650 Tank Farm Road Mixed-Use Project

Initial Study – Mitigated Negative Declaration

prepared by

City of San Luis Obispo
919 Palm Street
San Luis Obispo, California 93401
Contact: Rachel Cohen, City Planner

prepared with the assistance of

Rincon Consultants, Inc.
1530 Monterey Street, Suite D
San Luis Obispo, California 93401

November 2018

Rincon Consultants, Inc.
Environmental Scientists Planners Engineers
www.rinconconsultants.com

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Table of Contents

Tables

Figures

Appendices

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Initial Study

1. Project Title

650 Tank Farm Road Mixed-Use Project

2. Lead Agency Name and Address

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

3. Contact Person and Phone Number

Rachel Cohen, Associate Planner
(805) 781-7574

4. Project Site Location

The project site is a 12.75-acre property, located in the southern portion of the City of San Luis Obispo. The property is located at 650 Tank Farm Road, north of the intersection of Tank Farm Road and Santa Fe Road. The property is comprised of Assessor Parcel Number (APN): 053-421-005. Figure 1 shows the regional location of the project site, and Figure 2 shows the project site within the local context.

5. Project Sponsor's Name and Address

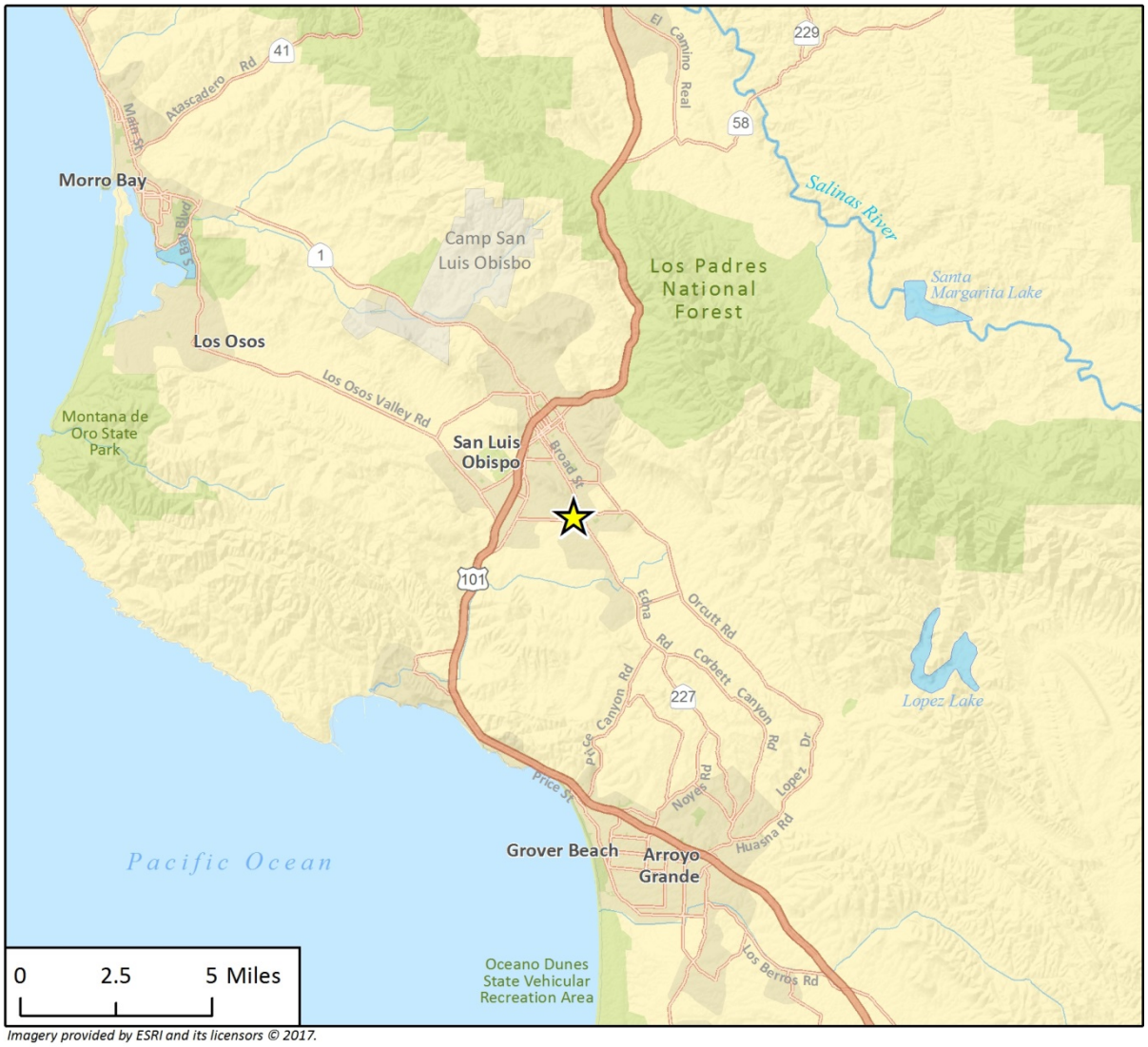
Project Sponsor

Agera Grove Investments, LLC
4927 Calloway Drive
Bakersfield, California 93312

Project Sponsor's Representative

RRM Design Group
Pam Ricci
3765 South Higuera Street, Suite 102
San Luis Obispo, California 93401

Figure 1 Regional Location



Project Location

N

Fig X Regional Location

Figure 2 Project Location

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ISMNDFig 2 Project Location

6. General Plan Designation/Zoning

The project site is located within the Airport Area Specific Plan (AASP), and currently includes three separate land use/zoning designations with a Specific Plan overlay. The site includes 3.25 acres of Business Park (BP), 6.85 acres of Medium Density Residential (R-2), and 2.65 acres of Open Space (OS). As identified in the AASP Land Use Program and Development Capacities Table 4-1, the R-2 designation supports a capacity of 10.9 units per acre, and the BP designation supports a capacity of 0.20 floor area ratio (FAR). Therefore, the existing development potential of the site is approximately 75 units and 28,300 square feet of non-residential development.

7. Description of Project

The project includes a General Plan Amendment, a rezone of the property and a Specific Plan Amendment to the AASP, a Conditional Use Permit for a mixed-use project within the C-S-SP zone, approval of a parking reduction request, and approval of a mobile home park conversation impact report. The project would rezone the Business Park portion of the site (3.25 acres), and the Medium-Density Residential portion of the site (6.85 acres). The rezoning would result in a net site area of 10.1 acres designated Service Commercial with the Specific Plan overlay (C-S-SP). The 2.65-acre remainder of the 12.75-acre site would remain zoned as Conservation Open Space (C/OS-SP) and includes the site's two creek corridors.

The project proposes approximately 17,500 square feet of commercial space and 249 residential units. Conceptual site plans for the project site, depicted in Figure 3, reflect the development of 15 three-story residential buildings comprised of studios, one and two bedrooms on the northern portion of the project site, and four three-story mixed-use buildings containing 17,500 square feet of commercial use, and 13,530 square feet of residential use on the southern portion of the project site. Table 1 shows a breakdown and summary of the project buildings, parking spaces, and square footages reflected in the conceptual site plan.

Table 1 Summary of Conceptual Project

Buildings	
Residential	15 buildings
Mixed-Use	4 buildings
Commercial	17,500 square feet
Residential	13,530 square feet
Unit Mix	249 total (including mixed use units)
Studios	55
One Bedroom	52
Two Bedroom	142
Parking	
Required[1]	500 spaces
Provided	500 spaces (144 garage and 356 surface/guest)

[1] Mixed-Use Parking Reduction (30% of standard commercial requirement) of 25 spaces is applied.

Figure 3 Conceptual Site Plan

Source: RRM Design Group, 2018

Other Project Components

The conceptual site plan for the project includes an indoor/outdoor clubhouse near the center of the site, a pool and an outdoor recreational space adjacent to the clubhouse, and a landscape buffer zone/water collection basin located between the four mixed-use buildings and the 15 residential buildings. There is an existing water well on the project site, which may be used for future non-potable water use, depending on City review of water quality testing data from the well. If not utilized for non-potable water, the City would require that this well be destroyed (capped or abandoned) consistent with all applicable State and local requirements or dedicated to the City for water quality and groundwater monitoring.

Potential Off-Site Access Improvements

The conceptual site plan for the project includes potential access to the project site through the Digital West property to the west and through the adjacent property to the east (APN 053-421-004). Access to the project site through the Digital West property to the west may involve modifications, including widening, to the existing crossing of Acacia Creek along the western portion of the project site. Access to the project site through the property to the east would involve construction of a new creek crossing over Orcutt Creek along the southeastern portion of the project site. The potential Orcutt Creek crossing would provide a connection to the existing Tank Farm Road/MindBody signalized intersection. In addition, development of the project site under the proposed project may include a pedestrian/bicycle access path from the northern site boundary to the existing pedestrian/bicycle paths at the Damon Garcia-Sports Fields. The locations of these proposed and potential improvements are shown in Figure 4.

Construction/Demolition

Future development facilitated by the proposed project would include re-grading of the project site to raise building ground elevations above the existing 100-year floodplain (as discussed in Section 9, *Hydrology and Water Quality*). Re-grading the project site to accommodate future development is anticipated to require approximately 25,000 cubic yards of fill material.

The existing vacant 35 coaches on the project site would be hauled off-site for removal; no on-site demolition is proposed. The applicant intends to donate the existing on-site coaches to the Cal Poly Agricultural Department or other local recipients.

8. Surrounding Land Uses and Setting

The project site is located within the AASP, south of the Margarita Area Specific Plan (MASP). The surrounding land uses and adjacent properties are described below. Photos of the site and surrounding areas are shown in Figure 5, Figure 6, and Figure 7, respectively.

- **North.** The site is bounded to the north by Damon Garcia-Sports Fields, a recreational area with open grass fields and trees.
- **East.** The land immediately adjacent to the east is generally vacant and undeveloped, and includes Orcutt Creek. East of Orcutt Creek is parking for the Damon Garcia-Sports Fields and the SESLOC Federal Credit Union property. A single-family residence is located along Tank Farm Road, southeast of the site.

Figure 4 Off-Site Access Improvement Locations

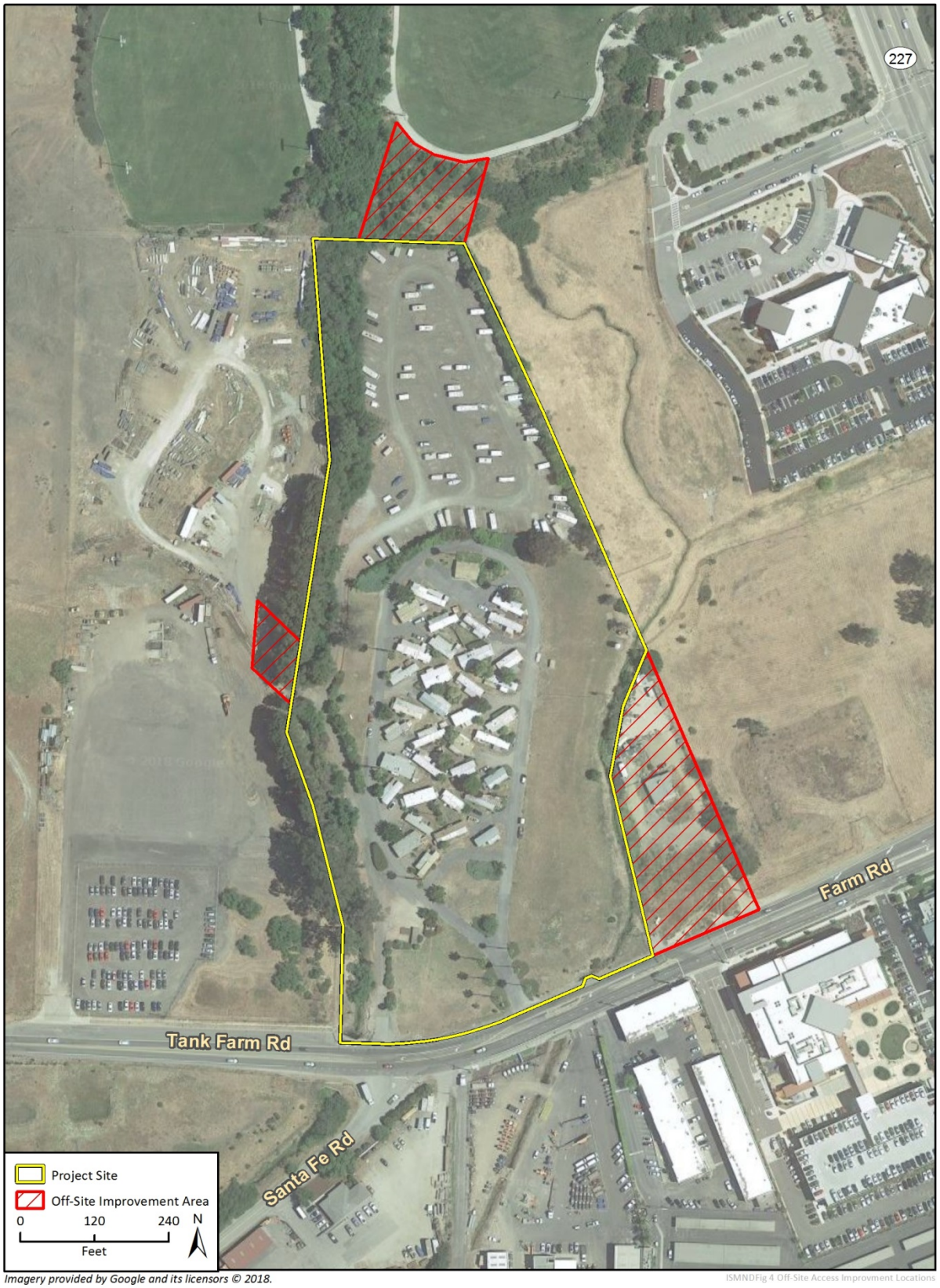

Figure 5 Site Photo Key

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ISMNDFig 2 Project Location

Figure 6 Site Photos

Photo 1: View of the project site from existing entry driveway, looking north.

Photo 2: View of the project site, looking east.

Figure 7 Site Photos

Photo 3: View of the western portion of the project site and adjacent westward property as viewed from Tank Farm Road, looking north.

Photo 4: View towards the project site as viewed from the Damon-Garcia Sports Complex west field, looking southwest.

- **South.** The site is bounded by Tank Farm Road to the south. United Rentals, a commercial/industrial site operating with equipment rentals, is located across the road.
- **West.** To the immediate west of the site, the land is generally undeveloped around Acacia Creek. West of Acacia Creek, the land is partially paved, and vacant. A few structures and remnants of an industrial yard are located to the northwest, and a gravel parking area is located to the southwest.

9. Other Public Agencies Whose Approval is Required

The City of San Luis Obispo is the lead agency for the project. Development of the project site under the proposed project would be required to comply with the Regional Water Quality Control Board (RWQCB) Post Construction Stormwater Requirements for redeveloped sites. In areas located in identified Special Flood Hazard Areas, any fill to remove sections or elevate areas above the Base Flood Elevation (BFE) would require a Letter of Map Change (LOMR-F) be submitted to the Federal Emergency Management Agency (FEMA). Future development of the project site, including widening of Tank Farm Road along the project's frontage and the potential off-site access improvement areas identified in Figure 4 may require work within Acacia Creek and/or Orcutt Creek. As such, future development under the proposed project may require permitting per Section 401/404 of the Clean Water Act from the U.S. Army Corps of Engineers and the RWQCB.

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Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" or "Potentially Significant Unless Mitigation Incorporated" as indicated by the checklist on the following pages.

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

Determination

Based on 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 to the project have been made or the mitigation measures described on an attached sheet(s) have been added and 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" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately

in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	11-27-18 Date
Tyler Corey Printed Name	Principal Planner Title

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	■	☐
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	■
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	■	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	■	☐

Setting

The City's General Plan Conservation and Open Space Element and Circulation Element assign scenic value ratings of 'moderate' and 'high' to several roadways in the City, based on the availability of views of scenic resources from these public viewpoints. According to the General Plan, the segment of U.S. Highway 101 (U.S. 101) through the City of San Luis Obispo is identified as having moderate and high scenic value (City of San Luis Obispo 2014a). The City's General Plan Conservation and Open Space Element identifies Tank Farm Road has having high scenic value west of the intersection with Santa Fe Road, and moderate scenic value east of the intersection with Santa Fe Road. The Conservation and Open Space Element does not identify any "cones of view" or other important scenic vistas in the project site vicinity.

Discussion

a. Would the project have a substantial adverse effect on a scenic vista?

c. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

The project site is located at the intersection of Tank Farm Road and Santa Fe Road on the north side of Tank Farm Road, and the project's proposed frontage would be along the moderate scenic

value portion of Tank Farm Road, east of the intersection with Santa Fe Road. Although the project site is located along the moderate scenic value portion of Tank Farm Road, the project site is visible from the high scenic value section of Tank Farm Road west of the intersection with Santa Fe Road. Therefore, the analysis below discusses both the moderate and high scenic value views from Tank Farm Road.

Existing public views of the project site from Tank Farm Road generally consist of vegetation within the creek corridors in the foreground, hillsides to the north and east in the background, and urban development to the east. Views of the project site from the moderate scenic value portion of Tank Farm Road include on-site vegetation and existing mobile homes in the foreground, and hillsides in the background. Views of the project site from the high scenic value portion of Tank Farm Road include open space and trees in the foreground, and existing developed land uses to the east of the site, including commercial structures, in the background.

The project would modify the foreground and middle ground views from Tank Farm Road by constructing new structures up to three stories in height, with frontage on Tank Farm Road. The conceptual site plan (see Figure 3) depicts two mixed-use buildings with frontage on Tank Farm Road, which would become the primary view of the project site from Tank Farm Road. The mixed-use buildings in the foreground, as well as the residential buildings in the background, would block views of the background hillsides from the moderate scenic value portion of Tank Farm Road. When viewed from the high scenic value portions of Tank Farm Road, three-story buildings would block views of other structures to the east, but would not block views of hillsides or other natural resources.

Although new structures would block views of hillsides from the moderate scenic value portion of Tank Farm Road, these hillsides are not within designated scenic vistas, and there are no identified scenic “cones of view” through the site. The visual character of the site would be modified, as the existing mobile homes would be removed and replaced with buildings up to three stories in height. The project may involve the removal of some trees on the project site, but would not involve removal of trees in the riparian corridor of Acacia Creek, which are the primarily visual component of views of the site from the south (refer to Figure 7; tree removal and associated impacts is discussed in detail in Section 5, *Biological Resources*). However, this change would not degrade or block any designated high scenic views or otherwise degrade the existing quality of the site or surroundings, and the project would incorporate on-site landscaping and vegetation consistent with background views of open space land uses. The project would be visually consistent with existing and planned development on the east side of Tank Farm Road and development along Broad Street to the east of the project site.

The project would be required to adhere to applicable policies and programs in the City’s General Plan Conservation and Open Space and Circulation Elements, including Circulation Element Policy Policies 9.1.5 and 9.2.1, which require environmental review to ensure that the City preserves and improves view from public scenic places. Therefore, the project would not have a significant adverse effect on a scenic vista, or substantially degrade the existing visual character or quality of the site and its surroundings.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The project site is located along Tank Farm Road, approximately one and a half miles from U.S. 101, which is the nearest state highway to the site. The section of U.S. 101 through the City of San Luis Obispo is classified as an Eligible State Scenic Highway, but is not officially designated (Caltrans 2015). However, due to the distance between U.S. 101 and the project site, there are no available views of the project site from U.S. 101.

NO IMPACT

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Existing sources of nighttime lighting in the vicinity of the site include lighting at the existing mobile home residential uses, streetlights along Tank Farm Road, spillover lighting from surrounding development (primarily from the commercial properties to the south), light from the headlights of vehicles traveling along Tank Farm Road, and from the single-family residence to the southeast. Development of the project site would result in an increase in ambient nighttime lighting through the addition of parking lot and security/safety lighting, and exterior fixtures associated with residential and commercial structures. The site would also experience an increase of headlights and vehicle glare from vehicles accessing the site. In addition, exterior building materials, windows, and surface paving materials may cause glare that could affect the nearby residence to the southeast.

The project would be required to conform to the City's Night Sky Preservation Ordinance (Zoning Regulations Chapter 17.23), which sets operation standards and requirements for lighting installations. These include limits on outdoor lighting that is misdirected, excess, or unnecessary, and meeting the minimum requirements of the California Code of Regulations for Outdoor Lighting and Signs (CCR Title 24, Chapter 6). The project would also be required to comply with City General Plan policies pertaining to lighting and glare (Policy 9.2.3 Outdoor Lighting), as well as the City's Community Design Guidelines. Prior to development of the site under the proposed project, the applicant would also be required to provide an overall lighting plan that demonstrates that the project complies with the requirements of City Ordinance No. 17.18.030, which prohibits lighting or illuminated devices that would create glare which results in a hazard or nuisance on other properties. The lighting plan for any subsequent development under the project would be required to be reviewed and approved by the Architectural Review Committee (ARC) prior to issuance of building permits. Compliance with applicable City policies and regulations would ensure that impacts associated with the creation of new sources of exterior lighting and glare would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	■
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	■

Setting

The project site is developed with a mobile home park and vacant paved parking lot. The Department of Conservation's Farmland Mapping and Monitoring Program classifies the project site as Urban and Built Up Land (DOC 2016).

Discussion

a. Would the project convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

e. Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?

There is no agriculturally-zoned land, land enrolled in a Williamson Act Contract, or timber or forest lands on the project site, and the site is not a part of any timber harvesting plans or zones (CALFire 2017). Therefore, the project would not convert agricultural land to non-agricultural use, conflict with existing zoning for agricultural use, convert forest land to non-forest use, or conflict with existing zoning for forest land.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	■	☐
b. Violate any air quality standard or contribute substantially to an 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)?	☐	■	☐	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☐	■	☐	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☐	■

Setting

The City of San Luis Obispo is in the South Central Coast Air Basin (SCCAB), which is under the jurisdiction of the San Luis Obispo County Air Pollution Control District (SLOAPCD). SLOAPCD monitors air pollutant levels to assure that air quality standards are met, and if they are not met, develops strategies to meet the standards. Depending on whether the standards are met or exceeded, the air basin is classified as being in "attainment" or as "non-attainment." SLOAPCD is in non-attainment for the 24-hour state standard for particulate matter (PM_{10}) and the eight hour state standard for ozone (O_3) (SLOAPCD 2015).

The major sources of PM_{10} in the SCCAB are agricultural operations, vehicle dust, grading, and dust produced by high winds. Additional sources of particulate pollution include diesel exhaust; mineral extraction and production; combustion products from industry and motor vehicles; smoke from open burning; paved and unpaved roads; condensation of gaseous pollutants into liquid or solid particles; and wind-blown dust from soils disturbed by demolition and construction, agricultural operations, off-road vehicle recreation, and other activities. Ozone is a secondary pollutant that is formed by a reaction between nitrogen oxides (NO_X) and reactive organic gases (ROGs) in the presence of sunlight. Therefore, ozone levels are dependent on the amount of these precursors. In the SCCAB, the major sources of ROGs are motor vehicles, organic solvents, petroleum production,

and pesticides. The major sources of NO_X are motor vehicles, public utility power generation, and fuel combustion by various industrial sources (SLOAPCD 2015).

Construction Emissions Thresholds

The SLOAPCD has developed specific daily and quarterly quantitative thresholds that apply to projects within the SCCAB. Daily thresholds are for projects that would be completed in less than one quarter (90 days). Quarterly thresholds are applicable to the project because construction would last for more than one quarter. The applicable thresholds from SLOAPCD's *CEQA Air Quality Handbook* (2012) are described below.

ROG AND NO_X EMISSIONS

- **Quarterly – Tier 1.** For construction projects lasting more than one quarter, exceedance of the 2.5 tons per quarter threshold requires Standard Mitigation Measures and Best Available Control Technology (BACT) for construction equipment. If implementation of the Standard Mitigation and BACT measures cannot bring the project below the threshold, off-site mitigation may be necessary; and
- **Quarterly – Tier 2.** For construction projects lasting more than one quarter, exceedance of the 6.3 tons per quarter threshold requires Standard Mitigation Measures, BACT, implementation of a Construction Activity Management Plan (CAMP), and off-site mitigation.

