i>			

9. Surrounding Land Uses and Settings:

Over time, land surrounding the property has transitioned from agricultural to a variety of urban uses, including residential areas, shopping centers and auto dealerships. With these changes, the project site is surrounded by development and represents a key infill property for the City. However, the site is also important for its historic agricultural use, and is highly visible from Highway 101. Its visually sensitive location at a southern gateway to the City has led to a policy to preserve a portion of the agriculture and open space on site, both to preserve views and to maintain the City's agricultural heritage.

Existing uses surrounding the site area are as follows:

West: Developed single-family properties in the City, zoned R-1.

North: Laguna Lake Park and surrounding open space is across Madonna Road (zoned PF and C/OS-40, respectively), along with developed single-family properties zoned R-1. A post office is adjacent to the site at southwest corner of Madonna and Dalidio Road, zoned C-R-PD (Commercial Retail with a Planned Development overlay).

East: U.S. Highway 101 is immediately east of the site, beyond which are a variety of public facilities, including the City's wastewater treatment plant. These areas are zoned PF (Public Facility). A drive-in theater is located north of Prado Road, and east of the freeway, and is zoned O-PD (Office, with a Planned Development overlay).

South: The SLO City Farm is immediately south of the site (zoned C/OS-20 – Conservation/Open Space with a 20-acre minimum size), beyond which are a variety of commercial service uses, including auto dealerships (zoned C-S or C-S-PD, or Commercial Service, some with a Planned Development overlay).

See Attachment 1, Vicinity Map.

10. Project Entitlements Requested:

The following entitlements and reviews would be required to implement the project:

1. General Plan Amendment/Pre-Zoning
2. Specific Plan
3. Processing Memorandum of Understanding (outlining a framework for process, fees, and a methodology for determining a fair share for Prado Road improvements)
4. Development Agreement
5. Development Plan/Tentative Tract Map(s)
6. Architectural Review

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

- Local Agency Formation Commission - annexation
- Caltrans review for any improvements along Highway 101 and the Prado Road interchange corridor
- Airport Land Use Commission review
- Army Corps of Engineers Nationwide or Individual permit (depending on acreage of total wetland disturbance)
- Regional Water Quality Control Board Section 401 Water Quality Certification
- Air Pollution Control District – grading permits

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

X	Aesthetics	X	Greenhouse Gas Emissions		Population / Housing
X	Agriculture Resources	X	Hazards & Hazardous Materials		Public Services
X	Air Quality	X	Hydrology / Water Quality	X	Recreation
X	Biological Resources	X	Land Use / Planning	X	Transportation / Traffic
X	Cultural Resources		Mineral Resources	X	Utilities / Service Systems
	Geology / Soils	X	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 Game fees pursuant to Section 711.4 of the California Fish and Game Code. This initial study has been circulated to the California Department of Fish and Wildlife for review and comment.


STATE CLEARINGHOUSE

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

On the basis of this initial evaluation:

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

Signature 

Date 9/22/15

Tyler Corey
Interim Deputy Director – Development Review

For: Michael Codron
Community Development Director

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 19, "Earlier Analysis," as described in (5) below, may be cross-referenced).
5. Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063 (c) (3) (D)). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they addressed site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

1. AESTHETICS. Would the project:

a) Have a substantial adverse effect on a scenic vista?	2, 5	--X--			
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, open space, and historic buildings within a local or state scenic highway?	5, 11	--X--			
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	1,11	--X--			
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	29	--X--			

LUCE Update Final Program EIR Analysis

Impact AES-1

Development under the LUCE Update would introduce new development along viewing corridors and scenic roadways, including state scenic highways, in the San Luis Obispo area. This could have a substantial adverse effect on scenic resources or an identified visual resource or scenic vista from a public viewing area. With the incorporation of the LUCE Update policies and other previously existing City policies, potential impacts to such views are considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. This 132-acre area (formerly the Dalidio Specific Plan area) is located in the southwest quarter of the city at the corner of Madonna Road and Dalidio Drive. The general development parameters for the San Luis Ranch Specific Plan Area have been outlined in the LUCE Update in Section 2.0, Project Description. The San Luis Ranch site is characterized primarily by its use as an agricultural property. Dominant visual features at the site are the predominantly flat landform seasonally planted with row crops, an existing stand of eucalyptus trees in the southwest portion of the site, and the Dalidio farm home located in the northwest portion of the site. The San Luis Obispo Promenade shopping center is located east of the site; Laguna Lake Park is located to the north; single-family residential development is to the west; U.S Highway 101 is to the east and south; and agricultural land with commercial development beyond, is south of the site.

The San Luis Ranch Specific Plan Area is located adjacent to a section of Highway 101 identified as a high value scenic resource. Development of the site, as outlined in the LUCE Update, could result in increased urbanization of the existing viewshed along the Highway 101 corridor and could potentially block or obstruct existing public views. However, implementation of the new LUCE Update policies, and other previously existing City policies identified below, would reduce program level impacts to less than significant levels.

Applicable LUCE Update Policies

[NOTE: THE LUCE EIR REFERRED TO THE POLICY NUMBERING SYSTEM FOR THE LAND USE AND CIRCULATION ELEMENTS IN PLACE AT THAT TIME. SINCE THE LUCE WAS ADOPTED, THE IDENTIFICATION NUMBER OF MANY GOALS AND POLICIES HAVE CHANGED. FOR CONSISTENCY IN CARRYING FORWARD THE ANALYSIS, THE NUMBERING SYSTEM USED IN THE LUCE EIR WILL BE USED IN THIS INITIAL STUDY. HOWEVER, THE UPDATED NUMBERING SYSTEM WILL BE APPLIED TO THE ANALYSIS IN THE PROJECT EIR AS APPROPRIATE.]

Land Use Element

- 1.3 Urban Edges Character.
- 1.7.1 Open Space Protection.
- 2.2.10 Site Constraints.
- 4.0.6 Open Places and Views.
- 4.0.12 New Buildings and Views.
- 4.0.26 Visual Resource Study.
- 6.0.2 Resource Mapping.
- 6.2 Hillside Policies.
- 15.0.2 Development Along Scenic Routes.
- 15.0.3 Public Equipment and Facilities.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

Applicable Previously Existing City Policies

Land Use Element

- 8.6.3 Required mitigation.
- 9.1.1 Preserve natural and agricultural landscapes.
- 9.1.3 Utilities and signs.
- 9.1.4 Streetscapes and major roadways.
- 9.1.5 View protection in new development.
- 9.2.1 Views to and from public places, including scenic roadways.
- 9.2.2 Views to and from private development.
- 9.3.2 Update Community Design Guidelines.
- 9.3.4 Environmental and architectural review.
- 9.3.5 Visual assessments.
- 9.3.6 View blockage along scenic highways.
- 9.3.8 Scenic highway designation.
- 9.3.9 Undergrounding utilities.
- 9.3.10 Prohibit billboards.
- 9.3.11 Billboard removal.
- 9.3.12 Preserve the Morros.
- 9.3.13 Monitor viewsheds.
- 5.2 Subdivision Design and General Residential Project Principles.

Impact AES-2

The LUCE Update emphasizes both reuse of existing urbanized lands, infill development on vacant parcels, and new development on vacant parcels near urban areas. The development of such areas could degrade the existing visual character and its surroundings. With the incorporation of the LUCE Update and other previously existing City policies and programs, potential impacts related to existing visual character changes are considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. The San Luis Ranch site is characterized primarily by its use as an agricultural property. Dominant visual features at the site are the predominantly flat landform seasonally planted with row crops, an existing stand of eucalyptus trees in the southwest portion of the site, and the Dalidio farm home located in the northwest portion of the site. Development of the area, as outlined in the LUCE Update, could result in increased urbanization of an undeveloped area, which could degrade the existing visual character and its surroundings. However, implementation of the LUCE Update policies, and other previously existing City policies identified below, would reduce program level impacts to less than significant levels.

Applicable LUCE Update Policies

- 1.3 Urban Edges Character
- 1.7.1 Open Space Protection
- 2.2.10 Site Constraints
- 4.0.6 Open Places and Views
- 4.0.12 New Buildings and Views
- 4.0.26 Visual Resource Study
- 6.0.2 Resource Mapping
- 6.2.1 The City shall maintain comprehensive standards and policies for hillside development
- 6.2 Hillside Policies
- 2.2.3 Residential next to Non-residential
- 2.2.5 Neighborhood Pattern
- 2.2.7 Natural Features
- 2.2.8 Parking
- 2.2.9 Compatible Development
- 2.2.11 Residential Project Objectives

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

- 4.0.11 Building Conservation and Compatibility
- 4.0.12 New Buildings and Views.
- 4.0.19 Building Height.
- 15.0.2 Development Along Scenic Routes
- 15.0.3 Public Equipment and Facilities

Applicable Previously Existing City Policies

- 8.6.3 Required mitigation
- 9.1.1 Preserve natural and agricultural landscapes
- 9.1.3 Utilities and signs
- 9.1.4 Streetscapes and major roadways
- 9.1.5 View protection in new development
- 9.2.1 Views to and from public places, including scenic roadway
- 9.2.2 Views to and from private development
- 9.2.2 Views to and from private development
- 9.3.2 Update Community Design Guidelines
- 9.3.4 Environmental and architectural review
- 9.3.5 Visual assessments
- 9.3.6 View blockage along scenic highways
- 9.3.8 Scenic highway designation
- 9.3.9 Undergrounding utilities
- 9.3.13 Monitor viewsheds
- 9.3.11 Billboard removal
- 9.3.12 Preserve the Morros
- 9.3.10 Prohibit billboards
- 9.1.2 Urban development
- 5.2 Subdivision Design and General Residential Project Principles
- 5.3 Infill Development
- 5.4 Multi-Family and Clustered Housing Design

Impact AES-3

Proposed development in accordance with the LUCE Update would introduce new sources of light and glare. However, adherence to policies included in the Zoning Ordinance and Community Design Guidelines would reduce potential impacts to a Class III, less than significant, level.

San Luis Ranch Specific Plan Area Impact Analysis. The San Luis Ranch site is characterized primarily by its use as an agricultural property, which includes seasonally planted row crops, an existing stand of eucalyptus trees in the southwest portion of the site, and the Dalidio farm home located in the northwest portion of the site. Development of the area, as outlined in the LUCE Update, could result in an increase in ambient nighttime lighting through the addition of residential, commercial, and agriculture uses. This can include parking lot and security/safety lighting, and fixtures associated with the allowed structural development. Development of the area has the potential to result in significant impacts with respect to increased nighttime lighting in the project vicinity. However, implementation of the LUCE Update policies, and other previously existing City policies identified below, would reduce program level impacts to less than significant levels.

Applicable LUCE Update Policies

- 1.3 Urban Edges Character;
- 2.2.11 Residential Project Objectives; and
- 4.0.19 Building Height
- 9.3.5 Urban Heat Effects.
- 9.3.7 Sustainable Design.
- 15.0.2 Development Along Scenic Routes

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

- 15.0.3 Public Equipment and Facilities

Applicable Previously Existing City Policies

- 4.5.6 Solar collector appearance
- 9.2.3 Outdoor lighting
- 17.08.072 Mixed Use Projects
- 17.08.095 Convenience Stores
- 17.18.030 Illumination
- 17.23: Night Sky Preservation

Project Level Evaluation

a) The proposed project is in a highly visible location adjacent to U.S. Highway 101, and otherwise surrounded by existing urban development. The Prado Road interchange, which would ultimately developed as a result of the project, would also potentially affect the scenic vistas from the freeway. U.S. Highway 101 is designated as a roadway having high scenic value in the 2035 Land Use and Circulation Element update. Because of the visual sensitivity of the site, and because the project design could not be evaluated in the LUCE EIR, this issue will be addressed in the EIR.

b, c) The proposed project will not damage or alter any scenic resources that are visible from a local or state scenic highway. Visual resources in the vicinity of the site include views of surrounding hills, as well as the agricultural fields that currently characterize the project site. The project also has the potential to impact historic buildings associated with the Dalidio Farm Complex, which are part of the site’s existing visual character. The proposed project would involve the urbanization of a portion of the project site. This would represent a major change of the aesthetic character of the project site and an intensification of the urban character of the project vicinity. While the project will be reviewed by the Architectural Review Commission for consistency with the Community Design Guidelines, the project has not yet been designed, so potential impacts could result. For these reasons, this issue will be examined in the EIR.

d) The project is located in an already urbanized area with light sources from neighboring residential uses, and light from vehicular circulation along neighboring streets and U.S Highway 101. The proposed project would also result in the introduction of a new source of nighttime lighting, which could affect nighttime views in the area. The project will be required to conform to the Night Sky Preservation Ordinance (Zoning Regulations Chapter 17.23) which sets operational standards and requirements for lighting installations. Nevertheless, this issue will be examined in the EIR, because the project lighting specifications have not yet been established.

Conclusion: Potentially significant project level impacts will be examined in the EIR.

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?	14	--X--			
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	10				--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?	12	--X--			

LUCE Update Final Program EIR Analysis

Impact AG-1

[Development under] the LUCE Update could alter the existing land use and zoning on sites throughout the city and may result in incompatibilities with adjacent urban and agricultural uses. However, the General Plan reduces land use conflicts through policies and plan review. Therefore, impacts that would occur from development would be Class

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. This 132-acre area is located in the southwest quarter of the city at the corner of Madonna Road and Dalidio Drive. Approximately 109 acres of the 131-acre project site are used for the production of irrigated row crops including celery, broccoli, lettuce, oriental vegetables, and peas. A vegetable packing facility, storage areas, Prefumo Creek watershed drainages, and eucalyptus trees occupy about 22 acres that have little or no agricultural production value at this time. The San Luis Obispo Promenade shopping center is located east of the site; Laguna Lake Park is located to the north; single-family residential development is to the west; U.S Highway 101 is to the east and south; and agricultural land with commercial development beyond, is south of the site. Although the San Luis Ranch Specific Plan Area is surrounded by non-agricultural uses, development of the site could result in increased urbanization of an agricultural area and increase incompatibilities with urban and agricultural uses directly adjacent to each other. However, implementation of the LUCE Update policies, and other previously existing City policies identified below, would reduce program level impacts to less than significant levels.

Applicable LUCE Update Policies

Land Use Element

- 1.6.1 Urban Reserve.
- 1.6.3 Interim Uses.
- 1.7.2 Greenbelt Uses.
- 1.7.3 Commercial Uses in Greenbelt.
- 1.9.1 Parcel Sizes.
- 1.9.3 Public Access.
- 1.9.4 Design Standards.
- 1.15.8 Refined Planning Area Map.
- 6.1.2 Open Space Uses.

