

APPENDIX A

Initial Study

This Page Intentionally Left Blank.



**CITY OF
SAN LUIS OBISPO**

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

1. Project Title:

Avila Ranch

A mix of residential, neighborhood commercial and business park uses while preserving substantial areas of open space on the 150-acre Avila Ranch 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 150-acre site located in the City of San Luis Obispo, generally bounded by Buckley Road to the south, Vachell Lane to the west, the City limit to the east, and industrial properties to the north. (APN 053-259-004, -005, and -006)

5. Project Sponsor's Name and Address:

Avila Ranch, LLC
Stephen Peck (Applicant Agent)
2455 Greenwood Avenue
Morro Bay, CA 93442

6. General Plan Designation:

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

7. Zoning:

The site is zoned within the City of San Luis Obispo. Based on the January 2015 Zoning Map, most of the site is zoned BP-SP (Business Park with a Specific Plan overlay), while the eastern and southern edges are zoned C/OS-SP (Conservation/Open Space with a Specific Plan overlay).

8. Description of the Project:

The project is a General Plan Amendment, Specific Plan Amendment (to the Airport Area Specific Plan), and related actions that would allow for the development of the Avila Ranch area as identified in the City's General Plan as Special Focus Area SP-4. 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 8.1.6 of the Land Use Element. This section states the following (in added italics):

8.1.6 SP-4, Avila Ranch Area

Location: *Avila Ranch is located on the north side of Buckley Road at the far southern edge of the City of San Luis Obispo. The three parcels that make up the Avila Ranch area comprise approximately 150 acres. The entire site is located within the Airport Area Specific Plan.*

Purpose: *This area will be developed as primarily a residential neighborhood development with supporting neighborhood commercial, park, recreation facilities, and open space/resource protection. Within the project, emphasis should be on providing a complete range of housing types and affordabilities. The specific plan for this area should consider and address the following land use and design issues:*

- a. Provision of a variety of housing types and affordability levels.*
- b. Modification of the Airport Area Specific Plan to either exclude this area or designate it as a special planning area within the Airport Area Specific Plan.*
- c. Provision of buffers along Buckley Road and along eastern edge of property from adjacent agricultural uses.*
- d. Provision of open space buffers along northern and western boundaries to separate this development from adjacent service and manufacturing uses.*
- e. Provision of open space buffers and protections for creek and wildlife corridor that runs through property.*
- f. Safety and noise parameters described in this General Plan and the purposes of the State Aeronautics Act; or other applicable regulations relative to the San Luis Obispo Regional Airport.*
- g. Participation in enhancement to Buckley Road and enhancement of connection of Buckley Road to South Higuera Street.*
- h. Appropriate internal and external pedestrian, bicycle, and transit connections to the City's circulation network.*
- i. Implementation of the City's Bicycle Transportation Plan including connections to the Bob Jones Trail.*

- j. *Water and wastewater infrastructure needs as detailed in the City’s Water and Wastewater Master Plans. This may include funding and/or construction of a wastewater lift station.*
- k. *Fire protection and impacts to emergency response times.*
- l. *Architectural design that relates to the pastoral character of the area and preserves view of agrarian landscapes.*
- m. *Provision of a neighborhood park.*

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

<i>Type</i>	<i>Designations Allowed</i>	<i>% of Site</i>	<i>Minimum ¹</i>	<i>Maximum</i>
<i>Residential</i>	<i>LDR MDR MHDR HDR</i>		<i>500 units</i>	<i>700 units</i>
<i>Commercial</i>	<i>NC</i>		<i>15,000 SF</i>	<i>25,000 SF</i>
<i>Open Space/ Agriculture</i>	<i>OS AG</i>	<i>50% ²</i>		
<i>Public</i>	<i>n/a</i>			
<i>Infrastructure</i>	<i>n/a</i>			
<p><i>1. There can be a reduction in the minimum requirement based on specific physical and/or environmental constraints.</i></p> <p><i>2. Up to 1/3 of the open space may be provided off-site or through in-lieu fees consistent with the Airport Area Specific Plan.</i></p>				

9. Surrounding Land Uses and Settings:

The site is composed of approximately 150 contiguous acres at the northeast corner of Buckley Road and Vachell Lane, and is comprised of three separate parcels: APN: 053-259-006, APN: 053-259-004 and APN: 053-259-005. The site is currently undeveloped. The site slopes from the northeast to southwest, although there are localized undulations. It is diagonally bisected by a drainage that is colloquially referred to as “Tank Farm Creek” which conveys on and offsite stormwater to San Luis Creek. This drainage comprises approximately 10 acres of the 150-acre site.

Existing uses surrounding the site area are as follows:

West: Developed and undeveloped land within the City designated as Services and Manufacturing, with some area designated Business Park under the General Plan, with consistent zoning.

North: Developed and undeveloped land partially within the City, designated as Services and Manufacturing under the General Plan, with consistent zoning. The eastern portion of the area north of the site is within unincorporated County, designated as Agriculture and Open Space.

East: Agricultural uses within the City are immediately east of the site, designated as Agriculture under the City’s General Plan, with consistent zoning.

South: Agricultural uses and open space are located to the south across Buckley Road, within unincorporated San Luis Obispo County, and designated as Agriculture and Open Space.

10. Project Entitlements Requested:

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

- **Specific Plan Amendment.** The LUCE identifies the Avila Ranch property as a Special Focus Area that requires the adoption of a Specific Plan prior to any development. The Airport Area Specific Plan (AASP) will need to be amended to accommodate the proposed development plan and to assure that it is consistent with existing and amended programs, policies, and guidelines.
- **General Plan Amendment and Rezone.** The LUCE designates the site for *"primarily a residential neighborhood development with supporting neighborhood commercial, park, recreation facilities, and open space/resource protection. Within the project, emphasis should be on providing a complete range of housing types and afford abilities."* It also assumes a Business Park component. A General Plan Amendment and rezone may be needed to accommodate a proposed land use plan that potentially does not include a Business Park component, although the EIR will evaluate a project alternative that does.
- **Vesting Tentative Tract Map (VTM).** A VTM will be submitted to establish the proposed lot lines to allow individual ownership of properties and to layout the required infrastructure and utilities.
- **Architectural Review** – Ultimately final architectural review of housing, commercial buildings, and some site facilities will be needed. The ARC will review the design guidance in the development plan.
- **Development Agreement/Memorandum of Understanding.** These documents will outline a framework for process, fees, and a methodology for determining fair share and timing for improvements.