DIESEL PARTICULATE MATTER (DPM) EMISSIONS

- **Quarterly – Tier 1.** For construction projects lasting more than one quarter, exceedance of the 0.13 tons per quarter threshold requires Standard Mitigation Measures, BACT for construction equipment; and
- **Quarterly – Tier 2**. For construction projects lasting more than one quarter, exceedance of the 0.32 ton per quarter threshold requires Standard Mitigation Measures, BACT, implementation of a CAMP, and off-site mitigation.

FUGITIVE PARTICULATE MATTER (PM_{10}), DUST EMISSIONS

- Quarterly: Exceedance of the 2.5 tons per quarter threshold requires Fugitive PM_{10}. Mitigation Measures and may require the implementation of a CAMP.

Operational Emissions Thresholds

SLOAPCD's long-term operational emission thresholds are summarized in Table 2.

Table 2 SLOAPCD Operational Emissions Significance Thresholds

Pollutant	Daily Threshold (lbs/day)	Annual Threshold (tons/year)
ROG + NO_X (combined)[1]	25	25
Diesel Particulate Matter (DPM)[1]	1.25	–
Fugitive Particulate Matter (PM_{10}), Dust	25	25
CO	550	–

[1] SLOAPCD specifies that CalEEMod winter emission outputs be compared to operational thresholds for these pollutants.

Source: SLOAPCD 2012

Methodology

SLOAPCD recommends the use of the most recent version of California Emissions Estimator Model (CalEEMod) (version 2016.3.2) to estimate construction and operational emissions of a project. The emissions model for the project was based on build out under the proposed project which would allow up to 249 residential units and 17,500 square feet of commercial space. Because the project site is currently developed with a mobile home park, existing operational emissions from this use were estimated and subtracted from the anticipated emissions under the proposed project, to establish the net increase in criteria pollutant emissions that would occur as a result of redevelopment of the project site. Trip generation rates for the project were based on the Draft Multimodal Transportation Impact Study prepared by Central Coast Transportation Consulting (Appendix E). The emissions model for the project assumes a maximum area of disturbance of 10.1 acres (12.75-acre project site, less 2.65 acres allocated to open space). In addition, the emissions modeling assumes import of 25,000 cubic yards of soil to the site during the site preparation phase of project construction. The CalEEMod results are included in in Appendix A.

The analysis used CalEEMod default values for residential and commercial projects in the SCCAB, including the construction schedule and equipment. The default construction schedule was modified for the architectural coating phase, which was extended to overlap with half of the default building construction phase, because painting is generally completed as buildings within a phase are completed, rather than subsequent to all building construction. Construction phasing assumptions are detailed in the CalEEMod output files (refer to Appendix A).

Discussion

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

SLOAPCD adopted the 2001 Clean Air Plan (CAP) in 2002. The 2001 CAP is a comprehensive planning document which is intended to providence to the SLOAPCD and other local agencies, including the City of San Luis Obispo, on how to attain and maintain the State standards for ozone and PM_{10}. The 2001 CAP presents a detailed description of the sources and pollutants which impact the jurisdiction, future air quality impacts to be expected under current growth trends, and an appropriate control strategy for reducing ozone precursor emissions, thereby improving air quality.

SLOAPCD identifies significant impacts related to consistency with the 2001 CAP by determining whether a project would exceed the population projections used in the CAP for the same area, whether the vehicle trips and vehicle miles traveled generated by the project would exceed the rate of population growth for the same area, and whether applicable land use management strategies

and transportation control measures from the CAP have been included in the project to the maximum extent feasible. The consistency of the project with each of these criteria is discussed in the following paragraphs.

Population Growth Consistency

As discussed in Section 13, *Population and Housing*, the project's projected population growth is within the forecasts in the City's Housing Element of the General Plan. Development of the project would add an estimated 498 new residents to the City. When added to the existing population within the City of approximately 46,725 (California Department of Finance 2017), buildout of the project site under the proposed General Plan Amendment and rezone would increase the City's total population to an estimated 47,223 residents. The 2001 CAP relies on SLOCOG population data and projections, most recently updated in the *2050 Regional Growth Forecast*. The *2050 Regional Growth Forecast* population estimate for the City is 48,601 by 2025, the nearest year after allowable development under the proposed project would be expected to be built, and 50,659 by 2035, the anticipated buildout year of the current General Plan Land Use Element. Because the project would not cause the City's population to exceed the population projections associated with the 2001 CAP, the project would not result in an exceedance of the population projections contained in the 2001 CAP.

Vehicle Trip Rate Increase and Miles Traveled

The Land Use and Circulation Update EIR (LUCE Update EIR) determined that buildout under the updated General Plan would result in 1,356,310 daily Vehicle Miles Traveled (VMT) in 2035. Based on the CalEEMod analysis (see Appendix A), development of the site under the proposed project would result in an increase in annual VMT of 3,961,403, or a daily VMT of 10,853 (annual VMT divided by 365 days per year). Buildout of the project would increase the City's daily VMT to 1,367,163, an increase of approximately 0.8 percent as compared to buildout under the General Plan as currently zoned. As described above, buildout of the project site under the proposed project would increase the City's total population to an estimated 47,223, which is an estimated population increase of approximately 1.0 percent. Therefore, the potential increase in total vehicle miles traveled would not exceed the anticipated increase in population, and the proposed project would be consistent with the CAP assumptions for VMT.

Implementation of Land Use and Transportation Control Measures

Although the project would rezone the site, the site has an existing medium-density residential zoning designation. Development under the proposed rezone would be consistent with the CAP's land use strategies, including locating residential development within an urban area proximate to an existing roadway, and locating new development near transit services and commercial and retail shopping areas. Similarly, development under the proposed project description would be consistent with applicable Transportation Control Measures (TCMs), which encourage co-location of new development and local transit connections, transit infrastructure and connectivity improvements, bicycling and bikeway enhancements, and traffic flow improvements. Therefore, the proposed project would be consistent with applicable land use strategies and TCMs. Overall, the project would not conflict with the 2001 CAP, and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

c. Would the project 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 that exceed quantitative thresholds for ozone precursors)?

d. Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impacts

Temporary construction activities associated with development under the proposed project would generate fugitive dust, ozone precursor emissions, and diesel exhaust emissions, which would contribute to the existing San Luis Obispo County nonattainment status for ozone and PM_{10}. Table 3 summarizes the estimated short-term emissions from construction. Table 3 shows maximum quarterly emissions during construction compared to the applicable SLOAPCD construction emissions thresholds (see Appendix A for complete CalEEMod results and assumptions).

Table 3 Maximum Quarterly Construction Emissions

	ROG + NO_X (combined)[1]	**Fugitive PM_{10} (dust)**	**DPM[2]**
Maximum Construction Emissions	2.3 tons/quarter	0.65 tons/quarter	0.11 tons/quarter
SLOAPCD Significance Threshold	2.5 tons/quarter (Tier 1)	2.5 tons/quarter (Tier 1)	0.13 tons/quarter (Tier 1)
Threshold Exceeded?	**No**	**No**	**No**

[1] The combined ROG and NO_X emissions were derived from the rolling maximum quarterly emissions for "ROG + NO_X" from CalEEMod.

[2] The DPM estimations were derived from the "PM_{10} Exhaust" and "$PM_{2.5}$ exhaust" output from CalEEMod as recommended by SLOAPCD. This estimation represents a worst case scenario because it includes other PM_{10} exhaust other than DPM. See Appendix A for CalEEMod software program output.

Quarterly emissions for Fugitive PM_{10} and DPM were calculated by dividing maximum annual construction emissions from CalEEMod by 4, since construction activities would extend for a duration exceeding 90 days, as recommended by SLOAPCD.

As shown in Table 3, the maximum quarterly construction emissions would not exceed the applicable SLOAPCD thresholds for ROG, NO_X, PM_{10}, $PM_{2.5}$, or DPM. Therefore, temporary construction impacts would be less than significant.

Operational Impacts

Development under the proposed project would result in an increase in vehicle trips that would generate new criteria pollutant emissions in the region. In addition, operation of new land uses on the project site would result in ongoing emissions associated with natural gas use and area sources, such as landscaping, consumption of consumer products, and off gassing from architectural coatings. Table 4 shows the daily and annual operational emissions associated with the development under the proposed project compared to the applicable SLOAPCD operational emissions thresholds (see Appendix A for complete CalEEMod results and assumptions). As discussed in the *Methodology* subsection above, operational emissions from the existing uses at the site were subtracted from the anticipated emissions from new development on the project site, to determine the overall net operational emissions that would result from the proposed project.

Table 4 Operational Emissions Comparison

	ROG + NO_X (combined)	Fugitive PM_{10} (dust)	DPM[1]	CO
Proposed Project Daily Emissions	32 lbs/day	12 lbs/day	0.7 lbs/day	73 lbs/day
Existing Daily Emissions	3.5 lbs/day	1 lbs/day	0.1 lbs/day	7 lbs/day
Net Daily Emissions	**28.5 lbs/day**	**11 lbs/day**	**0.6 lbs/day**	**66 lbs/day**
SLOAPCD Daily Threshold	25 lbs/day	25 lbs/day	1.25 lbs/day	550 lbs/day
Threshold Exceeded?	**Yes**	**No**	**No**	**No**
Proposed Project Annual Emissions	5 tons/year	2 tons/year	1 ton/year	10 tons/year
Existing Annual Emissions	1 ton/year	0.2 tons/year	0.0 tons/year	1 ton/year
Net Annual Emissions	**4 tons/year**	**1.8 tons/year**	**1 ton/year**	**9 tons/year**
SLOAPCD Annual Threshold	25 tons/year	25 tons/year	n/a	n/a
Threshold Exceeded?	**No**	**No**	**n/a**	**n/a**

[1] DPM estimates were derived from the "PM_{10} Exhaust" and "$PM_{2.5}$ exhaust" output from CalEEMod as recommended by SLOAPCD. This estimate represents a worst case scenario because it includes all PM_{10} exhaust.
Note: All numbers may not sum exactly due to rounding

As shown in Table 4, daily operational emissions associated with development under the proposed project would exceed the SLOAPCD 25 lbs/day threshold for ROG + NO_X. As discussed in the SLOAPCD *CEQA Air Quality Handbook*, projects with the potential to generate at least 25 but less than 30 lbs/day of combined ROG + NO_X should implement at least four mitigation measures from the Handbook's mitigation measure list (Table 3-5). Mitigation Measure AQ-1(a) requires implementation of on-site mitigation consistent with SLOAPCD's *CEQA Air Quality Handbook*. Therefore, long-term operational emissions would be less than significant with Mitigation Measure AQ-1(a) incorporated.

Sensitive Receptors

In accordance with the SLOPACD *CEQA Air Quality Handbook*, standard mitigation measures for localized construction impacts on nearby sensitive receptors are required because there are sensitive receptors are located within 1,000 feet of the project site (the existing residence 100 feet to the southeast), development of the project site would involve grading of more than 4.0 acres, and because the South Central Coast Air Basin is in nonattainment for PM_{10}. To address potential construction impacts per the SLOAPCD *CEQA Air Quality Handbook*, Mitigation Measures AQ-1(b) and AQ-1(c) are required to reduce localized fugitive dust, ozone precursors, and diesel particulate matter emissions from development under the proposed project. Therefore, impacts to sensitive receptors in the project vicinity would be less than significant with mitigation incorporated.

Mitigation Measures

The following mitigation measures are required to reduce operational emissions associated with development under the proposed project, and would ensure that sensitive receptors in the project vicinity would not be exposed to substantial pollutant concentrations during construction, which would reduce potential air quality impacts to a less than significant level. The application of standard dust control and construction equipment measures would also further reduce regional construction phase emissions.

AQ-1(a) **SLOAPCD Operational Emissions Reduction Measures.** Prior to issuance of grading permits, the applicant shall define and incorporate into project design at least four of the standard emission reduction measures from the SLOAPCD *CEQA Air Quality Handbook* (Table 3-5). Emission reduction measures shall include, but would not be limited to:

- Provide a pedestrian friendly and interconnected streetscape with good access to/from the development for pedestrians, bicyclists, and transit users to make alternative transportation more convenient, comfortable, and safe.
- Provide shade over 50% of parking spaces to reduce evaporative emissions from parked vehicles.
- Incorporate traffic calming modification into project roads to reduce vehicle speeds and increase pedestrian and bicycle usage and safety.
- Work with SLOCOG to create, improve, or expand a nearby 'Park and Ride' lot with car parking and bike lockers in proportion to the size of the project.
- Exceed Cal Green standards by 25% for providing on-site bicycle parking: both short term racks and long term lockers, or a locked room with standard racks and access limited to bicyclists only.
- Provide improved public transit amenities (covered transit turnouts, direct pedestrian access, bicycle racks, covered bench, smart signage, route information displays, lighting, etc.)
- Provide bicycle-share program for development.
- Provide dedicated parking for carpools, vanpools, and/or high-efficiency vehicles to meet or exceed Cal Green Tier 2.

AQ-1(b) **Fugitive Dust Control Measures**. Construction projects shall implement the following dust control measures so as to reduce PM_{10} emissions in accordance with SLOAPCD requirements.

- Reduce the amount of the disturbed area where possible;
- Water trucks or sprinkler systems shall be used during construction in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency shall be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water shall be used whenever possible;
- All dirt stock pile areas shall be sprayed daily as needed;
- Permanent dust control measures identified in the approved project revegetation and landscape plans shall be implemented as soon as possible following completion of any soil disturbing activities;
- Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established;
- All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD;
- All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible after grading unless seeding or soil binders are used;

- Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered or shall maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code Section 23114;
- Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site;
- Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water shall be used where feasible;

AQ-1(c) **Standard Control Measures for Construction Equipment.** The following standard air quality mitigation measures shall be implemented during construction activities at the project site:

- Maintain all construction equipment in proper tune according to manufacturer's specifications;
- Fuel all off-road and portable diesel powered equipment with ARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);
- Use diesel construction equipment meeting ARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State Off-Road Regulation;
- Use on-road heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;
- Construction or trucking companies with fleets that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g. captive or NO_X exempt area fleets) may be eligible by proving alternative compliance;
- All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5 minute idling limit;
- Diesel idling within 1,000 feet of sensitive receptors is not permitted;
- Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
- Electrify equipment when feasible;
- Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and
- Use alternatively fueled construction equipment on-site where feasible, such as compressed natural gas, liquefied natural gas, propane or biodiesel.

Plan Requirements and Timing. The applicant shall incorporate operational emissions reduction measures into development plans and submit evidence to the Community Development Department that these provisions would reduce long-term operational emissions have been reduced to below daily threshold levels prior to issuance of grading permits. Fugitive dust control measures and standard control

measures for construction equipment shall be shown on grading and construction plans prior to issuance of permits.

Monitoring. The Community Development Department shall verify compliance prior to issuance of grading or construction permits. The contractor or builder shall designate a person or persons to monitor fugitive dust emissions as necessary during construction to minimize dust complaints, reduce visible emissions below 20 percent opacity, and to prevent transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Compliance Division prior to the start of any grading, earthwork or demolition. The Community Development Department shall site inspect to ensure construction activities are completed in accordance with approved plans, and development is in accordance with approved plans prior to occupancy clearance. Community Development staff shall verify installation of operational emissions reduction measures in accordance with approved building plans.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

e. Would the project create objectionable odors affecting a substantial number of people?

The SLOAPCD *CEQA Air Quality Handbook* (2012) identifies typical land uses that have the potential to result in odorous emissions and provides recommendations for siting new sensitive land uses in close proximity to these uses. The project would rezone the site for residential and commercial uses, which are not identified by SLOAPCD as uses that typically create objectionable odors. In addition, the project site is surrounded by service commercial/business park land uses, an existing residence to the southeast, and open space and agricultural operations further to the southwest. None of these land uses include operations listed in the *CEQA Air Quality Handbook* as potential odor-contributing sources. Therefore, development under the proposed General Plan Amendment and rezone would not result in objectionable odors that would affect a substantial number of people.

NO IMPACT

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4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	■	☐	☐
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?	☐	■	☐	☐
c. Have a substantial adverse effect on federally protected wetlands as defined by 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?	☐	■	☐	☐
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?	☐	☐	■	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	■	☐
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?	☐	☐	☐	■

This section is based on the information and findings included in the Biological Resources Assessment (BRA), prepared by Rincon Consultants, Inc. (Rincon) for the project in January 2018, and updated in August 2018 (Appendix B). The analysis of biological resources within the 12.75-acre project site and in the potential off-site improvement areas (refer to Figure 4 in Section 2, *Project Description*) is based on a search of available biological databases, review of aerial photographs and topographic maps, and review of multiple literature resources. Reconnaissance-level biological surveys of the project site were conducted by a Rincon biologist on October 24 and December 19, 2017, to confirm the accuracy of an applicant-provided study, and evaluate the site's existing conditions and potential to support special status species and vegetation communities. Additional vegetation mapping was conducted on August 8, 2018, to include information about the potential off-site improvement areas. The project site and the potential off-site improvement areas collectively were evaluated as the study area for biological resources. The biological resources evaluation also included a formal jurisdictional delineation of the study area conducted on August 8, 2018.

Seven terrestrial vegetation communities/land cover types were identified within the study area: developed/landscaped/disturbed areas, eucalyptus grove, fennel patches, Bermuda grass lawn, non-native annual grassland and riparian woodland. These are depicted on Figure 8. The project site is disturbed and developed due to the existing mobile home park and recreation vehicle (RV) parking lot and contains Cropley clay, 0-2 percent slopes.

Setting

The project site is generally flat with a gentle slope toward Tank Farm Road. Onsite elevations range from approximately 147 to 176 feet above mean sea level. The project site is within the South Coast Ranges (SCoR) geographic subregion of California. The SCoR subregion is a component of the larger Central Western California geographic region, which occurs within the even larger California Floristic Province (Baldwin et al., 2012). The project site is within the San Luis Obispo Creek watershed (USGS, 2017). Acacia Creek runs along the western side of the site. Acacia Creek is an ephemeral stream that flows in a southerly direction and serves as a tributary to the east fork of San Luis Obispo Creek. The eastern side of the site is bordered by Orcutt Creek, which is an ephemeral creek that flows in a southwesterly direction before its confluence with Acacia Creek, south of the project site. Orcutt Creek crosses through the southeastern corner of the site before it enters a culvert and flows beneath Tank Farm Road. Natural vegetation within the biological study area is primarily associated with the drainages and riparian areas along Orcutt and Acacia Creeks. These creeks are visible on aerial photography and the centerline, tops of bank, and associated riparian vegetation are depicted in Figure 9.

Discussion

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

Rincon conducted a review of the California Natural Diversity Database (CNDDB) occurrences of special status plants, wildlife, sensitive natural communities (California Department of Fish and Wildlife [CDFW], 2017), and designated critical habitats from the United States Fish and Wildlife Service (USFWS) Critical Habitat Portal (2017) from within five miles of the project site. The majority of the suitable habitat is within the riparian areas, eucalyptus groves, wetland and annual grassland

Figure 8 Vegetation Communities/Land Cover Types

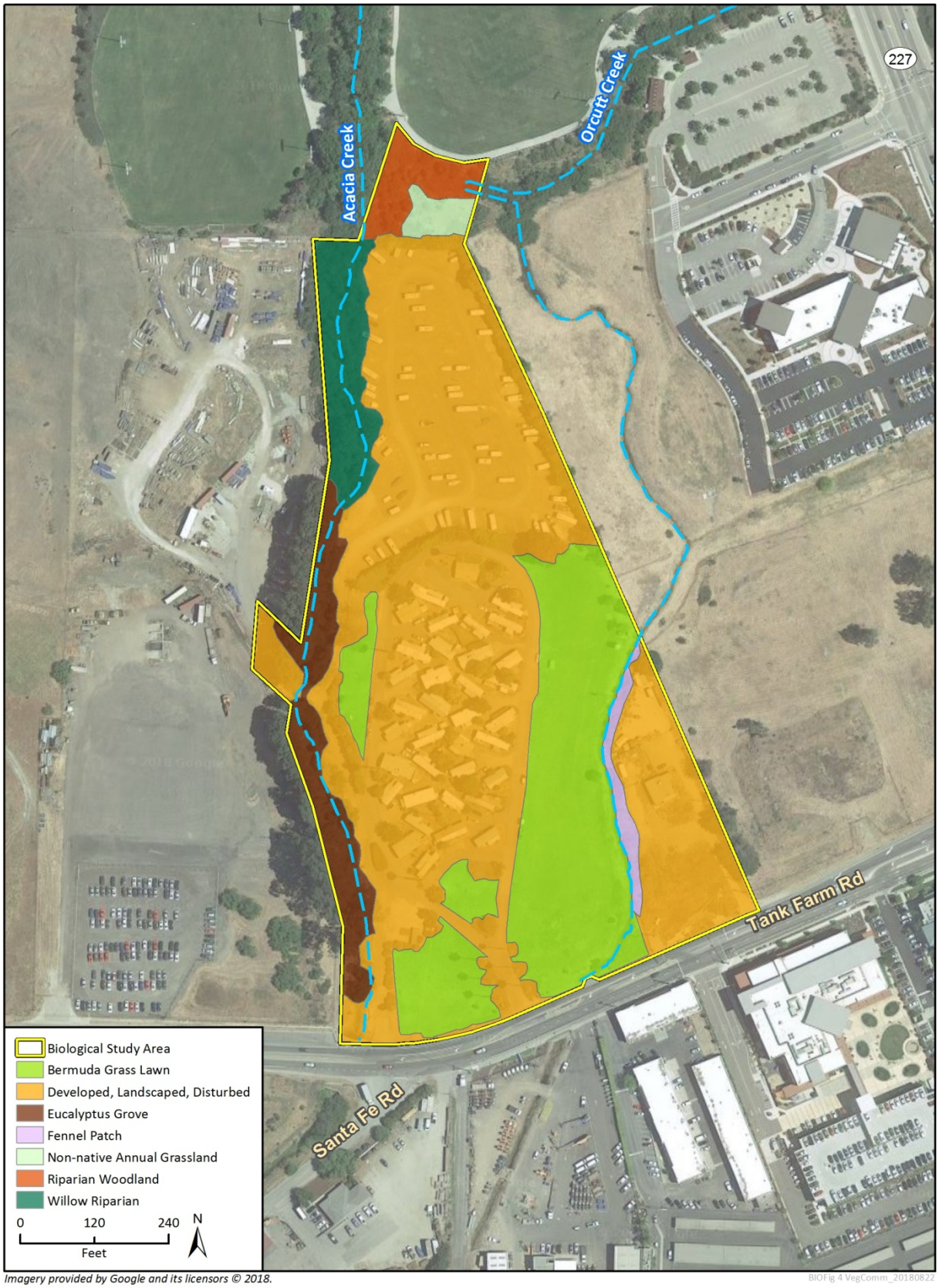

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Figure 9 Top of Bank/Edge of Riparian Dripline and Setbacks

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areas outside the project site, but associated with the potential off-site improvement areas. Special status plant and animal species with the potential to occur in the study area are discussed in the subsequent paragraphs.

Special Status Plant Species

Six special status plant species were determined to have potential to occur within the study area considering the presence of suitable habitat: San Luis Obispo sedge (*Carex obispoensis*), Hoover's button-celery (*Eryngium aristulatum* var. *hooveri*), black-flowered figwort (*Scrophularia atrata*), Cambria morning-glory (*Calystegia subacaulis* ssp. *episcopalis*), San Luis Obispo owl's-clover (*Castilleja densiflora* ssp. *obispoensis*), and Adobe sanicle (*Sanicula maritima*). Suitable habitat occurs within the creek margins and setbacks around Orcutt Creek and Acacia Creek, and the wetland and grassland on the northern portion of the study area. Ground disturbance in these margins and/or setbacks, such as with vegetation management activities within the riparian corridor and stream setbacks, or development within the potential off-site improvement areas, may result in direct impacts to special status plant species.