Applicable Previously Existing City Policies

Conservation and Open Space Element

- 8.1 Greenbelt. Open space outside the urban area
- Policy 8.6.1 Loss of open space.
- Policy 8.6.3 Required mitigation.
- Program 8.7.1 Protect open space resources.

Impact AG-2

Future development in accordance with the LUCE Update could occur on prime farmland, unique farmland, and/or farmland of statewide importance. Buildout within the City Limits would result in Class II, significant but mitigable impacts to agricultural conversion.

San Luis Ranch Specific Plan Area Impact Analysis. The San Luis Ranch site is characterized primarily by its use as an agricultural property. Approximately 109 acres of the site are used for the production of irrigated row crops including celery, broccoli, lettuce, oriental vegetables, and peas. A vegetable packing facility, storage areas, Prefumo Creek watershed drainages, and eucalyptus trees occupy a portion of the site that has little or no agricultural production value at this time. Cropley clay soils comprise about 83 acres, and Salinas silty clay loam occupies about 26 acres of crop production land. The 109 acres of irrigated row crops are considered prime agricultural land due to their Capability Class I and II rating and their high average gross revenue. This property is not currently under a Williamson Act or agricultural preserve contract. Development of the site, as outlined in the LUCE Update, could result in conversion of the prime farmland.

Existing Land Use Element policy 1.12.7 indicates that annexations shall help secure permanent protection for areas designated Open Space and specifically states, “Dalidio Area properties (generally bounded by Highway 101, Madonna Road, and Los Osos Valley Road) shall dedicate land or easements for approximately one half of each ownership that is to be preserved as open space.” This standard is carried forward in the LUCE update. The project applicant has requested consideration of allowing a portion of this 50% dedication to be met off-site. Policy direction for considering this option has not been included in the draft performance standards; however, the Council directed that if such an option were to be

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

pursued, the applicant would need to mitigate the on-site loss of up to 10 acres to development by using the following guidance: A substantial multiplier for the amount of open space is provided for the off-site property exchanged to meet the on-site requirement; and off-site land is of similar agricultural and visual value to the community; and off-site land is also protected through an easement, dedication or fee title in perpetuity for agriculture/open space.

Any proposal that involves replacement of on-site open space with off-site open space could result in the conversion of additional prime farmland to urban uses on this property. Such proposal has the potential to achieve protection of a greater total acreage of farmland, however, it is too speculative to determine whether impacts could be mitigated due to the lack of detail about type, location, and amount of off-site land being offered. Subsequent specific plan development would be required to undergo separate environmental review, which may result in specific impacts that require project specific mitigation consistent with these policies. Proposed performance standards carried forward from the existing Land Use Element and implementation of the LUCE Update policies, and other previously existing City policies identified below, as well as required program level mitigation, would reduce program level impacts to less than significant levels.

Applicable LUCE Update Policies

Land Use Element

- 1.6.1 Urban Reserve;
- 1.7.3 Commercial Uses in Greenbelt; and
- 1.9.1 Parcel Sizes.
- 1.7.1 Open Space Protection.
- 1.8.1 Agricultural Protection.
- 1.8.2 Prime Agricultural Land.
- 6.1.1 Open Space and Greenbelt Designations.

Applicable Previously Existing City Policies

Conservation and Open Space Element

- Policy 8.6.3 Required mitigation
- Policy 8.7.1 Protect open space resources.
- The Ahwahnee Principles.
- Policy 8.1 Greenbelt.
- Policy 8.2.1 Open space preserved.
- Policy 8.2.2 GOAL: Open space within the urban area.
- Policy 8.3.2 Open space buffers.
- Policy 8.4.1 Open space for safety.
- Policy 8.6.3 Required Mitigation.
- Policy 9.1.1 Preserve natural and agricultural landscapes.
- Policy 10.0 GOAL: Urban water needs.

Program-Level Mitigation Measures

AG-1 1.7.1 Open Space Protection. Within the City's planning area and outside the urban reserve line, undeveloped land should be kept open. Prime agricultural land, productive agricultural land, and potentially productive agricultural land shall be protected for farming. Scenic lands, sensitive wildlife habitat, and undeveloped prime agricultural land shall be permanently protected as open space.

Project Level Evaluation

The proposed project may result in land use conflicts with the continued on-site and adjacent agricultural operations.

- a) The site is identified in the General Plan as a location for a Specific Plan generally consistent with what is proposed. Nevertheless, the proposed project would result in the direct conversion of substantially acreage of actively farmed prime

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

soils to non-agricultural uses, as designated by the Farmland Mapping and Monitoring Program. The project as planned would preserve 50 acres in agricultural use, with another 11.96 acres in parks and open space. Collectively, this would comprise 50% of the net site acreage (when major roadways and right of way for the Prado Road interchange are discounted). The degree to which this complies with the intent of adopted city policy will be examined in the EIR.

Because the project has the potential to conflict with applicable city policies and required program-level mitigation, this issue will be examined in the EIR.

b) There is no Williamson Act contract in effect on the project site. No impacts would occur. This issue will not require further examination in the project EIR.

c) Except for the SLO City Farm property to the south, the project site is surrounded by urbanized and developed properties and public streets. The project would generally minimize existing offsite land use conflicts through the conversion of some onsite agricultural uses. However, the project also has the potential to create new conflicts onsite between proposed urban uses and existing agricultural development that would remain, which could adversely affect the long-term viability of the remaining agricultural uses onsite, as well as the neighboring SLO City Farm. Because the project has not been designed, and could therefore be potentially inconsistent with city policies with respect to land use compatibility, this issue will be examined in the EIR.

Conclusion: Potentially significant project-level impacts will be examined in the EIR.

3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	9, 16	--X--			
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?		--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)?		--X--			
d) Expose sensitive receptors to substantial pollutant concentrations?		--X--			
e) Create objectionable odors affecting a substantial number of people?				--X--	

LUCE Update Final Program EIR Analysis

Impact AQ-1 (Short-Term)

Implementation of the LUCE Update would involve construction of development projects that generate short-term emissions of criteria air pollutants and ozone precursors. Emissions from individual construction projects could exceed APCD's project-level significance thresholds. Thus, implementation of the LUCE Update could result in construction-generated emissions that violate or contribute substantially to an existing or projected air quality violation, contribute a cumulatively considerable net increase of criteria air pollutants for which the region is designated as non-attainment, and/or expose sensitive receptors to substantial pollutant concentrations. Adherence to relevant policies and implementation of APCD-recommended project-specific mitigation measures would reduce potential short-term impacts to a less than significant level. Thus, program level construction-generated air quality impacts are considered Class II, significant but mitigable.

San Luis Ranch Specific Plan Area Impact Analysis. There is no site specific analysis for the San Luis Ranch in the LUCE Update program EIR.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

Applicable LUCE Update Policies

The LUCE Update draft does not include any edits related to construction-related air quality issues.

Applicable Existing City Policies

Conservation and Open Space Element

- 2.2.1 Atmospheric change.
- 2.2.2 Health standards.
- 2.2.3 No decline.
- 2.2.4 Promote walking, biking and use of public transit use to reduce dependency on motor vehicles.
- 2.2.5 Model City.

Program-Level Mitigation Measures

APCD specifies construction mitigation measures designed to reduce emissions of ROG, NOx, PM10, and PM2.5 (both fugitive and exhaust). These include standard mitigation measures, best available control technology (BACT), and construction activity management plan (CAMP) and off-site mitigation for construction equipment emissions; along with short and expanded lists for fugitive dust emissions. The City shall ensure the implementation of the most current APCD-recommended construction mitigation measures to reduce construction-generated emissions to less-significant levels as defined by APCD.

Impact AQ-2 (Long-Term)

Implementation of the LUCE Update would involve operation of development projects that generate long-term emissions of criteria air pollutants and ozone precursors. Implementation of the LUCE Update would not result in the exposure of sensitive receptors to substantial sources of local carbon monoxide concentrations, odors, or TACs. However, with regards to criteria air pollutants and precursors implementation of the LUCE Update would not be consistent with the assumptions contained in the most recent version of the APCD’s Clean Air Plan even with the incorporation of the proposed LUCE Update policies and existing City policies. Thus, long-term air quality impacts are considered Class I, significant and unavoidable.

San Luis Ranch Specific Plan Area Impact Analysis. There is no site specific analysis for the San Luis Ranch in the LUCE Update program EIR.

Applicable LUCE Update and Other Existing City Policies

The list of policies is extensive. Please refer to Table 4.3-1 of the Draft LUCE EIR.

Program-Level Mitigation Measures

Implementation of the LUCE Update would involve operation of development projects that generate long-term emissions of criteria air pollutants and ozone precursors. Implementation of the LUCE Update would not result in the exposure of sensitive receptors to substantial sources of local carbon monoxide concentrations, odors, or TACs. However, with regards to criteria air pollutants and precursors implementation of the LUCE Update would not be consistent with the assumptions contained in the most recent version of the APCD’s Clean Air Plan even with the incorporation of the proposed LUCE Update policies and existing City policies. Thus, long-term air quality impacts are considered Class I, significant and unavoidable. APCD states that a Class 1 can be determined from a qualitative analysis.

Project Level Evaluation

a), b), c), d) Both long and short-term emissions resulting from project construction and operation would occur. Construction and grading equipment on the site would emit carbon monoxide and ozone precursors, such as nitrogen oxide and reactive organic compounds. In addition, grading and vehicle activity on the site would result in the release of dust and suspended particulates. The project would increase the number of average daily trips to the area for automobiles and increase the combustion of natural gas and electricity in the area, all of which would generate regional air pollutants. This impact is

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

potentially significant and likely unavoidable. The addition of traffic to area intersections would increase congestion at the intersections and subsequently increase carbon monoxide concentrations.

Because of potentially significant and unavoidable impacts, the project's size, and the fact that project emissions have not been calculated for the purpose of determining the extent to which mitigation will be needed, this issue will be examined in the project EIR.

The Clean Air Plan (CAP) for San Luis Obispo County was developed and adopted by the Air Pollution Control District (APCD) and is a comprehensive planning document designed to reduce emissions from traditional industrial and commercial sources, as well as from motor vehicle use. Conservation and Open Space Element Policy 2.3.2 states that the City will help the APCD implement the CAP. Assessment of potential air quality impacts that may result from the proposed project will need to be conducted using the April 2012 CEQA Air Quality Handbook. Under CEQA, the SLO County APCD is a responsible agency for reviewing and commenting on projects that have the potential to cause adverse impacts to air quality. The EIR will evaluate potential consistency with the CAP.

e) The project includes commercial, office and residential development. None of these uses are anticipated to potential to produce objectionable odors in the area. Impacts would be less than significant, and need not be considered further in the EIR.

Conclusion: Long-term impacts are potentially significant, and will be examined in the EIR. Construction impacts would potentially be less than significant if existing APCD and City requirements are applied, but should be evaluated in the project EIR to determine the extent to which mitigation would be needed.

4. BIOLOGICAL RESOURCES. Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	5,10, 11,15	--X--			
b) Have a substantial adverse effect, on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		--X--			
c) Have a substantial adverse effect on federally protected wetlands as defined in Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?		--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?		--X--			
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				--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?				--X--	

LUCE Update Final Program EIR Analysis

Impact BIO-1

Development under the LUCE Update has potential to impact common habitat types including non-native annual grasslands and disturbed/ruderal areas that provide habitat for common wildlife and plant species. With the

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

incorporation of the proposed LUCE Update policies and existing governing policies, potential impacts to these common habitats are considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. The San Luis Ranch Specific Plan Area consists primarily of non-native agricultural row crops found in the eastern and central portion of the site and a small amount of agricultural support development to the west. Native vegetation that exists on-site is found primarily in the riparian habitat along the banks of Prefumo Creek at the southwest border of the property. Mature non-native eucalyptus trees border the developed area on the west and along Prefumo Creek. Based on the development parameters for the San Luis Ranch Specific Plan area, as outlined in the LUCE Update, development of the site has the potential to result in impacts to disturbed/ruderal habitat adjacent to agricultural uses, roadways, and developed areas. However, implementation of the LUCE Update policies, and the previously existing policies identified below, would reduce future program level impacts to less than significant levels.

Applicable LUCE Update Policies

- 2.2.7 Natural Features.
- 6.0.1 Resource Planning.
- 6.0.2 Resource Mapping.
- 6.0.3 Resource Protection.
- 6.1.1 Open Space and Greenbelt Designations.
- 6.1.2 Open Space Uses.
- 6.2.2 Development Limits.
- 12.3.11 Environmental Review. The purpose of the City’s environmental review process is to develop and maintain a high quality environment now and in the future. Some projects may be exempted from environmental review by state law or city procedures. For those projects subject to environmental review, features to be examined would include but not be limited to, toxic contamination, air quality, open space preservation, sustainability impacts, scenic values and impacts, airport operations, ground slopes, seismic hazards, soil and groundwater characteristics, wildlife habitats, road and rail traffic noise, water and sewer service limits, access and circulation, and historic and archaeological resources. *When considering private proposals for a major development, such as a specific plan or special-design area, the City must conduct an evaluation of environmental opportunities and constraints, to which a private proposal can respond. [ITALICS ADDED.]* The City is committed to early and meaningful participation by the community in the environmental review process to help inform the public and decision-makers of the potential environmental consequences of their actions.

Applicable Existing City Policies

Conservation and Open Space Element

- Goal 7.2. Sustainable natural populations.
- Goal 7.4: Trees and other plants.
- 7.3.1 Protect listed species.
- 7.3.2 Species of local concern.
- 7.3.3 Wildlife habitat and corridors.
- 7.5.4 Preservation of grassland communities and other habitat types.
- 7.7.1 Protect natural communities.
- 7.7.2 Implement the Natural Communities policies above.
- 7.7.3 Participate in any area-wide planning efforts such as Habitat Conservation Plans under the U.S. Endangered Species Act.
- 7.7.4 Participate in environmental review conducted by other agencies for projects that could affect natural communities in the San Luis Obispo Planning Area.
- 8.3.2 Open space buffers.

San Luis Ranch Specific Plan Area Impact Analysis. See discussion under Impact BIO-2.