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.

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

- Caltrans Encroachment Permit review for any needed improvements related to Highway 101, as well as review of compatibility with the San Luis Obispo County Regional Airport

- San Luis Obispo Airport Land Use Commission review
- U.S. Army Corps of Engineers Nationwide or Individual permit (depending on acreage of total wetland disturbance)
- California Department of Fish and Wildlife Streambed Alteration Agreement
- Regional Water Quality Control Board Section 401 Water Quality Certification, National Pollutant Discharge Elimination System (NPDES) Permit
- 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	X	Public Services
X	Air Quality	X	Hydrology / Water Quality		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)).
---	--

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 or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	

Signature

Date

John Rickenbach, AICP, Consulting Planner

For: Derek Johnson
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.

Avila Ranch Specific Plan Area Impact Analysis. This site encompasses approximately 150 acres and is located on the north side of Buckley Road at the far southern edge of the city. The planned development parameters for the Avila Ranch Specific Plan Area have been outlined in the LUCE Update in Section 2.0, Project Description. The County- operated airport is to the east of the Avila Ranch Specific Plan Area. The site is influenced by distant views of the hills, including the Irish Hills to the West, Cerro San Luis Obispo to the Northwest, South Hills to the north, Davenport Hills to the South, and Islay Hill to the East. There are some existing buildings along the north and west consisting of service and manufacturing uses, which influence site views.

The Avila Ranch Specific Plan Area is located adjacent to a section of Buckley Road which has not been identified as scenic resource. However, development of the site, as outlined in the proposed LUCE Update, could result in 500 to 700 homes and 15,000- 25,000 square feet of commercial space with 75 acres of open space. This increase in development could impact the existing public viewshed along the Buckley Road. However, implementation of the new LUCE Update policies, and the existing City policies identified below, would reduce 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 CIRUCLATION 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.

Applicable Previously Existing City Policies

Land Use 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)					

- 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.
- 9.3.9 Underground utilities.
- 9.3.10 Prohibit billboards.
- 9.3.11 Billboard removal.
- 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.

Avila Ranch Specific Plan Area Impact Analysis. This area is primarily undeveloped with some existing buildings along the north and west consisting of service and manufacturing uses. The County- operated airport is to the east of the Avila Ranch Specific Plan Area.

However, development of the site, as outlined in the LUCE Update, could result in 500 to 700 homes and 15,000- 25,000 square feet of commercial space with 75 acres of open space. This increase in development could impact the existing visual character and its surroundings. However, implementation of the new LUCE Update policies, and the other previously existing City policies identified below, would reduce 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
- 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

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

- 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
- 9.3.9 Undergrounding utilities
- 9.3.13 Monitor viewsheds
- 9.3.11 Billboard removal
- 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.

Avila Ranch Specific Plan Area Impact Analysis. The area is primarily undeveloped with some existing buildings along the north and west consisting of service and manufacturing uses. The County- operated airport is to the east of the Avila Ranch Specific Plan Area.

However, development of the site could result in 500 to 700 homes and 15,000- 25,000 square feet of commercial space with 75 acres of open space. This increase in development could result in an increase in ambient nighttime lighting through the addition of residential and commercial uses and associated structural development. However, implementation of the new LUCE Update policies, and other previously existing City policies identified below, would reduce 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
- 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

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)					

- 17.18.030 Illumination
- 17.23: Night Sky Preservation

Project Level Evaluation

a) The proposed project is in a highly visible location adjacent to Buckley Road, which is designated as a scenic roadway under the General Plan. A 300-foot open space area is proposed to be located along the north side of the road for the following reasons: 1) to buffer agricultural uses on the south side of Buckley; 2) as a noise mitigation area; 3) as a Reservation Space for airport safety; and 4) to preserve scenic views. 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 and nearby areas. 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 evaluated, so potential impacts could result. For these reasons, this issue will be examined in the EIR.

d) The project site is located in the City and designated for urban development, but is within the rural fringe of the City, and not subject to intensive sources of light and glare. 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 III, less than significant.

Avila Ranch Specific Plan Area Impact Analysis. This site encompasses approximately 150 acres and is located on the north side of Buckley Road at the far southern edge of the city. The planned development parameters have been outlined in the LUCE Update in Section 2.0, Project Description. This area is mainly undeveloped with some existing buildings along the north and west property boundaries consisting of service and manufacturing uses.

The Avila Ranch Specific Plan Area has historically been used for agriculture, consisting primarily of livestock grazing and production. Development of this site could result in 500 to 700 homes and 15,000- 25,000 square feet of commercial space

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 75 acres of open space. This increase in development has the potential to impact the agriculture opportunities by increasing the urban uses adjacent to an agricultural area. However, implementation of the proposed LUCE Update policies, and the 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.

Avila Ranch Specific Plan Area Impact Analysis. This area is mainly undeveloped with some existing buildings along the north and west consisting of service and manufacturing uses. The Avila Ranch Specific Plan Area has historically been used for agriculture but is not under a Williamson Act or agricultural preserve contract. With the development of the site, as outlined in the LUCE Update, future development could result in 500 to 700 homes and 15,000- 25,000 square feet of commercial space with 75 acres of potential open space. As shown in Figure 4.2-2 [of the LUCE Update EIR], portions of this site contain prime soils (if irrigated). This increase in development could convert the agriculture uses onsite. However, implementation of the proposed 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;
- 1.7.3 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.

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)					

- 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. Onsite soils include Concepcion loam, Cropley clay, Marimel sandy clay loam, Marimel silty clay loam, Diablo clay, and Salinas silty clay loam. With the exception of the Concepcion loam, the remaining soils are considered prime if irrigated, which comprises roughly the southern half of the 150-acre site. However, agricultural production on the site is limited by the availability of irrigation water and the productivity of the soils. The Storie index for onsite soils is variable, with the Marimel silty clay loam and Salinas silty clay loam having the highest rating of “Grade 1 – Excellent”. These soils collectively comprise about 14 acres, roughly 12 of which are along the Buckley Road frontage (Salinas silty clay loam) and about 2 acres of Marimel silty clay loam along the northwestern edge of the site. Marimel sandy clay loam comprises about 20 acres of the site, and is considered “Grade 2 – Good”. The remaining soils on the site are rated “Fair” to “Poor”. Farming on the site has been ongoing for many years, with three crops grown in the site in most years, primarily dry grains such as barley and wheat, occasional safflower, and beans. Crops are normally dry farmed or at least selectively irrigated and crop yields are somewhat lower than the County average. Because the project has the potential to conflict with applicable city policies and required program-level mitigation, and potentially impact prime soils or those with a Good to Excellent Storie index rating, 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) The project site is surrounded by a mixture of urbanized and agricultural development. In general, existing or planned urbanized uses are to the north and west, while agricultural properties and development is to the south and east. The property to the south is under Williamson Act contract within the unincorporated County. The project would generally minimize existing offsite land use conflicts through the conversion of some onsite agricultural uses, primarily through the inclusion of a 300-foot open space buffer along Buckley Road and a 150-foot buffer along the site’s eastern boundary. Proposed buffers would minimize potential offsite agricultural conflicts, and thus would minimize the potential for conversion of existing offsite agricultural uses to a less than significant level. This issue will not be examined further 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		--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)					

existing or projected air quality violation?					
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.