Indirect impacts could occur due to the spread of invasive, non-native species from construction equipment or imported fill materials. Invasive, non-native plant species can out-compete native species and/or alter habitat towards a state that is unsuitable for special status species. For example, the spread of non-native weed species can reduce the biodiversity of native habitats through displacement of vital pollinators, potentially eliminating special status plant species, or through competition with native plants for water and light. If ground disturbance is anticipated in the margins or setbacks of Orcutt Creek and/or Acacia Creek, or within the potential off-site improvement areas, Mitigation Measures BIO-1(a) through BIO-1(c) would be required to reduce impacts to special status plant species to a less than significant level.

Special Status Animal Species

California Red-Legged Frog. The study area was assessed for the potential to support the California red-legged frog (CRLF*; Rana draytonii*), a federally threatened species and California Species of Special Concern. Development of potential off-site improvements facilitated by the proposed project would occur in suitable foraging and dispersal habitat for this species. The majority of the upland habitat within the project site is not suitable for CRLF, and this species would only be expected to occur in disturbance areas incidentally during periods of overland movement occurring during or immediately after rainstorms, due to the disturbed nature and limited vegetative cover in the project footprint. However, due to the proximity of suitable habitat, this species has potential to disperse into the work area. As a result, there would be potential direct impacts to CRLF individuals during on-site construction or vegetation management activities. In addition, indirect impacts to CRLF may occur from general project-related disturbance and noise, as well as from future increased human occupancy, if individuals are dispersing within the project site. Indirect impacts to water and habitat quality could occur during construction associated with modifications to the existing crossing over Acacia Creek or the development of a new crossing over Orcutt Creek. Mitigation Measures BIO-2(a) through BIO-2(c) would be required to reduce potential impacts to special status animal species in the work area to a less than significant level.

Western Pond Turtle, Coast Range Newt, and Two-Striped Garter Snake. Orcutt Creek, Acacia Creek, and the willow riparian habitat in the northwest corner of the site provide potentially suitable habitat for Western pond turtle (*Actinemys* [=*Emys*] *marmorata*), Coast Range newt (*Taricha torosa torosa*), and two-striped garter snake (*Thamnophis hammondii*); all designated as California Species

of Special Concern. Both creeks and willow riparian habitat occur outside the project's disturbance footprint, but within the potential off-site improvement areas. Therefore, habitat for these species may be directly affected by future development facilitated by the proposed project, including modifications to the existing crossing over Acacia Creek or the development of a new crossing over Orcutt Creek. Due to the high degree of disturbance associated with the remainder of the site, these species are not expected to occur within the disturbance footprint on the project site. Mitigation Measure BIO-2(d) is required to reduce potential impacts to these species to a less than significant level.

Steelhead. No water was documented within Acacia Creek during the field surveys where future development facilitated by the proposed project may occur, and no steelhead individuals were observed during the field surveys. Potential direct impacts to steelhead in Acacia Creek include harassment or injury during modifications to the existing crossing if individuals are present within the work area. Modifications to the existing crossing of Acacia Creek also have the potential to result in indirect impacts to steelhead habitat quality. However, depending on final design of a modified crossing over Acacia Creek, the project could result in long-term net improvements to flow and passage potential at this location by alleviating the choke point currently caused by the existing undersized structure. Temporary construction activity could result in impacts to habitat and individuals. Mitigation Measure BIO-2(e) would reduce this potential impact to a less than significant level.

Nesting Birds. Suitable nesting habitat for birds protected under the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC) occurs in vegetation on site as well as on structures within and adjacent to the project site. Future development facilitated by the proposed project would have the potential to result in direct impacts to nesting birds, including special status birds, if they are nesting within the project site, potential off-site improvement areas, and/or immediate vicinity during construction activities. Two State Fully Protected bird species (golden eagle [*Aquila chrysaetos*]) and white-tailed kite [*Elanus leucurus*]), two State Species of Special Concern bird species (loggerhead shrike [*Lanius ludovicianus*] and purple martin [*Progne subis*]), and one State Endangered and Fully Protected species (American bald eagle [*Haliaeetus leucocephalus*]) have potential to occur or are known to occur in the vicinity of the project site. The project is not anticipated to result in removal of substantial foraging habitat for raptors due to the existing development and disturbed condition of the project site. Mitigation Measure BIO-2(f) would be required to reduce potential impacts to nesting, migratory, and protected birds to a less than significant level.

Pallid Bat. The study area contains suitable foraging habitat for pallid bat (*Antrozous pallidus*), a California Species of Special Concern. This species could roost in trees and/or crevices within the site. Potential direct impacts to pallid bats within the project site include removal of roosting habitat and harassment or injury if they are foraging within the project area during project implementation. Mitigation Measure BIO-2(g) would be required to reduce potential impacts to roosting bats to a less than significant level.

Mitigation Measures

The following measures would reduce impacts to special status plant and animal species to a less than significant level.

BIO-1(a) **Special Status Plant Species Surveys.** Prior to the start of vegetation management activities on the project site, or prior to the start of any construction activity within potential off-site improvement areas, the developer shall ensure an approved

biologist conducts surveys for special status plant species throughout suitable habitat. Surveys shall be conducted when plants with potential to occur are in a phenological stage conducive to positive identification (i.e., usually during the blooming period for the species), a qualified biologist shall conduct surveys for special status plant species throughout suitable habitat within all potential vegetation management areas. Reference sites must be visited prior to botanical surveys to confirm target species are detectable. Valid botanical surveys will be considered current for up to five years; if construction has not commenced within five years of the most recent survey, botanical surveys must be repeated.

BIO-1(b) **Special Status Plant Species Avoidance**. If special status plant species are discovered within the project site or potential off-site improvement areas, an approved biologist shall flag and fence these locations before construction activities start to avoid impacts. During vegetation management activities, any special status plants identified during the survey must be flagged for avoidance.

BIO-1(c) **Restoration Plan.** If avoidance is not feasible; all impacts shall be mitigated at a minimum ratio of 2:1 (number of acres or individuals restored to number of acres or individuals impacted) for each species as a component of habitat restoration. A qualified biologist shall prepare and submit a restoration plan to the City for approval. The restoration plan shall include, at a minimum, the following components:

- Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type);
- Goal(s) of the compensatory mitigation project [type(s) and area(s) of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type(s) to be established, restored, enhanced, and/or preserved];
- Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions and values);
- Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan [including species to be used, container sizes, seeding rates, etc.]);
- Maintenance activities during the monitoring period, including weed removal and irrigation as appropriate (activities, responsible parties, schedule);
- Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year, along with performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, and annual monitoring reports to be submitted to the City for a minimum of five years at which time the applicant shall demonstrate that performance standards/success criteria have been met;
- Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80% survival of container plants and 30% relative cover by vegetation type;
- An adaptive management program and remedial measures to address any shortcomings in meeting success criteria;

- Notification of completion of compensatory mitigation and agency confirmation; and
- Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism).

BIO-2(a) **Best Management Practices.** The following Best Management Practices (BMPs) shall be implemented for project construction activities within the work area.

- No pets or firearms shall be allowed at the project site during construction activities.
- All trash that may attract predators must be properly contained and removed from the work site. All such debris and waste shall be picked up daily and properly disposed of at an appropriate site.
- All refueling, maintenance, and staging of equipment and vehicles shall occur at least 50 feet from Acacia Creek and Orcutt Creek and in a location where a spill would not drain toward aquatic habitat. A plan must be in place for prompt and effective response to any accidental spills prior to the onset of work activities. All workers shall be informed of the appropriate measures to take should an accidental spill occur.
- Pallets or secondary containment areas for chemicals, drums, or bagged materials shall be provided. Should material spills occur, materials and/or contaminants shall be cleaned from the project site and recycled or disposed of to the satisfaction of the Regional Water Quality Control Board.
- Prior to construction activities within 30 feet of potentially jurisdictional features, including Acacia Creek and Orcutt Creek, the drainage features shall be fenced with orange construction fencing and signed to prohibit entry of construction equipment and personnel unless authorized by the City. Fencing should be located a minimum of 30 feet from the edge of the riparian canopy or top of bank and shall be maintained throughout the construction period for each phase of development. Once all phases of construction in this area are complete, the fencing may be removed.
- Erosion control and landscaping specifications allow only natural-fiber, biodegradable meshes and coir rolls, to prevent impacts to the environment and to fish and terrestrial wildlife.
- All vehicles and equipment shall be in good working condition and free of leaks.
- Construction work shall be restricted to daylight hours (7:00 AM to 7:00 PM) to avoid impacts to nocturnal and crepuscular (dawn and dusk activity period) species.
- Concrete truck and tool washout shall be limited to locations designated by a qualified biologist or a Qualified Storm-water Practitioner such that no runoff will reach Acacia Creek or Orcutt Creek.
- All open trenches shall be constructed with appropriate exit ramps to allow species that accidentally fall into a trench to escape. Trenches will remain open for the shortest period necessary to complete required work.
- No water will be impounded in a manner to attract sensitive species.

BIO-2(b) **Worker Environmental Awareness Program.** Prior to the initiation of construction activities (including staging and mobilization), all personnel associated with project construction shall attend a Worker Environmental Awareness Program (WEAP) training.

The training shall be conducted by a qualified biologist, to aid workers in recognizing special status resources that may occur in the project area. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and avoidance measures required to reduce impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction of the project. All employees shall sign a form provided by the trainer documenting they have attended the training.

BIO-2(c) **California Red-legged Frog Impact Avoidance and Minimization.** The following shall be implemented to avoid and minimize potential impacts to CRLF.

- A pre-construction survey of the proposed disturbance footprint (within the project site or potential off-site improvement areas) for California red-legged frog shall be conducted by a qualified biologist within 48 hours prior to the start of project construction to confirm this species is not present in the work area.
- In the event the pre-construction survey identifies the presence of individuals of CRLF, or if individuals of these species are encountered during construction, then the applicant shall stop work and comply with all relevant requirements of the Federal Endangered Species Act prior to resuming project activities.
- Only City- and USFWS-approved biologists shall participate in activities associated with the capture, handling, and monitoring of CRLF.
- If activities occur between November 1 and April 30, the qualified biologist shall conduct a pre-activity clearance sweep prior to start of project activities on the morning following any rain events of 0.1 inch or greater.

BIO-2(d) **Coast Range Newt, Two-striped Garter Snake, and Western Pond Turtle Impact Avoidance and Minimization**. A qualified biologist shall conduct a pre-construction survey within 48 hours of initial ground disturbing activities associated with any off-site improvements, including modifications to the existing crossing over Acacia Creek or the development of a new crossing over Orcutt Creek. The survey area shall include any proposed disturbance area(s) and all proposed ingress/egress routes. If any of these species are found and individuals may be injured or killed by work activities, the biologist shall be allowed sufficient time to move them from the project site before work activities begin. The biologist(s) shall relocate any coast range newts, two-striped garter snakes, and/or western pond turtles the shortest distance possible to a location that contains suitable habitat that is not likely to be affected by activities associated with the project.

BIO-2(e) **Steelhead – South-central California Coast DPS Impact Avoidance and Minimization**. The applicant shall implement the following to avoid and minimize potential impacts to steelhead.

- Construction associated with the widening of the existing crossing over Acacia Creek shall be restricted to periods of dry weather from April 16 through

October 31, and shall not be conducted within 48 hours after a rain event of 0.25 inch or greater, or until an approved biologist confirms there is no longer a chance for flowing water to enter the work area.

- Widening of the existing crossing shall follow the design standards developed by the City of San Luis Obispo and shall be developed in a manner that does not impede wildlife movement.

BIO-2(f) **Nesting Birds Impact Avoidance and Minimization**. The following actions shall be undertaken to avoid and minimize potential impacts to nesting birds:

- For construction activities occurring during the nesting season (generally February 1 to September 15), surveys for nesting birds covered by the California Fish and Game Code and the Migratory Bird Treaty Act shall be conducted by a qualified biologist no more than 14 days prior to vegetation removal. The surveys shall include the disturbance area plus a 500-foot buffer around the site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of 50 feet for non-raptor bird species and at least 300 feet for raptor species. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer.
- If feasible, removal of vegetation within suitable nesting bird habitats will be scheduled to occur in the fall and winter (between September 1 and February 14), after fledging and before the initiation of the nesting season.
- If a suspected American bald eagle nest is discovered during the pre-construction survey, then the applicant shall consult with the City, USFWS, and CDFW regarding appropriate nest buffers and nest monitoring. If a nest is discovered with construction underway, a no-activity buffer a minimum of 660 feet from the nest must be implemented, or as otherwise directed by CDFW and USFWS, until appropriate authorizations are obtained. Any subsequent buffer adjustments shall be made in consultation with the City, CDFW and USFWS and shall rely on monitoring observations and activity at the site. Additional avoidance measures for special status bird nests such as American bald eagle nests are often required, and would be developed in consultation with the City, CDFW and USFWS.

BIO-2(g) **Roosting Bat Impact Avoidance and Minimization.** The following actions shall be undertaken to avoid and minimize potential impacts to roosting bats:

- Prior to issuance of grading permits, a qualified biologist shall conduct a survey of existing structures within the project site to determine if roosting bats are present. The survey shall be conducted during the non-breeding season (November through March). The biologist shall have access to all interior attics, as needed. If a colony of bats is found roosting in any structure, further surveys shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.) If the bats are not part of an active maternity colony, passive exclusion measures may be implemented, in close coordination

with CDFW. These exclusion measures must include one-way valves that allow bats to exit the structure but are designed so that the bats may not re-enter the structure.

- If a bat colony is excluded from the project site, appropriate alternate bat habitat as determined by a qualified biologist shall be installed on the project site or at an approved location offsite.
- Prior to removal of any trees, a survey shall be conducted by a qualified biologist to determine if any of the trees proposed for removal or trimming harbor sensitive bat species or maternal bat colonies. If a non-maternal roost is found, the qualified biologist, in close coordination with CDFW shall install one-way valves or other appropriate passive relocation method. For each occupied roost removed, one bat box or alternate roost structure shall be installed in similar habitat and should have similar cavity or crevices properties to those which are removed, including access, ventilation, dimensions, height above ground, and thermal conditions. Maternal bat colonies may not be disturbed.

Plan Requirements and Timing. Special status species protection plans and surveys shall be prepared by the applicant and shall be submitted to for review and approval by the City prior to the approval of grading and construction permits. Any required permits shall be obtained from the state and federal agencies prior to issuance of grading permits.

Monitoring. The Environmental Monitor shall monitor environmental compliance of the construction activities throughout the construction period or as stipulated in the species- or resource-specific mitigation measure and provide monitoring reports to the City.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Would the project 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?

c. Would the project have a substantial adverse effect on federally protected wetlands as defined by 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?

The study area contains riparian habitat, which may be under CDFW jurisdiction pursuant to Section 1600 et seq. of the California Fish and Game Code. Future development on the project site facilitated by the proposed project would not result in direct disturbances to Acacia Creek, Orcutt Creek, or associated jurisdictional areas. However, widening Tank Farm Road along the project site frontage and the implementation of potential off-site improvements have the potential to result in temporary and permanent impacts to jurisdictional aquatic resources, including wetlands, other waters, and riparian habitats. Approximately 0.14 acre of wetlands and 0.05 acre of other waters potentially under U.S. Army Corps of Engineers (USACE) and the Regional Water Quality Control Board (RWQCB) jurisdictions (Clean Water Act Sections 404 and 401, respectively) are present in the study area (refer to Appendix B). In addition, 1.74 acres of streambed/riparian habitat potentially subject to regulation by CDFW under Section 1600 et seq. of the CFGC, and RWQCB under Porter-Cologne are also present. The exact location and area of potential impacts that would result from implementation of potential off-site improvements are not yet known. However, off-site

improvements would impact these jurisdictional features within the potential off-site improvement areas. Impacts to jurisdictional areas resulting from implementation of potential off-site improvements are potentially significant.

The City has established a zoning regulation that requires a 35-foot setback for development off both Acacia Creek and Orcutt Creek. The setback distance is defined in terms of the distance from the top of bank or edge of riparian drip line, whichever is farther from the creek. Mitigation Measure BIO-2(a) requires implementation of construction BMPs that would avoid indirect impacts to the riparian habitat and stream during construction activities. Modification to the existing crossing over Acacia Creek or the development of a new crossing over Orcutt Creek would be required to comply with the City's Standard Specifications and Engineering Standards for creek crossings. Nevertheless, potential impacts to jurisdictional features and associated riparian habitat would result.

Mitigation Measures

The following measures would reduce impacts to jurisdictional features and associated riparian habitat to a less than significant level.

BIO-3 **Wetland, Stream, and Riparian Habitat Mitigation and Monitoring**. Temporary impact areas shall be restored at a one to one (1:1) ratio (one acre of restoration for each acre of impact) to offset temporary losses in wetland, stream, or riparian function. Permanent impacts on jurisdictional areas shall be offset through creation, restoration, and/or enhancement of in-kind habitats at a minimum ratio of 2:1. Permitting agencies (CDFW, USACE, RWQCB) may require a higher mitigation ratio associated with applicable permits.

A Mitigation and Monitoring Plan is required to outline the approach that will be taken for restoration and habitat creation or enhancement. The plan shall be prepared by a qualified restoration ecologist. The plan shall include, but not be limited to the following components:

- Description of the project/impact site,
- Goal(s) of the compensatory mitigation,
- Description of the proposed compensatory mitigation-site,
- Implementation plan for the compensatory mitigation-site,
- Maintenance activities during the monitoring period,
- Monitoring plan for the compensatory mitigation-site,
- Success criteria and performance standards,
- Reporting requirements, and
- Contingency measures and funding mechanisms.

Plan Requirements and Timing. Crossing structure designs and the Mitigation and Monitoring Plan shall be prepared by the applicant and shall be submitted to for review and approval by the City prior to the approval of grading and construction permits. Any required permits shall be obtained from the state and federal agencies prior to issuance of grading permits.

Monitoring. The Environmental Monitor shall monitor environmental compliance of the construction activities throughout the construction period or as stipulated in the Mitigation and Monitoring Plan and provide monitoring reports to the City.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

d. Would the project 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?

Future development facilitated by the proposed project would result in increased residential development in proximity to riparian areas along Acacia Creek and Orcutt Creek, and the wildlife corridors associated with these features. However, future development would be designed consistent with the City's required 35-foot creek setback from Orcutt Creek and Acacia Creek, which would ensure that development would not result in long-term adverse effects to wildlife utilization and movement along these riparian areas and associated wildlife corridors.

Construction of potential off-site improvements would potentially result in temporary short-term impacts to wildlife movement due to equipment access and staging in and around the riparian corridor. Modification to the existing crossing over Acacia Creek or the development of a new crossing over Orcutt Creek would be required to comply with the City's Standard Specifications and Engineering Standards for creek crossings. Depending on final design of a modified crossing over Acacia Creek, the project could result in net improvements to flow and passage potential at this location by alleviating the choke point currently caused by the existing undersized structure and replacing older asphalt and concrete rubble with materials that facilitate passage. Because the project site and immediate vicinity are already developed and disturbed, the increase in lighting, noise, and human activity onsite due to the project would not result in a substantial change or long term impact to wildlife movement through the region.

LESS THAN SIGNIFICANT IMPACT

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The City has established a zoning regulation that requires a 35-foot setback off both Acacia Creek and Orcutt Creek. The setback distance is defined in terms of the distance from the top of bank or edge of riparian drip line, whichever is farther from the creek.

Planted and naturally-occurring trees are present in the project site. The project may require removal of naturally-occurring native trees. The City regulates tree removal within its jurisdiction. Once the project plans have been finalized, the exact number, type, and locations of trees within the project site to be removed, if any, shall be determined. If trees will be removed, the project applicant would be required to show all tree removals as part of the architectural and landscape plan submittal. The applicant will be required to develop and implement a tree protection and replacement plan to ensure the project is consistent with local tree preservation and removal regulations. As the project would not conflict with any local policies or ordinances, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The project site is not located in any adopted Habitat Conservation Plans or Natural Community Conservation Plans or other approved local, regional, or state habitat conservation plan. Therefore, there would be no impact.

NO IMPACT

5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	■	☐
b. Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	☐	■	☐	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☐	■	☐	☐
d. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	■	☐

The analysis in this section is based on a Cultural Resources Technical Report conducted by Rincon Consultants in November 2017 and updated in August 2018, and a Paleontological Resources Assessment conducted by Rincon Consultants in November 2017. The Cultural and Paleontological studies are included in this Initial Study as Appendix C.

Setting

The project site is located in the Central Coast archaeological region, one of eight organizational divisions of the state. The Central Coast archaeological region extends from Monterey Bay to Morro Bay, and includes the County of San Luis Obispo. The project site is located within Chumash ethnographic territory, which extends from the City of Malibu, north beyond San Luis Obispo, and inland as far as 42 miles (see Appendix C).

The Hidden Hills Mobilodge and the Lazy Acres RV Storage lot, located on the project site, include mobile homes and facilities associated with the mobile home park. Historic aerial photographs of the Mobilodge indicate that it is at least 50 years old, which is the minimum age requirement for eligibility for the California Register of Historical Resources (CRHR). In addition, there is a structure on the proposed eastern off-site improvement area (refer to Figure 4 in Section 2, *Project Description*), that appears to be at least 50 years old (refer to Appendix C).

Discussion

a. Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

On October 24, 2017, Rincon performed a search of the California Historical Resources Information System (CHRIS) from the Central Coast Information Center (CCIC) located at the University of

California, Santa Barbara (see Appendix C). The search was conducted to identify previously recorded cultural resources (prehistoric or historic), as well as previously conducted cultural resources studies within the project site and 0.5-mile radius of surrounding it. The CHRIS search included a review of the National Register of Historic Places and CRHR. The records search also included a review of available historic maps and aerial photographs. Rincon also performed a field survey of the project site on October 30, 2017, to visually observe all exposed ground surfaces for potential artifacts, and on August 18, 2018 for the potential off-site improvement areas (refer to Figure 4 in Section 2, *Project Description*).

The results of the cultural resources records search and pedestrian field survey conducted by Rincon did not identify any historic cultural resources on the project site. The Hidden Hills Mobilodge contains mobile homes and facilities infrastructure that are at least 50 years old (NETRonline 2017), which is the minimum age requirement for eligibility for CRHR. However, mobile homes are not considered permanent structures and do not qualify as built environment resources under CEQA.

One structure was identified within the proposed eastern off-site improvement area, a single-family residence located at 660 Tank Farm Road. Historic aerial imagery indicates that this structure was constructed more than 50 years ago (NETRonline 2017; UCSB 2018). The residence is not designated for listing in the National Register of Historic Places, the California Register of Historical Resources or as a City of San Luis Obispo historic resource and is not located within an existing or potential historic district. The remaining built environment resources within the project area include the Hidden Hills Mobilodge, which includes temporary structures. As there are no historic structures on the project site, future development facilitated by the proposed project would not cause an adverse change to any historical resource.

LESS THAN SIGNIFICANT IMPACT

b. Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?

The CCIC records search identified 44 previously-conducted cultural resources studies within the records search area. Of these, two studies included a portion of the project site (see Appendix C). In addition, the CCIC records search identified eight previously recorded cultural resources within the records search area (which included the project site and a half mile radius surrounding the site). None of these resources are located within the project site.

, Although no cultural resources have been identified on the project site, based on the previously-recorded resources identified in the records search area, previously-undiscovered cultural resources may be present on the project site or within the adjacent potential off-site improvement areas (refer to Figure 4 in Section 2, *Project Description*).

Because future development of the project site under the proposed project would involve grading of previously-ungraded portions of the site, previously-undiscovered cultural resources may be unearthed during project construction. Based on the presence of cultural resources in the area surrounding the project site, general sensitivity, and poor surface visibility during the pedestrian survey, future development requiring earth-disturbing activities within an approximately 100-foot (30-meter) radius of the Orcutt Creek and Acacia Creek riparian areas, or in the northern potential off-site improvement area, would require an Extended Phase I (XPI) testing program to explore the potential for buried cultural deposits. Implementation of Mitigation Measures CR-2(a) through CR-2(c) would reduce this impact to a less than significant level.