Impact BIO-2

Development consistent with the LUCE Update has potential to impact four Natural Communities of Special Concern

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

present within the LUCE SOI Planning Subarea including Serpentine Bunchgrass, Northern Interior Cypress Stand, Central Maritime Chaparral, and Coastal and Valley Freshwater Marsh. With the incorporation of the proposed and existing City policies, and the requirements of regulatory and oversight agencies, potential impacts to sensitive habitats are considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. The San Luis Ranch Specific Plan Area consists primarily of agricultural row crops and a small amount of agricultural support development to the west. Native vegetation that exists on-site is found primarily in the riparian habitat along the banks of Prefumo Creek at the southwest border of the property. Mature non-native eucalyptus trees border the developed area on the west and along Prefumo Creek. Based on the proposed development parameters for the San Luis Ranch Specific Plan area, and onsite resources including habitat associated with San Luis Obispo and Prefumo Creeks, development of the site has the potential to result in impacts to Coastal and Valley Freshwater Marsh habitat associated in particular with Prefumo Creek. No other sensitive habitats are known to occur in this Specific Plan area. Program level impacts to Coastal and Valley Freshwater Marsh habitat in this area are considered less than significant with incorporation of the LUCE Update, and adherence to the previously existing City policies and state and federal regulatory requirements discussed above.

Applicable LUCE Update Policies

- 2.2.7 Natural Features.
- 6.0.1 Resource Planning.
- 6.0.2 Resource Mapping.
- 6.0.3 Resource Protection.
- 8.3.2 Open space buffers.
- 12.3.11 Environmental Review.
- 1.7.7 Trees Outside City Limits.
- 4.0.10 San Luis Obispo Creek.
- 6.4 Creeks Wetlands, and Flooding Policies.
- 6.4.1 Creek and Wetlands Management Objectives.
- 6.4.2 Citywide Network.

Applicable Existing City Policies

Conservation and Open Space Element

- Goal 7.2 Sustainable natural populations.
- Goal 7.4 Trees and other plants.
- 7.2.1 Protect Listed Species.
- 7.3.3 Wildlife habitat and corridors.
- 7.7.1 Protect natural communities.
- 7.7.5 Develop and maintain current benchmark information on habitat types and conditions.
- 7.7.9 Creek Setbacks.
- 8.6.3 Required mitigation.

Impact BIO-3

Development consistent with the LUCE Update has the potential to impact special-status plant species within the LUCE SOI Planning Subarea. With the incorporation of the proposed and existing City policies, and the requirements of regulatory and oversight agencies, potential impacts to special-status plant species are considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. The 131-acre San Luis Ranch Specific Plan Area is vegetated primarily by non-native agricultural row crops found in the eastern and central portion of the site and a small amount of agricultural support development. Native vegetation that exists on-site is found primarily in the riparian habitat along the banks of Prefumo Creek at the southwest border of the property. Mature non-native eucalyptus trees border the developed area on the west and along Prefumo Creek. Based on the proposed development parameters for the San Luis Ranch Specific

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

Plan Area, development of the site has the potential to result in impacts to the special-status plant species associated with Prefumo Creek. As shown on Figure 4.4-2 [of the LUCE EIR], several special-status species occurrences are mapped on or near the site by the CNDDDB. Program level impacts to special-status plant species in this area are considered less than significant with incorporation of the LUCE Update, and adherence to the previously existing City policies and state and federal regulatory requirements.

Applicable LUCE Update Policies

- 2.2.7 Natural Features.
- 6.0.1 Resource Planning.
- 6.0.2 Resource Mapping.
- 6.0.3 Resource Protection.
- 12.3.11 Environmental Review.

Applicable Existing City Policies

Conservation and Open Space Element

- Goal 7.2. Sustainable natural populations.
- 7.3.1 Protect listed species.
- 7.3.2 Species of local concern.
- 7.3.3 Wildlife habitat and corridors.
- 7.7.1 Protect natural communities.
- 7.7.5 Develop and maintain current benchmark information on habitat types and conditions.
- 7.7.9 Creek Setbacks.
- 8.6.3 Required mitigation.

Impact BIO-4

Development consistent with the LUCE Update has potential to impact special-status wildlife species within the LUCE SOI Planning Subarea. With the incorporation of the proposed and existing City policies, and the requirements of regulatory and oversight agencies, potential impacts to special-status wildlife species are considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. The San Luis Ranch Specific Plan Area consists primarily of non-native agricultural row crops found in the eastern and central portion of the site and a small amount of agricultural support development to the west. Native vegetation that exists on-site is found primarily in the riparian habitat along the banks of Prefumo Creek at the southwest border of the property. Mature non-native eucalyptus trees border the developed area on the west and along Prefumo Creek. Based on the proposed development parameters for the San Luis Ranch Specific Plan area, development of the site has the potential to result in impacts to special-status wildlife species associated with Prefumo Creek and with Eucalyptus groves. As shown on Figure 4.4-3 [of the LUCE EIR], occurrences of several special-status wildlife species are mapped on or near the site by the CNDDDB. Program level impacts to special-status wildlife species in this area are considered less than significant with incorporation of the proposed LUCE Update, and adherence to the existing City policies and state and federal regulatory requirements discussed below.

Applicable LUCE Update Policies

- 6.0.1 Resource Planning.
- 6.0.2 Resource Mapping.
- 6.0.3 Resource Protection.
- 6.2.2 Development Limits.
- 12.3.11 Environmental Review.
- 1.7.6 Wildlife Habitat.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

Applicable Existing City Policies

Conservation and Open Space Element

- Goal 7.2. Sustainable natural populations.
- 7.3.1 Protect listed species.
- 7.3.3 Wildlife habitat and corridors.
- 7.7.1 Protect natural communities.
- 7.7.7 Preserve ecotones.
- 7.7.8 Protect wildlife corridors.

Impact BIO-5

Development consistent with the LUCE Update has potential to impact common wildlife species and species of local concern within the LUCE SOI Planning Subarea. With the incorporation of the proposed and existing City policies, and the requirements of regulatory and oversight agencies, potential impacts to common and species of local concern are considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. The San Luis Ranch Specific Plan Area consists primarily of non-native agricultural row crops found in the eastern and central portion of the site and a small amount of agricultural support development to the west. Native vegetation that exists on-site is found primarily in the riparian habitat along the banks of Prefumo Creek at the southwest border of the property. Mature non-native eucalyptus trees border the developed area on the west and along Prefumo Creek. Based on the proposed development parameters for the San Luis Ranch Specific Plan Area, development has the potential to result in impacts to common wildlife species and species of local concern associated with Prefumo Creek, agricultural activities, ruderal areas, and with Eucalyptus groves. Program level impacts to common wildlife and species of local concern in this area are considered less than significant with incorporation of the LUCE Update, and adherence to previously existing City policies and state and federal regulatory requirements.

Applicable LUCE Update Policies

- 6.0.1 Resource Planning.
- 6.0.2 Resource Mapping.
- 6.0.3 Resource Protection.
- 12.3.11 Environmental Review.
- 1.7.7 Trees Outside City Limits.
- 1.7.6 Wildlife Habitat.

Applicable Existing City Policies

Conservation and Open Space Element

- Goal 7.2. Sustainable natural populations.
- Goal 7.4. Trees and other plants.
- 7.3.2 Species of local concern.
- 7.3.3 Wildlife habitat and corridors.
- 7.5.4 Preservation of grassland communities and other habitat types.
- 7.7.1 Protect natural communities policies that address impacts related to common wildlife and species of local concern.

Project Level Evaluation

(a-f) The 131-acre Dalidio project site is vegetated primarily by non-native agricultural row crops (109 acres) found in the eastern and central portion of the site and to a lesser extent by ruderal and urban landscape species in the western developed area. Native vegetation that exists on-site is found primarily in the riparian habitat along the banks of Prefumo Creek at the southwest border of the project area. Mature non-native eucalyptus trees border the developed area on the west and along Prefumo Creek. The Prado Road interchange project site is vegetated primarily by non-native grassland, ruderal species, and urban landscape species. Native vegetation exists adjacent to the interchange site, primarily along the riparian banks of San

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

Luis Obispo Creek.

No sensitive plant species have been observed on-site and would not be expected due to the history of agricultural uses, Caltrans maintenance within the Prado Road interchange area, and limited suitable habitat. Native vegetation on the Dalidio property exists in Prefumo Creek and the water and riparian vegetation provide habitat for several sensitive species with the southern steelhead recorded during high flows. Other sensitive species may potentially occur within the Prefumo Creek corridor, including the California red-legged frog, southwestern pond turtle, and two-stripe garter snake. Similar riparian habitat and sensitive species may be expected adjacent to the Prado Road interchange area within San Luis Obispo Creek. Non-native eucalyptus trees on the Dalidio property provide habitat for the Monarch butterfly and several avian species, some of which nest in the trees and are protected by the Migratory Bird Treaty Act. Nests of the great blue heron have been observed on-site and vultures and raptors are also known to nest in the eucalyptus trees on-site.

The project description indicates that several eucalyptus trees would be subject to cutting or thinning for development and Madonna Road widening and to accommodate the proposed Business Park and Commercial uses. Tree removal or thinning could have adverse significant impacts on Monarch butterfly wintering sites and great blue heron, vulture and raptor nest/roost sites. Development in the vicinity of the sensitive avian species could have short and long-term significant impacts related to increased light, noise, and human and domestic animal intrusion. Any action that would cause a Migratory Bird Treaty Act (MBTA)-protected bird to flee the nest or abandon reproductive effort would be considered a significant impact. Measures are available to reduce impacts to sensitive avian species and Monarch butterfly habitat. These measures include setbacks, buffers, shielding for lights, and limits on timing for construction and disturbance in the area. The EIR will critically evaluate this issue and the effectiveness of these measures.

Sensitive species occurring in the Prefumo and San Luis Obispo Creek corridors could experience impacts from similar project related actions such as construction practices that could cause siltation and changes to water quality. Sensitive species in Prefumo and San Luis Obispo Creeks could also experience impacts due to development of a road within or adjacent to these areas, and intrusion associated with increased human activity. Impacts are potentially significant, and will be examined in the EIR.

Wetland habitat on-site in Prefumo Creek and San Luis Obispo Creeks are under the jurisdiction of federal, state and local agencies. Construction practices, the development of the Los Osos Valley collector road across Prefumo Creek, widening of the Prado Road bridge over San Luis Obispo Creek, and increased human use on-site could have short and long-term significant impacts to wetlands. Impacts include siltation and run-off to the creek affecting water quality and, cut and fill within Prefumo Creek and removal of vegetation for the road, and auxiliary lane for U.S. Highway 101 (depending on final project plans). The dedication of permanent Open Space along Prefumo Creek would help to reduce adverse impacts to wetlands. However, since the project has not yet been designed and evaluated, impacts are potentially significant, and will be examined in the EIR.

Based on the 2004 San Luis Marketplace EIR, there were no known candidate, sensitive or special status species in the immediate vicinity of the project at that time. The City's former Natural Resource Manager visited the site in 2004 and identified no biological issues associated with the project. However, because of the passage of time, and potential changes to resource protection regulations since then, the EIR will critically evaluate this information, and determine if this finding is still accurate. Potential impacts will be discussed in the EIR.

No heritage trees or significant native vegetation exist on the site. A tributary of Acacia Creek runs through the site. The drainage way that runs through the property has been highly disturbed and is in a degraded condition. While the creek's value as a significant biological corridor is diminished by its physical separation from other segments of the riparian corridor, its condition could be improved with the proposed project development. Because the project has not been designed, it is not known whether any areas meeting the criteria for jurisdictional wetlands will be disturbed by the project. Potential impacts will be discussed in the EIR.

The project site is not part of a local, regional, or state habitat conservation plan. This issue will not be further evaluated in the EIR.

A large, multi-trunked walnut tree in the northeast portion of the site identified in the 2004 San Luis Marketplace EIR could

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

potentially be removed with the proposed development, depending on how the project is designed. This tree was previously approved for removal with an earlier development application and planting plan (A/MS/ER 34-11). This issue will be evaluated in the EIR.

Conclusion: Potentially significant impacts will be examined in the EIR.

5. CULTURAL RESOURCES. Would the project:

a) Cause a substantial adverse change in the significance of a historic resource as defined in §15064.5.	10,15, 21,22, 23	--X--			
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5)		--X--			
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				--X--	
d) Disturb any human remains, including those interred outside of formal cemeteries?		--X--			

LUCE Update Final Program EIR Analysis

Impact CR-1

Development allowed by the LUCE update could cause a substantial adverse change in the significance of a historical resource which is either listed or eligible for listing on the National Register of Historic Places, the California Register of Historic Resources, or a local register of historic resources. This impact is considered to be Class II, significant but mitigable.

San Luis Ranch Specific Plan Area Impact Analysis. The San Luis Ranch Specific Plan Area includes one historical site complex, the Dalidio Farm Complex, which includes several structures such as the Dalidio home, Laguna Race Track viewing stands, a barn, and water tower, and is considered to be a significant historical resource. However, implementation of the LUCE Update policies and other previously existing City policies identified below, as well as prescribed program level mitigation, would reduce program level impacts to less than significant levels.

Applicable LUCE Update Policies

- 1.9.4 Design Standards.
- 2.2.9 Compatible Development.
- 4.0.11 Building Conservation and Compatibility.
- 4.0.19 Building Height.
- 4.0.20 Building Width.
- 12.3.5 Historic Preservation Ordinance, Guidelines, and Context Statement.
- 6.0.1 Resource Planning.
- 12.3.11 Environmental Review.

Applicable Previously Existing City Policies

Conservation and Open Space Element

- 3.2 Historical and architectural resources.
- 3.3.1 Historic preservation.
- 3.3.2 Demolitions.
- 3.3.3 Historical documentation.
- 3.3.4 Changes to historic buildings.
- 3.3.5 Historic districts and neighborhoods.
- 3.5.10 Southern Pacific Water Tower.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

- 3.5.11 Cultural resources and open space.
- 3.6 Programs.
- 3.6.1 Cultural Heritage Committee.
- 3.6.2 Financial assistance and incentives.
- 3.6.3 Construction within historic districts.
- 3.6.4 Post-disaster Historic Preservation.
- 3.6.6 Educational programs.
- 3.6.7 Partnering for preservation.
- 3.6.8 Promote adaptive reuse of historic buildings.
- 3.6.9 City-owned adobes and historic structures.
- 3.6.10 Cultural Heritage Committee Whitepaper.

Program-Level Mitigation Measures

CR-1 3.3.2 Demolitions. Historically or architecturally significant buildings should shall not be demolished or substantially changed in outward appearance, unless doing so is necessary to remove a threat to health and safety and other means to eliminate or reduce the threat to acceptable levels are infeasible.