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

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.

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, 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 LUCE Update policies and existing City policies. Thus, long-term air quality impacts are considered Class I, significant and unavoidable.

Avila Ranch Specific Plan Area Impact Analysis. There is no site-specific analysis for the Avila 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 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,	5,10, 11	--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)					

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

Avila Ranch Specific Plan Area Impact Analysis. This site encompasses approximately 150 acres and is located on the north side of Buckley Road at the far southern edge of the city. Although primarily used for agriculture, there are some existing buildings along the north and west consisting of service and manufacturing uses. A portion of San Luis Obispo Creek runs diagonally through the middle of the property, influencing onsite biological resources and drainage patterns in low lying areas. Based on the known development parameters for the Avila 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 roadways and developed areas. Impacts to this common habitat type are considered potentially significant. 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

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)					

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.

Avila 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 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.

Avila Ranch Specific Plan Area Impact Analysis. The proposed development parameters for the Avila Ranch Specific Plan area have been generally outlined through the LUCE Update. This site is characterized by primarily agricultural development and open space associated with San Luis Obispo Creek which flows diagonally through the property from the northeast to the southwest, with some service and manufacturing uses included on a small portion of the site. Development of the site has the potential to result in impacts to Coastal and Valley Freshwater Marsh habitat associated with San Luis Obispo Creek. No other sensitive habitats are known to occur in this Specific Plan area. Program level impacts are considered less than significant with incorporation of the LUCE Update policies, and adherence to other previously existing City policies and state and federal regulatory requirements discussed in the LUCE EIR.

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.

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)					

- 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.

Avila Ranch Specific Plan Area Impact Analysis. This site is characterized by primarily agricultural development and open space associated with San Luis Obispo Creek which flows diagonally through the property from the northeast to the southwest, with some service and manufacturing uses included on a small portion of the site. Based on the proposed development parameters for the Avila Ranch Specific Plan area outlined in the LUCE Update, development of the site has the potential to result in impacts to special-status plant species associated with San Luis Obispo Creek and associated riparian habitats. 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. Impacts to special-status plant species in this area are considered less than significant with incorporation of the LUCE Update, and adherence to other previously existing City policies and state and federal regulatory requirements discussed in the LUCE EIR.

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

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)					

regulatory and oversight agencies, potential impacts to special-status wildlife species are considered Class III, less than significant.

Avila Ranch Specific Plan Area Impact Analysis. This site is characterized by primarily agricultural development and open space associated with San Luis Obispo Creek which flows diagonally through the property from the northeast to the southwest, with some service and manufacturing uses included on a small portion of the site. Based on the proposed development parameters for the site, development has the potential to result in impacts to special- status wildlife species associated with San Luis Obispo Creek and associated riparian habitats. 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 in the LUCE EIR.

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.

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.

Avila Ranch Specific Plan Area Impact Analysis. This site is characterized by primarily agricultural development and open space associated with San Luis Obispo Creek which flows diagonally through the property from the northeast to the southwest, with some service and manufacturing uses included on a small portion of the site. Based on the proposed development parameters for the Avila Ranch Specific Plan Area, development has the potential to result in impacts to common wildlife species and species of local concern associated with San Luis Obispo Creek, riparian, and ruderal habitats. Program level impacts to common wildlife species and species of local concern in this area are considered less than significant with incorporation of the LUCE Update, and adherence to other previously 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.
- 12.3.11 Environmental Review.
- 1.7.7 Trees Outside City Limits.
- 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.
- 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

The following information is summarized from the *Biological Report for Avila Ranch*, prepared by Althouse and Meade in May 2015. That report identified several potential impacts and prescribed a variety of mitigation measures that will be evaluated and peer reviewed in the project EIR.

(a-d) The 150-acre project site consists primarily of relatively flat agricultural fields and gently sloping hills that are continuously planted and plowed cropland. Croplands are surrounded on the south, west, and north side by a narrow strip of ruderal habitat adjacent to public roadways or developed properties. Tank Farm Creek, a seasonal drainage, runs northeast to southwest across the site, leaving the site at its southwest corner connecting with the East Fork of San Luis Obispo Creek about 450 feet downstream. The sources of surface water in Tank Farm Creek include a portion of South Hills, residential and commercial tracts, and a portion of the decommissioned Chevron Tank Farm north of Avila Ranch.

Wetland habitats occur in several actively farmed areas beyond Tank Farm Creek. One wetland habitat occurs below the Lockheed facility (Diophtics) where storm runoff and nuisance water from the facility saturates the routinely cropped soil. Several narrow, farmed wetlands east of Tank Farm Creek convey excess irrigation and runoff water from Avila Ranch crop operations and adjacent farms toward the creek. Only the northeast tributary to Tank Farm Creek contains substantial wetland vegetation (sedges and rushes) within the project site. The other wetlands contain limited wetland indicator plants or hydric soil indicators.

Six special status plant species could potentially occur in the Study Area based on an analysis of known ecological requirements of these species and the habitat conditions that were observed in the Study Area. These include Cambria morning glory, Congdon’s tarplant, Hoover’s button celery, Jones’ layia, Miles milk-vetch, and San Luis Obispo owls’-clover. Of these, one special status plant species was detected in the Study Area during botanical surveys in spring 2014: Congdon’s tarplant (*Centromadia parryi* subsp. *congdonii*). In order to be consistent with regulatory agencies’ botanical survey guidelines (USFWS 2000, CDFW 2009), seasonally timed floristic surveys were conducted in spring and summer 2014.