Mitigation Measures

The following mitigation measures are required to reduce impacts to potential cultural resources to a less than significant level.

CR-2(a) **Retain a Qualified Principal Investigator.** In accordance with the City's Conservation and Open Space Policies 3.5.6 and 3.5.7, a qualified principal investigator, defined as an archaeologist who meets the Secretary of the Interior's Standards for professional archaeology (hereafter qualified archaeologist), shall be retained to carry out all mitigation measures related to archaeological resources.

Monitoring shall involve inspection of subsurface construction disturbance in the immediate vicinity of known sites, or at locations that may harbor buried resources that were not identified on the site surface. A Native American monitor shall also be present because the area is a culturally-sensitive location. The monitor(s) shall be on-site on a full-time basis during earthmoving activities, including grading, trenching, vegetation removal, or other excavation activities.

CR-2(b) **Extended Phase I (XPI) Testing Program.** An extended phase I (XPI) testing program, utilizing standard shovel test pits and/or hand auguring at arbitrary levels, shall be conducted for development activity that would require ground disturbance within the potential off-site improvement areas, including riparian areas associated with the Orcutt Creek and Acacia Creek corridors, and in riparian areas immediately north of the project site.

If the XPI program identifies subsurface deposits that cannot be avoided by project design, a Phase II evaluation program shall be prepared to determine whether development would significantly impact identified resources.

If the Phase II evaluation program identifies identified resources as significant, a Phase III data recovery program shall be prepared and implemented. The purpose of the Phase III data recovery program is to recover, analyze, interpret, report, curate, and preserve archaeological data that would otherwise be destroyed.

The testing and evaluation programs shall be prepared by a qualified archaeologist prior to the issuance of grading permits, and shall be submitted for review and approval by the City prior to the approval of grading and construction permits. The qualified archaeologist shall monitor compliance with testing and evaluation program requirements during implementation of the testing and evaluation programs.

CR-2(c) **Unanticipated Discovery of Cultural Resources.** If cultural resources are encountered during ground-disturbing activities, work in the immediate area must halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (NPS 1983) should be contacted immediately to evaluate the find. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation and Native American consultation may be warranted to mitigate any significant impacts.

Plan Requirements and Timing. The project applicant shall retain a qualified archaeologist prior to the issuance of grading permits. If resources are found, the project applicant shall retain a qualified archaeologist and Native American monitor prior to the issuance of grading permits. The requirement that construction work be

stopped in the event of discovery of archaeological resources shall be included on construction plans prior to the issuance of grading permits.

Monitoring. The City shall confirm the qualifications of and approve the applicant's choice of a qualified archaeologist. The City shall inspect the site periodically during grading and demolition to ensure compliance with this measure. The City shall review construction plans and periodically inspect project construction to ensure compliance with these measures.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

The Paleontological Resource Assessment (see Appendix C), consisted of a fossil locality record search at the Natural History Museum of Los Angeles County (LACM) and review of existing geologic maps and primary literature regarding fossiliferous geologic units within the proposed project vicinity and region. A search of the paleontological locality records at the LACM resulted in no previously recorded fossil localities within the project boundaries. However, McLeod (2017) reports that at least two vertebrate localities have been recorded nearby from within older Quaternary alluvium, which has a similar lithology to the Pleistocene sedimentary deposits that likely underlie the project area at depth.

Quaternary alluvial sediments mapped at ground surface in the project area are Holocene in age, and as such have low paleontological sensitivity, and shallow ground disturbance in these areas would not be expected to impact scientifically significant paleontological resources. However, based on regional geologic mapping and previously identified fossil localities, these Holocene sediments may grade into older Pleistocene-aged sediments that have high paleontological sensitivity at as few as six feet below ground surface. The maximum depth of proposed project ground disturbance is unknown until project design is finalized. Therefore, any excavations in the project area that disturb the buried highly sensitive Pleistocene alluvium could result in potential impacts to paleontological resources. Implementation of Mitigation Measures CR-3(a) through CR-3(e) would reduce this impact to a less than significant level.

Mitigation Measures

The following mitigation measures would address the potentially significant impacts relating to the discovery of paleontological resources during project implementation and ground-disturbing activities. These measures would apply to all phases of project construction that would disturb the buried Pleistocene alluvium (approximately six feet below ground surface) and would ensure that any significant fossils present on-site are preserved through the recovery, identification, and curation of previously unrecovered fossils. Implementation of Mitigation Measure CR-3(a) through CR-3(c) would reduce potential impacts to paleontological resources to a less than significant level.

CR-3(a) **Paleontological Monitoring**. Prior to the commencement of ground disturbing activities under the project, a qualified professional paleontologist shall be retained to conduct paleontological monitoring during project ground disturbing activities. The Qualified Paleontologist (Principal Paleontologist) shall have at least a Master's Degree or equivalent work experience in paleontology, shall have knowledge of the local paleontology, and shall be familiar with paleontological procedures and techniques.

Ground disturbing construction activities (including grading, trenching, drilling with an auger greater than 3 feet in diameter, and other excavation) within previously undisturbed sediments at depths greater than six feet shall be monitored on a full-time basis. Monitoring shall be supervised by the Qualified Paleontologist and shall be conducted by a qualified paleontological monitor, who is defined as an individual who meets the minimum qualifications per standards set forth by the SVP (2010), which includes a B.S. or B.A. degree in geology or paleontology with one year of monitoring experience and knowledge of collection and salvage of paleontological resources.

The duration and timing of the monitoring shall be determined by the Qualified Paleontologist. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, he or she may recommend reducing monitoring to periodic spot-checking or cease entirely. Monitoring would be reinstated if any new ground disturbances are required, and reduction or suspension would need to be reconsidered by the Qualified Paleontologist. Ground-disturbing activity that does not exceed six feet in depth within Quaternary alluvium would not require paleontological monitoring.

CR-3(b) **Fossil Discovery, Preparation, and Curation**. In the event that a paleontological resource is discovered, the monitor shall have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and collected. Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection along with all pertinent field notes, photos, data, and maps. Curation fees are assessed by the repository, and are the responsibility of the project owner.

CR-3(c) **Final Paleontological Mitigation Report**. At the conclusion of laboratory work and museum curation, a final report shall be prepared describing the results of the paleontological mitigation monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. The report shall be submitted to the lead agency(s) for the project. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.

Plan Requirements, Timing, and Monitoring. The project applicant shall retain the qualified paleontologist prior to the issuance of grading permits. Prior to the issuance of any construction related permits, the City shall confirm that the training of construction personnel has occurred. During initial ground disturbance, the project applicant shall ensure that the qualified paleontologist is on-site and monitoring during these activities. The Final Paleontological Monitoring Report shall be submitted to the City of San Luis Obispo once ground-disturbing activities are finished.

Monitoring. Prior to initial ground disturbance, the City shall confirm the qualifications of and approve the applicant's choice of the qualified paleontologist. The City shall inspect the site periodically during grading and demolition to ensure compliance with this measure. The City shall review construction plans and

periodically inspect project construction to ensure compliance with these measures. The City shall review and approval the Final Paleontological Monitoring Report.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

d. Disturb any human remains, including those interred outside of formal cemeteries?

Ground disturbing construction activities have the potential to encounter or disturb undiscovered human remains. If human remains are found, the State of California Health and Safety Code Section 7050.5 requires that no further disturbance occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner would be notified immediately. If the human remains are determined to be prehistoric, the coroner would notify the Native American Heritage Commission (NAHC), which would determine and notify a most likely descendant (MLD). The MLD would complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. The project would adhere to the statutory requirements of the State Health and Safety Code and Public Resources Code, which would ensure proper procedures are implemented if human remains are uncovered. Compliance with applicable State and local regulations regarding handling of human remains would ensure that this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

6 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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?	☐	☐	■	☐
2. Strong seismic ground shaking?	☐	☐	■	☐
3. Seismic-related ground failure, including liquefaction?	☐	■	☐	☐
4. Landslides?	☐	☐	☐	■
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	■	☐
c. Be located on a geologic unit or soil that is made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	■	☐	☐
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	■	☐	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	■

Setting

San Luis Obispo is located in a geologically-complex and seismically-active region. Seismic conditions have the potential to result in significant harm to both people and property. The Safety Element of the City General Plan considers the effects of earthquakes, including the rupture of the ground surface along a fault and the ground shaking that occurs from fault movement, as well as liquefaction, settlement, erosion, landslides, and other geologic hazards (City of San Luis Obispo 2014b).

Surface Rupture and Ground Shaking

Surface rupture refers to the top of the ground moving unevenly along a fault. It typically occurs within an area of linear traces along previous ruptures, which mark a fault zone, and often in concert with movement on adjacent or intersecting faults. Ground shaking refers to the vibration that occurs in response to displacement along a fault. Typically, ground shaking has a side-to-side component as well as a vertical component, with the actual movement depending on the type of fault, a site's distance from the fault, and the rock and soil conditions at the site.

The Safety Element of the City General Plan shows active or potentially active fault lines in the City. The nearest active fault is the Los Osos Fault, which runs northwest/southeast outside of the City limits, and does not pass through the project site. The Los Osos Fault has been classified as active within the last 11,000 years. Other faults in the vicinity of San Luis Obispo are the West Huasna, Oceanic, and Edna faults (City of San Luis Obispo 2014b). Other faults are capable of producing strong ground motion in San Luis Obispo include the Point San Luis, Black Mountain, Rinconada, Wilmar, Pecho, Hosgri, La Panza, and San Andreas faults. The San Andreas Fault and the offshore Hosgri Fault present the most likely source of ground shaking for San Luis Obispo (City of San Luis Obispo 2014b).

Settlement and Liquefaction

Settlement occurs when the ground supporting part of a structure or facility lowers more than the rest or becomes softer, usually because ground shaking reduces the voids between soil particles (often with groundwater rising in the process). Liquefaction is the sudden loss of the soil's supporting strength due to groundwater filling and lubricating the spaces between soil particles as a result of ground shaking. Soils in the San Luis Obispo area with high risk for liquefaction are typically sandy and in creek floodplains or close to lakes. The likelihood of liquefaction increases with the strength and duration of an earthquake. The project site is identified in the Safety Element of the San Luis Obispo General Plan as being located in an area of very high liquefaction potential (City of San Luis Obispo 2014b). A significant portion of the City is located within this "very high risk" liquefaction zone. However, few properties in the City have identified a substantial liquefaction risk once a soils engineer has conducted borings to evaluate the risk. Site-specific liquefaction risks would be evaluated through a project soils report or engineer of record opinion based on neighboring reports and underlying mapping.

Slope Stability and Landslides

Slope instability can occur as a gradual spreading of soil, a relatively sudden slippage, a rockfall, or in other forms. Causes include steep slopes, inherently weak soils, saturated soils, and earthquakes. Improper grading and man-made drainage contribute to slope instability. Slope instability may result in gradual or sudden damage to buildings, roads, and utility lines. The project site is relatively flat, and does not contain slopes or hillsides.

Discussion

a.1. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

a.2. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

The project would result in the construction of new residential and mixed-use commercial/residential buildings on the project site. There are no active or potentially active fault lines crossing the project site. The nearest active fault is the Los Osos Fault, which runs northwest/southeast outside of the City limits, and does not pass through the project site (City of San Luis Obispo 2012).

Although no faults have been mapped across the project site, seismic events caused by active and potentially active faults in the region could result in seismic ground shaking on-site. The City is within Seismic Zone 4. A seismic hazard cannot be completely avoided in these regions; however, effects can be minimized by implementing requirements specified in the California Building Code (CBC). The CBC (incorporates the Uniform Building Code) and the California Division of Mines and Geology Guidelines for Evaluating and Mitigating Seismic Hazards in California, Special Publication 117 (revised 2008), includes design and construction requirements related to fire safety, life safety, and structural safety. Compliance with existing building standards would minimize potential safety hazards from seismic ground shaking, and ensure impacts associated with the project would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.3. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

c. Would the project be located on a geologic unit or soil that is made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

d. Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Development on the project site under the proposed project would be required to comply with the CBC, the City of San Luis Obispo Municipal Code, and applicable General Plan policies. As discussed in Items a.1 and a.2 above, development on the project site would be required to comply with applicable City Municipal Code Requirements and the CBC, which require documentation of soil characteristics for designing structurally sound buildings to ensure new structures are built to resist ground shaking, liquefaction risks, and unstable expansive soils. Policy 4.7 of the Safety Element of the City General Plan states that development may be located in areas of high liquefaction potential only if a site-specific investigation by a qualified professional determines that the proposed development would not be at risk from settlement and liquefaction. In addition, the City requires that preliminary grading and drainage reports would be prepared as part of future development of the site facilitated by the proposed project. However, because such analyses have not been completed, development of the site could result in the exposure of people or structures to liquefaction hazards. Therefore, potential geotechnical hazards would be a potentially significant

impact. Implementation of Mitigation Measures GEO-1 is required to ensure that the project would not expose people or structures to adverse geologic effects.

Mitigation Measure

Implementation of Mitigation Measure GEO-1 would reduce impacts regarding the project's potential geologic hazards.

GEO-1 **Site Geotechnical Study.** 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. In addition to a liquefaction analysis, the Geotechnical Study shall include an evaluation of the potential for soil settlement and soil expansion beneath the project site. All on-site structures shall comply with applicable methods of State and Local Building Codes.

Future development of the site shall incorporate all applicable engineering requirements and recommendations as presented in the Geotechnical Study. Suitable measures to reduce liquefaction, settlement, and soil expansion impacts may 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;
- In-situ densification of soils or other alterations to the ground characteristics; or
- Other alterations to the ground characteristics.
- Excavation and re-compaction of on-site or imported soils;
- Treatment of existing soils by mixing a chemical grout into the soils prior to re-compaction; 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.

Plan Requirements and Timing. The Applicant shall submit a geotechnical study in accordance with this mitigation measure for approval prior to site development. Applicable engineering requirements shall be incorporated into project site plans submitted for approval before the issuance of grading and building permits.

Monitoring. The Community Development Department shall verify compliance prior to issuance of grading permits. The Community Development Department shall site inspect to ensure development is in accordance with approved plans prior to occupancy clearance. Community Development staff shall verify installation in accordance with approved building plans.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

a.4. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The project site is generally flat, without slopes, hills, or mountains that would expose people or structures to risks regarding landslides. As identified in the Safety Element of the City General Plan, the project is not located in an area identified with landslide hazards. There would be no impact.

NO IMPACT

b. Would the project result in substantial soil erosion or the loss of topsoil?

The site is previously developed, generally flat, and located in a partially-developed area of the City. The most significant source of potential erosion of on-site would be during initial site ground disturbance/construction and from stormwater runoff. Stormwater runoff is discussed in detail in Section 9, *Hydrology and Water Quality*. The project applicant would be required to develop a Stormwater Control Plan which would describe design requirements to address the collection of stormwater and the direction of run off flow to on and off site drainages. In addition, the project applicant would be required to develop and implement a Storm Water Pollution Prevention Plan (SWPPP), which would describe best management practices to minimize on- and off-site erosion and sediment run off during construction. Preparation of the required Stormwater Control Plan and SWPPP would ensure that the project would not result in substantial temporary or long-term erosion or loss of topsoil. In addition, the required dust-reduction measures discussed in Section 3, *Air Quality* would further reduce soil erosion and loss of top soil during construction.

LESS THAN SIGNIFICANT IMPACT

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

A private septic system was previously utilized on-site, and has been abandoned since 2008. The project would connect to the City sanitary sewer system, and would not require the use of septic tanks or other alternative wastewater disposal systems. There would be no impact regarding soil capability.

NO IMPACT

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7 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	■	☐
b. Conflict with any applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gases?	☐	☐	■	☐

Setting

In response to an increase in man-made GHG concentrations over the past 150 years, California has implemented legislation to reduce statewide emissions. Assembly Bill 32 (AB 32) codifies the Statewide goal of reducing emissions to 1990 levels by 2020 (essentially a 15% reduction below 2005 emission levels) and the adoption of regulations to require reporting and verification of statewide GHG emissions. Senate Bill 32 (SB 32) extends AB 32, requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030.

On December 14, 2017, the California Air Resources Board (ARB) adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 statewide target set by SB 32. The 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with a statewide per capita goal of six metric tons (MT) CO_2e by 2030 and two MT CO_2e by 2050 (ARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level), but not for specific individual projects because they include all emissions sectors in the State.

The vast majority of individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15064[h][1]).

Significance Thresholds

The City of San Luis Obispo has not adopted GHG emissions thresholds for use in CEQA documents. In March 2012, the SLOAPCD adopted CEQA thresholds for GHG emissions. Based on the adopted

SLOAPCD guidance, the following three quantitative thresholds may be used to evaluate the level of significance of GHG emissions impacts for residential and commercial projects:

1. *Qualified GHG Reductions Strategies. A project would have a significant impact if it is not consistent with a qualified GHG reduction strategy that meets the requirements of the State CEQA Guidelines. If a project is consistent with a qualified GHG reduction strategy, it would not have a significant impact; OR,*
2. *Bright-Line Threshold. A project would have a significant impact if it exceeds the "bright-line threshold" of 1,150 metric tons CO_2e/year; OR,*
3. *Efficiency Threshold. A project would have a significant impact if the efficiency threshold exceeds 4.9 metric tons of CO_2e/service population/year. The service population is defined as the number of residents plus employees for a given project.*

The efficiency threshold is specifically intended to avoid penalizing large-scale plans or projects that incorporate emissions-reducing features and/or that are located in a manner that results in relatively low vehicle miles traveled. The City of San Luis Obispo Climate Action Plan, adopted in 2012, serves as the City's qualified GHG reduction strategy. The GHG-reducing policy provisions contained in the Climate Action Plan were prepared with the purpose of complying with the requirements of AB 32 and achieving the goals of the AB 32 Scoping Plan.

The 2017 Scoping Plan provides a framework for achieving the 2030 statewide target set by SB 32. The 2017 Scoping Plan does not provide project-level thresholds for land use development, but recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with a statewide per capita goal of 6 MT CO_2e by 2030 and 2 MT CO_2e by 2050. As stated in the 2017 Scoping Plan, these goals are appropriate for plan-level analyses. Therefore, the project's contribution to cumulative GHG impacts would be cumulatively considerable if development under the proposed project would result in annual GHG emissions that would exceed 6 MT CO_2e per capita.

Methodology

Calculations of CO_2, CH_4, and N_2O emissions are provided to identify the magnitude of potential project effects. The analysis focuses on CO_2, CH_4, and N_2O because these make up 98.9 percent of all GHG emissions by volume (IPCC 2007) and are the GHG emissions that the project would emit in the largest quantities. Fluorinated gases, such as HFCs, PFCs, CFCs, and SF_6, which are primarily associated with industrial processes, were also considered for the analysis. However, because the project is a residential and commercial development, the quantity of fluorinated gases would not represent a substantial proportion of emissions from development on the project site. Emissions of all GHGs are converted into their equivalent global warming potential in terms of CO_2 (CO_2e). Calculations are based on the methodologies discussed in the California Air Pollution Control Officers Association (CAPCOA) CEQA and Climate Change white paper (2008) and included the use of the California Climate Action Registry General Reporting Protocol (2009). GHG emissions associated with the project were calculated using the most recent version of CalEEMod (version 2016.3.2) (refer to Appendix A for CalEEMod emissions results and assumptions).

Construction Emissions

Construction of the project would generate temporary GHG emissions primarily as a result of operation of construction equipment on-site, as well as from vehicles transporting construction

workers to and from the project site. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling. This analysis assumes 25,000 cubic yards of soil would be imported to the site. CalEEMod provides an estimate of emissions associated with the construction period, based on parameters such as the duration of construction activity, area of disturbance, and anticipated construction.

CAPCOA does not discuss whether any of the suggested threshold approaches adequately address impacts from temporary construction activity. As stated in the CEQA and Climate Change white paper, "more study is needed to make this assessment or to develop separate thresholds for construction activity" (CAPCOA 2008). Nevertheless, air districts such as the SLOAPCD have recommended amortizing construction-related emissions over the life of the project; SLOAPCD suggests the life of a project is typically 50 years for residential projects and 25 years for commercial projects (SLOAPCD 2012). The project includes commercial uses; therefore, to provide a conservative estimate of construction emissions, emissions were amortized over the shorter project lifetime estimate of 25 years.

Operational Emissions

CalEEMod provides operational emissions of CO_2, N_2O, and CH_4. Emissions from energy use include emissions from electricity and natural gas use. The emissions factors for natural gas combustion are based on the United States Environmental Protection Agency's (U.S. EPA's) AP-42 (Compilation of Air Pollutant Emissions Factors) and California Climate Action Registry. Electricity emissions are estimated by multiplying the energy use by the carbon intensity of the utility district per kilowatt hour (CalEEMod User Guide 2017). The default electricity consumption values in CalEEMod include the California Energy Commission-sponsored California Commercial End Use Survey and Residential Appliance Saturation Survey studies.

Emissions associated with area sources, including consumer products, landscape maintenance, and architectural coating were estimated in CalEEMod based on standard emission rates from ARB, U.S. EPA, and emission factor values provided by the local air district (CalEEMod User Guide 2017).

Emissions from waste generation were estimated in CalEEMod and are based on the IPCC's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste (CalEEMod User Guide 2017). Waste disposal rates by land use and overall composition of municipal solid waste in California were based on data available from the California Department of Resources Recycling and Recovery (CalRecycle).

Emissions from water and wastewater usage were estimated in CalEEMod based on the default electricity intensity from the California Energy Commission's *2006 Refining Estimates of Water-Related Energy Use in California*, using the average values for northern and southern California.

For mobile sources, CO_2 and CH_4 emissions from vehicle trips to and from the project site were estimated using CalEEMod based on vehicle trip generation rates from the Draft Multimodal Transportation Impact Study prepared by Central Coast Transportation Consulting (Appendix E). Because CalEEMod does not calculate N_2O emissions from mobile sources, N_2O emissions were estimated using the California Climate Action Registry General Reporting Protocol (CAPCOA 2009) direct emissions factors for mobile combustion (Appendix A provides calculations). Rates for N_2O emissions were based on the vehicle fleet mix output generated by CalEEMod and the emission factors found in the California Climate Action Registry General Reporting Protocol.

Because the project site is currently developed with a mobile home park, existing operational emissions from this use were estimated and subtracted from the anticipated emissions under the

proposed project's emissions, to establish the net increase in GHG emissions that would occur as a result of redevelopment of the project site. Operational emissions associated with the existing mobile home park include area and utility emissions, as well as mobile emissions from vehicle trips entering and exiting the site.

Service Population

The service population of a project is the number of residents plus employees. As discussed in Section 13, *Population and Housing*, the project would add approximately 498 new residents to the City of San Luis Obispo. In addition, based on employment generation rates for retail uses from the SLOAPCD's *CEQA Air Quality Handbook* (SLOAPCD 2012), the project would result in a net increase of approximately 24 new employees (1.39 employees per 1,000 feet). Therefore, the total service population would be 522 persons.

Discussion

a. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction activities, energy use, daily operational activities, and mobile sources (traffic) associated with development under the proposed project would result in new GHG emissions. Project-related construction emissions are confined to a relatively short period of time in relation to the overall life of the project. Therefore, construction-related GHG emissions were amortized over a 25-year period to determine the annual construction-related GHG emissions over the life of the project. Table 5 shows construction emissions for the project.

Table 5 Construction Greenhouse Gas Emissions

Year	Construction Emissions (MT CO_2e/yr)
Total	2,050
Total Amortized over 25 Years	82
See Appendix A for CalEEMod worksheets	

As shown in Table 5, construction would result in an annualized average of 82 MT CO_2e/yr.

Table 6 shows the project's total annual GHG emissions, including operational emissions and annualized construction emissions.