Impact CR-2

Development facilitated by Land Use and Circulation Element Update could adversely affect identified and previously unidentified archaeological and paleontological resources. This includes potential disturbance of human remains.

General Plan policies would ensure that such impacts are addressed on a case-by-case basis.

San Luis Ranch Specific Plan Area Impact Analysis. The San Luis Ranch site is characterized primarily by its use as an agricultural property. Potential development of the site, as outlined in the LUCE Update, would convert the undeveloped land to residential and commercial uses. Due to the history of the area discussed under Impact CR-1 above, there is a potential for archaeological resources to be onsite. The potential archaeological and paleontological resource impacts related to development would be considered significant. However, compliance with state law and implementation of the LUCE Update policies such as 3.5 (which requires protection of both known and potential archaeological sites), and 3.6.3 (which requires the Cultural Heritage Committee and Architectural Review Commission to provide guidance on the construction of new buildings within historic districts, and for properties that contain potentially historic structures), and similar existing City policies listed below would reduce program level impacts to a less than significant level.

Applicable LUCE Update Policies

- 1.9.4 Design Standards.
- 3.5.11 Cultural Resources and Open Space.
- 12.3.11 Environmental Review.

Applicable Previously Existing City Policies

Conservation and Open Space Element

- 3.6.1 Cultural Heritage Committee.
- 6.0.1 Resource Planning.
- 3.4 Archeological resources.
- 3.5.1 Archaeological resource protection.
- 3.5.2 Native American sites.
- 3.5.3 Non-development activities.
- 3.5.4 Archaeologically sensitive areas.
- 3.5.5 Archaeological resources present.
- 3.5.6 Qualified archaeologist present.
- 3.5.7 Native American participation.
- 3.5.8 Protection of Native American Cultural Sites.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

- 3.5.9 Archaeological site records.
- 3.6.5 Archaeological resource preservation standards.

Project Level Evaluation

a-d) One historical site complex, the Dalidio Farm Complex, is a unique and significant historical resource according to the significance criteria found in the Archaeological Resource Preservation Guidelines and Historical Preservation Program Guidelines of the City of San Luis Obispo as well as the CEQA criteria of significance. Project development could result in demolition of these onsite structures, resulting in a potentially significant impact to historic resources. The 2004 San Luis Marketplace EIR, in evaluating potential impacts to this resource, found that this impact could be reduced to less than significant levels with appropriate mitigation. It should be noted, however, that this complex is not included on the City’s Master List of Historic Properties, as shown in its 2006 General Plan Conservation and Open Space Element.

Impacts to historic resources will be re-evaluated in an EIR, because the project has not been designed or evaluated, the extent of project impacts cannot yet be determined, and a more recent determination of the site’s historical significance needs to be completed.

According to the 2004 San Luis Marketplace EIR analysis for the site, the potential for subsurface archaeological deposits also exists on the property. The original cultural resources survey of the Dalidio property (Singer and Atwood 1988) recognized the potential for buried archaeological remains and recommended monitoring during construction. Research conducted as part of the 2004 EIR confirmed this potential. This issue will be re-evaluated in the new EIR.

A cultural resources survey of the preliminary Prado Road interchange footprint was conducted in March 2000. One isolated prehistoric artifact was discovered during the surface reconnaissance. The assayed chert cobble is not considered a significant archaeological resource. The gas station located at 253 Elks Lane is less than 50 years old. Therefore, the gas station is not considered a historic structure and may be demolished without resulting in a significant impact to historic resources.

No geologic feature that is likely to support paleontological resources is on the site. Therefore, impacts to such resources are determined to be less than significant. This issue will not be examined further in the EIR.

Conclusion: Impacts to historical and other cultural resources are potentially significant, and will be examined in the EIR.

6. GEOLOGY AND SOILS. Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:	4,10, 15, 28				
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.			--X--		
II. Strong seismic ground shaking?			--X--		
III. Seismic-related ground failure, including liquefaction?			--X--		
IV. Landslides?			--X--		
b) Result in substantial soil erosion or the loss of topsoil?			--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?			--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?			--X--		
e) Have soils incapable of adequately supporting the use of septic					--X--

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?					
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LUCE Update Final Program EIR Analysis

Impact GEO-1

New development under the LUCE Update could be susceptible to impacts from future seismic events, creating the potential for structural damage or health and safety risks. However, compliance with required building codes and implementation of General Plan polices would result in a Class III, less than significant impact.

San Luis Ranch Specific Plan Area Impact Analysis. The San Luis Ranch site is characterized primarily by its use as an agricultural property, which is primarily undeveloped with the exception of ranch-support structures. The San Luis Ranch Specific Plan Area development potential, as outlined in the LUCE Update, could result in areas prone to geologic hazards and in underlying soil types that are conducive to liquefaction and other stability risks. However, new development would conform to the California Building Code (CBC). Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and policies listed below and described in the LUCE EIR, would minimize the risk to life and property. Impacts to new development from groundshaking would therefore be less than significant.

Applicable LUCE Update Policies

- 6.2.2 Development Limits.

Applicable Previously Existing City Policies

Safety Element

- 5.5 Policy S: Avoiding Faults.
- 5.6 Policy S: Avoiding Slope Instability.

Impact GEO-2

Future seismic events could result in liquefaction of soils near San Luis Obispo Creek, Prefumo Creek and other low-lying areas. Development in these areas could be subject to liquefaction hazards. The compliance of future development projects with the California Building Code (CBC) and General Plan policies would result in Class III, less than significant impacts.

San Luis Ranch Specific Plan Area Impact Analysis. The majority of the San Luis Ranch property is near San Luis Obispo Creek and Prefumo Creek and the associated low-lying areas. Therefore, development in these areas could be subject to liquefaction hazards. However, new development would conform to the California Building Code (CBC). Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and policies listed below and described in the LUCE EIR, would reduce impacts from settlement and liquefaction to less than significant.

Applicable Previously Existing City Policies

Safety Element

- 5.7 Policy S: Avoiding Liquefaction Hazards.

Impact GEO-3

Development facilitated by the LUCE Update could occur on soils that have the potential to present natural hazards (expansive soils, erosive soils, and differential settlement) to structures and roadways. Development could also result in the loss of a unique geologic feature. However, compliance of future development projects with the California Building Code and adopted General Plan policies would ensure that resulting impacts are Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. According to the soils map shown in Section 4.2 [of the LUCE EIR], Agricultural Resources, the San Luis Ranch property contains soils with moderate shrink-swell potential and high erosion potential. Therefore, development in these areas could occur on soils that have the potential to present hazards.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

However, new development would conform to the CBC. Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code, and General Plan policies listed below, and described in the LUCE EIR, would reduce impacts from expansive soils, erosive soils, and differential settlement to less than significant.

Applicable LUCE Update Policies

- 6.2.2 Development Limits

Applicable Previously Existing City Policies

Safety Element

5.6 Policy S: Avoiding Slope Instability

Project Level Evaluation

a) San Luis Obispo County, including the City of San Luis Obispo is located within the Coast Range Geomorphic Province, which extends along the coastline from central California to Oregon. This region is characterized by extensive folding, faulting, and fracturing of variable intensity. In general, the folds and faults of this province comprise the pronounced northwest trending ridge-valley system of the central and northern coast of California.

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. Groundwater at the site was encountered at 25 to 50 feet below grade according to a hydrograph of an on site well recording water levels from 1989 to 1992 (Phase One Inc., January 1999). These depths to water were pumping levels, and probably overestimate the depth to groundwater during natural conditions. A geotechnical test boring, completed approximately 1,200 feet south-southwest of the subject property, encountered groundwater at 9.5 feet below grade with lithologies of sandy clays and clayey sands (Earth Systems Consultants, October 1997).

Under the Alquist-Priolo Special Studies Zone Act, the State Geologist is required to delineate appropriately wide special studies zones to encompass all potentially and recently-active fault traces deemed sufficiently active and well-defined as to constitute a potential hazard to structures from surface faulting or fault creep. In San Luis Obispo County, the Special Studies Zones (now known as Earthquake Fault Zones) includes the San Andreas and Los Osos faults, neither of which traverse the project site.

The nearest fault mapped in the site vicinity by Lettis and Hall (1994) is the Los Osos Fault, which is actually a fault zone that lies approximately 0.5 miles to the southwest of the project site. This fault zone generally trends along the northern flank of the Irish Hills. The Los Osos Fault is capable of a magnitude 6.8 earthquake according to the CDMG. The project site is not located in an Alquist-Priolo Earthquake Fault Zone. The nearest Alquist-Priolo Zone is located approximately 1.5 miles west northwest of the site, along the Los Osos Fault.

Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and listed above, and described in the LUCE EIR, as well as prescribed mitigation below, would ensure that potential project impacts associates with earthquakes and groundshaking would be reduced to a less than significant level.

b) This is an infill site located in an urbanized area and the planting plan for the drainage channel that runs through the property is specifically designed to enhance the riparian channel to prevent further erosion. The project will not result in loss of topsoil.

b), c), d) The following evaluates the potential for impacts related to a variety of soil hazards to occur on the site:

Liquefaction. Liquefaction is a temporary, but substantial, loss of shear strength in granular solids, such as sand, silt, and gravel, usually occurring during or after a major earthquake. This occurs when the shock waves from an earthquake of sufficient magnitude and duration compact and decrease the volume of the soil; if drainage cannot occur, this reduction in soil volume will increase the pressure exerted on the water contained in the soil, forcing it upward to the ground surface. This process can transform stable granular material into a fluidlike state. The potential for liquefaction to occur is greatest in areas

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

with loose, granular, low density soil, where the water table is within the upper 40 to 50 feet of the ground surface. Liquefaction can result in slope and/or foundation failure. The project site is identified in the Safety Element of the San Luis Obispo General Plan as being located in an area of very high liquefaction potential. Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and General Plan policies as listed above, and described in the LUCE EIR, as well as prescribed mitigation below, potentially significant impacts will be reduced to a less than significant level.

Soil Hazards. Geologic hazards of concern that are not seismically induced events at the site include soils hazards such as settlement, expansive soils, and subsidence. Slope stability is not a concern due to the subtle topography of the site. However, slope stability issues could arise as a result of future grading activities.

Settlement. 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. The project site is identified as possibly being underlain by soft organic soils. This gives the site a high potential for settlement. With prescribed mitigation measures, potentially significant impacts will be reduced to a less than significant level.

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. The project area is located in an area identified as having a moderate to high potential for expansion. With prescribed mitigation measures, potentially significant impacts will be reduced to a less than significant level.

Subsidence. Subsidence is the sinking of the ground surface caused by compression or collapse of earth materials. Subsidence can be caused by both groundwater extraction or seismically induced liquefaction. Groundwater withdrawal subsidence results from the extraction of groundwater from an unconsolidated aquifer. As water is removed from the aquifer, the total weight of the overburden, which was supported in part by hydrostatic pressure, is placed on the soil matrix compressing the now empty void spaces. This compaction produces a net loss in volume and hence; a subsidence of the land surface. Damage caused by this type of subsidence is generally not of an immediate or violent nature. The consolidation of alluvium and settling of the land surface is a process that often occurs over many years, except when prompted by seismic shaking or wetting of highly collapsible soils. During the drought years between 1987-1991, groundwater levels in the site vicinity were lowered enough to cause subsidence. Soft organic soils were compressed when dewatered causing subsidence and some structural damage in areas north of Los Osos Valley Road (Earth Systems Consultants, 1998). With prescribed mitigation measures, potentially significant impacts will be reduced to a less than significant level.

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: Potentially significant impacts will be reduced to a less than significant level with compliance with the CBC, the City of San Luis Obispo Municipal Code and General Plan policies listed above, and described in the LUCE EIR, as well as prescribed mitigation below, consistent with those that had been required in the 2004 San Luis Marketplace EIR. This issue will not be examined further in the EIR.

Project Level Mitigation Measures:

GEO-1. Design and construction of the buildings, roadway infrastructure and all subgrades shall be engineered to withstand the expected ground acceleration that may occur at this site. The design should take into consideration the soil type, potential for liquefaction, and the most current and applicable seismic attenuation methods that are available. All on-site structures shall comply with applicable provisions of the 2010 California Building Code, local codes, and the most recent California Department of Transportation seismic design standards.

GEO-2. For retail stores included in the project, goods for sale may be stacked no higher than 8 feet from the floor in any

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

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. A geotechnical study shall be prepared 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. If the site is confirmed to be in an area prone to seismically-induced liquefaction, appropriate techniques to minimize liquefaction potential shall be prescribed and implemented. All on-site structures, transportation infrastructure and subgrades shall comply with applicable methods of State and Local Building Codes and all transportation infrastructure shall comply with the most current California Department of Transportation design standards.

Suitable measures to reduce liquefaction impacts could include one or more of the following techniques, as determined by a registered geotechnical engineer:

- 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.

GEO-4. Measure GEO-3 (Site Geotechnical Investigation) shall include an evaluation of the potential for soil settlement beneath the project site.

GEO-5. If the project site is identified to be in a high potential for settlement zone based on the Site Geotechnical Investigation, 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 one or more of the following techniques, as determined by a qualified geotechnical engineer:

- 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 post tensional slab and/or ribbed foundations designed in accordance with the California Building Code (CBC).

GEO-6. Measure GEO-2 (Site Geotechnical Investigation) shall include an evaluation of the potential for soil expansion beneath the project site.

GEO-7. If the project site is identified to be in a high expansive soil zone based on the Site Geotechnical Investigation, 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 one or more of the following techniques, as determined by a qualified geotechnical engineer:

- excavation of existing soils and importation of non-expansive soils; and
- foundation design to accommodate certain amounts of differential expansion such as post tensional slab and/or ribbed foundations designed in accordance with the CBC.

GEO-8. Measure GEO-2 (Site Geotechnical Investigation) shall include soil parameter analyses to determine the potential for subsidence at the project site. If the potential for subsidence is found to be significant, then structural and grading engineering measures shall be implemented to incorporate the results of the geotechnical study. These measures would be similar to those recommended to mitigate impacts to soil settlement.

GEO-9. During future droughts, groundwater pumping limitations for the unconsolidated aquifer underlying the project site shall be assessed and implemented to prevent soil subsidence.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

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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, 2, 13	--X--			
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.		--X--			

LUCE Update Final Program EIR Analysis

Impact GCC-1

Implementation of the LUCE Update could result in an increase in GHG emissions due to short-term construction and long-term operational activities associated with new housing and commercial development, resulting in a cumulatively considerable contribution to the impact of global climate change. However, because the LUCE Update would be consistent with the City’s Climate Action Plan (CAP) and incorporates applicable CAP policies and programs that would reduce GHG emissions, this impact would be considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. There is no site specific analysis for the San Luis Ranch in the LUCE Update program EIR.