A small patch of Congdon’s tarplant, a CRPR list 1B.1 subspecies, was mapped in the southern portion of the Study Area in 2014. The patch was approximately 70 feet by 19 feet and consisted of about 750 individuals near Buckley Road adjacent to the cropland and associated with ruderal habitat. One individual dried plant from the previous year was observed upturned in the soil of cropland habitat in February, about 500 feet west of the known patch. Based on preliminary site plans, development of cropland and surrounding ruderal habitat may adversely affect this special status subspecies. This impact is considered significant.

Several special status animal species could potentially occur in the Study Area, including the California red-legged frog, western pond turtle, merlin, burrowing owl, Cooper’s hawk, Sharp-shinned hawk, Ferruginous hawk, white-tailed kite, Nuttall’s woodpecker, loggerhead shrike, oak titmouse, California horned lark, Oregon vesper sparrow, yellow warbler, tricolored blackbird, pallid bat, and Townsend’s big-eared bat. Of these, seven special status species were found onsite: California horned lark, Nuttall’s woodpecker, oak titmouse, Oregon vesper sparrow, sharp-shinned hawk, tricolored blackbird, and white-tailed kite were observed during onsite surveys. Without mitigation, construction of the proposed

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 potentially could result in adverse effects on special status species.

The Althouse and Meade report recommends conducting protocol surveys for the California red-legged frog to determine presence or absence of that species.

Four habitat types are identified on the site: agriculture-intensive (141.7 acres), riparian (3.3 acres), wetland (4.3 acres), and ruderal/disturbed (0.1 acres). Sensitive natural communities do not occur in the Study Area.

Vegetation removal and construction activities associated with the proposed structures could result in adverse impacts to nesting birds if conducted during nesting season (March 15 through August 15). Removal of riparian vegetation along a portion of Tank Farm Creek and demolition of structures in the proposed Buckley Road extension could adversely affect nesting birds if implemented during the nesting season. Because the cropland is regularly tilled, ground nesting birds are not expected to be adversely affected by the proposed project, but surveys for nesting birds may still be recommended if vegetation grubbing is conducted during nesting season. The potential for the project to adversely affect nesting birds can be avoided.

The proposed Project would primarily affect cropland, riparian, and wetland habitat.

Based on preliminary site plans, the majority of the cropland habitat within the Study Area may be impacted by the proposed Project. Cropland in the Study Area is poor quality habitat for most plants and wildlife; however some organisms may utilize it for shelter and foraging purposes. Cropland may provide foraging opportunities for songbirds, small mammals and raptors including special status wintering birds such as Oregon vesper sparrow and tricolored blackbird. Regular tilling of cropland habitat makes it an inconsistent resource for flora and fauna.

Riparian areas provide habitat to many wildlife species, potentially including nesting birds, bats, small mammals and amphibians such as the California red-legged frog. The proposed project would permanently impact approximately 0.2 acres of riparian habitat. This effect would ultimately be offset by revegetation, enhancement, and creation of riparian habitat along the impacted creek segments and in the relocation area. Further impacts would occur to the riparian habitat where widening of the drainage channel and a span-bridge crossing the drainage are proposed. Impacts to riparian habitat are considered significant and typically require mitigation.

Based on preliminary plans, approximately 0.7 acres of wetland waters of the U.S. and State within Tank Farm Creek and the contributing farmland ditch may be permanently impacted by the proposed Project. The northern reach of the creek may be relocated to a more historic configuration to the east. It may be restored, widened, and aligned with the planned Tank Farm restored wetland habitats and associated retention basin. Up to nine creek outfalls may be installed within the drainage channel. Impacts to waters of the U.S. are considered significant.

Ruderal / disturbed habitat may be impacted by the proposed Project. The ruderal habitat found in the Study Area is located at the site of the proposed Buckley Road extension. This habitat is highly disturbed and dominated by introduced plant species, but still may provide foraging habitat for many songbirds and some mammals. Ruderal habitat is not considered a sensitive habitat type and usually does not require mitigation, except where special status species are affected.

(e,f) 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.

Conclusion: Potentially significant impacts will be examined in the EIR, based on a peer review of existing information provided in the May 2015 Althouse and Meade report.

5. CULTURAL RESOURCES. Would the project:

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

a) Cause a substantial adverse change in the significance of a historic resource as defined in §15064.5.	10, 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.

Avila Ranch Specific Plan Area Impact Analysis. This site encompasses approximately 150 acres and is located on the north side of Buckley Road at the far southern edge of the city. There are some existing buildings along the north and west consisting of service and manufacturing uses. The Avila Ranch Specific Plan Area does not contain known historical buildings or structures. Therefore, development of this expansion area in accordance with the LUCE Update would result in no program level impact to historical resources.

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.
- 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.

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)					

- 3.6.9 City-owned adobes and historic structures.
- 3.6.10 Cultural Heritage Committee Whitepaper.

Program-Level Mitigation Measures

None required for Avila Ranch, since no significant program level impacts were identified for this area.

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.

Avila Ranch Specific Plan Area Impact Analysis. This site is primarily used for agricultural production and encompasses approximately 150 acres on the north side of Buckley Road at the far southern edge of the city. There are no buildings on the site. Existing service and manufacturing uses are adjacent to the site to the north and west. A portion of San Luis Creek and associated riparian habitat can be found onsite.

Potential development of the site could result in 500 to 700 homes and 15,000- 25,000 square feet of commercial space with 75 acres of open space. However, due to the history of the area and availability of resources associated with the onsite creek, there is a potential for archaeological resources to be on this site. However, if archaeological and paleontological resources are found compliance with state law and implementation of the LUCE Update policies that requires protection of both known and potential archaeological sites, and those that require the Cultural Heritage Committee and Architectural Review Commission to provide guidance on the construction of new buildings within historic districts, as well as similar existing City policies, program level impacts would be reduced 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.
- 3.5.9 Archaeological site records.
- 3.6.5 Archaeological resource preservation standards.

Project Level Evaluation

a-d) As noted in the LUCE EIR, there is a potential for archaeological resources to be on this site because of the suitability of the site for previous human habitation, largely because of the site’s topography and proximity to potential food and water

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)					

sources. Because the site has not been formally evaluated, there is potential for project development to impact potential resources. This issue will require a project-specific evaluation in the EIR based on a survey of the site, and prescribed mitigation measures (if any) will need to be incorporated in the EIR.

There are no existing structures on the site, so there are no potentially historic resources onsite. No impacts to historic resources would occur.

The site has not been examined for the possible presence or absence of paleontological resources. This issue will be examined further in the EIR.

Conclusion: Impacts to 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:	4,10,28				
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 tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?					--X--

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.