Table 6 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (MT CO_2e/yr)
Construction	82
Operational	
Area	6
Energy	612
Solid Waste	67
Water	63
Mobile	
CO_2 and CH_4	1,695
N_2O [1]	94
Proposed Total	**2,619**
Existing Total[2]	279
Net (Proposed – Existing)	2,340
Service Population [2]	522 persons
Total MT CO_2e/SP/year	**4.5 CO_2e/SP/year [3]**
SLOAPCD GHG Emissions Threshold	**4.9 MT CO_2e/SP/year**
Project Population	498 persons
Total MT CO_2e per capita/year	**4.7 CO_2e per capita/year [3]**
2017 Scoping Plan 2030 Per Capita Emissions Goal	**6.0 MT CO_2e per capita/year**

[1] N_2O output is not calculated by CalEEMod. See *N_2O Mobile Emissions* Worksheet in Appendix A

[2] 498 new residents plus 24 new employees.

[3] All numbers may not sum exactly due to rounding.

See Appendix A for CalEEMod worksheets.

As shown in Table 6, the development under the proposed project would result in approximately 4.5 MT CO_2e per service population per year, or 4.7 MT CO_2e per capita per year. The project's annualized GHG emissions would not exceed the SLOAPCD GHG emissions threshold of 4.9 MT CO_2e or the 2017 Scoping Plan statewide 2030 per capita emissions goal of 6.0 MT CO_2e per capita per year. Therefore, the project's GHG emissions impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

CAP Consistency

The City of San Luis Obispo Climate Action Plan (CAP) serves as a qualified GHG reduction strategy consistent with *State CEQA Guidelines*. The CAP outlines a course of action to improve environmental, social, and economic sustainability and includes six emission reductions strategies: 1) buildings, 2) renewable energy, 3) transportation and land use, 4) water, 5) solid waste, and 6) parks and open space. A project is considered consistent with the City's CAP if it includes provisions to further the emissions reduction goals in the Plan. Measures and goals from the CAP include transportation and land use goals that promote residential developments in close proximity to transit development and commercial areas to reduce the need for commuting, promoting mixed–use development, and to implement water conservation techniques. The proposed project would locate mixed-use development in close proximity to stops on the SLO Transit 1A (Johnson/Tank Farm) route, as well as commercial business park and industrial uses south of Tank Farm and east of Broad Street. The project would not conflict with any of the goals, policies, and programs of the Climate Action Plan. Therefore, the project would be consistent with the Climate Action Plan.

Senate Bill 32

The 2017 Scoping Plan provides a framework for achieving the 2030 statewide emissions target codified by SB 32, and recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with a statewide per capita goal of six metric tons (MT) CO_2e by 2030 and two MT CO_2e by 2050 (ARB 2017). As discussed above, the project would not conflict with the goals of the locally-adopted GHG reduction strategy, and would not exceed the SLOAPCD GHG emissions threshold of 4.9 MT CO_2e or the 2017 Scoping Plan statewide 2030 per capita emissions goal of 6.0 MT CO_2e per capita per year. Because the project would be consistent with the 2017 Scoping Plan, which has been developed to achieve the statewide emissions target set by SB 32, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

8 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	■	☐
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?	☐	☐	■	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	☐	■
d. Be located on a site that is included on a list of hazardous material 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?	☐	☐	☐	■
e. For a project located in 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?	☐	☐	■	☐
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?	☐	☐	■	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
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?	☐	☐	☐	■

Setting

Airport Safety Hazards

The project site is located within the jurisdiction of both the San Luis Obispo County Regional Airport Land Use Plan (ALUP) adopted by the San Luis Obispo County Airport Land Use Commission (ALUC) in 1973 and updated in 2005. The project site is also located in the City's Airport Overlay Zone (AOZ) as identified in Chapter 7 of the City's 2014 Land Use and Circulation Element Update, which includes guidance regarding airport safety issues. It should be noted that the ALUP is currently undergoing an update, which is expected to be completed in late 2019. Both documents put forth standards for development intensity within airport safety zones, and identify potential airport safety hazards using similar, but different criteria governing allowable types and intensity of future development and the location of safety zones based on differences in mapping. The ALUC oversees development subject to the ALUP to ensure safety, while the City has ultimate jurisdiction over potential land use decisions and future development. This section briefly describes the operations at the Airport and associated physical safety hazards associated with the project site in terms of both the ALUP and the Land Use and Circulation Element safety standards.

The 2014 Airport Land Use Compatibility Report prepared by Johnson Aviation in support of the City's recent Land Use and Circulation update process and the LUCE Update EIR analyzed potential airport hazards and included recommendations to update safety and hazards planning around the Airport based on guidance from the Caltrans California Airport Land Use Planning Handbook (CALUPH) and other sources. The CALUPH describes the characteristics of "ideal" safety zones such as "easily definable geometric shapes," a limited number of five or six zones, a distinct progression in the degree of safety risk farther from the runway, providing that "each zone should be as compact as possible." The Land Use Element and associated Airport Safety Zones implement these suggested standards by identifying six revised safety zones that represent distinct progression in the degree of safety risk farther from the runway. These Airport Safety Zones are supported by Land Use Element and Circulation Element policies, programs, and development standards consistent with those guidelines.

San Luis Obispo County Regional Airport

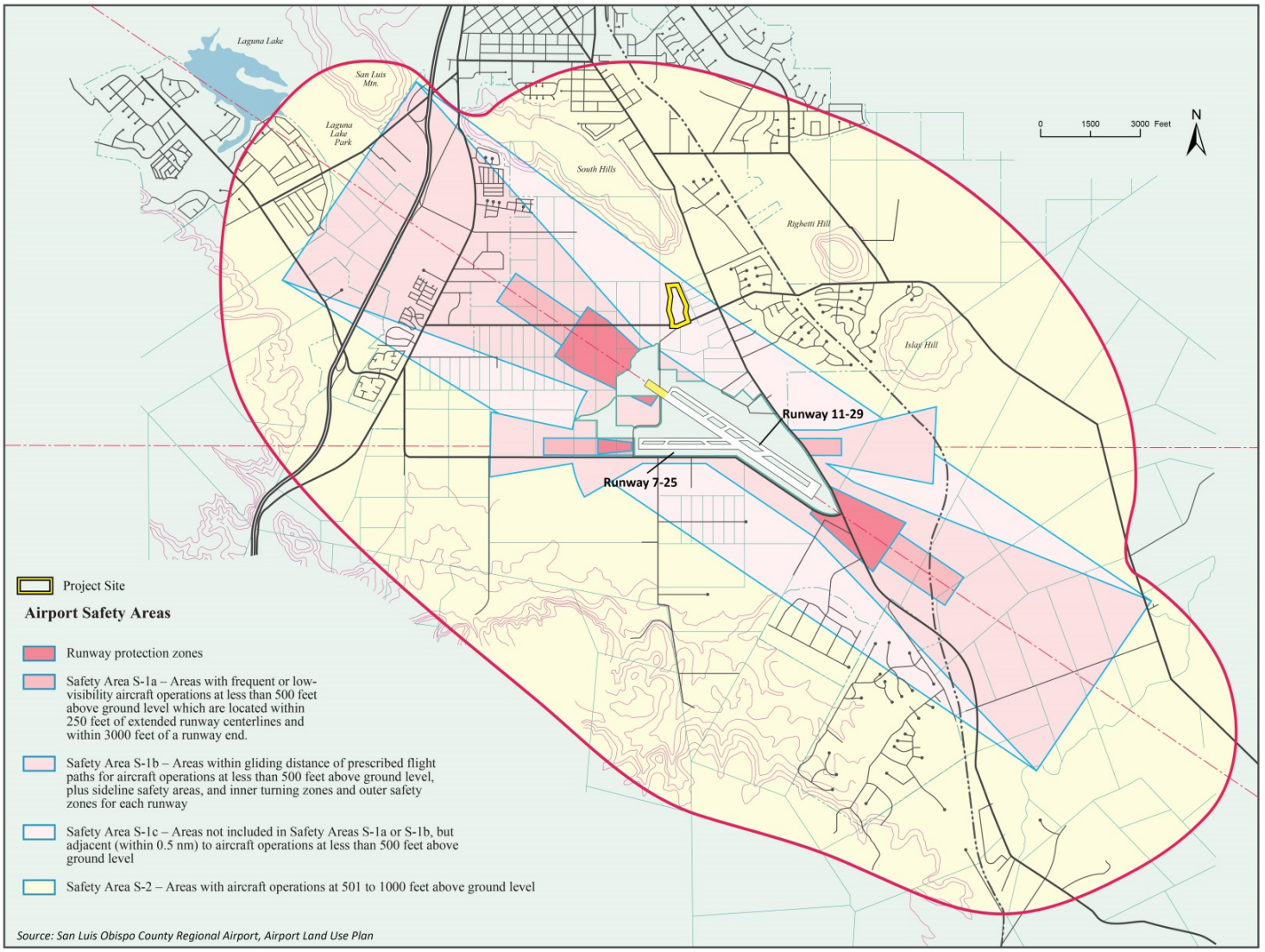
The Airport provides commuter, charter, and private aviation service to the City of San Luis Obispo and vicinity. The primary hazard associated with land uses near the airport is the risk of aircraft incidents on approach and take-off. Aircraft flight operations are determined largely by the physical layout of the airport and rules of the Federal Aviation Administration (FAA) (City of San Luis Obispo 2014). The Airport has had a mix of commercial airline service and general aviation operations for most of its history. At the time of the San Luis Obispo County Regional Airport (SBP) Master Plan Update (adopted in 2005), business aviation accounted for approximately 5 percent of general aviation operations, with most general aviation operations being flight training and leisure flying. The split of general aviation operations at the Airport averaged 60 percent itinerant and 40 percent local, and military operations accounted for less than 1 percent of total operations. Enplaned air cargo at the Airport was growing at an average annual rate of 2.4 percent (Johnson Aviation 2014). In 2015, the split of general aviation operations averaged 66 percent itinerant and 34 percent local, with military operations continuing to account for less than 1 percent of total operations (San Luis Obispo County Regional Airport 2015).

There are two runways at the Airport (see Figure 10). Runway 11-29 is utilized for most aircraft operations, with 97 percent of all aircraft operating at the Airport using this runway for departures and arrivals, as well as touch-and-go flights. Runway 7-25 is mostly used by small, light, general aviation flights, only for General Aviation propeller aircraft. Both runways have parallel taxiways. According to the Aviation Safety Areas Map of the ALUP, the project site is located northeast of Runway 11-29, and is within Airport Safety Areas S-1c, which is the vicinity where aircrafts operate frequently or in conditions of reduced visibility at altitudes less than or equal to 500 feet above ground level (agl).

AVIATION ACCIDENTS AT SAN LUIS OBISPO COUNTY REGIONAL AIRPORT

According to the California Airport Land Use Planning Handbook Accident Study, 68 percent of aviation accidents occur over or within an airport, and accidents sites tend to occur close to the extended runway centerline (Johnson Aviation 2014). There had been a total of 33 aviation accidents or incidents associated with the Airport, six of which resulted in fatalities, between 1984 and 2014. Of these, five incidents resulting in emergency landings within Land Use Element and Circulation Element defined AOZs between 1984 and 2014, none of which resulted in an on-ground fatality or occurred within or adjacent to the project site.

Figure 10 San Luis Obispo Regional Airport Safety Zones and Runways



Discussion

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b. Would the project 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?

The project includes the construction and operation of new commercial and residential development. These uses would not involve the use or storage of large quantities of hazardous materials. Small quantities of potentially hazardous materials such as fuels, lubricants, and solvents would be used during construction of the project. California Health and Safety Code, Division 20, Chapter 6.5, and California Code of Regulations Title 22 – Hazardous Waste Management states that waste that is toxic, corrosive, flammable, or reactive when tested in accordance with the California Code of Regulations, Title 22, Article 11, Section 66693, must be handled, stored, transported, and disposed of in accordance with these regulations, which are more stringent than federal regulations.

The transport of materials during the construction of the project could pose a threat to residents and people in the area. An accident involving such trucks could potentially expose nearby people to health hazards. However, U.S. EPA and U.S. Department of Transportation laws and regulations have been promulgated to track and manage the safe interstate transportation of hazardous materials and waste. U.S. EPA administers permitting, tracking, reporting, and operations requirements established by the Resource Conservation and Recovery Act (RCRA). U.S. Department of Transportation regulates the transportation of hazardous materials through implementation of the Hazardous Materials Transportation Act. This act administers container design, labelling, and driver training requirements. State and local agencies enforce the application of these acts and provide coordination of safety and mitigation responses in the case that accidents involving hazardous materials occur. Enforcement of these regulations and rapid response by local agencies would ensure that hazards to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment are less than significant.

In addition, the project would be required to adhere to all federal, state, and local regulations, as well as the policies in the City of San Luis Obispo Safety Element, which discuss safety and reducing the risks of hazardous material exposure. Program 9.6 of the City's Safety Element states that the City shall ensure that transportation of hazardous materials follows Caltrans-approved routes, and that all necessary safety precautions are taken to prevent hazardous material spills.

LESS THAN SIGNIFICANT IMPACT

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

The nearest school to the site is the Montessori School at Unity, located approximately one and a half miles to the northeast. There are no schools within 0.25 miles of the project site, and the project would not emit or handle large quantities of hazardous materials.

NO IMPACT

d. Would the project be located on a site included on a list of hazardous material 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?

Rincon reviewed the Department of Toxic Substances Control (DTSC) - EnviroStor online database and the State Water Resources Control Board - Geotracker online database for potential hazardous material sites and contamination at the project site. No listed hazardous material sites/facilities or active clean ups were identified on or adjacent to the site, and no listed Federal Superfund sites were identified in the City of San Luis Obispo (DTSC 2017, SWRCB 2017). Therefore, construction of the project would not result in hazards to the public or the environment.

NO IMPACT

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?

f. For a project near a private airstrip, would it result in a safety hazard for people residing or working in the project area?

Airport safety is primarily related to the potential for operational aircraft accidents such as emergency landings, or in rare cases crashes, as well as ensuring that land use development is carried out in manner that minimizes or avoids risks associated with such aircraft incidents or accidents. Minimizing or avoiding risks to residential land uses involves designating areas around the ends of runways that must be free of objects or sensitive land uses, limiting the height of new structures in the surrounding airspace, and understanding historical accident patterns. The risk of an aircraft accident increases with proximity to the runway and its approach path, and airport land use planning documents generally discourage development in the zones closest to the ends of runways to prevent placing people at risk of aircraft-related hazards. As shown in Figure 10 the project site is located approximately 1,500 feet northeast of Runway 11-29, which has a northwest-southeast orientation. The project site is within Airport Safety Areas S-1c, which is the vicinity where aircrafts operate frequently or in conditions of reduced visibility at altitudes less than or equal to 500 feet above ground level (agl).

However, the project site is not within the trajectory of defined aircraft flight paths for Runway 11-29, the extended runway centerline, or in the probable gliding distance for aircraft in expected approach or departure courses depicted in the ALUP. In addition, the project does not include any large public gathering areas, high intensive lightings, or tall obstructing uses. Because prevailing flight patterns would not affect the project site, there would be a reduced likelihood of air traffic accidents. Furthermore, the project does not include obstructions that pose risks to air navigation, and the project would not otherwise expose people or workers to airport related risks.

The ALUC has reviewed the project and determined that development facilitated under the proposed General Plan Amendment, Specific Plan Amendment, and rezone would be consistent with the ALUP. Therefore, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

g. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction of new residential and commercial structures on the project site would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. The project would be required to comply with San Luis Obispo Fire Department specifications and Chapter 5 of the California Fire Code, which would ensure that the project does not interfere with emergency response or evacuation procedures.

LESS THAN SIGNIFICANT IMPACT

h. Would the project 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?

As identified in the Safety Element of the City General Plan, the site is not located in a moderate, high, or very high fire hazard severity zone. The project site and surrounding parcels do not contain wildlands, forests, or dense vegetation that would expose the project to wildfire risk. In addition, the project would be required to adhere to the 2013 CBC Chapter 7A Partial Requirements which requires certain construction materials and methods to minimize wildfire exposure hazards. These include Class A fire rated roof assemblies, flame and ember intrusion resistant vents, and non-combustible building side materials.

NO IMPACT

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9 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	■	☐
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 or the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	■	☐
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 that would result in substantial erosion or siltation on- or off-site?	☐	☐	■	☐
d. Substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	■	☐
e. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	■	☐
f. Otherwise substantially degrade water quality?	☐	☐	■	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g. Place housing in a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map?	☐	■	☐	☐
h. Place structures in a 100-year flood hazard area that would impede or redirect flood flows?	☐	■	☐	☐
i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including that occurring as a result of the failure of a levee or dam?	☐	☐	☐	■
j. Result in inundation by seiche, tsunami, or mudflow?	☐	☐	☐	■

Setting

Drainage Patterns

The project site is located in the San Luis Obispo Creek Watershed, which drains an area of approximately 84 square miles, including the City of San Luis Obispo and its surrounding hills, mountains, and valleys. According to the San Luis Obispo Waterway Management Plan, average seasonal precipitation in the City of San Luis Obispo is approximately 21 inches. Because the City is part of a coastal watershed, it is subject to wide ranges in precipitation from droughts to heavy storms (City of San Luis Obispo 2003).

The project is located between Orcutt Creek and Acacia Creek. Orcutt Creek is an ephemeral stream that flows in a southwesterly direction to meet Acacia Creek south of the project site. Acacia Creek is an ephemeral stream that borders the western boundary of the project site and serves as a tributary to the East Fork of San Luis Obispo Creek.

Water Quality

Neither Orcutt Creek nor Acacia Creek is on the 2012 Clean Water Act Section 303(d) list of impaired waters for pathogens (State Water Resources Control Board 2018). Groundwater quality in the San Luis Obispo Groundwater Basin has been reduced in part due to the degradation of surface waters in San Luis Obispo Creek. Groundwater in the unconfined aquifers within the basin contains high levels of nitrates, iron, manganese, and organic compounds.

Discussion

a. Would the project violate any water quality standards or waste discharge requirements?

f. Would the project otherwise substantially degrade water quality?

The protection of water quality is under the jurisdiction of the RWQCB. The project would be required to comply with all state and federal requirements pertaining to the preservation of water quality. A National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activities is required when a project involves clearing, grading, disturbances to the ground (such as stockpiling), or excavation that would result in soil disturbances of one or more acres of total land area. Coverage under the General Permit must also be obtained prior to construction and the preferred project is subject to these requirements.

Under the conditions of the General Permit, the developer would be required to eliminate or reduce non-storm water discharges to waters of the nation, develop and implement a Storm Water Pollution Prevention Plan (SWPPP) for the project construction activities, and perform inspections of the storm water pollution prevention measures and control practices to ensure conformance with the site SWPPP. The General Permit prohibits the discharge of materials other than storm water discharges, and prohibits all discharges that contain a hazardous substance in excess of reportable quantities established at 40 CFR 117.3 or 40 CFR 302.4. The General Permit also specifies that construction activities must meet all applicable provisions of Sections 30 and 402 of the Clean Water Act. Conformance with Section 402 of the Clean Water Act would ensure that the preferred project does not violate any water quality standards or waste discharge requirements.

In addition, the project would be required to comply with the City's and RWQCB's Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region. To demonstrate compliance, a Stormwater Control Plan would be required for the project. Based on compliance with these existing State and local regulations, the project would not violate any water quality standards or waste discharge requirements, or substantially degrade surface or groundwater quality, and potential water quality impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering or the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?

The project site is currently developed with mobile homes and surface parking areas. There is an existing water well on the project site, which may be used for future non-potable water use, depending on City review of water quality testing data from the well. If not utilized for non-potable water, the City would be expected to require that this well be destroyed (capped) consistent with all applicable State and local requirements or dedicated to the City for water quality and groundwater monitoring.

The City of San Luis Obispo no longer draws groundwater for potable purposes as of 2015. As discussed in Section 18, *Utilities and Service* Systems, potable water for future residential and commercial uses developed under the proposed project would be served by the existing City's sewer and water systems. The project site includes open space permeable vegetated areas and a

stormwater retention basin, which would aid in groundwater recharge. Therefore, the project would not substantially deplete groundwater supplies and would not interfere with groundwater recharge.

LESS THAN SIGNIFICANT IMPACT

c. Would the project 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 that would result in substantial erosion or siltation on- or off-site?

d. Would the project substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?

e. Would the project create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Future development facilitated by the proposed project would include re-grading of the project site to raise building ground elevations above the existing 100-year floodplain (discussed further in items g and h below). Re-grading would alter the existing drainage pattern on the project site. However, the City would require preliminary grading and drainage reports be prepared as part of future development of the site facilitated by the proposed project. These reports would include the anticipated amount of fill material (currently anticipated to require approximately 25,000 cubic yards) and the limits of a proposed revised AE flood zone. The final grading plan would be required to be consistent with the requirements in the City's Drainage Design Manual (DDM), matching post-development flows to pre-development for the 2-year through 100-year storm events. The proposed detention facilities and stormwater conveyance infrastructure would change the way water is conveyed through the site and would result in changes to stormwater management control and peak surface flows. However, the proposed detention structures and drainage facilities would be required to meet applicable City requirements to ensure that runoff flows are either less than or equal to existing conditions. This would ensure that the project does not result in an increase in post-development peak runoff from the project site.

LESS THAN SIGNIFICANT IMPACT

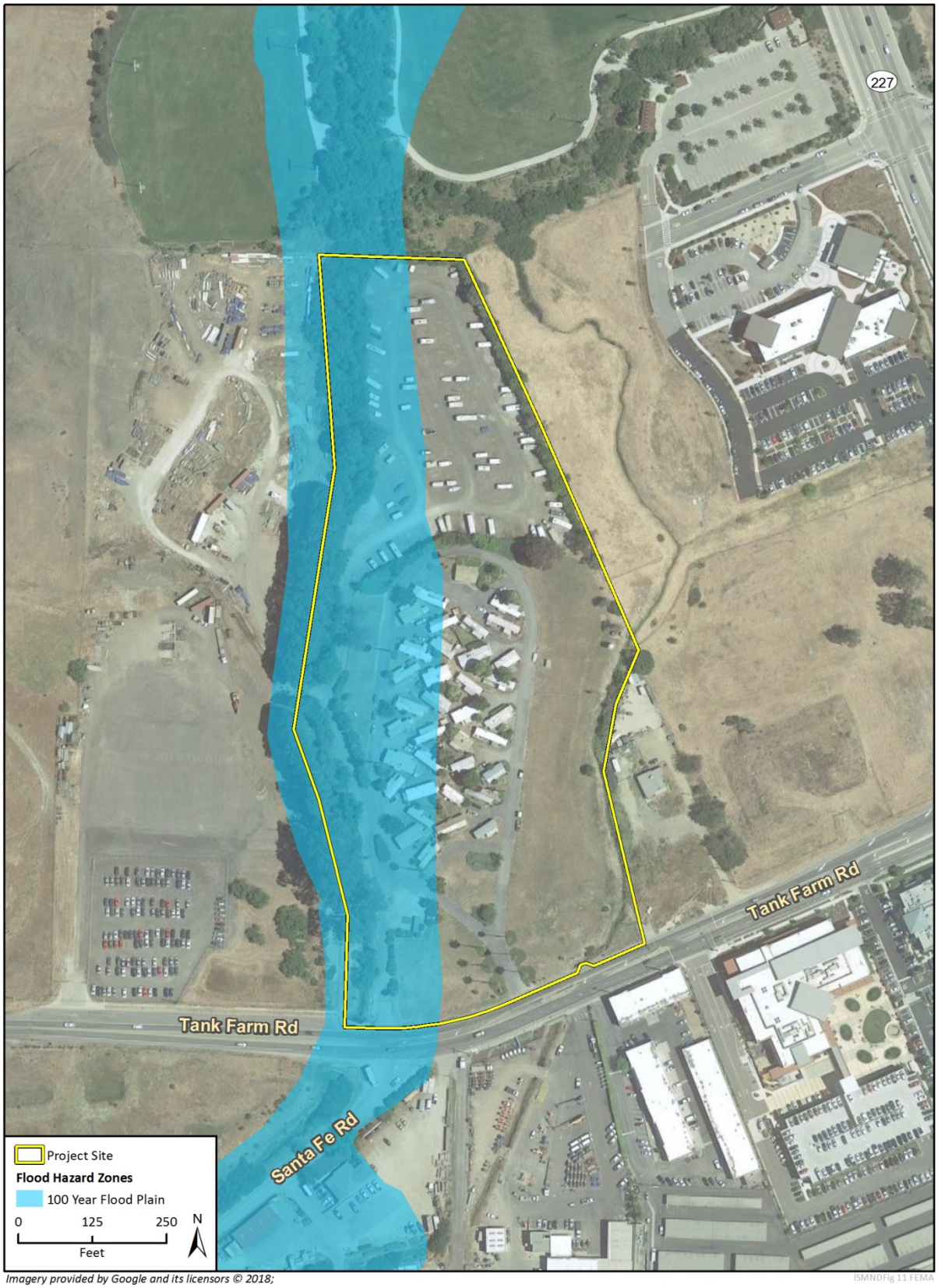
g. Would the project place housing in a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map?

h. Would the project place structures in a 100-year flood hazard area that would impede or redirect flood flows?