Applicable LUCE Update Policies

There are extensive applicable policies. Please refer to Table 4.7-3 of the LUCE EIR.

Project Level Evaluation

a) b) The state of California passed Assembly Bill 32, the California Global Warming Solution Act of 2006 and California Governor Schwarzenegger Executive Order S-3-05 (June 1, 2005), both require reduction of greenhouse gases in the State of California, with the goal being the reduction of greenhouse gas emissions to 1990 levels by 2020, and to be 80% below 1990 levels by 2050. In concept, anthropogenically-increased greenhouse gas emissions have been shown to be directly linked with human-induced global climate change. The conceptual impacts associated with climate change in California include increased risk of wildfires, less precipitation (and snowpack), greater probability of more extreme weather events (flooding, drought), higher temperatures (which leads to public health risk), and sea level rise. Collectively, these changes will affect the sustainability of our long-term water supplies, agricultural resources, and coastal resources, all of which adversely impact our ability to effectively engage in long-range planning, since our climate, which had once been considered a stable background condition, is now a much more dynamic and less predictable situation. Our human response to these unpredictable environmental changes also carries increasing fiscal costs, which in turn affects our ability to provide adequate public services.

The proposed project will result in infill development, in an area designated for urban uses under the City’s General Plan. However, the magnitude of development, while generally anticipated in the City’s Greenhouse Gas Inventory that underlies its 2012 Climate Action Plan (CAP), was not examined in detail. Furthermore, the proposed project has not been designed, so it is difficult to evaluate its potential compliance with the CAP and its underlying strategies that would ensure its potential compliance with long-range GHG reduction targets that underlie state law.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

For these reasons, impacts related to greenhouse gas emissions and will be examined in the EIR.

Conclusion: This issue is potentially significant, and will be examined in the EIR.

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?	28, 30	--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?	30, 15	--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?	10, 30, 15	--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?	10				--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?	27, 30	--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?	10, 12				--X--
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	4, 30			--X--	
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	4, 11				--X--

LUCE Update Final Program EIR Analysis

Impact HAZ-1

Development facilitated by the LUCE Update could occur near known hazardous material users or result in construction in areas with existing hazardous materials. Implementation of the LUCE Update could expose individuals to health risks due to soil/groundwater contamination or emission of hazardous materials into the air and could impact an adopted emergency response/evacuation plan. With the incorporation of the LUCE Update policies and other previously existing City policies, potential impacts are considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. This area is characterized primarily by its use as an agricultural property which is mainly undeveloped with the exception of a small amount of agricultural support development. The San Luis Ranch Specific Plan Area is currently in agricultural production. Although there are no records of previous or existing sources of contamination in this area, historic agricultural use onsite may have resulted in undocumented residual quantities of presently-banned agricultural chemicals, which could pose a health hazard to construction workers or future residents or visitors.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

Applicable LUCE Update Policies

Land Use Element

- 2.2.11 Residential Project Objectives.
- 6.2.6 Homesites Outside the Limit Lines.
- 12.3.11 Environmental Review.

Applicable Previously Existing City Policies

Safety Element

- 6.1 Other Hazardous Materials.
- 6.2 Policy S: Minimizing Hazardous Materials Exposure.
- 6.3 Policy S: Hazardous Materials in City Operations.

Impact HAZ-2

Development consistent with the LUCE Update could introduce incompatible residential and commercial land uses into safety zones established through the Airport Land Use Plan and may result in a safety hazard for people residing or working in these areas. Impacts would be Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. The ALUP designates most of this property in Safety Zone 1B which allows only 0.2 dwelling units per acre (1 dwelling unit per 5 acres). A small portion, perhaps 16 acres, is located in Safety Zone 2, which allows 6-12 dwelling units per acre with an approved Airport Compatible Open Space (ACOS) plan. The City of San Luis Obispo does have an approved ACOS and the San Luis Ranch property contains one of the designated open space areas in the ACOS. The ALUP allows increases in density under certain circumstances (use of a detailed area plan and clustered development plan), however, even if residential density is maximized by use of these techniques, residential density envisioned in the Proposed Project exceeds that considered as potentially compatible under the ALUP. In addition, non-residential intensity envisioned in the Proposed Project has the potential to exceed the 50-75 persons per acre considered to be compatible in the ALUP for Safety Zone 1B, and with the 150 persons per acre in Safety Zone 2. Development of new residential uses in this area fall within the ALUP-identified 55 dB CNEL noise contour which would not be consistent with Table 5.3 of the ALUP.

The proposed changes and development described in the LUCE update and through Zoning Code implementation locates this area in proposed Airport Overlay Zones 4 and 6 (corresponding to Handbook Safety Zones 4 and 6) for approximately 1/3 of the property adjacent to Highway 101. The remainder of the property (91 acres) is located outside of the proposed Airport Overlay Zone entirely. Draft performance standards for the property indicate a large percentage of open space to be retained for agricultural use (around 50%) and indicate that land uses shall be in keeping with the safety parameters described in the LUCE update or other applicable regulations.

The bulk of the proposed development is anticipated to be clustered outside of the Airport Overlay Zones with some non-residential development and circulation infrastructure located in proposed Airport Overlay Zone 4 (AOZ 4). AOZ 4 allows non-residential development intensity of up to 200 persons per acre. Uses that have the potential to be incompatible with this outer approach/departure zone are identified as prohibited. Examples of such uses include larger public assembly uses, schools, industrial research and development uses (potential for hazardous materials or processes), service stations, residential dwellings and day care facilities. Compliance with the proposed policies and regulations, including use limitations and overflight notification and aviation easements will ensure that future development under the LUCE Update would not result in significant airport-related safety hazards.

Applicable LUCE Update Policies

Land Use Element

- 7.3.3 Airport Land Use Plan.
- New Program 7.14 Airport Overlay Zone.
- New Program 7.15 Airport Land Use and Zoning Code.
- New Policy Airport Safety Zones.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

- New Policy Airport Noise Compatibility.
- 11.0.1 County Aircraft Operations.
- 11.1.1 Environmentally Sensitive Aircraft.
- 11.1.4 Update of the Airport Land Use Plan.

Applicable Previously Existing City Policies

Conservation and Open Space Element

- 8.3.3 Open space for safety.
- 7.0 Policy : Airport Land Use Plan.

Impact HAZ-3

Development consistent with the LUCE Update would introduce residential land uses into areas designated as having a Moderate or High Wildland Fire Hazard, introducing the potential to expose people or structures to a significant risk of loss and/or injury. However, compliance with existing policies and state and local regulations would reduce impacts to a Class III, less than significant level.

San Luis Ranch Specific Plan Area Impact Analysis. This area is characterized primarily by its use as an agricultural property, which is mainly undeveloped with the exception of a relatively small amount of agricultural support structures. This portion of the site includes a mature stand of tall eucalyptus trees which, although not connected to outlying wildland areas, has the potential to present fire fuel risks and vertical fire ladder structure that can increase potential fire intensity. The San Luis Ranch Specific Plan Area is designated as Moderate Wildland Fire Hazard Areas. As such, future development of the site could be exposed to potential wildland fire hazards. However, compliance with applicable UFC, CBC and General Plan policies would reduce the risk of injury or damage from wildland fires to a less than significant level.

Applicable LUCE Update Policies

Land Use Element

- 6.2.6 Homesites Outside the Limit Lines;
- 6.2.2 Development Limits.

Applicable Previously Existing City Policies

Conservation and Open Space Element

- 8.3.3 Open space for safety.

Safety Element

- Policy 3.0: Adequate Fire Services.
- Policy 3.1: Wildland Fire Safety

Impact HAZ-4

Development facilitated by the LUCE Update could introduce sensitive receptors to additional hazards related to exposure to radiation, electromagnetic fields and hazardous trees. With the incorporation of the LUCE Update policies and other previously existing City policies, potential impacts are considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. The San Luis Ranch Specific Plan Area is currently in agricultural production. The site also supports a mature stand of non-native eucalyptus trees associated with the farming complex. Future development under the LUCE Update could introduce residents, employees or visitors to tree hazards. Although there are overhead transmission lines in the site vicinity, they are not close enough to pose a risk associated with EMF. Radiation hazards associated with Diablo Canyon Nuclear Power Plant are regionwide, and not specific to this site.

Applicable LUCE Update Policies

The General Plan Land Use Element Update draft includes edits to existing policies and programs for development in proximity to known hazards discussed above. Specifically, implementation of LUCE Update policy 12.3.11 Environmental Review will require appropriate studies of proposed development projects with the potential to result in impacts. Refer to the discussion under Impact HAZ-1 for the full text of this policy.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

Applicable Previously Existing City Policies

Safety Element

- 7.0 Policy S: Exposure to Electromagnetic Fields.
- 7.1 Policy S: Notification to Buyers Near Electromagnetic Fields.
- 9.0 Policy S: Hazardous Trees.
- 9.1 Program S: Hazardous Trees.

Impact HAZ-5

Development under the LUCE Update could potentially introduce sensitive receptors to areas in direct proximity to hazardous materials transportation corridors including the Union Pacific Railroad and Highway 101 and could potentially create a public safety hazard. This is a Class III, less than significant impact.

San Luis Ranch Specific Plan Area Impact Analysis. Because this site is located adjacent to U.S. Highway 101, to a major transportation corridor, there is a potential for risks associated with the transportation of hazardous materials. Future mixed use development in this area, as envisioned under the LUCE Update, could expose individuals to health risks due to the site location in proximity to Highway 101.

Applicable LUCE Update Policies

The General Plan Land Use Element Update draft includes edits to existing policies and programs for development in proximity to known hazards discussed above. Specifically, implementation of LUCE Update policy 12.3.11 Environmental Review will require appropriate studies of proposed development projects with the potential to result in impacts, including potential impacts related to development in direct proximity to hazardous materials transportation corridors. Refer to the discussion under Impact HAZ-1 for the full text of this policy.

Applicable Previously Existing City Policies

Safety Element

- 6.1 Other Hazardous Materials.
- 6.2 Policy S: Minimizing Hazardous Materials Exposure.
- 6.3 Policy S: Hazardous Materials in City Operations.

Project Level Evaluation

a), b), c), d) The proposed project is a mixed residential, commercial, and office development, and would not involve the use, transportation, disposal, or emission of hazardous materials. The site is not listed as having known hazardous materials or contamination. Pacific Beach High School (a continuation school at 11950 Los Osos Valley Road) and the Vicente Education and Community Program Center are within ¼ mile of the project site.

The historic and continued use of the Dalidio property for agricultural production is assumed to involve the use of agricultural chemicals (pesticides, herbicides, fertilizers). The use and storage of these chemicals on the project site could have resulted in undocumented releases of contaminants. In addition, due to the historic application of agricultural chemicals on the project site, residual quantities of these chemicals, including presently banned agricultural chemicals, could occur in on-site soils. It is also possible that existing hazardous materials releases from off-site properties could potentially affect the subject property. The potential exposure of site construction workers, and future residents and visitors to the site could result in adverse impacts.

A “Limited Level I Preliminary Site Assessment” was prepared for the proposed Prado Road/U.S. Highway 101 interchange (PAR Environmental Services, Inc., August 2000). A records search of Federal, State, and County hazardous materials incident databases on and in the vicinity of the project site was conducted by Environmental Data Resources, Inc. (February 10, 2003). This records search identified government-regulated properties having known or potential recognized hazardous materials conditions within the site vicinity. Based on this records review, the project site is not listed on a local, state, or federal hazardous materials database. However, several registered users of hazardous materials are located in the project vicinity. Most of these hazardous materials sites are commercial or institutional uses located along U.S. Highway 101, Madonna Road, and Los Osos Valley Road. Several of these sites involved a release of hazardous materials within ¼ mile of

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

the project site.

The proposed Prado Road/U.S. Highway 101 interchange and associated improvements could be located on soils that contain aerially deposited lead (ADL) associated with historic vehicle traffic on U.S. Highway 101. The release and/or exposure of site construction workers could be a potentially significant impact.

Because of the length of time that has passed since this research was conducted, the possibility that neighboring land uses and their potential create impacts related to hazardous materials have changed since that time, and to more clearly investigate the project's unknown potential to affect offsite land use, this issue will be re-evaluated in the EIR.

e) The proposed project may conflict with ongoing operations at the San Luis Obispo County Airport, exposing lives and property to potential safety hazards. The County's Airport Land Use Plan (ALUP) shows the Safety Area S-1b affecting a majority of the project site. See the discussion under program level impacts discussed in the LUCE EIR, Impact HAZ-2.

The City of San Luis Obispo has requested an update to the existing Airport Land Use Plan to accurately define and update safety boundaries. The City has requested the Airport Land Use Commission (ALUC) use the *California Airport Land Use Planning Handbook*, which is typically the standard starting point for providing guidance and direction for Airport Land Use Plans across the state. Under the *Handbook* guidelines, the zone affecting the site is Zone 4 and it allows for housing where it was previously restricted. The proposed project would rely on the revised safety zone designation for the provision of housing, a significant change to the ALUP, or a decision by the City Council to override the existing Airport Land Use Plan.

This issue will require evaluation in the EIR, discussing the appropriate policy framework, and evaluating the project's potential inconsistency with the ALUP if it is not changed as described above.

f) The project site is not in the vicinity of a private airstrip.

g), h) 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, provided that the project's cumulative traffic impacts are adequately mitigated. Project plans would need to be evaluated by the Fire Marshal and comply with applicable UFC, CBC and General Plan policies. Compliance with these requirements would reduce the risk of injury or damage from wildland fires to a less than significant level. This issue will not be evaluated further in the EIR.

Conclusion: Impacts related to airport hazards and agricultural chemical use will be evaluated in the EIR.