Avila Ranch Specific Plan Area Impact Analysis. This site encompasses approximately 150 acres and is located on the north side of Buckley Road at the far southern edge of the city. The property is in agricultural use and relatively undeveloped. The Avila Ranch Specific Plan Area development potential could result in 500 to 700 homes and 15,000-25,000 square feet of commercial space. This could result in development in areas prone to geologic hazards and in soil types conducive to liquefaction and other stability risks. It is important to note that new development under a future Specific Plan would be required to conform to the California Building Code (CBC). Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code and policies described below, would minimize the risk to life and property. As such, program level impacts to new development from groundshaking would therefore be less than significant.

Applicable LUCE Update Policies

- 6.2.2 Development Limits.

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

- 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.

Avila Ranch Specific Plan Area Impact Analysis. A portion of this plan area is near San Luis Obispo Creek and the associated low lying areas and wetlands. 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 program level impacts from settlement and liquefaction to less than significant levels.

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.

Avila Ranch Specific Plan Area Impact Analysis. According to the soils map shown in Section 4.2 [of the LUCE EIR], Agricultural Resources, the Avila 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 related to differential settlement, expansive soils and erosion. 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 program level 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,

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)					

clay, and gravel). The hills to the southwest are comprised of the Franciscan Formations and Miocene aged marine terrace deposits.

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 1 mile to the west of the project site and trends intermittently from northwest to southeast 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 3 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) The site is located in an area designated for urban development, and project plans are intended to minimize the potential for erosion along the drainage feature in the center of the site (Tank Farm Creek). The project will be subject to the Water Board’s Low Impact Development requirements. Part of those requirements includes water quality sub-basins to cleanse the water before final disposal into Tank Farm Creek. The project’s improvement plans will include an erosion control plan as required by City Improvement Standard 1010. 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 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 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

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)					

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

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

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

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)					

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-5. The Site Geotechnical Investigation shall include an evaluation of the potential for soil expansion beneath the project site.

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-6. The 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-7. During drought periods, groundwater pumping limitations for the unconsolidated aquifer underlying the project site shall be assessed and implemented to prevent soil subsidence.

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.

Avila Ranch Specific Plan Area Impact Analysis. There is no site specific analysis for the Avila 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

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) 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. Executive Order B-30-15 (April 29, 2015) sets a further goal of reducing GHG emissions to 40% below 1990 levels by 2030. 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.

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	--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	--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--			

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 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.

Avila Ranch Specific Plan Area Impact Analysis. This site is located on the north side of Buckley Road at the far southern edge of the city. The majority of the site is undeveloped and used for agriculture (primarily livestock grazing). There are no records of previous or existing sources of contamination in this area. Historic agricultural use in this area 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. In addition, this site is located in direct proximity to the Chevron Tank Farm site currently undergoing final project approvals for the remediation of historic petroleum spills dating back to the 1920s and continuing through the final closure of the property. Although extensive testing and groundwater monitoring at this site has shown that the contamination has not migrated from the Tank Farm facility, future construction associated with development of the nearby Avila Ranch Specific Plan Area has the potential to expose construction workers or future residents or visitors to previously undiscovered hazardous materials.

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.

Avila Ranch Specific Plan Area Impact Analysis. The ALUP designates approximately 32 acres of the property in Safety Zone 1B, 25 acres of the property in Safety Zone 1C and 94 acres of the property in Safety Zone 2. The LUCE update contains performance standards to support an Airport Area Specific Plan (AASP) amendment to accommodate the development changes from Business Park to the residential development and associated non- residential uses described in the project description. The AASP was found to be consistent with the ALUP and used intensity adjustments to cluster development and capture/relocate the unused development potential created by the large amount of open space associated with remediation of the Chevron property.

Changing the type of development in this area has the potential to be consistent with the ALUP noise, density and intensity standards. The 12 dwelling units of residential density allowed in Safety Zone 2 (the City has an approved Airport Compatible Open Space (ACOS) plan) result in nearly 1,128 dwelling units allowed on the 94 acres of property. The performance standards associated with this area envision up to 700 dwelling units and up to 25,000 sq. ft. of non- residential space however it is spread over the larger 150 acre property, which would involve areas in ALUP Safety Zones 1B and 1C. Portions of the site fall within the ALUP- identified 55 dB CNEL noise contour which would not support new residential development under Table 5.3 of the ALUP.

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 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). Draft performance standards for the property indicate a large percentage of the site is to be retained in open space including an agricultural buffer adjacent to Buckley Road and in direct alignment with Runway 7/25. In addition, performance standards in the LUCE update indicates that land uses shall be in keeping with the safety parameters of the State Aeronautics Act and the LUCE update or other applicable regulations.

The bulk of the proposed development is anticipated to occur within proposed Airport Overlay Zone 6 along with some minor non-residential development. While some residential development is proposed in AOZ 4, residential uses have the potential to be incompatible with this outer approach/departure zone and are identified as prohibited in the proposed Zoning Code unless they are replacement dwellings or infill lots in existing residential subdivisions.

Compliance with the proposed policies and regulations, including use limitations, aviation easements, and overflight notification will ensure that future development under the LUCE Update would not result in significant program level airport-related safety impacts.

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.
- 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.

Avila Ranch Specific Plan Area Impact Analysis. The Avila Ranch Specific Plan Area is designated as a Moderate Wildland Fire Hazard Area. Future development and potential human occupation could therefore 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.

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)					

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.

Avila Ranch Specific Plan Area Impact Analysis. Future development under the LUCE Update could introduce residents, employees or visitors to tree hazards through existing or future landscape trees. 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 region- wide.

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.

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.

Avila Ranch Specific Plan Area Impact Analysis. Future development under the LUCE Update is not in direct proximity to either the UPRR line or Highway 101 and a possible accident involving hazardous materials spills within these transportation corridors would not directly impact future residents, workers or visitors to the site. No impacts would occur.

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 includes residential, commercial, and business park development, and would not involve the use, transportation, disposal, or emission of hazardous materials. The site is not listed as having known hazardous

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)					

materials or contamination. Montessori Children’s School at 4200 S. Higuera Street School (a private school) is within ¼ mile of the western boundary of the project site.

The historic use of the property for agricultural production is assumed to have involved 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, because of possible 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.

This issue will be 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. 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. 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.