The project site is located between Orcutt Creek to the west and Acacia Creek to the east. As shown in Figure 11, approximately half of the site is currently located in a flood area susceptible to 100-year flood hazards. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map 06079C1332G, the project site is located in Zone A, which is an unstudied zone where no base flood elevations have been determined, but is potentially susceptible to a 1% annual chance flood (FEMA 2012).

Future development facilitated by the proposed project would require re-grading of the property to increase elevations on the westward portion of the project site, and installation of detention/retention and drainage facilities. Re-grading the project site to accommodate future development is expected to require approximately 25,000 cubic yards of fill material. Residential

Figure 11 FEMA Flood Hazard Area



Imagery provided by Google and its licensors © 2018;
Additional data provided by FEMA, 2017.

and commercial building pads on the central portion of the project site would be elevated above the post-development 100-year floodplain consistent with standards in the Special Floodplain Management Zone Regulations. This would ensure that no housing would occur within the 100-year floodplain, based on the City's hydrologic and hydraulic models, and would ensure compliance with the City Floodplain Management Regulations Code 17.84.050.

In addition, the City's Floodplain Management Regulations require that projects within the 100-year FEMA floodplain prepare a Master Drainage Plan, which demonstrates that new development would not cause the 100-year flood elevation to increase more than 2.5 inches, cause stream velocities to increase more than 0.3 feet per second, or cause a significant net decrease in floodplain storage volume unless the conditions listed in the Managed Fill Criteria of the DDM are met.

Prior to any development, the project would also require a conditional letter of map revision (CLOMR-F) application[1] requesting that the FEMA 100-year floodplain boundary be redefined. With the implementation of these measures, the project would be in compliance with FEMA and City floodplain regulations and potential floodplain elevation increases affecting other properties would be avoided. However, Mitigation Measure HYD-1 is required to ensure the final grading plan and resulting post-development floodplain would exclude areas proposed for housing, and confirm that the CLOMR application to redefine the FEMA 100-year floodplain boundary is approved and an official letter of map revision (LOMR-F)[2] is issued by FEMA.

Mitigation Measure

Implementation of Mitigation Measure HYD-1, would reduce impacts regarding the project's location in a floodplain hazard area.

HYD-1 **Conditional Letter of Map Revision/Letter of Map Revision**. The applicant shall prepare the CLOMR application and obtain a LOMR from FEMA.

Plan Requirements and Timing. The applicant shall prepare the CLOMR application and submit it to FEMA.

Monitoring. The City will confirm that FEMA has approved the CLOMR prior to issuance of a grading permit, and LOMR prior to issuance of a building permit.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

i. Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including that occurring as a result of the failure of a levee or dam?

j. Would the project result in inundation by seiche, tsunami, or mudflow?

The project site is located approximately six miles northeast of the Pacific Ocean. Elevations on the project site range from approximately 147 to 176 feet above mean sea level, generally sloping downwards towards Tank Farm Road. The nearest lake is Laguna Lake, approximately two miles west of the site. Due to the proximity and topography between the site and the nearest largest bodies of water, tsunami and seiche impacts would be less than significant. As identified in the City's

[1] A CLOMR is based on proposed conditions and does not change the FIRMs. A CLOMR is the method used by FEMA to let people know that if projects are constructed per the design submitted to and approved by FEMA, revision of the FIRM panel with an official letter of map revision (LOMR) is likely.

[2] A LOMR is an official revision to the FIRMs issued by FEMA. LOMRs reflect changes to the 100-year floodplains or Special Flood Hazard Areas (SFHA) shown on the FIRMs.

Safety Element, the City is not located in a dam inundation area or Tsunami Inundation Zone. There would be no impact associated with flooding as a result of levee or dam failure, or inundation by seiche, tsunami, or mudflow.

NO IMPACT

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10 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	■
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?	☐	☐	■	☐
c. Conflict with an applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	■

Setting

The City has approximately 46,725 residents (California Department of Finance 2017), and covers roughly 13 square miles. Primary land uses in the City include residential development at a low to moderate density, professional services, government facilities, and general retail. The core of the City constitutes a compact urban form, including a downtown area and distinct surrounding neighborhoods. The City is surrounded by a green belt, which defines a separation of urban uses within the City and rural uses outside of the City. The project site currently includes three separate land use/zoning designations with a Specific Plan overlay. The site includes 3.25 acres of Business Park (BP), 6.85 acres of Medium Density Residential (R-2), and 2.65 acres of Open Space (OS).

Discussion

a. Would the project physically divide an established community?

The property was previously utilized as a mobile home park; however the coaches remaining on site are currently vacant. Therefore, no residents would be displaced with the redevelopment of the site. There is one single-family home adjacent to the project site, but this residence does not use the project site for access. The proposed service commercial zoning would be consistent with the surrounding land uses. No project components would divide an established community, or place pressure on adjacent properties for future development.

NO IMPACT

b. Would the project 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?

The Land Use, Circulation, and Housing Elements of the City's General Plan, and the Zoning Ordinance, are the primary land use planning guidance documents for the development pattern of the City. The proposed General Plan Amendment, Specific Plan Amendment and the rezone is consistent with existing general plan goals, programs, and policies, and zoning ordinance requirements for the proposed service commercial zoning. The AASP was recently updated to allow mixed-use projects within the C-S zone, subject to the approval of the Planning Commission. The project will be reviewed by the Planning Commission and the City Council.

The project site is located within the City's ALUP area, and the project was reviewed and deemed consistent with the ALUP on November 18, 2018 by the ALUC. Therefore, the project would be consistent with applicable City goals, policies and programs.

LESS THAN SIGNIFICANT IMPACT

c. Would the project conflict with an applicable habitat conservation plan or natural community conservation plan?

As discussed in Section 4, *Biological Resources*, there are no applicable habitat conservation plans or natural community conservation plans that pertain to the project.

NO IMPACT

11 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	■
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?	☐	☐	☐	■

Setting

Consistent with the requirements of the California's Surface Mining and Reclamation Act of 1975 (SMARA), the State Geologist has classified land based on the known or inferred mineral resource potential. The Mineral Land Classification process identifies lands that contain economically significant mineral deposits and primarily classifies land as Mineral Resource Zones (MRZ) 1-4. The Division of Mines and Geology's Guidelines for Classification and Designation of Mineral Lands, defines MRZs as:

- MRZ-1: Areas of No Mineral Resource Significance
- MRZ-2: Areas of Identified Mineral Resource Significance
- MRZ-3: Areas of Undetermined Mineral Resource Significance
- MRZ-4: Areas of Unknown Mineral Resource Significance/No Known Mineral Occurrence

According to the City's Conservation and Open Space Element, quarries and mines in the San Luis Obispo area previously produced basaltic stone, "red rock," and cinnabar. The extraction of mineral resources is not permitted within City limits (pursuant to Section 17.08.070 of the Zoning Regulations) and there are no active mines located within the project area (DOC 2017).

Discussion

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b. Would the project 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?

The project site is in the Incorporated City Limit of San Luis Obispo and therefore is not within a designated mineral resource zone (Busch and Miller 2011). Based on a review of the Department of Conservation's Division of Oil, Gas, and Geothermal Resources Well Finder, there are no oil or gas

wells or fields on the project site. The project does not propose the exploration or harvesting of oil or gas resources. Because there are no identified significant mineral resources in the project site vicinity, and the project does not propose exploration or mining, there would be no impact on available mineral resources.

NO IMPACT

12 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?		■	□	□
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	□	□	■	□
c. A substantial permanent increase in ambient noise levels above those existing prior to implementation of the project?	□	□	■	□
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	□	■	□	□
e. For a project located in 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?	□	□	■	□
f. For a project near a private airstrip, would it expose people residing or working in the project area to excessive noise?	□	□	■	□

Setting

Noise Background

Noise in this study is defined as the unwanted sound that disturbs sensitive receptors. Environmental noise levels typically fluctuate over time, and different types of noise descriptors are used to account for this variability. Noise level measurements include intensity, frequency, and duration, as well as time of occurrence. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). Because of the way the human ear works, a

sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dBA changes are typically not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise levels typically attenuate (or drop off) at a rate of 6 dBA per doubling of distance from point sources (such as construction equipment). Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance; while noise from a point source typically attenuates at about 6 dBA per doubling of distance. Noise levels may also be reduced by the introduction of intervening structures. For example, a solid wall or berm that breaks the line-of-sight reduces noise levels by approximately 5 to 10 dBA. The construction style for dwelling units in California generally provides a reduction of exterior-to-interior noise levels of about 25 dBA with closed windows (Federal Highway Administration [FHWA] 2006).

The time period in which noise occurs is important since nighttime noise tends to disturb people more than daytime noise. Community noise is usually measured using Day-Night Average Level (Ldn), which is the 24-hour average noise level with a 10-dBA penalty for noise occurring during nighttime (10 PM to 7 AM) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a 5 dBA penalty for noise occurring from 7 PM to 10 PM and a 10 dBA penalty for noise occurring from 10 PM to 7 AM. Noise levels described by Ldn and CNEL typically do not differ by more than 1 dBA. In practice, CNEL and Ldn are often used interchangeably.

Some land uses are more sensitive to ambient noise than other uses due to the characteristics of the exposed populations. For example, residences, motels, hotels, schools, libraries, churches, nursing homes, auditoriums, museums, cultural facilities, parks, and outdoor recreation areas are more sensitive to noise than commercial and industrial land uses. Sensitive receptors near the project site include a single-family residence to the east.

Regulatory Setting

CITY OF SAN LUIS OBISPO GENERAL PLAN AND STATE OF CALIFORNIA NOISE STANDARDS

The Noise Element and Noise Guidebook (1996) of the City of San Luis Obispo General Plan uses modified land use compatibility standards recommended by the California Department of Health Services. The noise criteria for the City and the State of California for current and projected conditions state that the noise intrusive to interior habitable space of residential units from exterior sources should not exceed 45 dBA CNEL. The General Plan Noise Element restricts noise in outdoor living areas due to transportation noise sources to 60 dB CNEL.

The following Noise Element policies are applicable to the project and the local noise environment:

> **Policy 1.4. New Transportation Noise Sources**. Noise created by new transportation noise sources, including road, railroad, and airport expansion projects, shall be mitigated to not exceed the levels specified in Table 4.10-3 for outdoor activity areas and indoor spaces of noise-sensitive land uses which were established before the new transportation noise source.
>
> **Policy 1.6. New Development and Stationary Noise Sources**. New development of noise-sensitive land uses may be permitted only where location or design allow the development to meet the standards of Table 4.10-4, for existing stationary noise sources.

CITY OF SAN LUIS OBISPO MUNICIPAL CODE CONSTRUCTION NOISE STANDARDS

Table 7 and Table 8 show the City's maximum allowable noise levels for short-term operation of mobile equipment and long-term operation of stationary equipment at residential properties. Where technically and economically feasible, the City requires that construction activities that use mobile or stationary equipment which may result in noise at residential properties be conducted so that maximum sound levels from stationary equipment at affected properties would not exceed 60 dBA for single-family residences (Municipal Code 9.12.050). Except for emergency repair of public service utilities, or where an exception is issued by the City Community Development Department, the City prohibits operation of tools or equipment used in construction, drilling, repair, alteration, or demolition work daily between the hours of 7:00 PM and 7:00 AM, or any time on Sundays or holidays, such that the sound creates a noise disturbance across a residential or commercial property line.

Table 7 Maximum Noise Levels for Nonscheduled, Intermittent, Short-term Operation (Less than Ten Days) of Mobile Equipment

	Single-Family Residential	Multi-Family Residential	Mixed Residential/ Commercial
Daily, except Sundays and legal holidays 7:00 a.m. to 7:00 p.m.	75 dBA	80 dBA	85 dBA
Daily, 7:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	60 dBA	65 dBA	70 dBA

Source: City of San Luis Obispo Municipal Code

Table 8 Maximum Noise Levels for Repetitively Scheduled and Relatively Long-Term Operation (Periods of Ten Days or More) of Stationary Equipment

	Single-Family Residential	Multi-Family Residential	Mixed Residential/ Commercial
Daily, except Sundays and legal holidays 7:00 a.m. to 7:00 p.m.	60 dBA	65 dBA	70 dBA
Daily, 7:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	50 dBA	55 dBA	60 dBA

Source: City of San Luis Obispo Municipal Code

VIBRATION IMPACTS

Project construction would potentially expose nearby sensitive receptors to a temporary increase in groundborne vibration levels. Groundborne vibration can expose nearby structures to vibration damage or excessive vibration noise. The ground motion caused by vibration is measured as particle velocity in inches per second (in/sec) peak particle velocity (PPV) and is referenced as vibration decibels (VdB). The City of San Luis Obispo considers construction-related vibration significant if construction-related activities create a vibration which is above the vibration perception threshold. The vibration perception threshold is defined in the City of San Luis Obispo Municipal Code (Section 9.12.050) as "The minimum ground or structure-borne vibrational motion necessary to cause a normal person to be aware of the vibration by such direct means as, but not limited to, sensation by touch or visual observation of moving objects. The perception threshold shall be presumed to be a motion velocity of 0.01 in/sec over the range of 1 to 100 Hz."

Groundborne vibration levels associated with construction activities were estimated based on methods in the 2013 California Department of Transportation's (Caltrans) *Transportation and Construction Vibration Guidance Manual*. Potential vibration levels were identified for onsite and offsite locations that are sensitive to vibration, including adjacent residences. Vibration is estimated based on the equipment used and the attenuated distance from the source.

Caltrans' *Transportation-and Construction-Induced Vibration Manual* (Caltrans 2004) provides general guidance on vibration issues associated with construction and operation of projects in relation to human perception and structural damage. Table 9 indicates vibration levels at which humans would be affected by vibration levels.

Table 9 California Department of Transportation Vibration Annoyance Potential Criteria

Human Response Condition	Maximum Vibration Level (in/sec) for Transient Sources[1]	Maximum Vibration Level (in/sec) for Continuous/Frequent Intermittent Sources[2]
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.10
Severe	2.0	0.4

[1] Transient construction vibrations are generated by a single isolated vibration event, such as blasting or wrecking balls.

[2] Continuous/frequent intermittent vibrations result from equipment or activities such as excavation equipment, static compaction equipment, tracked vehicles, vibratory pile drivers, and vibratory compaction equipment.

Source: California Department of Transportation 2013

In addition, the FTA's Transit Noise and Vibration Impact Assessment (2006) was used to determine whether or not groundborne vibration resulting from project-related construction would cause damage to nearby structures. Damage criteria vary depending on the type of building adjacent to the vibration source. For example, for older residential structures, the construction vibration damage criterion is 98 VdB (0.3 in/sec PPV). For non-engineered timber and masonry ("fragile") buildings, the construction vibration damage criterion is 88 VdB (0.1 in/sec PPV). For the purpose of this analysis, an impact would be significant if construction vibration from continuous/ frequent intermittent sources exceeds 98 VdB (0.3 in/sec PPV).

Discussion

a. Would the project result in 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?

A Sound Level Assessment was prepared by 45dB Acoustics in March 2017 (refer to Appendix D). Existing sound levels were measured on the project site, and an acoustic software modeling tool was used to estimate sound level contours based on topography, noise sources (including vehicle traffic along Tank Farm Road and noise from airplanes taking off and landing at San Luis Obispo Regional Airport), and measured sound level values. As described in the South Level Assessment, the measured and estimated sound levels on the project site are primarily a result of vehicle traffic along Tank Farm Road. Future noise levels from vehicle traffic along Tank Farm Road after buildout of future development on the project site (including anticipated future traffic growth of

approximately two percent per year) would result in an increase in sound levels on the site of less than three decibels above existing conditions.

Development of commercial mixed use or other building types on the project site along Tank Farm Road would create a barrier to traffic noise on the project site, resulting in sound levels at future potential outdoor activity areas across the site generally below 60 dBA CNEL. Potential residential building elevations facing Tank Farm Road would experience exterior sound levels between 70 and 75 dBA CNEL at locations closest to Tank Farm Road. However, due to the barrier effect of structures along Tank Farm Road, the majority of the remaining structures on the project site would not experience exterior sound levels that would exceed 60 dBA CNEL. As described above, the construction style for dwelling units in California generally provides a reduction of exterior-to-interior noise levels of about 25 dBA with closed windows. Ordinary building construction assemblies with a Sound Transmission Class (STC) of 20 or greater would ensure that interior sound levels in habitable spaces would not exceed 45 dBA CNEL for buildings on the project site not directly adjacent to Tank Farm Road. However, for structures nearest to Tank Farm Road, interior sound levels could reach up to 50 dBA CNEL. Therefore, potential noise impacts at future residential uses closest to Tank Farm Road would be potentially significant.

Mitigation Measures

Implementation of Mitigation Measure N-1 would require use of construction techniques intended to reduce interior sound levels at residential units facing Tank Farm Road in structures on the project site located closest to Tank Farm Road, which would ensure that interior noise levels would not exceed the City's interior standard in proposed residential, hotel, and office uses. Therefore, implementation of Mitigation Measures N-1 would ensure that interior sound levels would not exceed 45 dBA CNEL.

N-1 **Interior Noise Reduction**. If the final project site design includes residential units facing Tank Farm Road in the structures located closest to Tank Farm Road, the project site developer shall implement the following measures, or similar combination of measures, which demonstrate that interior noise levels in residences facing Tank Farm Road would be reduced below the City's 45 dBA CNEL interior noise standard. The required interior noise reduction shall be achieved through a combination of standard interior noise reduction techniques, which may include (but are not limited to):

- In order for windows and doors to remain closed, mechanical ventilation such as air conditioning shall be provided for all units facing Tank Farm Road (passive ventilation may be provided, if mechanical ventilation is not necessary to achieve interior noise standards, as demonstrated by a qualified acoustical consultant).
- All exterior walls shall be constructed with a minimum STC rating of 50, consisting of construction of 2 inch by 4 inch wood studs with one layer of 5/8 inch Type "X" gypsum board on each side of resilient channels on 24 inch centers and 3 ½ inch fiberglass insulation.
- All windows and glass doors shall be rated STC 39 or higher such that the noise reduction provided will satisfy the interior noise standard of 45 dBA CNEL.
- An acoustical test report of all the sound-rated windows and doors shall be provided to the City for review by a qualified acoustical consultant to ensure

that the selected windows and doors in combination with wall assemblies would reduce interior noise levels sufficiently to meet the City's interior noise standard.

- All vent ducts connecting interior spaces to the exterior (i.e., bathroom exhaust, etc.) shall have at least two 90 degree turns in the duct.
- All windows and doors facing Tank Farm Road shall be installed in an acoustically-effective manner. Sliding window panels shall form an air-tight seal when in the closed position and the window frames shall be caulked to the wall opening around the perimeter with a non-hardening caulking compound to prevent sound infiltration. Exterior doors shall seal air-tight around the full perimeter when in the closed position.
- The applicant shall submit a report to the Community Development Department by a qualified acoustical consultant certifying that the specific interior noise reduction techniques included in residential, hotel, and office components of the project would achieve interior noise levels that would not exceed 45 dBA CNEL.

Plan Requirements and Timing**.** These requirements shall be incorporated into all the building plan submittals.

Monitoring**.** The Community Development Department shall verify compliance prior to approval of the building plans and shall verify installation in accordance with approved building plans.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction on the project site would require noise-generating equipment and vehicles that would temporarily increase noise levels in the vicinity. The nearest noise-sensitive receptor to the project site is the single-family residence located approximately 100 feet southeast of the project boundary. Apart from minor grading, which would occur up to the project boundary, the majority of project construction would occur closer to the center of the site. To reflect average conditions during construction, the analysis of construction noise has been prepared based on the distance from the center of the site to the nearest receptor, which is approximately 350 feet.

Noise levels typically attenuate (or drop off) at a rate of 6 dBA per doubling of distance from point sources (such as construction equipment). The construction equipment listed in Table 10 is based on standard construction equipment typically used during residential and commercial construction. Construction equipment noise levels are shown at a standard minimum distance of 50 feet from the source, at the minimum distance from the project site boundary to the nearest noise-sensitive receptor of 100 feet, and at the average distance from the project site center to the nearest noise-sensitive receptor of 350 feet.

Table 10 Typical Noise Levels Generated by Construction Equipment

Construction Phase	Combined Noise Level 50 feet (dBA Leq)	Combined Noise Level 100 feet (dBA Leq)	Combined Noise Level 350 feet (dBA Leq)
Demolition	86	80	70
Site Preparation	84	78	67
Grading	87	81	70
Building Construction	85	79	68
Paving	82	76	65

RCNM results are included in Appendix D

Source: Roadway Construction Noise Model (RCNM); individual equipment noise levels based on FTA 2006

As shown in Table 10, typical construction noise levels associated with the use of heavy construction equipment would range from approximately 65 dBA Leq to 70 dBA Leq at 350 feet from the source. Based on the equipment noise levels shown in Table 10, the nearest single-family residence would temporarily be exposed to noise levels above the City's 60 dBA stationary equipment standard for relatively long-term construction activity (10 days or more) at single-family residences (shown in Table 8). Since the estimated noise levels during construction would exceed the applicable City noise standard, the temporary noise impact would be potentially significant.

Mitigation Measures

Implementation of Mitigation Measure N-2(a) would require use of construction equipment best management practices, including shielding stationary equipment, temporary sound barriers between the construction site and the single-family residence to the southeast, and limiting construction activity to daytime hours when people are typically awake. Mitigation Measure N-2(b) would require nearby residential receptors to be notified of future construction activities at the site. Acoustic shielding can reduce noise from stationary equipment by 5-10 dBA, and temporary sound barriers can reduce noise from construction equipment by up to 10 dBA. Therefore, implementation of Mitigation Measures N-2(a) and N-2(b) would ensure that noise levels would not exceed the stationary equipment noise standards in the City of San Luis Obispo Municipal Code, Title 9, Chapter 9.12 (Noise Control).

N-2(a) **Construction Equipment Best Management Practices.** For all construction activity at the project site, noise attenuation techniques shall be employed to ensure that noise levels are maintained within levels allowed by the City of San Luis Obispo Municipal Code, Title 9, Chapter 9.12 (Noise Control). Such techniques shall include:

- Sound blankets on noise-generating equipment.
- Stationary construction equipment that generates noise levels above 60 dBA at the project boundaries shall be shielded with barriers that meet a sound transmission class (a rating of how well noise barriers attenuate sound) of 25.
- All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers.

- For stationary equipment, the applicant shall designate equipment areas with appropriate acoustic shielding on building and grading plans. Equipment and shielding shall be installed prior to construction and remain in the designated location throughout construction activities.
- Electrical power shall be used to power air compressors and similar power tools.
- The movement of construction-related vehicles, with the exception of passenger vehicles, along roadways adjacent to sensitive receptors shall be limited to the hours between 7:00 AM and 7:00 PM, Monday through Saturday. No movement of heavy equipment shall occur on Sundays or official holidays (e.g., Thanksgiving, Labor Day).
- Temporary sound barriers shall be constructed between the construction site and the single-family residence to the southeast.

N-2(b) **Neighboring Property Owner Notification and Construction Noise Complaints.** The contractor shall inform the property owner of the single-family residence to the southeast of the project site of proposed construction timelines and noise complaint procedures to minimize potential annoyance related to construction noise. Proof of mailing the notice shall be provided to the Community Development Department before the City issues a zoning clearance. Signs shall be in place before beginning of and throughout grading and construction activities. Noise-related complaints shall be directed to the City's Community Development Department.