9. HYDROLOGY AND WATER QUALITY. Would the project:

a) Violate any water quality standards or waste discharge requirements?	10,19,30	--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)?				--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?		--X--			
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?		--X--			
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?		--X--			

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

f) Otherwise substantially degrade water quality?		--X--			
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?		--X--			
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?		--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?					--X--
j) Inundation by seiche, tsunami, or mudflow?	11, 12				--X--

LUCE Update Final Program EIR Analysis

Impact HWQ-1

New development under the LUCE Update within the 100-year flood plain could be subject to flooding and have the potential to impede or redirect flood flows. However, with implementation of General Plan policies and adherence to the City's Floodplain Management Regulation impacts related to flooding would be Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. The San Luis Ranch site is located within the floodplain of both San Luis Obispo and Pefumo Creeks and is characterized primarily by its use as an agricultural property. About 3/4 of the San Luis Ranch property is within the 100-year flood zone as identified by FEMA. The City of San Luis Obispo also documents that the San Luis Ranch property is an area of flooding concern, as it lies within the floodplain of two creeks. However, implementation of the LUCE Update policies, and other previously existing City policies identified below, would reduce future programmatic impacts to less than significant levels. The development will also be subject to the new Post Construction Requirements adopted by the Central Coast Regional Water Quality Control Board, and incorporated in City development requirements.

Applicable LUCE Update Policies

Land Use Element

- 6.2.2 Development Limits.
- 6.4.1 Creek and Wetlands Management Objectives.
- 6.4.5 Runoff Reduction and Groundwater Recharge.
- 6.4.6 Development Requirements.
- 6.5.1 Previously Developed Areas.
- 6.5.2 National Flood Program.
- 6.5.3 Creekside Care and Notification.
- 8.3.2.4 SP-2, San Luis Ranch (Dalidio) Specific Plan Area.

Applicable Previously Existing City Policies

Conservation and Open Space Element

- 7.7.9 Creek Setbacks.
- 8.3.3 Open space for safety.
- 10.2.2 Ahwahnee Water Principles.

Safety Element

- 2.1 Policy S: Flood Hazard Avoidance and Reduction
- 10.12 Policy S: Critical Facilities Locations.

Impact HWQ-2

Development facilitated by the LUCE Update has the potential to increase the amount of impervious surfaces within the city. This could result in a decrease in percolation to the Groundwater Basin, the alteration of drainage patterns and increases in the volume of surface runoff. Compliance with the City's Stormwater Management Plan (SWMP)

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

would reduce impacts to a Class III, less than significant level.

San Luis Ranch Specific Plan Area Impact Analysis. This area is characterized as an agricultural property, which is primarily undeveloped and consists of unpaved native soils within the floodplain of San Luis Obispo and Prefumo Creeks. The San Luis Ranch Specific Plan Area development potential, as outlined in the LUCE Update, would result in a primarily developed environment and a general increase in the amount of impervious surfaces onsite. Implementation of the LUCE Update policies and other previously existing City policies identified below would reduce programmatic impacts related to groundwater percolation and recharge and the altering of existing drainage patterns to less than significant levels.

Applicable LUCE Update Policies

Land Use Element

- 6.4.5 Runoff Reduction and Groundwater Recharge.
- 6.4.6 Development Requirements.
- 6.5.1 Previously Developed Areas.

Applicable Previously Existing City Policies

Conservation and Open Space Element

- 8.3.3 Open space for safety.
- 10.2.2 Ahwahnee Water Principles.
- 10.1.3 GOAL: Water Quality.
- 10.2.1 Water Quality.

Impact HWQ-3

Point and non-point sources of contamination could affect water quality in San Luis Obispo Creek, Prefumo Creek as well as other surface waters and groundwater in the city. However, compliance with existing regulations and implementation of General Plan policies and the City’s Stormwater Management Plan (SWMP) would result in Class III, less than significant impacts.

San Luis Ranch Specific Plan Area Impact Analysis. The San Luis Ranch site is characterized primarily by its use as an agricultural property, which is primarily undeveloped, consisting of low lying areas within the floodplain of and draining directly to both San Luis Obispo and Prefumo Creeks. The San Luis Ranch Specific Plan Area development potential, as outlined in the LUCE Update, could result in an increase of point and non-point sources of contamination that could drain to and ultimately affect water quality in San Luis Obispo. However, implementation of the LUCE Update policies, compliance with current federal and state requirements, and other previously existing City policies identified below, would reduce programmatic impacts related to surface and groundwater pollution to less than significant levels.

Applicable LUCE Update Policies

Land Use Element

- 3.5.4.3 Air & Water Quality.

Applicable Previously Existing City Policies

Conservation and Open Space Element

- 10.3.2 Maintain water quality.

Impact HWQ-4

Development facilitated by the LUCE Update has the potential to create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, resulting in increased stormwater runoff and has the potential to result in the need for additional stormwater infrastructure. Compliance with the City’s Stormwater Management Plan (SWMP), and State regulatory requirements, would reduce impacts to a Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. The site is relatively flat, and is located within the floodplain of San

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

Luis Obispo and Prefumo Creeks. The majority of the San Luis Ranch property is within the 100-year flood zone as identified by FEMA. The City of San Luis Obispo also documents that the San Luis Ranch property is an area of flooding concern, as it lies within the floodplain of two creeks. The San Luis Ranch Specific Plan Area development potential, as outlined in the LUCE Update, would result in a more built environment with a significant increase in the amount of impervious surfaces within the area, resulting in increased stormwater runoff and the need for additional stormwater infrastructure. However, as development occurs, site-specific stormwater infrastructure needs would be determined on a project-specific basis. Upon compliance with the City’s SWMP, Engineering Standards, General Plan and City Ordinance requirements discussed above, programmatic impacts related to the need for additional stormwater infrastructure would be less than significant.

Applicable LUCE Update Policies

Land Use Element

- 6.4.5 Runoff Reduction and Groundwater Recharge.
- 6.4.6 Development Requirements.
- 6.5.1 Previously Developed Areas.

Applicable Previously Existing City Policies

Conservation and Open Space Element

- 8.3.3 Open space for safety.
- 10.2.2 Ahwahnee Water Principles.

Project Level Evaluation

a), f) This project is subject to the current stormwater regulations as set forth by the Regional Water Quality Control Board. The proposed project is also subject to the requirements for Interim Low Impact Development as a Tier 3 Project, as it is a residential subdivision map of 5 or more units. Because project-specific storm drain facilities have not yet been developed or analyzed, these will require examination in the project EIR.

b) The project is consistent with the buildout parameters included in the General Plan, for which adequate water supply has been planned. The project will be served by the City’s sewer and water systems and will not deplete groundwater resources.

c), d), e), i) Physical improvement of the project site will be required to comply with the drainage requirements of the City’s Waterways Management Plan. This plan was adopted for the purpose of insuring water quality and proper drainage within the City’s watershed. The Waterways Management Plan requires that site development be designed so that post-development site drainage does not significantly exceed pre-development run-off. Compliance with the Waterways Management Plan would be sufficient to mitigate any potentially significant impacts of the project in the areas of water quality and hydrology. However, since the project’s drainage system has not been developed or analyzed, project impacts are potentially significant and will be analyzed in the EIR.

g), h) About 3/4 of the San Luis Ranch property is within the 100-year flood zone as identified by FEMA. The City of San Luis Obispo also documents that the San Luis Ranch property is an area of flooding concern, as it lies within the floodplain of two creeks. Because the project has not been designed, it is possible that future development could be subject to flood-related impacts. This issue will be analyzed in the EIR.

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.

Conclusion: Because the project’s development footprint and drainage system have not been established, potential impacts are possible. Flooding and drainage issues will be examined in the EIR.

10. LAND USE AND PLANNING. Would the project:

a) Physically divide an established community?	1, 10				--X--
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but	1, 9, 30	--X--			

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

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?					
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	5, 12				--X--

LUCE Update Final Program EIR Analysis

Impact LU-1

The LUCE Update would conflict with the airport land use plan (ALUP). However, with the implementation of LUCE Update policies and implementing zoning regulations, potential land use conflicts are less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. Most of the site is in agricultural production. Nearby land uses include the San Luis Obispo Promenade shopping center to the east; Laguna Lake Park to the north; single-family residential development to the west; U.S Highway 101 is to the southeast; and agricultural land with commercial development beyond is south of the site. The entire site is within the City’s LUCE SOI Planning Subarea, but is outside the current city limits. For analysis purposes the LUCE EIR anticipated that implementation of the San Luis Ranch Specific Plan would result in the development of approximately 500 dwelling units and 470,000 square feet of non-residential uses.

The ALUP designates most of this property in Safety Zone 1B which allows only 0.2 dwelling units per acre (1 dwelling unit per 5 acres). A small portion, around 16 acres, is located in Safety Zone 2, which allows 6-12 dwelling units per acre with an approved Airport Compatible Open Space (ACOS) plan. The City of San Luis Obispo does have an approved ACOS and the San Luis Ranch property contains one of the designated open space areas in the ACOS. The ALUP allows increases in density under certain circumstances (use of a detailed area plan and clustered development plan), however, even if residential density is maximized by use of these techniques, residential density envisioned in the proposed project exceeds that considered as potentially compatible under the ALUP. In addition, non-residential intensity envisioned in the proposed Project has the potential to exceed the 50-75 persons per acre considered to be compatible in the ALUP for Safety Zone 1B, and with the 150 persons per acre in Safety Zone 2.

Development of new residential uses in this area fall within the ALUP-identified 55 dB CNEL noise contour which would not be consistent with Table 5.3 of the ALUP.

Changes and development supported by the LUCE update for this area and implementation through the Zoning Code are assumed to represent potentially significant and unavoidable potential land use conflicts with the San Luis Obispo County Airport Land Use Plan. This issue was previously discussed under Section 8. Of this Initial Study (*Hazards and Hazardous Materials*), and will be examined in the EIR.

Impact LU-2

The LUCE Update would have the potential to result in land use conflicts between existing and proposed land uses. With the implementation of LUCE Update policies, potential land use conflict impacts are considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. Land use conflicts that could have the potential to occur between development under the San Luis Ranch Specific Plan and adjacent land uses may include impacts associated with nearby agricultural operations such as odors, dust, noise, pesticide or herbicide spraying, and trespass onto agricultural lands. Potential land use conflicts may also result from design- and construction-related issues such as increased noise and traffic, the impairment of views of important visual resources, shadows and loss of privacy, and short- term construction impacts. Conflicts between land uses on the San Luis Ranch site and nearby existing uses would have the potential to result in significant environmental impacts. Programmatically, these potential impacts, however, could feasibly be reduced to a less than significant level with the implementation of the existing and LUCE policies identified below.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

Applicable LUCE Update Policies

Land Use Element

- 1.3 Urban Edges Character.
- 1.15.1 County “RMS.”
- 2.1.3 Neighborhood Traffic.
- 2.1.4 Neighborhood Connections.
- 2.2.2 Separation and Buffering.
- 2.2.3 Residential Next to Non-residential.
- 2.2.5 Neighborhood Pattern.
- 2.2.6 Housing and Businesses.
- 2.2.9 Compatible Development.
- 3.0.2 Access.
- 7.3.3 Airport Land Use Plan.
- New Policy: Airport Safety Zones.
- New Policy: Airport Noise Compatibility.
- 7.3.6 Internal Open Space.
- New Program: Airport Overlay Zone.
- New Program: Airport Land Use and Zoning Code.

Circulation Element

- 7.0.3 Growth Management & Roadway Expansion.
- 8.1.3 Quality of Life.
- New Policy: Regional Cut-Through Traffic.

Impact LU-3

The Land Use Element Update would result in conflicts with applicable habitat conservation plans or natural community conservation plans. With the implementation of LUCE Update policies, potential plan and policy conflict impacts are considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. Development of the San Luis Ranch area has the potential to conflict with the Calle Joaquin Reserve Plan if the open land envisioned with the Specific Plan area is not contiguous or configured in a way that supports on-going operations of the Agricultural Reserve. In addition, development of the San Luis Ranch property with residential uses may result in impacts related trespass onto agricultural lands or impacts to sensitive wildlife species addressed in the Plan. Conflicts between land uses on the San Luis Ranch site and the adjacent Calle Joaquin Reserve could have the potential to result in significant environmental impacts. These potential programmatic impacts, however, are reduced to a less than significant level with the implementation of the existing and LUCE policies identified below.

Applicable LUCE Update Policies

Land Use Element

- 1.15.1 Consistent Plans.
- 3.3.1.1 Zoning Regulations.
- 6.0.1 Resource Planning.
- 6.1.2 Open Space Uses.
- 6.2.2 Development Limits.
- 6.4.1 Creek and Wetlands Management Objectives.

Applicable Previously Existing City Policies

Conservation and Open Space Element

- 8.3.2 Open space buffers.
- 8.5.1 Public access.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

- 8.6.3 Required mitigation.

Impact LU-3

The Circulation Element Update identifies future roadway improvements that would have the potential to result in a significant impact if the improvements would physically divide an established community. This impact is considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. The proposed Prado Road interchange/overpass would not be located in a developed neighborhood or community. No impacts with respect to dividing an established community would occur.

Project Level Evaluation

a), c) Proposed development project is designed to fit among existing surrounding urban development and will not physically divide an established community or conflict with any applicable habitat conservation plan or natural community conservation plans.

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 City regulations and development standards, although as a Specific Plan, it could include new standards that differ from those in zoning provisions of the Municipal Code. If that is the case, the potential impacts arising from these standards will need to be examined in the EIR.

As discussed above, the project is potentially inconsistent with the adopted Airport Land Use Plan. Impacts arising from that potential inconsistency will require examination in the EIR.

Conclusion: Impacts related to the project’s potential inconsistency with the Airport Land Use Plan will be examined in the EIR. If the project includes new development standards (e.g., setbacks, building heights, density provisions) that differ from those in the zoning provisions of the Municipal Code, their potential impacts will need to be examined in the project EIR.

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?					--X--

LUCE Update Final Program EIR Analysis

No programmatic impact analysis was performed for the San Luis Ranch Specific Plan area.

Project Level Evaluation

a), b) There are no known mineral resources on the project site.

Conclusion: No impact. This issue will not be examined in the project EIR.

12. NOISE. Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	3, 9, 10	--X--			
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?		--X--			
c) A substantial permanent increase in ambient noise levels in the				--X--	

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

project vicinity above levels existing without the project?					
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				--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?	27			--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?	10,12				--X--

LUCE Update Final Program EIR Analysis

Impact N-1: Short-Term Construction Noise Levels

Implementation of development projects under the LUCE Update would involve construction that could generate noise levels that exceed applicable standards for mobile construction equipment in the City's Noise Control Ordinance and result in temporary substantial increases in noise levels primarily from the use of heavy-duty construction equipment (see thresholds a and c). Even with the incorporation of the LUCE Update policies and other previously existing City policies, short-term construction noise levels are considered Class I, significant and unavoidable.

San Luis Ranch Specific Plan Area Impact Analysis. There is no site-specific analysis of this issue for the San Luis Ranch in the LUCE Update program EIR.