The project site is located in Safety Zones S-2, S-1b and S-1c under the County’s current Airport Land Use Plan (ALUP). A small portion (0.3 acres) of the site is located within the 65 dB(A) single event noise contour, and approximately 4.5 acres in the northeast portion of the site is located in the 55-60 Ldn/CNEL contour. According to the adjusted aviation safety zones, 34.9 acres (23.2%) of the project site is located in S-1b zone, 7.6 acres (5.1%) of the site is in the S-1c zone, with 107.4 acres (71.6% of the site), located in the S-2 Safety Zone. In order to address the policies and constraints in the ALUP, the project includes the following features:

1. Open space is maintained along 300 feet of the Buckley frontage, along the approximate extended centerline of Runway 7-5. This area will include a ALUP-compliant 100-foot wide by 1,200-foot long Reserve Space between Jespersion and the eastern project boundary.
2. Open space is maintained along the eastern 150 feet of the project.
3. All non-residential land uses are located easterly of Jespersion in the S-1B Safety Zone. Total open space in the S-1B zone is 10.3 acres, 29.5% of the total onsite S-1b zone.
4. Open space and park development only is proposed in the S-1c zone. That is, 100% of the S-1c area will be in open space.
5. The S-2 area includes portions of the neighborhood park, small pocket parks, and the Tank Farm Creek corridor. It includes 34.5 acres of open space, approximately one third of the total onsite S-2 area.
6. Where residential facilities are located on the boundary between zones non-living outdoor areas are to be located on or in the adjoining boundary. These facilities would include onsite landscape setbacks, parking and carport areas, internal circulation areas, and common area recreational facilities. Non-sleeping area of the structures (bathrooms, closets, kitchens, etc.) will also be located towards these transitional areas.
7. The project will include special noise mitigation measures that will limit the aircraft-related interior 24-hour, 10-second interval peak noise level (“Lmax”) to 45 decibels. The ALUP’s existing standard is 50 decibels, and this higher standard (lower threshold), will be used to reduce the number of noise complaints from project residents.
8. Single family detached components of the project will be located in the westerly portions of the S-2 zone (generally

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)					

westerly of the Jespersen alignment).

9. The access road to the business park will be extended and connected to the easterly open space. This street and open space in the BP zone will create a 75-foot wide 1,500-foot long “no build” area that is fairly close to Runway 7-25’s extended centerline. This will not be a formal Reserve Space because of possible above ground utility obstructions, but will advance the ALUP’s safety and noise policies otherwise.

The applicant has prepared a preliminary conformity analysis and taken this to ALUC for preliminary review. Observations from those findings for the ALUC’s consideration and review are the following:

1. The project proposes development totaling 700 dwelling pursuant to the LUCE performance standards (Attachment A). A total of 1,620 dwelling units are permitted by the ALUP, assuming development of a Detailed Area Plan (Specific Plan), ACOS compatible plan and Cluster Development Zones. Development on the site is less than half of that permitted by the ALUP.

2. The ALUP would permit the development of up to 3.7 million square feet of non-residential building. The project proposes approximately 240,000 square feet of building area, approximately 6.5% percent of that permitted by the ALUP.

3. Cumulatively, the ALUP would permit up to 18,500 employees, or 3,650 residents. By comparison the proposed project would result in 1,575 residents and 1,200 employees.

4. With the exception of a less than one-acre area in the northwest corner of the S-1B zone, all residential development is confined to the S-2 zone. Cumulatively nine single family residential units would be permitted in both S-1 zones, and 16 R-3 are theoretically possible in the S-1b portion of project with the project plan. The actual number will be less based on the design guidelines described above. This minor variance is included to avoid an awkward and inefficient diagonal boundary, and is justified for the following reasons:

- a. There are few, if any, approaches to Runway 7. Any such approaches would be “centered” or straight in, or would come from the south. The one acre encroachment is located entirely in the northwest “flair” portion of the approach area, away from any likely approaches.
- b. There are even fewer, if any, approaches from the northeast since this would conflict with other traffic, including ILS and commercial approach traffic using Runway 11, and Runway 29 departures.
- c. Departures from Runway 25 will go straight (west) or turn left (south), negating the reason for the flaired line in the 1.0-acre area.
- d. Runway 25 departures are rare and achieve an elevation of greater than 775 feet MSL (650 feet AGL based on average elevation of project surface) at the 1.0 acre area. Even with the extension of Runway 7-25 as planned, the departures are projected to operate above 600 AGL at the 1.0 acre area.
- e. Net encroachment is minimal (less than 1.0 acre) and represents less than 3% of the S-1b zone and is in the least sensitive area of the zone.
- f. The proposed project approximates less than 50% of the residential units that would otherwise be permitted under the ALUP, even without the adjustment to the 0.50 NM line.
- g. The 45 decibel interior Lmax standard will reduce noise complaints overall.

5. Thirty-five percent (35%) of the property is in some form of open space such as agriculture, parks, drainage or riparian areas.

6. The 7.6-acre portion of the park in the S-1c zone will offer an opportunity for a secondary Reserve Space/Area associated with downwind and touch and go traffic.

7. The onsite and offsite open space will create a network of airport compatible open spaces that will support the ALUP safety and noise policies.

However, because the ALUP has not yet been updated in accordance with the City’s assumptions, there remains a potential conflict between the City’s adopted general Plan and the ALUP.

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)					

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 San Luis Obispo County General Plan Fire Hazards map identifies the area south of Buckley Road as a potentially high wildland fire hazard area, while the City's map indicates this area is subject to moderate fire hazard. This issue will require evaluation in the EIR. 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.

Conclusion: Impacts related to airport hazards, wildland fires, 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--			
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.

Avila Ranch Specific Plan Area Impact Analysis. A portion of San Luis Creek runs diagonally through the middle of the property, influencing site flooding and drainage patterns in low lying areas. The property on either side of San Luis Creek

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)					

(“Tank Farm Creek”) within the Avila Ranch Specific Plan Area is identified by FEMA as being within the 100-year flood zone. The City of San Luis Obispo also documents that the Avila Ranch Specific Plan Area is an area of flooding concern, as it lies within the floodplain of San Luis Obispo Creek. However, implementation of the LUCE Update policies, and the previously existing City policies identified below, would reduce program-level impacts related to potential future development 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, Avila 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) would reduce impacts to a Class III, less than significant level.

Avila Ranch Specific Plan Area Impact Analysis. The majority of the site is undeveloped land used for agriculture consisting primarily of land within the floodplain of a portion of San Luis Obispo Creek. Onsite stormwater is drained by the creek. The Avila Ranch Specific Plan Area development potential, as outlined in the LUCE Update, could result in 500 to 700 homes and 15,000- 25,000 square feet of commercial space with 75 acres of open space. This would result in increase the amount of impervious surface throughout the Avila Ranch Specific Plan Area. Implementation of the LUCE Update policies and the previously existing City policies identified below would reduce program-level 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.