Plan Requirements and Timing**.** Construction plans shall note construction hours, truck routes, and construction Best Management Practices (BMPs) and shall be submitted to the City for approval prior to grading and building permit issuance for each project phase. BMPs shall be identified and described for submittal to the City for review and approval prior to building or grading permit issuance. BMPs shall be adhered to for the duration of the project. The applicant shall provide and post signs stating these restrictions at construction site entries. Signs shall be posted prior to commencement of construction and maintained throughout construction. Schedule and neighboring property owner notification mailing list shall be submitted 10 days prior to initiation of any earth movement. The Community Development department shall confirm that construction noise reduction measures are incorporated in plans prior to approval of grading/building permit issuance.

All construction workers shall be briefed at a pre-construction meeting on construction hour limitations and how, why, and where BMP measures are to be implemented. A workday schedule will be adhered to for the duration of construction for all phases.

Monitoring**.** City staff shall ensure compliance throughout all construction phases. Building inspectors and permit compliance staff shall periodically inspect the site for compliance with activity schedules and respond to complaints.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction activity on the project site would temporarily generate groundborne vibration. Table 11 shows the anticipated vibration levels from construction equipment based on a reference distance of 25 feet, and the distance from the closest sensitive receptors (single-family residence located at a minimum 100 feet southeast of the project site) for the types of construction equipment that would be used on the project site. Although the average distance from construction activity would be approximately 350 feet, due to the nature of vibration noise, analysis for vibration impacts utilizes the minimum distance between source and receiver, as short durations of peak vibration levels have the potential to damage structures. Therefore, the analysis below is based on a minimum distance of 100 feet.

Table 11 Vibration Source Levels for Construction Equipment

	Vibration Level at 25 feet[1]		Vibration Level at 100 feet[1]	
Construction Equipment	**Ppv (in/sec)**	**VdB**	**Ppv (in/sec)**	**VdB**
Large Bulldozer	0.089	87	0.003	69
Loaded Trucks	0.076	86	0.002	68
Jackhammer	0.035	79	0.001	61
Small Bulldozer	0.003	58	0.000	39

[1] Calculated using equation from FTA Transit Noise and Vibration Impact Assessment (2006): PPVequip = PPVref * (25/D)^1.5

Source: California Department of Transportation 2013

As shown in Table 11, periodic vibration levels could reach up to 0.003 in/sec or 69 VdB at 100 feet from construction activity. Based on California Department of Transportation vibration criteria in Table 9, the vibration level at the minimum distance of 100 feet would be in the barely perceptible range of the nearby residence. Furthermore, vibration-generating construction activity would be temporary and intermittent due to the nature of construction, and would only occur during daytime hours. Based on vibration criteria in the FTA's Transit Noise and Vibration Impact Assessment, the anticipated vibration level of 69 VdB at the nearest single-family residence would not result in structural damage. Since development under the proposed project would not result in exposure to excessive groundborne vibration, impacts associated with vibration would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project result in a substantial permanent increase in ambient noise levels above levels existing without the project?

Components of the project would be expected to include typical rooftop mechanical equipment, such as air handling units (heating and air conditioning) and exhaust fans. This type of equipment is shielded for noise, and does not typically result in noise levels that would exceed approximately 55 dBA at 100 feet from the source. As described above, noise attenuates by approximately 6 dBA with each doubling of distance from the source. The nearest sensitive receptor is approximately 100 feet from the proposed project's boundary and would not experience a perceptible permanent increase in ambient noise levels above levels existing without the project from air handling units.

Noise associated with operation of the project would primarily result from project-added traffic on Tank Farm Road and Broad Street. For traffic-related noise, impacts would be significant if project-generated traffic would result in exposure of sensitive receptors to an unacceptable increase in traffic noise levels. The following roadways were analyzed for potential increases on roadway noise (see Draft Multimodal Transportation Impact Study, Appendix E).

- Tank Farm Road – west of the project site (segment between Long Street and the project site)
- Tank Farm Road – east of the project site (segment between the project site and the Mindbody Traffic Signal)
- Broad Street – north of Tank Farm Road (segment between Tank Farm Road and Industrial Way)
- Broad Street – south of Tank Farm Road (segment between Tank Farm Road and Aero Drive)

The Draft Multimodal Transportation Impact Study estimated the number of average daily trips (ADT) from the project, in comparison to both existing and cumulative conditions.

Existing and Existing Plus Project

The existing ADT along study area roadways, and the anticipated ADT with development under the proposed project, are shown in Table 12.

Table 12 Average Daily Trips on Study Area Roadways – Existing and Existing Plus Project

	ADT			
Roadway	**Existing**	**Existing Plus Project**	**Increase**	**Percent Increase**
Tank Farm Road West of the project site	20,160	20,430	270	1.3%
Tank Farm Road East of the project site	22,450	23,490	1,040	4.6%
Broad Street North of Tank Farm Road	26,200	27,150	950	3.6%
Broad Street South of Tank Farm Road	20,320	20,490	170	0.8%

Source: Transportation Impact Study (see Appendix E)

As shown in Table 12, the project would not increase roadway traffic along any study area roadway by more than 4.6 percent. In general, a doubling of the intensity of a noise source (such as a doubling of traffic along a roadway) results in a 3 dBA noise level increase. FHWA describes a 3 dBA noise level increase as barely perceptible (FHWA 2017). A noise level increase of less than 3 dBA is typically not perceptible for most people in an urban or suburban outdoor environment. The anticipated increase in traffic along area roadways that would result from development under the proposed project would not result in a perceptible traffic noise increase. Therefore, noise-sensitive receptors in the vicinity of the project site would not be exposed to a substantial increase in roadway noise under Existing plus Project conditions as a result of development under the proposed project.

Cumulative and Cumulative Plus Project

Cumulative roadway conditions, as discussed in Section 16, *Transportation*, are based on buildout of planned projects in the project site vicinity. The cumulative ADT along study area roadways, and the anticipated cumulative ADT with development under the proposed project, are shown in Table 13.

Table 13 Average Daily Trips on Study Area Roadways – Cumulative and Cumulative Plus Project

Roadway	ADT			
	Cumulative	Cumulative Plus Project	Increase	Percent Increase
Tank Farm Road West of the project site	22,620	22,750	130	0.6%
Tank Farm Road East of the project site	28,900	29,930	1,030	3.6%
Broad Street North of Tank Farm Road	34,740	35,510	770	2.2%
Broad Street South of Tank Farm Road	28,210	28,600	390	1.4%

Source: Transportation Impact Study (see Appendix E)

As shown in Table 13, the project would not increase roadway traffic along any study area roadway by more than 3.6 percent. As discussed above, a doubling of the intensity of a noise generating source results would result in a perceptible noise increase for most receptors. Under cumulative conditions, the anticipated increase in traffic along area roadways that would result from development under the proposed project would not result in a perceptible traffic noise increase. Therefore, noise-sensitive receptors in the vicinity of the project site would not be exposed to a substantial increase in roadway noise under Cumulative plus Project conditions as a result of development under the proposed project.

LESS THAN SIGNIFICANT IMPACT

e. For a project located in 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?

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?

As discussed in Section 8, *Hazards and Hazardous Materials*, the project site is within the City of San Luis Obispo AASP. As identified in the ALUP and in the San Luis Obispo General Plan Noise Element, the project site is outside the 60 dBA airport sound level contour, and within the 55 dBA airport sound level contour. Airport noise levels at the project site are lower than existing road traffic noise levels (see Appendix D). Therefore, the project would not expose people residing or working in the project area to excessive noise levels from aircraft or other airport uses.

LESS THAN SIGNIFICANT IMPACT

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13 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	■	☐
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■

Setting

The City of San Luis Obispo currently has a population of 46,725 residents, and 21,140 housing units (Department of Finance [DOF] City Population and Housing Estimates 2017). The City currently has a residential density of 2.33 persons per household.

Discussion

a. Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Development under the proposed project would add up to 249 new housing units to the City, and remove the existing 35 coaches on the project site, which would result in approximately 498 new residents to the City (DOF 2018). Land Use Element Policy 1.11.2 (Residential Growth Rate) states: "The City shall manage the growth of the city's housing supply so that it does not exceed one percent per year, on average, based on thresholds established by Land Use Element Table 3, excluding dwellings affordable to residents with extremely low, very low or low incomes as defined by the Housing Element. This rate of growth may continue so long as the City's basic service capacity is assured. Table 3 shows the approximate number of dwellings and residents which would result from the one percent maximum average annual growth rate over the planning period. Approved specific plan areas may develop in accordance with the phasing schedule adopted by each specific plan provided thresholds established by Table 3 are not exceeded. The City Council shall review the rate of growth on an annual basis in conjunction with the General Plan annual report to ensure consistency with the City's gradual assimilation policy."

As presented in LUCE Update EIR, Table 3 (One Percent City Population Growth Projection), the anticipated number of people living in the City in 2035 would be 56,686, and the City has an

estimated urban reserve capacity of 57,200 people. The LUCE Update EIR states that "based on a maximum annual residential unit growth rate of one percent per year, by the year 2035 (the buildout year for the proposed LUCE Update) the maximum number of residential units in the city would be 25,762," which results in a population of 56,686. Based on anticipated buildout of the adopted Land Use Element, approximately 25,601 dwelling units could be located in the City, noting that the number of dwelling units anticipated in the General Plan was less than the maximum number of residential units based on the one percent residential growth estimate (LUCE Update EIR, Section 4.12.2).

While the proposed project would result in the development and occupation of 214 more housing units than initially anticipated for the AASP, this project (in addition to the cumulative development of housing within the City) is subject to the one percent population growth policy identified in the Land Use Element, Table 3, which further states that the one percent growth rate can be averaged over five year increments. Cumulatively, residential buildout in the City up to the year 2035 would not exceed 25,762 units (or 56,686 people). Therefore, while the project would induce growth within the City, and specifically the area subject to the AASP, the effect would be less than significant because this development, and future development, are subject to the annual one percent growth over five year increments limitation.

Based on employment generation rates for retail uses from the San Luis Obispo Air Pollution Control District's (SLOAPCD) *CEQA Air Quality Handbook* (SLOAPCD 2012a), the potential new commercial floor area under the proposed project would result in a net increase of approximately 24 new employees (1.39 employees per 1,000 feet). Although the project would result in the generation of new employees, these employees would likely come from the existing population in the City, and would not contribute to new population growth.

LESS THAN SIGNIFICANT IMPACT

b. Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

c. Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

The project proposes to remove the existing coaches from the site. Although housing would be removed, all existing coaches are currently vacant or have limited leases based on the commencement of the project. The project would result in a net increase in housing units, and in accordance with the City's Mobile Home Park Conversion requirements (Chapter 5.45 of the City Municipal Code (2018a) relocation benefits and provisions for re-housing prior mobile home residents were arranged by the current and previous property owners. In addition, former residents would receive right of first refusal for new units, including affordable units, that would be offered for rent for the future residential development on site. Therefore, the project would not displace existing housing or population, and would not necessitate replacement housing elsewhere.

NO IMPACT

14 Public Services

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	1 Fire protection?	☐	☐	■	☐
	2 Police protection?	☐	☐	■	☐
	3 Schools?	☐	☐	■	☐
	4 Parks?	☐	☐	■	☐
	5 Other public facilities?	☐	☐	■	☐

Setting

Fire protection services are provided by the San Luis Obispo City Fire Department (SLOFD). SLOFD is staffed by four administrative professionals, and 42 firefighters. Services provided by SLOFD include fire response, emergency medical response, hazardous materials response, public assistance, and non-emergency services such as fire and life safety inspections, building inspections, fire code investigations, and public education (SLOFD 2016b).

The San Luis Obispo Police Department (SLOPD) provides police protection for the City. SLOPD has 86 employees including 60 sworn police officers, and is divided into two Bureaus: Operations and Administrative Services. The Operations Bureau includes the Patrol Services Division, the Traffic Safety Unit, Situation Oriented Response Team, and Neighborhood Services. The Administrative Services Bureau includes the Administrative Services Division, Investigative Division, Communications Division, and Records Unit (SLOPD 2016c).

The project site is within the San Luis Coastal Unified School District (SLCUSD). SLCUSD operates 10 elementary schools, two middle schools, three high schools, and an adult school.

Discussion

a.1 Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire or police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The project site is within the existing service area of the SLOFD. The closest fire station to the project site is City Fire Station 3, located at 1280 Laurel Lane, approximately two miles northeast of the project site. The City has a mutual aid agreement with CALFIRE which allows for additional fire or emergency assistance when needed, CALFIRE Fire Station 21 is located approximated 1 mile to the southeast. New development would be subject to the SLOFD standards and California Fire Code in all proposed buildings, including installation of fire hydrants, building sprinklers, provision of adequate water supply and pressure, placement of fire extinguishers, provision of adequate fire access to buildings, and other requirements.

The City's Fire Master Plan (FMP) discusses current and future operations (Citygate 2009), and concludes that the City does not have enough primary neighborhood fire stations to deliver suburban response times to all outer areas, including the AASP. Since the FMP's preparation in 2009, increasing population and new development have been further pressure on the department's ability to respond to requested services. In April 2018, the City's Fire Marshal reviewed the project, and determined that development facilitated by the proposed project may worsen response times in the AASP (Maggio 2018).

The 2016 San Luis Obispo Fire Department Master Plan requires construction of a new fire station in the southern area of the City when the southern area of the City reaches 90 percent buildout. In April 2018, the City Council adopted amendments to the Capital Facilities Fee Program to include an impact fee program to pay for acquisition and construction of a new fire station in the southern area of the City. Future development under the proposed rezone would be required to contribute its fair share to the costs of the planned new fire station in the southern area of the City prior to issuance of building permits.

LESS THAN SIGNIFICANT IMPACT

a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire or police protection facilities, or the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The project site is within the existing service area of the SLOPD. The closest police station to the project site is located at 1042 Walnut Street, approximately 2.5 miles northwest of the project site. Although new residential uses would marginally increase the City's population, the project site is already served by existing police services, and no new police facilities would be required to provide service. Since no new facilities would be required to be constructed as a result of the project, the project would not result in adverse physical impacts.

LESS THAN SIGNIFICANT IMPACT

a.3, a.4, a.5. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, parks, or other governmental/public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The project site is located in the existing services area of the City's schools, parks, and other public facilities. As discussed in Section 13, *Population and Housing*, future development under the proposed project would include construction of new residential uses, which would increase the population of San Luis Obispo by approximately 498 persons. The introduction of new residents to the area would introduce new students to SLCUSD. Consistent with the requirements of Senate Bill 50, the project would be required to pay a school impact fee (Government Code Section 65970) to SLCUSD. SB 50 fees would be directed towards the maintenance of adequate schools service levels, including increases in capacity.

In addition, as discussed in Section 15, *Recreation,* Sections 16.40.040 through 16.040.100 of the City Municipal Code require project applicants to pay parkland in-lieu fees to offset potential impacts on park facilities (2018a). Since the project would not require the need of new or expanded school, park, or other public service facilities, the project would not result in adverse physical impacts.

LESS THAN SIGNIFICANT IMPACT

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15 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	■	☐
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?	☐	☐	■	☐

Setting

There are 26 parks in the City of San Luis Obispo, including eight community parks, ten neighborhood parks, and eight mini parks. Collectively, these parks include approximately 152 acres of parkland, of which 34 acres are neighborhood parks. In addition to parks, the City owns or manages approximately 7,000 acres of open space within and adjacent to San Luis Obispo. This open space provides recreational opportunities such as fishing, hiking, and biking trails.

Existing recreational facilities near the project site include the Damon-Garcia Sports Complex directly north of the project site, and E.A. French Park approximately a half mile east of the site. Damon-Garcia Sports Complex is a Community Park open space area available by reservation containing soccer fields, picnic area, and a large open space. E.A. French Park is a neighborhood park with amenities/activities such as an outdoor barbeque area, basketball court, picnic tables, tennis courts, playgrounds, and open space.

Discussion

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

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?

As discussed in Section 13, *Population and Housing*, the project would allow construction of new residential uses, which would increase the population of San Luis Obispo by approximately 498 persons. The project includes recreational opportunities for residents through the development of a clubhouse and pool area. However, new residents would also use existing City recreational facilities and areas, including the nearby Damon-Garcia Sports Complex, by reservation, and E.A. French Park.

As required by Sections 16.40.040 through 16.040.100 of the City Municipal Code, project applicants are required to pay parkland in-lieu fees to help finance additional park space, maintenance or

equipment in the vicinity, offsetting potential impacts on City recreational facilities. With payment of required parkland in-lieu fees, the project would not result in the deterioration of existing neighborhood or regional parks, and would not result in the need for new recreational facilities, the development of which could cause an adverse physical impact on the environment.

LESS THAN SIGNIFICANT IMPACT

16 Transportation/Traffic

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?	☐	■	☐	☐
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?	☐	■	☐	☐
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?	☐	☐	☐	■
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	■	☐
e. Result in inadequate emergency access?	☐	☐	■	☐
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?	☐	☐	■	☐

Background and Setting

The analysis in this section is based on the Draft Multimodal Transportation Impact Study conducted by Central Coast Transportation Consulting in May 2018 and the 650 Tank Farm- Tank Farm Road Fair Share Calculation memorandum prepared in October 2018. The Draft Multimodal Transportation Impact Study and the 650 Tank Farm- Tank Farm Road Fair Share Calculation memorandum are included in this Initial Study as Appendix E.

Roadway conditions during the weekday AM and PM peak periods were evaluated at the following nine intersections and along the following four roadways. Study intersections and segments were identified for analysis in consultation with City staff, consistent with City policies.

Intersections

1. Tank Farm Road/South Higuera Street
2. Tank Farm Road/Long Street
3. Tank Farm Road/Santa Fe Road
4. Tank Farm Road/Mindbody Traffic Signal
5. Broad Street/Capitolio Way
6. Broad Street/Industrial Way
7. Broad Street/Tank Farm Road
8. Broad Street/Aero Vista Lane
9. Broad Street/Aero Drive

Roadways

1. Tank Farm Road (Broad Street to Higuera Street)
2. Tank Farm Road (Broad Street to Orcutt Road)
3. Broad Street (Orcutt Road to Tank Farm Road)
4. Broad Street (Tank Farm Road to South City Limits)

The studied intersections and segments were evaluated under the following scenarios:

- **Existing Conditions** reflect 2016 traffic counts and the existing transportation network.
- **Existing Plus Project** adds project-generated traffic to existing conditions volumes.
- **Cumulative Conditions** were developed using the City's Travel Demand Model, which includes planned network and land use changes expected upon buildout of the City's General Plan.
- **Cumulative Plus Project** represents future traffic conditions reflective of the buildout of the City's General Plan, including the proposed project.

The weekday AM peak period occurs between 7:00 AM and 9:00 AM, while the weekday PM peak period occurs between 4:00 PM and 6:00 PM. These time periods were chosen as they reflect typical commute periods when the surrounding commercial area experiences the greatest congestion.

Pedestrian Facilities

Pedestrian facilities in the study area include sidewalks, crosswalks, and pedestrian signals at signalized intersections. However, multiple studied segments do not currently have pedestrian

facilities or have discontinuous pedestrian facilities. South of Rockview Place, Broad Street has a paved sidewalk only on the east side of the street. Broad Street between Tank Farm Road and Aero Vista Lane has a discontinuous sidewalk on the east side of the street. East of the Union Pacific Railroad overhead crossing, Tank Farm Road has a discontinuous sidewalk on its north side. West of Broad Street, Tank Farm Road has no sidewalks on the north side of the road, and between Santa Fe Road and Old Windmill Lane has no sidewalks on either side. All other study segments have paved sidewalks on both sides of the street.

Bicycle Facilities

Bicycle facilities in the study area consist of Class II bike lanes, which provide a striped lane for one-way bicycle travel on the side of a street. Broad Street and Tank Farm Road both have Class II bike lanes on both sides of the road throughout the study segments.

Transit Service

The San Luis Obispo Regional Transit Authority (RTA) and the City of San Luis Obispo Transit Division (SLO Transit) provide transit service to the study area. SLO Transit Routes 1 and 3 provide fixed-route service to the study area. RTA offers Dial-A-Ride curb to curb services within the city limits.

Traffic Analysis Methodology & Regulatory Setting

City of San Luis Obispo Level of Service Standards

The City's Circulation Element (2014) establishes the following multimodal minimum level of service (LOS) standards:

- **Bicycle** – An impact would be significant if a facility would degrade from LOS D or better to LOS E or worse.
- **Pedestrian** – An impact would be significant if a facility would degrade from LOS C or better to LOS D or worse.
- **Transit** – An impact would be significant if a facility would degrade from LOS D or better to LOS E or worse, or if a segment with a baseline LOS E or LOS F would degrade in a contextually significant manner.
- **Vehicle** – An impact would be significant if a facility would degrade from LOS D or better to LOS E or worse, and experience an increase of the V/C ratio by 0.01 or more.

The Circulation Element also establishes priorities for each mode, such that construction, expansion, or alteration for one mode does not degrade the service level of a higher priority mode. In the study area, modes are prioritized as follows: 1) vehicles, 2) transit, 3) bicycles, and 4) pedestrians. Exceptions to multimodal priorities may apply when in conflict with safety or regulatory requirements or conflicts with area character, topography, street design, and existing density.

In accordance to the criteria specified in the San Luis Obispo Circulation Element and LUCE Update EIR, a project has a significant impact on the above modes of transportation when it causes an exceedance to one of these LOS standards. For modes already operating below the established LOS standards, any further degradation to the LOS score would also be considered a significant impact under CEQA.

Cumulative Impacts

Cumulative and Cumulative plus Project traffic volume forecasts were developed using the City's Travel Demand Model, which includes planned network and land use changes expected upon buildout of the City's General Plan. The following key network changes would shift travel patterns in the study area, and were incorporated into the Cumulative baseline conditions:

- Prado Road would extend as a four-lane regional route arterial from South Higuera Street to Broad Street with a new intersection between Capitolio Way and Industrial Way.
- A full interchange would be constructed at Prado Road and U.S. 101.
- Victoria Avenue would be extended from Woodbridge Street to High Street.
- Orcutt Road would be widened as a four-lane arterial from the railroad tracks to Johnson Avenue.
- Tank Farm Road would be widened to four lanes west of 250 Tank Farm Road and east of Santa Fe Road.
- The intersection of Tank Farm Road/Long Street would be signalized.
- Transit conditions were assumed to remain the same as those in Existing conditions.

General Plan Policies

Policy 6.1.5 - Mitigation. For significant impacts, developments shall be responsible for their fair share of any improvements required. Potential improvements for alternative mode may include, but are not limited to:

- **Pedestrian:** Provision of sidewalk, providing or increasing a buffer from vehicular travel lanes, increased sidewalk clear width, providing a continuous barrier between pedestrians and vehicle traffic, improved crossings, reduced signal delay, traffic calming, no right turn on red, reducing intersection crossing distance.
- **Bicycle:** Addition of a bicycle lane, traffic calming, provision of a buffer between bicycle and vehicle traffic, pavement resurfacing, reduced number of access points, or provision of an exclusive bicycle path, reducing intersection crossing distance.
- **Transit:** For transit-related impacts, developments shall be responsible for their fair share of any infrastructural improvements required. This may involve provision of street furniture at transit stops, transit shelters, and/or transit shelter amenities, pullouts for transit vehicles, transit signal prioritization, provision of additional transit vehicles, or exclusive transit lanes.

Discussion

a. Would the project conflict with an applicable plan, ordinance or policy establishing a measure 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?

b. Would the project 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?

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?

Trip Generation

The Draft Multimodal Transportation Impact Study estimates the number of vehicle trips generated by the project using standard rates published by the Institute of Transportation Engineers (ITE) in *Trip Generation Manual*, 9th Edition, 2012 for Apartment (ITE LU 220) and Shopping Center (ITE LU 820) uses (Appendix E). These uses provide a reasonable approximation for vehicle trip generation from anticipated development under proposed project based on the conceptual site plan (refer to Figure 3). Table 14 shows the total number of new vehicles trips anticipated from this potential development, as well as the net new trips that would result from implementation of the project. Net new trips were determined by subtracting internal capture trips, pass-by trips, and trips associated with the existing mobile home land use from the gross trip generation.