Applicable LUCE Update Policies

Land Use Element

- 2.1.1 Residential Project Objectives
- 2.8.1 Enforcing Standards

Applicable Previously Existing City Policies

Many policies from Noise Element

Impact N-2 Long-Term Roadway and Railroad Traffic Noise Levels

Implementation of the LUCE Update would increase traffic volumes and associated noise levels along major transportation routes. In some instances, traffic-related noise increases could be more than 3 dB, the level typically audible to the human ear and; therefore, considered a substantial increase in noise. New development associated with the LUCE Update could also result in the siting of new sensitive receptors in close proximity to transportation noise sources such as the railroad, with potential to exceed the land use compatibility and transportation noise exposure standards in the existing Noise Element. However, because the City's Noise Element contains policies and programs that would address and mitigate potential site-specific impacts for individual projects in the future, this impact would be considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. There is no site-specific analysis of this issue for the San Luis Ranch in the LUCE Update program EIR. The LUCE EIR reports that modeled noise levels at General Plan buildout (2035), which includes the proposed project, would result in noise increases along Highway 101 adjacent to the project site. As modeled at 50 feet from the roadway centerline, there would be a 1.3 dB increase along Highway 101 between Los Osos Valley Road and Madonna Road, from 81.2 dBA to 82.5 dBA. No increase in noise level is expected along Madonna Road from Oceanaire Drive to Highway 101. Future noise levels along Dalidio Drive were not modeled.

Applicable LUCE Update Policies

Land Use Element

- 2.2.11 Residential Project Objectives

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

- 3.5.7.6 Noise Control
- 4.0.13 Noise
- 8.3.2.2 Specific Plan Content
- 12.3.11 Environmental Review

Circulation Element

- 1.0 Manage Traffic
- 8.0.6 Non-Infill Development
- 8.1.3 Quality of Life
- 10.0.1 Truck Routes

Applicable Previously Existing City Policies

Many policies from Noise Element

Impact N-3 Exposure of Noise Sensitive Receptors to Stationary Sources.

Implementation of the LUCE Update could increase stationary source noise levels from new development. New development associated with the LUCE Update could also result in the siting of new sensitive receptors in close proximity to these source types, with potential to exceed the land use compatibility and stationary noise exposure standards in the existing Noise Element. However, because the City’s Noise Element contains policies and programs that would address and mitigate potential site-specific impacts for individual projects in the future, this impact would be considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. There is no site-specific analysis of this issue for the San Luis Ranch in the LUCE Update program EIR.

Applicable LUCE Update Policies

Same as for Impact N-2

Applicable Previously Existing City Policies

Same as for Impact N-2

Impact N-4 Airport Noise Exposure

Implementation of the LUCE Update would result in the designation of noise-sensitive land uses located within or near the 55 dBA and 60 dBA noise contours of the San Luis Obispo County Regional Airport Land Use Plan. This could result in exposure of people to excessive noise levels. However, with the incorporation of the LUCE Update policies that address airport noise compatibility and consistency with the adopted ALUP, this impact would be considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. There is no site-specific analysis of this issue for the San Luis Ranch in the LUCE Update program EIR.

Applicable LUCE Update Policies

Land Use Element

- 7.3.3 Airport Land Use Plan
- New Policy Airport Noise Compatibility
- New Policy County Airport Land Use Plan
- New Program: 7.14 Airport Overlay Zone
- New Program: 7.15 Airport Land Use and Zoning Code

Circulation Element

- 1.1. Manage Traffic

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

- 11.0.2 County Aircraft Operations
- 11.1.4 Update of the Airport Land Use Plan

Applicable Previously Existing City Policies

Noise Element

- 1.4 New Transportation Noise Sources
- 1.23 Relationship to Noise Ordinance

Impact N-5 Exposure to Excessive Vibration Levels.

Implementation of the LUCE Update could increase exposure to vibration levels. However, because the City’s ordinance contains and that these sources (existing and proposed) would be anticipated to be minor, this impact would be considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. There is no site-specific analysis of this issue for the San Luis Ranch in the LUCE Update program EIR.

Applicable Previously Existing City Policies

Noise Element

- 7. Vibration.

Project Level Evaluation

a) As modeled at 50 feet from the roadway centerline, there would be a 1.3 dB increase along Highway 101 between Los Osos Valley Road and Madonna Road, from 81.2 dBA to 82.5 dBA. Based on a 3-dBA attenuation for each doubling of distance, this suggests that noise levels would still be 70.5 dBA at 800 feet from centerline, which is about halfway across the project site. This noise level exceeds City standards for usable outdoor residential areas. The Noise Element indicates that noise levels of 60 dB are acceptable for outdoor activity areas and 45 dB for indoor areas. This suggests that there could be potentially significant impacts to future onsite residents, which will require examination in the EIR.

b) Noise and ground borne vibrations may occur during construction. As noted in the LUCE EIR, these impacts are potentially significant and unavoidable, and will require examination in the project EIR.

c), d) Based on the Program EIR analysis, it appears that at buildout, cumulative noise impacts that result from the project and all other City development will not significantly increase ambient noise levels. Therefore, this impact would be less than significant.

e), f) The project is within the projected 50-55 dB contour from the County Airport, based on the Airport Land Use Plan. Table 1 of the General Plan Noise Element states that the maximum noise exposure for outside residential activities is 60 dB. The project will not experience noise sources that exceed significance thresholds. The project is not within the vicinity of a private airstrip. This issue will not be examined further in the EIR.

Conclusion: Impacts related to roadway and construction noise will be examined in the EIR.

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

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

LUCE Update Final Program EIR Analysis

Impact PH-1

The LUCE Update would not result in residential unit development or associated population growth that exceeds an adopted average annual growth rate threshold. Potential population and housing impacts are considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. There is no site-specific analysis of this issue for the San Luis Ranch in the LUCE Update program EIR.

Applicable LUCE Update Policies

Land Use Element

1.10.2 Residential Growth Rate.

Impact PH-2

The LUCE Update would not result in a substantial displacement of residents or existing housing Units. This impact is considered Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. No homes or residents would be displaced within the San Luis Ranch Specific Plan area as a result of project implementation.

Project Level Evaluation

a), b), c) The project proposes development consistent with the population projections expected under the General Plan. This will not result in population exceeding local and regional growth projections. As noted in the LUCE EIR, no homes or residents would be displaced within the San Luis Ranch Specific Plan area as a result of project implementation.

Conclusion: No impact is anticipated, and this issue will not be examined in the project EIR.

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?	12, 30			--X--	
b) Police protection?				--X--	
c) Schools?				--X--	
d) Parks?				--X--	
e) Roads and other transportation infrastructure?				--X--	
f) Other public facilities?				--X--	

LUCE Update Final Program EIR Analysis

Impact PS-1

Buildout under the Land Use Element would increase the demand for fire protection services by increasing population and the number of structures in the city. This is a Class II, potentially significant but mitigable impact.

San Luis Ranch Specific Plan Impact Analysis. The San Luis Ranch Specific Plan area is located approximately 0.5 mile east of City Fire Station No. 4, and is within the four-minute response area of the fire station.

Applicable Previously Existing City Policies

Safety Element

- Policy 3.0: Adequate Fire Services.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

Mitigation Measures

The following policy shall be added to the proposed Land Use Element Update prior to adoption:

PS-1 New Policy. Development shall be approved only when adequate fire suppression services and facilities are available or will be made available concurrent with development, considering the setting, type, intensity, and form of the proposed development.

Impact PS-2

Buildout under the Land Use Element Update would increase the demand for police protection services by increasing population and development in the city. This is a Class III, less than significant impact.

Impact PS-3

Buildout under the Land Use Element Update would increase enrollment in public schools by increasing the population of the city. This is a Class III, less than significant impact.

San Luis Ranch Specific Plan Area Impact Analysis. The San Luis Ranch Specific Plan could result in the development of approximately 500 residences, consisting of 320 single-family dwellings and 180 multi-family units. It is estimated that the new residences located on the San Luis Ranch Specific Plan site would generate approximately 89 additional school-age children.

Mitigation Measures

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, future development projects would be required to pay school impact fees established to offset potential impacts on school facilities. Therefore, although the LUCE Update would result in additional students and could result in or contribute to over-capacity at individual schools, payment of the fees mandated under SB 50 is the mitigation measure prescribed by the statute, and payment of the fees is deemed full and complete mitigation. Therefore, no additional mitigation is required.

Project Level Evaluation

a), b), d), e), f) Project-specific impacts to public services would be the same as programmatic impacts, provided that the development parameters of the project would remain within the limits described in the LUCE EIR. Impacts would be less than significant for all services, because they are addressed either through required development fees, and in the case of the proposed project, through the financing mechanisms included in the Specific Plan and development agreement that will be part of potential project approval.

c) The school districts in the state have the authority to collect fees at the time of issuance of building permits to offset the costs to finance school site acquisition and school construction, and are deemed by State law to be adequate mitigation for all school facility requirements. As noted under the discussion of the LUCE EIR, payment of the fees mandated under SB 50 is the mitigation measure prescribed by the statute, and payment of the fees is deemed full and complete mitigation.

Conclusion: Impacts would be less than significant because of existing requirements to offset potential impact through the payment of fees. This issue will not be examined further in the EIR.

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, 30			--X--	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might		--X--			

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

have an adverse physical effect on the environment?					
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LUCE Update Final Program EIR Analysis

Impact REC-1

Buildout of the LUCE Update would increase the population of the city and would facilitate the development of additional parkland. Buildout of the LUCE Update would result in a small increase in total per capita parkland in the city when compared to existing conditions. Although the LUCE Update would not comply with the City’s per capita parkland standard, this would not result in a physical effect. Therefore the LUCE Update would result in a Class III, less than significant environmental impact related to the increased use of existing park and recreation facilities.

San Luis Ranch Specific Plan Area Impact Analysis. New parkland would be provided on the San Luis Ranch Specific Plan site. The size, location, and uses of parkland area provided by the proposed specific plans and area plan has not yet been defined and may not meet the City’s parkland standard of 10 acres per 1,000 residents, however, this is not considered to result in or contribute to a significant recreation impact because on a city-wide basis the proposed Land Use Element Update would result in an increase in the existing per capita parkland area in the city, and would not result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration of the facility would occur.

Applicable LUCE Update Policies

Land Use Element

- 2.1.1 Mixed Uses and Convenience.

Applicable Previously Existing City Policies

Many policies in the Parks and Recreation Element

Impact REC-2

Buildout of the Land Use Element would potentially provide up to 52.4 acres of new park facilities in the city. The construction and use of the proposed parks would have the potential to result in significant environmental impacts. This is considered a Class III impact, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. Most of the future parkland to be provided in the city would be constructed as part of the buildout of previously approved (Margarita and Orcutt) or proposed (San Luis Ranch, Avila Ranch, Madonna) specific plans, which would facilitate park planning and design opportunities to minimize environmental impacts and land use conflicts. Therefore, potential adverse physical effects on the environment resulting from future park development and use would be reduced to a less than significant level through the implementation of proposed policy and project-specific CEQA requirements.

Applicable LUCE Update Policies

Land Use Element

- 2.2.2 Separation and Buffering.

12.3.11 Environmental Review.

Project Level Evaluation

a), b) The project will add incrementally to the demand for parks and other recreational facilities. The LUCE EIR determined that as long as the project meets the City’s parkland standard of 10 acres per 1,000 residents, programmatic impacts would be less than significant. Parks and Recreation Element Policy 3.13.1 states the following: *The City shall develop and maintain a park system at the rate of 10 acres of parkland per 1,000 residents. Five acres shall be dedicated as a neighborhood park. The remaining five acres required under the 10 acres per 1000 residents in the residential annexation policy may be located anywhere within the City’s park system as deemed appropriate.*

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

Based on an average household size of 2.29 for the City (per California Department of Finance Report E-5, January 2015), buildout under the Specific Plan could yield an estimated population of 1,145. Based on the city standard, this would require at least 5.8 acres of neighborhood parks, and 5.8 acres of parkland “anywhere in the City’s park system as deemed appropriate.” The draft Specific Plan includes 3.39 acres of parkland, and assumes a credit of 2.41 acres for the Bob Jones trail where it traverses the planning area. This meets the City requirement for neighborhood parks.

The plan also includes an additional 7.55 acres of open space, including creek areas and drainage basins, although a portion of this is considered “interim” open space, and could ultimately be converted to other urban uses. It is not clear if this meets the intent of the remaining 5.8-acre park requirement “anywhere within the City’s park system”, particularly since a portion of this may ultimately be converted to other uses as interim open space.

The Specific Plan has the potential to include a substantial portion of the City’s future park needs, and is in a unique location to link surrounding communities and commercial areas. In order to ensure compliance with City park programming requirements in the context of citywide needs, and that existing offsite facilities would not be overburdened or impacted as a result, this issue will be examined in the EIR.

Conclusion: The adequacy of the Specific Plan’s proposed park and recreation amenities to serve neighborhood and citywide needs will be examined in the EIR.

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?	9,12, 17	--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?		--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?	27			--X--	
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	30	--X--			
e) Result in inadequate emergency access?	12			--X--	
g) 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, 9, 30	--X--			

LUCE Update Final Program EIR Analysis

Impact CIR-1

Development and street network changes under the LUCE Update will cause roadways currently operating at LOS D or better to deteriorate to LOS E or F, in downtown San Luis Obispo, roadways operating at LOS E or better will deteriorate to LOS F, or will add additional traffic to roadways operating at LOS E (outside of downtown) or F (in downtown). Impact is considered to be Class I, significant and unavoidable.

San Luis Ranch Specific Plan Area Impact Analysis. The LUCE EIR identified these areas near the proposed project

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

areas as being potentially adversely impacted by future development within the City, including the proposed project:

- *Los Osos Valley Road (just west of the City Limits)*. Due to land use changes in the vicinity of the city limit and changes in traffic patterns, these segments will experience significant increases in volume.
- *Prado (US 101 – Higuera and Higuera – Broad)*. Due to the improvement of the interchange at US 101/Prado Road, these segments will experience significant increases in volume.

While the potential addition of traffic related to implementation of the above development area projects and street network changes would be considered significant, the incorporation of the LUCE Update policies and existing City policies discussed below could reduce volumes. However, further reduction of volumes would be necessary to reduce impacts to less than significant levels.