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)					

- 10.2.2 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.

Avila Ranch Specific Plan Area Impact Analysis. Onsite runoff is currently directed towards low lying areas in the middle of the site to a portion of San Luis Obispo Creek that runs through the property. Future development in accordance with the LUCE Update could result in an increase of point and non- point sources of contamination that could adversely affect water quality. However, implementation of the LUCE Update policies; compliance with current federal and state requirements; and the previously existing City policies identified below, would reduce 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.

Avila Ranch Specific Plan Area Impact Analysis. The site currently drains towards the low lying floodplains associated with a portion of San Luis Obispo Creek, which runs diagonally through the center of the property. Development under the Avila Ranch Specific Plan would result in an incremental 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, program-level 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

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), 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 significantly 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) Substantial portions of the Avila Ranch site are within the 100-year flood zone as identified by FEMA. The City of San Luis Obispo also documents that the Avila Ranch property is an area of flooding concern, as it lies within the floodplain of a tributary to San Luis Obispo Creek. Although the project indicates that development will generally avoid the 100-year flood zone, portions of future development will nonetheless be within the currently designated flood area. 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: 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 not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	1, 9, 30	--X--			
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.

Avila Ranch Specific Plan Area Impact Analysis. The ALUP designates approximately 32 acres of this site in Safety Zone 1B, 25 acres of the property in Safety Zone 1C and 94 acres of the property in Safety Zone 2. The LUCE update contains performance standards to support an Airport Area Specific Plan (AASP) amendment to accommodate the development changes from Business Park to the residential development and associated non-residential uses described in the paragraph above. The AASP was found to be consistent with the ALUP and used intensity adjustments to cluster development and capture/relocate the unused development potential created by the large amount of open space associated with remediation of the Chevron property.

Changing the type of development in this area has the potential to be consistent with the ALUP noise, density and intensity standards. The 12 dwelling units of residential density allowed in Safety Zone 2 (the City has an approved ACOS plan) result in nearly 1,128 dwelling units allowed on the 115 acres of property. The performance standards associated with this area

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)					

envison up to 700 dwelling units and up to 25,000 sq. ft. of non- residential space however it is spread over the larger 150 acre property, which would involve areas in Safety Zones 1B and 1C.

Portions of the site fall within the ALUP- identified 55 dB CNEL airport noise contour which would not support new residential development under Table 5.3 of the ALUP.

Changes and development supported by the LUCE update for this area and implementation through the Zoning Code have the potential to result in conflicts with the San Luis Obispo County Airport Land Use Plan. These potential program level impacts, however, could feasibly be reduced to a less than significant level with the implementation of the previously existing and new LUCE policies.

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.

Avila Ranch Specific Plan Area Impact Analysis. Land use conflicts that could have the potential to occur between development under the Avila 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 Avila 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 previously existing and newly adopted LUCE policies identified below.

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

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)					

impacts are considered Class III, less than significant.

Avila Ranch Specific Plan Area Impact Analysis. There is no program level analysis of this issue for the Avila Ranch Specific Plan area, because there are no adjacent Conservation Plan areas. No impacts would occur.

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.
- 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.

Avila Ranch Specific Plan Area Impact Analysis. No impacts with respect to dividing an established community were identified in the LUCE EIR for the Avila Ranch area.

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) It is not yet certain whether the proposed project will 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 part of a Specific Plan, it could include new standards that differ from those in zoning provisions of the Municipal Code. 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.

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--

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
---	---------	--------------------------------	--	------------------------------	-----------

LUCE Update Final Program EIR Analysis

No programmatic impact analysis was performed for the Avila 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, 15	--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 project vicinity above levels existing without the project?				--X--	
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.

Avila Ranch Specific Plan Area Impact Analysis. There is no site-specific analysis of this issue for the Avila 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

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)					

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.

Avila Ranch Specific Plan Area Impact Analysis. There is no site-specific analysis of this issue for the Avila 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 South Higuera Street, which is the closest modeled roadway to the project site (about 1,500 feet from the northwesternmost edge of the project site, and about 1,000 feet from the western edge of the site along fronting Vachell Lane). As modeled at 50 feet from the roadway centerline, there would be a 1.2 dB increase along South Higuera between Los Osos Valley Road and Tank Farm Road, from 71.3 dBA to 72.5 dBA. There would also be an 0.7 dBA increase on South Higuera south of Los Osos Valley Road, from 66.4 to 67.1 dBA. Future noise levels along Buckley Road or Vachell Lane were not modeled.

Applicable LUCE Update Policies

Land Use Element

- 2.2.11 Residential Project Objectives
- 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.

Avila Ranch Specific Plan Area Impact Analysis. There is no site-specific analysis of this issue for the Avila 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

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)					

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.

Avila Ranch Specific Plan Area Impact Analysis. The Airport Area Specific Plan (AASP) is addressed in Chapter 7 of the existing Land Use Element. The Airport Area chapter of the 1994 Land Use Element focused on the need to develop a specific plan for the area surrounding the airport, which is located south of the current city limits. While not directly referenced in Chapter 7, the Avila Ranch area is located within the AASP and future land use changes proposed for the Avila Ranch are supported by performance standards in Chapter 8 of the Land Use Element. Subsequent amendment to the AASP will be required to accommodate changes from the current designation of Business Park to a mix of residential densities and a small commercial center for the Avila Ranch.

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
- 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.

Avila Ranch Specific Plan Area Impact Analysis. There is no site-specific analysis of this issue for the Avila 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 1.2 dB increase along South Higuera between Los Osos Valley Road and Tank Farm Road, from 71.3 dBA to 72.5 dBA. Based on a 3-dBA attenuation for each doubling of distance, this suggests that noise levels would still be 57.5 dBA at 1,600 feet from centerline, which is within northwesternmost edge of the project site. The noise level along the project boundary with Vachell Lane would be less than 55 dBA, since it would be 55.1 dBA at 800 feet from South Higuera. This noise level is within 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 would be less than significant impacts to future onsite residents from these roadways. These conclusions are consistent with the discussion included in the applicant’s noise study for the 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)					

prepared by David Lord Acoustics Consulting.

Future noise levels along Buckley Road or Vachell Lane were not modeled in the LUCE program EIR. Therefore, the project EIR will examine noise levels along these roadways in the context of future development and the projected cumulative traffic volumes associated with this project along these roadways.