Applicable LUCE Update Policies

Circulation Element

- 2.0.1 Multi-level Programs
- 2.0.2 Flexible Work Schedules
- 2.0.3 Work-based Trip Reduction
- 2.0.5 Long-term Measure
- 6.0.A Complete Streets
- 6.0.B Multimodal Level of Service (LOS) Objectives, Service Standards, & Significant Criteria
- 6.0.C Multimodal Priorities
- 6.0.D Defining Significant Circulation Impact
- 6.0.E Mitigation
- 6.0.F City Review
- 7.0.3 Growth Management & Roadway Expansion
- 7.0.4 Transportation Funding
- 7.0.5 Vehicle Speeds
- 7.1.7 Traffic Access Management [Program]

Applicable Previously Existing City Policies

Circulation Element

- 7.0.1 Peak Hour and Daily Traffic
- 7.0.2 Street Network

Impact CIR-2

Development and street network changes under the LUCE Update will cause intersections currently operating at LOS D or better to deteriorate to LOS E or F, in downtown San Luis Obispo, intersections operating at LOS E or better will deteriorate to LOS F, or will add additional traffic to intersections operating at LOS E (outside of downtown) or F (in downtown). Impact is considered to be Class I, significant and unavoidable.

San Luis Ranch Specific Plan Area Impact Analysis. The LUCE EIR identified these areas near the proposed project areas as being potentially adversely impacted by future development within the City, including the proposed project:

- *Higuera & Tank Farm (#85)*. Due to increases in traffic along Higuera Street and Tank Farm Road, the SB left-turn movement experiences significant delay.

The potential addition of traffic related to implementation of the above development area projects and street network changes would be considered significant; however, incorporation of the LUCE Update policies and previously existing City policies discussed below would reduce impacts to less than significant levels.

Applicable LUCE Update Policies

Circulation Element

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

See policies listed under Impact CIR-1.

Applicable Previously Existing City Policies

Circulation Element

See policies listed under Impact CIR-1.

Impact CIR-3

Development under the LUCE Update will increase traffic on freeway facilities. Impact is considered to be Class I, significant and unavoidable.

San Luis Ranch Specific Plan Area Impact Analysis. Development on the project site will contribute to future operational deficiencies on U.S. Highway 101, which will need to be analyzed as part of the project-specific environmental review.

Applicable LUCE Update Policies

Circulation Element

See policies listed under Impact CIR-1.

Applicable Previously Existing City Policies

Circulation Element

See policies listed under Impact CIR-1.

Impact CIR-4

Development under the LUCE Update may increase traffic volumes or traffic speed in designated neighborhood traffic management areas. Impact is considered to be Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. Development on the project site has the potential to increase traffic volumes and speeds in neighborhoods, but this impact will be less than significant by implementing applicable City policies.

Applicable LUCE Update Policies

Circulation Element

- 8.0.1 Through Traffic
- 8.0.3 Neighborhood Traffic Speeds
- 8.0.4 Neighborhood Traffic Management
- 8.0.5 Neighborhood Traffic Management Guidelines
- 8.0.6 Non-Infill Development
- 8.0.7 Development

Applicable Previously Existing City Policies

Circulation Element

- 8.0.2 Residential Streets

Impact CIR-5

Development under the LUCE Update may encourage increased heavy vehicle traffic on non-designated truck routes. Impact is considered to be Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. Development on the project site has the potential to encourage increased heavy vehicle traffic on non-designated truck routes, but this impact will be less than significant by implementing applicable City policies.

Applicable LUCE Update Policies

Circulation Element

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

- 10.0.1 Truck Routes

Impact CIR-6

Development under the LUCE Update will cause increased activity at San Luis Obispo County Regional Airport that may lead to changes in traffic volumes or traffic patterns that result in deteriorated safety conditions. Impact is considered to be Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. Development on the project site has the potential to cause increased activity at San Luis Obispo County Regional Airport that may lead to changes in traffic volumes or traffic patterns that result in deteriorated safety conditions, but this impact will be less than significant by implementing applicable City policies.

Applicable LUCE Update Policies

Circulation Element

- 11.0.1 Interstate Air Service
- 11.0.2 County Aircraft Operations
- 11.0.3 Public Transit Service

Impact CIR-7

Development and street network changes and adoption of the policies and programs under the LUCE Update would not conflict with adopted policies that are supportive of increased active transportation. Impact is considered to be Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. This issue is not specifically addressed in the LUCE EIR with respect to the proposed project site.

Applicable LUCE Update Policies

Many Circulation Element policies support increased active transportation.

Impact CIR-8

Development and adoption of the policies and programs under the LUCE Update would not conflict with adopted policies that are supportive of increased transit ridership and provision of services. Impact is considered to be Class III, less than significant.

San Luis Ranch Specific Plan Area Impact Analysis. This issue is not specifically addressed in the LUCE EIR with respect to the proposed project site.

Applicable LUCE Update Policies

Many Circulation Element policies support increased transit service and ridership.

Project Level Evaluation

a), b) The project is intended to be consistent with the requirements of the Circulation Element. However, because of the complexity and scale of the project and its likely impacts to citywide and regional roadways, this issue will be examined in the EIR.

c) The project will not result in any changes to air traffic patterns, and the LUCE EIR found that citywide development will not alter or substantially effect airline traffic volumes. This issue will not be further examined in the project EIR.

d) The project will be required to meet City Engineering Standards to avoid safety risks. The project will include curb, gutter, and sidewalk per City Engineering Standards. However, it is possible that some project roadways, by virtue of the site’s proximity to existing agriculture, will need to provide access fro slow moving agricultural equipment. This could lead to potential vehicular safety conflicts if roadways are not properly designed, signed, or restricted as appropriate to avoid such

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

conflicts. This aspect of the proposed circulation network will be examined in the EIR.

e) The project is within an infill location, surrounded by development and offsite emergency access in all directions. No significant impact is anticipated. The project will be reviewed by the City Fire Marshal to ensure adequate emergency access has been provided.

f) The project will be required to be consistent with policies supporting alternative transportation as included in the Circulation Element. This is particularly important at this location because of the site's proximity to homes, shopping, parks and services. This aspect of the proposed circulation plan will be examined in the EIR.

Conclusion: Impacts with respect to vehicle circulation and the project's consistency with policies to provide a multi-modal transportation system that works in the context of nearby development in the City will be examined in the EIR.

17. UTILITIES AND SERVICE SYSTEMS. Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	9,12, 20,24, 28			--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?				--X--	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				--X--	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed?		--X--			
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				--X--	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				--X--	
g) Comply with federal, state, and local statutes and regulations related to solid waste?				--X--	

LUCE Update Final Program EIR Analysis

Impact USS-1

New development that could occur as a result of the LUCE Update would increase existing water demand. This is a Class III, less than significant impact.

San Luis Ranch Specific Plan Area Impact Analysis. The San Luis Ranch Specific Plan could result in the development of approximately 500 residences. Using a dwelling unit occupancy rate of 2.29 persons per dwelling unit, buildout of the specific plan could support a population of approximately 1,145. Based on a per capita water use of 119 gallons per day, the San Luis Ranch Specific Plan would have a water demand of approximately 153 acre feet per year. Additionally, it is important to note that the per capita water use introduced by development of the specific plan area would replace the existing irrigated row crops and associated groundwater use.

Applicable LUCE Update Policies

Land Use Element

- 1.12.1 Water and Sewer Service.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

- 9.3.7 Sustainable Design.

Applicable Previously Existing City Policies

Water and Wastewater Element

- A 3.1 Goal.
- A 3.2.1 Basis for Planning.
- A 3.2.2 Coordinated Operation.
- A 3.2.3 Groundwater.

Impact USS-2

New development that could occur as a result of the LUCE Update would generate wastewater flows that exceed the existing capacity of the City’s Water Resource Recovery Facility. This is a Class III, less than significant impact.

San Luis Ranch Specific Plan Area Impact Analysis. This issue is not specifically addressed in the LUCE EIR with respect to the proposed project site.

Applicable LUCE Update Policies

Land Use Element

- 1.12.1 Water and Sewer Service.

Applicable Previously Existing City Policies

Water and Wastewater Element

- B2.2.2 Service Capacity.
- B2.2.3 Wastewater Service for New Development.

Impact USS-3

New development that could be facilitated by the LUCE Update would require the construction of new water and wastewater infrastructure or the replacement of existing infrastructure. The construction or replacement of infrastructure has the potential to result in significant environmental effects. This is a Class III, less than significant impact.

San Luis Ranch Specific Plan Area Impact Analysis. This issue is not specifically addressed in the LUCE EIR with respect to the proposed project site.

Applicable LUCE Update Policies

Land Use Element

- 12.3.11 Environmental Review.

Impact USS-4

New development that could be facilitated by the LUCE Update would increase the demand for solid waste disposal at county landfills. Potential new development would also comply with applicable regulations related to the management of solid waste. As such, solid waste disposal impacts of the LUCE Update are Class III, less than significant impact.

San Luis Ranch Specific Plan Area Impact Analysis. This issue is not specifically addressed in the LUCE EIR with respect to the proposed project site.

Applicable LUCE Update Policies

Land Use Element

- 1.14 Solid Waste Capacity.

Project Level Evaluation

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

a), b), 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 use. Existing storm water facilities exist in the vicinity of the project site, and it is not anticipated the proposed project will result in the need for new facilities or expansion of existing facilities which could have significant environmental effects.

The developer will be required to construct private sewer facilities to convey wastewater to the nearest public sewer. The on-site sewer facilities will 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 Water Reclamation Facility (WRF). The fees are set at a level intended to offset the potential impacts of each new residential unit in the project.

d) As noted in the LUCE EIR, Using a dwelling unit occupancy rate of 2.29 persons per dwelling unit (500 units), buildout of the specific plan could support a population of approximately 1,145. Based on a per capita water use of 119 gallons per day, the San Luis Ranch Specific Plan would have a water demand of approximately 153 acre feet per year. Additionally, it is important to note that the per capita water use introduced by development of the specific plan area would replace the existing irrigated row crops and associated groundwater use. Provided that the project parameters remain within what was examined in the LUCE EIR, the incremental increase in demand on water supplies would be anticipated in the General Plan, and impacts to water supply would be less than significant. Per the 2012 Water Resource Status Report, the City has sufficient water supplies for build-out of the City's General Plan.

Nevertheless, because of the existing severe drought that affects all municipalities within the state, it would be prudent to re-examine the City's water supply availability in the context of this regionally significant project, and to report the findings within the framework of this EIR.

f), g) The proposed project will be served by San Luis Garbage Company, which maintains standards for access and access to ensure that collection is feasible, both of which will be reviewed by the Architectural Review Commission.

Background research for the Integrated Waste Management Act of 1989 (AB 939) shows that Californians dispose of roughly 2,500 pounds of waste per month. Over 90% of this waste goes to landfills, posing a threat to groundwater, air quality, and public health. Cold Canyon landfill is projected to reach its capacity by 2018. The Act requires each city and county in California to reduce the flow of materials to landfills by 50% (from 1989 levels) by 2000. To help reduce the waste stream generated by this project, 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 must be submitted with the building permit application. The project is required by ordinance to include facilities for recycling to reduce the waste stream generated by the project, consistent with the Source Reduction and Recycling Element. The incremental additional waste stream generated by this project is not anticipated to create significant impacts to solid waste disposal.

Conclusion: Impacts would be less than significant, and will not be examined further in the EIR.

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--			
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As discussed above, potential impacts to biological and cultural resources are potentially significant.

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		--X--			
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Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 202-13 (A/ARC/TR/ER 202-13)					

when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects)?					
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The project is intended to be consistent with the General Plan, which identifies this site as appropriate for medium-density residential uses, and which supports infill development utilizing existing infrastructure. Still, because the LUCE EIR did not examine all issues described above in detail for the proposed project area, some cumulative impacts could occur that were not previously examined. In addition, certain cumulative impacts identified in the LUCE, notably traffic and air quality, would likely be considered significant and unavoidable.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		--X--			
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If all impacts cannot be mitigated to less than significant levels, and as noted above this is a possibility, the project could result in substantial adverse impacts on human quality of life.

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.

The LUCE Final EIR (certified September 2014) was used as the basis for determining programmatic impacts that inform the potential project impacts identified in this Initial Study and the project EIR. Project files are available for review at the City of San Luis Obispo's Community Development Department.

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.

These are noted above in the analysis of specific impacts for each issue.

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.

These are noted above in the analysis of specific impacts for each issue.

20. SOURCE REFERENCES.

1.	City of SLO General Plan Land Use Element (2035 LUCE Update Vol.2, Appendix A), December 2014
2.	City of SLO General Plan Circulation Element (2035 LUCE Update Vol.2, Appendix B), December 2014
3.	City of SLO General Plan Noise Element, May 1996
4.	City of SLO General Plan Safety Element, March 2012
5.	City of SLO General Plan Conservation & Open Space Element, April 2006
6.	City of SLO General Plan Housing Element, April 2010
7.	City of SLO Water and Wastewater Element, July 2010
8.	City of SLO 2035 LUCE Update Final EIR, September 2014
9.	City of San Luis Obispo Municipal Code
10.	City of San Luis Obispo, Land Use Inventory Database
11.	Site Visit
12.	City of San Luis Obispo Staff Knowledge
13.	City of SLO Climate Action Plan, August 2012
14.	Website of the Farmland Mapping and Monitoring Program of the California Resources Agency: http://www.consrv.ca.gov/dlrp/FMMP/
15.	Dalidio/San Luis Marketplace Annexation and Development Project Final EIR, April 2004.
16.	CEQA Air Quality Handbook, Air Pollution Control District, April 2012
17.	Institute of Transportation Engineers, Trip Generation Manual, 9 th Edition, on file in the Community Development Department
18.	HELD IN RESERVE
19.	City of SLO Waterways Management Plan

Issues, Discussion and Supporting Information Sources ER # 202-13 (A/ARC/TR/ER 202-13)	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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20.	Water Resources Status Report, July 2012, on file with in the Utilities Department
21.	City of San Luis Obispo, Archaeological Resource Preservation Guidelines, on file in the Community Development Department
22.	City of San Luis Obispo, Historic Site Map
23.	City of San Luis Obispo Burial Sensitivity Map
24.	City of SLO Source Reduction and Recycling Element, on file in the Utilities Department
25.	HELD IN RESERVE
26.	HELD IN RESERVE
27.	San Luis Obispo County Airport Land Use Plan
28.	2010 California Building Code
29.	City of San Luis Obispo Zoning Regulations August 2012
30.	Applicant Preliminary Project Plans and Description

Attachments:

1. Vicinity Map
2. Project Plans