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) A small portion (0.3 acres) of the northeastern edge of the site is located within the 65 dB(A) single event noise contour, and approximately 4.5 acres in the northeastern portion of the site is located in the 55-60 Ldn/CNEL 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--

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.

Avila Ranch Specific Plan Area Impact Analysis. There is no site-specific analysis of this issue for the Avila 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.

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

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 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 Avila 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.

Avila Ranch Specific Plan Impact Analysis. The specific plan site is located approximately 1.5 miles west of CalFire Fire Station No. 21 which provides mutual aid response, but is located beyond the City Fire Department’s four minute travel time area. The lack of four- minute response coverage in the southern portion of the city was identified by the Fire Department Master Plan, which recommended adding a fifth fire station and crew to improve response time in southern areas of the city. Potential fire safety impacts that may result from new development located beyond the Fire Department’s four- minute response time could feasibly be reduced to a less than significant level with the implementation of the previously existing and new LUCE policies, which indicate that new development should be approved only when adequate fire suppression services and facilities are available. The proposed Specific Plan performance standards include the requirement to address fire protection and impacts to emergency response times.

If a new fire station is required, environmental impacts that may result could include short-term effects such as construction-related increases in noise and air emissions, water quality impacts from increased erosion or an accidental release of construction materials, or impacts to sensitive biologic or cultural resources if such resources are present within or adjacent to project site. Short-term construction- related impacts such as these are generally reduced to a less than significant level with the implementation of site design measures and compliance with applicable regulations. Fire stations are commonly located within or adjacent to residential areas, therefore, it is reasonably anticipated that potential long-term compatibility impacts of a new fire station (i.e., noise, traffic, aesthetics, etc.) would not be significant. Adverse physical impacts associated with the provision of a new or altered fire station needed to comply with travel time standards are unlikely as any new or reconstructed facility would be required to meet community design guidelines, and its location would need to meet the response time needs of the community.

Applicable Previously Existing City Policies

Safety Element

- Policy 3.0: Adequate Fire Services.

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.

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)					

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.

Avila Ranch Specific Plan Area Impact Analysis. Without density bonuses, the Avila Ranch Specific Plan could result in the development of up to 700 homes, supporting an estimated 1,315 residents. It is estimated that the new residences located on the Avila Ranch Specific Plan site would generate approximately 120-130 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 generally 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. However, it should be noted that because of the area’s proximity to identified wildland fire areas, the issue of fire protection will be examined in the EIR.

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: With the exception of the fire hazards issues, impacts would be less than significant because of existing requirements to offset potential impact through the payment of fees. These issues will not be examined further in the EIR. Fire hazards will be examined because of the site’s proximity to identified wildland fire hazard areas.

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 have an adverse physical effect on the environment?				--X--	

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.

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)					

Avila Ranch Specific Plan Area Impact Analysis. Without density bonuses, the Avila Ranch project would provide approximately 700 units, for a total of approximately 1,315 residential units. To achieve the City’s parkland standard of 10 acres per 1,000 residents, a total of approximately 13.1 acres of parkland would be required to serve the population of the proposed specific plan. New parkland would be provided within the Avila Ranch Specific Plan.

The size, location, and uses of parkland area provided by the proposed specific plans throughout the City have not all 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 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.

Avila 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 (Avila 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. Based on a projected Specific Plan buildout population of 1,315 (without density bonuses), there would be a demand for 13.1 acres of parkland within the plan area. The proposed specific plan indicates that a total of 19.7 acres of parkland would be provided through a combination of neighborhood parks, mini parks, pocket parks, community gardens, and bike trails/linear parks. This exceeds the City’s parkland requirement for the site. Impacts would be less than significant upon buildout, provided that project phasing includes sufficient parkland area based on demand as the site develops. This issue will not be examined further in the project EIR.

Conclusion: Project and program level impacts would be less than significant, and will not be examined further in the EIR.

16. TRANSPORTATION/TRAFFIC. Would the project:

a) Conflict with an applicable plan, ordinance or policy	9,12,	--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)					

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?	17				
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.

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

- *Broad (S/South, South – Orcutt, Orcutt – Tank Farm Road and Buckley – South City Limit).* Due to changes in local and regional land uses and traffic patterns, these segments would 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 previously 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

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)					

- 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.

Avila 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.
- *Broad & Tank Farm (#98).* Due to increases in traffic on both streets, all approaches experience significant delay.
- *Broad & Airport (#102).* Due to increases in traffic along Broad Street, the EBL 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

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.

Avila 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

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)					

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.

Avila 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.

Avila 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

- 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.

Avila 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

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)					

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.

Avila 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.

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

e) The project is within the existing City limits, bordered to the north and west by development in the City and offsite emergency access. The project will be reviewed by the City Fire Marshal to ensure adequate emergency access has been provided. This issue will be examined in the EIR.

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				--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)					

facilities, the construction of which could cause significant environmental effects?					
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.

Avila Ranch Specific Plan Area Impact Analysis. The Avila Ranch Specific Plan could result in the development of approximately 700 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 1,603. Based on a per capita water use of 119 gallons per day, the Avila Ranch Specific Plan would have a water demand of approximately 214 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.
- 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.

Avila 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.

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

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.

Avila 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.

Avila 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

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 (700 units), buildout of the specific plan could support a population of approximately 1,603. Based on a per capita water use of 119 gallons per day, the Avila Ranch Specific Plan would have a water demand of approximately 214 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 buildout of the City’s General Plan.

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)					

California is currently in the midst of an historic drought. Because of this, Governor Brown issued Executive Order B-29-15 on April 1, 2015, which requires municipalities to reduce water consumption to address reduced water supplies statewide. This information, and the implications for the City of San Luis Obispo, were not available at the time the LUCE EIR was prepared, nor the City's Urban Water Management Plan. It is uncertain what affect this will have relative to the proposed project, and whether there remains sufficient water supply to serve the project in light of this Executive Order. For this reason, the issue of water supply will be examined in the 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--			
--	--	-------	--	--	--

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 when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects)?		--X--			
--	--	-------	--	--	--

The 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--			
---	--	-------	--	--	--

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

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)					

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.	Sound Level Assessment for the Avila Ranch Project, David Lord Acoustics Consulting, June 2015.
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
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

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)					

2. Illustrative Site Plan

Figure 1: Vicinity Map



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)					

Figure 2: Illustrative Site Plan