Table 14 Estimated Project Traffic Trip Generation

	Weekday Peak Hour		
ITE Land Use	**AM**	**PM**	**Total Daily Trips**
Proposed			
220: Apartment[1]	127	154	1,656
820: Shopping Center[2]	17	65	747
Subtotal	**144**	**219**	**2,403**
Reductions			
Internal Trips	0	26	328
Pass-By Trips[3]	0	18	90
Existing Mobile Home Park[4]	15	11	150
Total	**129**	**164**	**1,835**

[1] ITE Land Use Code #220, Apartment. Fitted curve equations used.

[2] ITE Land Use Code #820, Shopping Center. Average rates used.

[3] PM Peak Hour rate multiplied by a factor of 5 to determine daily trips.

[4] PM Peak Hour rate multiplied by a factor of 10 to determine daily trips.

Source: Draft Multimodal Transportation Impact Study (see Appendix E)

As shown in Table 14, the anticipated development under the proposed project would be expected to generate up to 1,835 net new vehicle trips on a daily basis, including 129 vehicle trips during the morning peak hour and 164 new trips during the evening peak hour. These new trips represent the increase in traffic associated with the proposed project compared to existing volumes.

INTERSECTION LEVEL OF SERVICE

The Existing conditions scenario provides an evaluation of current roadway and intersection congestion based on existing traffic volumes. This condition does not include project-generated traffic volumes. The Existing plus Project scenario evaluates existing conditions with the addition of project-generated trips. Table 15 shows the peak hour intersection levels of service under existing conditions and with project-added vehicle trips.

Table 15 Peak Hour Intersection Levels of Service – Existing and Existing Plus Project

		Existing Conditions			Existing Plus Project			
Study Intersection	Peak Hour	V/C	Delay (sec/veh)	LOS	V/C	V/C Delta	Delay (sec/veh)	LOS
1. Tank Farm Road/South Higuera Street	AM	0.87	26.7	C	0.87	0.00	27.0	C
	PM	0.93	32.7	C	0.94	0.01	33.3	C
2. Tank Farm Road/Long Street	AM	0.19	1.9 (23.4)	C	0.19	0.00	1.9 (24.1)	C*
	PM	0.40	3.8 (41.7)	E	0.42	0.02	4.0 (50.0)	F*
3. Tank Farm Road/Santa Fe Road	AM	0.15	1.3 (20.5)	C	0.15	0.00	1.1 (14.9)	B
	PM	0.57	2.7 (39.6)	E	0.48	-0.09	2.0 (20.0)	C
4. Tank Farm Road/MindBody Traffic Signal	AM	0.77	7.4	A	0.78	0.01	6.3	A
	PM	0.91	14.7	B	0.95	0.04	9.3	A
5. Broad Street/Capitolio Way	AM	0.20	1.0 (14.7)	B	0.21	0.01	1.1 (15.4)	C
	PM	0.38	1.7 (23.5)	C	0.39	0.01	1.8 (24.8)	C
6. Broad Street/Industrial Way	AM	0.79	13.5	B	0.79	0.00	13.6	B
	PM	0.97	26.9	C	0.98	0.01	28.2	C
7. Broad Street/Tank Farm Road	AM	0.87	38.2	D	0.87	0.00	39.2	D
	PM	0.88	43.8	D	0.89	0.01	46.1	D
8. Broad Street/Aero Vista Lane	AM	0.14	0.8 (19.9)	C	0.15	0.01	0.8 (20.1)	C
	PM	0.47	2.1 (28.0)	D	0.48	0.01	2.1 (28.6)	D
9. Broad Street/Aero Drive	AM	0.66	7.6	A	0.66	0.00	7.7	A
	PM	1.07	32.9	C	1.11	0.04	33.8	C

The signalization of Tank Farm Road and Long Street is part of a condition of approval for the Long-Bonetti Ranch project, which is an approved City of San Luis Obispo project. The signalized intersection is planned to be completed before the project is occupied.
Delay is measured in average seconds per vehicle

Source: Draft Multimodal Transportation Impact Study (see Appendix E)

As shown in Table 15, study area intersections are currently operating acceptably at LOS D or better during both the AM and PM peak hours, except for the Tank Farm Road/Long Street intersection and the Tank Farm Road/Santa Fe Road intersection. Under Existing plus Project conditions, the Tank Farm Road/Santa Fe Road intersection would operate at LOS C during the PM peak hour as a result of widening Tank Farm Road at the project site frontage. At the Tank Farm Road/Long Street intersection, the side street approaches operate unacceptably during both Existing and Existing plus Project conditions during the PM peak hour (Appendix E). However, as noted in the Draft Multimodal Transportation Impact Study, this intersection is currently under final design for a traffic

signal, which is a condition of approval for the City approved Long-Bonetti Ranch project, and upon installation, would result in acceptable operations at this location. Therefore, the project would not result in a significant impact to intersection level of service under Existing plus Project conditions.

INTERSECTION VEHICLE QUEUING

Table 16 shows vehicle queues at study area intersections. Detailed queue and LOS results are included in Appendix E.

The addition of project generated traffic would increase the eastbound left queue length by one to two vehicle lengths at the Broad Street/Tank Farm Road intersection in the Existing plus Project scenario due to project traffic turning north onto Broad Street. The queues for Tank Farm Road/Santa Fe Road would decrease with the addition of the project as a result of widening Tank Farm Road at the project site frontage. The increase in critical queues at the Broad Street/Tank Farm Road intersection would be a potentially significant impact.

ROADWAY SEGMENT LEVEL OF SERVICE

Table 17 and Table 18 show the Existing plus Project level of service conditions along study area roadway segments during AM and PM peak hours, respectively. The tables show level of service conditions for all modal types (i.e. vehicle, pedestrian, bicyclist, and transit users). Existing conditions without project added vehicle trips are shown in the Draft Multimodal Transportation Impact Study (Appendix E).

Table 16 Peak Hour Intersection Queues – Existing and Existing Plus Project

Study Intersection	Movement	Store Length (ft)	Peak Hour	Existing 95th Percentile Queues (ft)[1]	Existing Plus Project 95th Percentile Queues (ft)[1]
1. Tank Farm Road/South Higuera Street	WBL	670	AM	125	47
			PM	#311	#316
	WBR	250	AM	63	63
			PM	93	94
	NBR	140	AM	30	30
			PM	61	63
	SBL	165	AM	#324	#324
			PM	#471	#477
3.Tank Farm Road/Santa Fe Road	NBR	25	AM	11	7
			PM	73	31
4. Tank Farm Road/MindBody Traffic Signal	WBL	210	AM	36	36
			PM	20	19
	NBL	330	AM	21	23
			PM	#183	#159
5. Broad Street/Capitolio Way	WBL	_	AM	3	9
			PM	16	18
6. Broad Street/Industrial Way	EBT/L	350	AM	18	18
			PM	67	67
	NBL	150	AM	63	63
			PM	#96	#96
	SBL	150	AM	79	79
			PM	#274	#274
7. Broad Street/Tank Farm Road	EBL	300	AM	145	173
			PM	#277	#313
	EBR	90	AM	89	101
			PM	58	59
	WBL	150	AM	#265	#266
			PM	#273	#276
	NBL	290	AM	120	122
			PM	#210	#223
	SBL	250	AM	95	95
			PM	#244	#246
	SBR	300	AM	83	98
			PM	167	230
8. Broad Street/Aero Vista Lane	EBL	75	AM	11	11
			PM	51	53
9. Broad Street/Aero Drive	EBT/L	310	AM	32	32
			PM	83	84

1. Queue length that would not be exceed 95 percent of the time

# indicates that 95th percentile volume exceeds capacity, queue may be longer

Detailed queues are included in Appendix E.

Table 17 Roadway Segments AM Peak Hour MMLOS – Existing Plus Project

		Auto		Pedestrian		Bicycle		Transit	
Roadway Segment	**Direction**	**Score**	**LOS**	**Score**	**LOS**	**Score**	**LOS**	**Score**	**LOS**
1a. Tank Farm Road – Old Windmill Lane to Santa Fe Road	EB	2.34	B	N/A	N/A	2.79	C	N/A	N/A
	WB	2.34	B	N/A	N/A	2.71	B	N/A	N/A
1b. Tank Farm Road – Santa Fe Road to Broad Street	EB	2.75	B	2.84	C	2.07	B	N/A	N/A
	WB	2.75	B	N/A	N/A	2.10	B	N/A	N/A
2a. Tank Farm Road – Broad Street to UPRR	EB	2.47	B	2.85	C	2.19	B	N/A	N/A
	WB	2.47	B	3.14	C	2.38	B	3.33	C
2b. Tank Farm Road – UPRR to Orcutt Road	EB	3.13	C	1.14	A	0.32	A	N/A	N/A
	WB	3.13	C	N/A	N/A	0.47	A	4.17	D
3a. Broad Street – Orcutt Road to Industrial Way	NB	2.14	B	3.20	C	2.24	B	4.66	E
	SB	2.14	B	N/A	N/A	2.10	B	N/A	N/A
3b. Broad Street – Industrial Way to Tank Farm Road	NB	2.14	B	2.88	C	2.12	B	5.55	F
	SB	2.14	F	N/A	N/A	2.06	B	N/A	N/A
4a. Broad Street – Tank Farm Road to Aero Vista Lane	NB	2.52	F	N/A	N/A	2.08	B	N/A	N/A
	SB	2.52	B	3.23	C	0.98	A	4.70	E
4b. Broad Street – Aero Vista Lane to Aero Drive	NB	2.14	B	2.89	C	1.25	A	N/A	N/A
	SB	2.14	B	2.19	B	0.93	A	N/A	N/A
4c. Broad Street – Aero Drive to South City Limits	NB	2.93	F	N/A	N/A	2.10	B	N/A	N/A
	SB	2.93	C	N/A	N/A	1.22	A	5.71	F

1. HCM 2010 LOS score and LOS
2. LOS is not established for segments without a sidewalk
3. LOS is not established without a directional transit route.

Table 18 Roadway Segments PM Peak Hour MMLOS – Existing Plus Project

		Auto		Pedestrian		Bicycle		Transit	
Roadway Segment	**Direction**	**Score**	**LOS**	**Score**	**LOS**	**Score**	**LOS**	**Score**	**LOS**
1a. Tank Farm Road – Old Windmill Lane to Santa Fe Road	EB	2.34	B	N/A	N/A	2.81	C	N/A	N/A
	WB	2.34	B	N/A	N/A	2.92	C	N/A	N/A
1b. Tank Farm Road – Santa Fe Road to Broad Street	EB	2.75	B	3.14	C	2.22	B	N/A	N/A
	WB	2.75	B	N/A	N/A	2.24	B	N/A	N/A
2a. Tank Farm Road – Broad Street to UPRR	EB	2.47	B	3.30	C	2.59	B	N/A	N/A
	WB	2.47	B	3.14	C	2.38	B	3.33	C
2b. Tank Farm Road – UPRR to Orcutt Road	EB	3.13	C	1.73	A	0.66	A	N/A	N/A
	WB	3.13	C	N/A	N/A	0.35	A	4.14	D
3a. Broad Street – Orcutt Road to Industrial Way	NB	2.14	F	3.67	D	2.40	B	4.72	E
	SB	2.14	B	N/A	N/A	2.13	B	N/A	N/A
3b. Broad Street – Industrial Way to Tank Farm Road	NB	2.14	B	2.82	C	2.13	B	5.54	F
	SB	2.14	F	N/A	N/A	2.10	B	N/A	N/A
4a. Broad Street – Tank Farm Road to Aero Vista Lane	NB	2.52	F	N/A	N/A	2.07	B	N/A	N/A
	SB	2.52	B	3.39	C	1.05	A	4.72	E
4b. Broad Street – Aero Vista Lane to Aero Drive	NB	2.14	B	2.33	B	0.83	A	N/A	N/A
	SB	2.14	F	2.68	B	1.18	A	N/A	N/A
4c. Broad Street – Aero Drive to South City Limits	NB	2.93	C	N/A	N/A	1.77	A	N/A	N/A
	SB	2.93	C	N/A	N/A	1.53	A	5.71	F

1. HCM 2010 LOS score and LOS
2. LOS is not established for segments without a sidewalk
3. LOS is not established without a directional transit route.

Roadway Facilities

Several roadway segments in the study area would experience LOS F under Existing plus Project conditions. However, none of these segments would experience a decline in LOS as a result of new vehicle trips associated with the project (refer to Appendix E). The Draft Multimodal Transportation Impact Study does not note any new deficiencies with the addition of project-added vehicles trips. Therefore, impacts to roadway segment LOS would be less than significant.

Pedestrian Facilities

Multiple segments in the study area do not have a pedestrian LOS reported due to the absence of pedestrian facilities, or currently have discontinuous pedestrian facilities. The addition of project-generated pedestrian trips would not further degrade the level of service at any of these facilities, or otherwise overburden or substantially decrease the effectiveness of the pedestrian network under Existing plus Project conditions. Therefore, the project's impacts on pedestrian facilities would be less than significant.

Bicycle Facilities

All bicycle facilities operate at LOS C or better under Existing and Existing plus Project conditions. Therefore, impact on bicycle facilities would be less than significant. As discussed in Section 2, *Project Description*, future development of the project site under the proposed project may include a pedestrian/bicycle access path from the northern site boundary to the existing pedestrian/bicycle paths at the Damon Garcia-Sports Fields. This potential connection would be consistent with the intent of the Bicycle Transportation Plan and the AASP, which show a planned Class I bicycle path from Tank Farm up to Damon-Garcia via the Digital West property west of the project site.

Transit Facilities

Multiple segments in the study area would operate below the City's transit LOS thresholds due to the relatively infrequent service times and/or lack of bus stops on the specific segment under existing and cumulative conditions. The addition of project-generated transit trips would not further degrade the level of service at any of these facilities, or otherwise overburden or substantially decrease the effectiveness of the transit network under Existing plus Project conditions. Therefore, impact on transit facilities would be less than significant.

Cumulative and Cumulative Plus Project Conditions

INTERSECTION LEVEL OF SERVICE

The Cumulative traffic scenario reflects planned network and land use changes expected upon buildout of the City's General Plan. Table 19 shows the peak hour intersection levels of service under cumulative conditions and with project-added vehicle trips.

Table 19 Peak Hour Intersection Levels of Service - Cumulative and Cumulative Plus Project

Study Intersection	Peak Hour	Cumulative Conditions V/C	Cumulative Conditions Delay (sec/veh)	Cumulative Conditions LOS	Cumulative Plus Project V/C	Cumulative Plus Project V/C Delta	Cumulative Plus Project Delay (sec/veh)	Cumulative Plus Project LOS
1. Tank Farm Road/South Higuera Street	AM	1.35	94.9	F	1.35	0.00	94.9	F
	PM	1.70	78.9	E	1.71	0.01	79.2	E
2. Tank Farm Road/Long Street	AM	0.83	16.9	B	0.83	0.00	17.0	B
	PM	0.75	12.0	B	0.76	0.01	12.1	B
3.Tank Farm Road/Santa Fe Road	AM	>1.00	- (>200)	F	>1.00	-	- (>200)	F
	PM	>1.00	- (>200)	F	>1.00	-	- (>200)	F
4. Tank Farm Road/MindBody Traffic Signal	AM	0.76	17.4	B	0.85	0.09	18.7	B
	PM	0.96	38.0	D	0.99	0.03	42.5	D
5. Broad Street/Capitolio Way	AM	0.24	1.3 (25.2)	D	0.26	0.02	1.3 (26.6)	D
	PM	1.58	13.2 (191.2)	F	1.70	0.12	14.6 (>200)	F
6. Broad Street/Industrial Way	AM	1.05	35.1	D	1.06	0.01	36.8	D
	PM	1.35	106.1	F	1.38	0.03	113.9	F
7. Broad Street/Tank Farm Road	AM	1.36	103.2	F	1.37	0.01	105.2	F
	PM	1.82	134.9	F	1.91	0.09	142.6	F
8. Broad Street/Aero Vista Lane	AM	0.29	1.2 (26.7)	D	0.31	0.02	1.2 (27.8)	D
	PM	1.09	7.8 (132.3)	F	1.13	0.04	8.4 (142.6)	F
9. Broad Street/Aero Drive	AM	0.95	31.7	C	0.95	0.00	32.2	C
	PM	0.91	37.1	D	0.94	0.03	38.4	D

Delay is measured in average seconds per vehicle

Source: Draft Multimodal Transportation Impact Study (see Appendix E)

As shown in Table 19, the following intersections would operate below the LOS D threshold with project-added vehicle trips:

- The Tank Farm Road/South Higuera Street intersection would operate at LOS F during the AM peak hour and LOS E during the PM peak hour during both Cumulative and Cumulative plus Project conditions. The addition of project-generated trips would increase the worst movement V/C ratio by 0.01 during the PM peak hour.
- The Tank Farm Road/Santa Fe Road intersection would operate at LOS F during both Cumulative and Cumulative plus Project conditions.
- The Broad Street/Capitolio Way intersection would operate at LOS F during the PM peak hour during both Cumulative and Cumulative plus Project conditions. The addition of project-generated trips would increase the worst movement V/C ratio by 0.12 during the PM peak hour.
- The Broad Street/Industrial Way intersection would operate at LOS F during both the AM and PM peak hour, during both Cumulative and Cumulative plus Project conditions. The addition of project-generated traffic would increase the worst movement V/C ratio by 0.03.
- The Broad Street and Tank Farm Road intersection would operate at LOS F during both the AM and PM peak hours and both Cumulative and Cumulative plus Project conditions. The addition

of project-generated traffic would increase the worst movement V/C ratio by 0.01 during the AM peak hour and by 0.09 during the PM peak hour.

- The Broad Street/Aero Vista Lane intersection would operate at LOS F during the PM peak hour during both Cumulative and Cumulative plus Project conditions. The addition of project traffic would increase the worst movement V/C ratio by 0.04 during the PM peak hour.

Under Cumulative conditions, the introduction of new vehicle trips associated with development on the project site would substantially degrade the six listed study area intersections, with a worst-movement V/C ratio increase of 0.1 or more, resulting in potentially significant level of service impacts. Therefore, the project's contribution to significant cumulative impacts would be cumulatively considerable.

INTERSECTION VEHICLE QUEUING

Table 20 shows vehicle queues at study area intersections. Detailed queue and LOS results are included in Appendix E.

Table 20 Peak Hour Intersection Queues - Cumulative and Cumulative Plus Project

Intersection	Movement	Store Length (ft)	Peak Hour	Cumulative	Cumulative Plus Project
				95th Percentile Queues (ft)[1]	
1. Tank Farm Road/South Higuera Street	WBL	670	AM	151	153
			PM	#434	#440
	WBR	250	AM	71	71
			PM	#340	#342
	NBR	140	AM	#297	#298
			PM	63	63
	SBL	165	AM	#681	#681
			PM	#704	#706
3.Tank Farm Road/Santa Fe Road	NBR	25	AM	48	48
			PM	167	174
4. Tank Farm Road/MindBody Traffic Signal	WBL	210	AM	#176	#176
			PM	#199	#196
	NBL	330	AM	73	75
			PM	#292	#303
5. Broad Street/Capitolio Way	WBL	_	AM	20	22
			PM	191	202
6. Broad Street/Industrial Way	EBT/L	350	AM	41	41
			PM	111	111
	NBL	150	AM	#67	#67
			PM	#98	#98
	SBL	150	AM	#115	#115
			PM	#311	#311

Intersection	Movement	Store Length (ft)	Peak Hour	Cumulative	Cumulative Plus Project
				95th Percentile Queues (ft)[1]	
7. Broad Street/Tank Farm Road	EBL	300	AM	#197	#245
			PM	#523	#553
	EBR	90	AM	308	#347
			PM	56	57
	WBL	150	AM	#554	#554
			PM	#405	#409
	NBL	290	AM	#251	#256
			PM	#319	#346
	SBL	250	AM	#237	#237
			PM	#523	#529
	SBR	300	AM	#796	#824
			PM	346	#450
8. Broad Street/Aero Vista Lane	EBL	75	AM	24	26
			PM	169	176
9. Broad Street/Aero Drive	EBT/L	310	AM	73	73
			PM	#360	#361

1. Queue length that would not be exceed 95 percent of the time

# indicates that 95th percentile volume exceeds capacity, queue may be longer

Detailed queues are included in Appendix E.

As shown in Table 20, the following intersections would experience queueing deficiencies with the addition of project-generated traffic in the Cumulative scenario:

- At the Tank Farm/South Higuera Street intersection, queues would exceed storage length during at least one peak hour on the westbound right, northbound right, and southbound left turning movements. The addition of project-generated traffic would increase queues by less than one vehicle length.
- At the Tank Farm Road/Santa Fe Road intersection, the northbound right turn queue length would exceed storage length during both peak hours under Cumulative and Cumulative plus Project conditions. The addition of project-generated traffic would increase queues by less than one vehicle length.
- At the Broad Street/Tank Farm Road intersection, the addition of project generated traffic to queues that exceed storage would result in an increase of more than one vehicle length during at least one peak hour on the eastbound left and right, northbound left, and southbound right movements.
- At the Broad Street/Aero Vista Lane intersection, the eastbound left movement would exceed storage during the PM peak hour both with and without project-added vehicle traffic. The addition of project-generated traffic would increase this queue by less than one vehicle length.

During the Cumulative scenario conditions, the introduction of new vehicle trips generated by development on the project site would result in significant queuing impacts at the four listed study area intersections. Therefore, the project's contribution to significant cumulative queuing impacts would be cumulatively considerable.

ROADWAY SEGMENT LEVEL OF SERVICE

Table 21 and Table 22 show the Cumulative plus Project level of service conditions along study area roadway segments during AM and PM peak hours. The tables show level of service conditions for all modal types (i.e. vehicle, pedestrian, bicyclist, and transit users). The baseline cumulative conditions without project added vehicle trips are shown in the Draft Multimodal Transportation Impact Study (Appendix E).

Table 21 Roadway Segments AM Peak Hour MMLOS[1] – Cumulative Plus Project

		Auto		Pedestrian[2]		Bicycle		Transit[3]	
Roadway Segment	**Direction**	**Score**	**LOS**	**Score**	**LOS**	**Score**	**LOS**	**Score**	**LOS**
1a. Tank Farm Road – Old Windmill Lane to Santa Fe Road	EB	2.34	B	N/A	N/A	2.98	C	N/A	N/A
	WB	2.34	B	N/A	N/A	2.88	C	N/A	N/A
1b. Tank Farm Road – Santa Fe Road to Broad Street	EB	2.75	B	3.22	C	2.25	B	N/A	N/A
	WB	2.75	B	3.13	C	2.38	B	N/A	N/A
2a. Tank Farm Road – Broad Street to UPRR	EB	2.47	B	2.99	C	2.35	B	N/A	N/A
	WB	2.47	B	3.51	D	2.60	B	3.38	C
2b. Tank Farm Road – UPRR to Orcutt Road	EB	3.13	C	0.95	A	0.13	A	N/A	N/A
	WB	3.13	C	N/A	N/A	0.34	A	4.14	D
3a. Broad Street – Orcutt Road to Industrial Way	NB	2.14	B	3.36	C	2.30	B	4.69	E
	SB	2.14	F	N/A	N/A	2.29	B	N/A	N/A
3b. Broad Street – Industrial Way to Tank Farm Road	NB	2.14	B	3.08	C	2.22	B	5.58	F
	SB	2.14	F	3.57	D	2.28	B	N/A	N/A
4a. Broad Street – Tank Farm Road to Aero Vista Lane	NB	2.52	F	N/A	N/A	2.23	B	N/A	N/A
	SB	2.52	B	3.66	D	1.15	A	4.76	E
4b. Broad Street – Aero Vista Lane to Aero Drive	NB	2.14	B	3.23	C	1.35	A	N/A	N/A
	SB	2.14	F	2.94	C	1.27	A	N/A	N/A
4c. Broad Street – Aero Drive to South City Limits	NB	2.93	F	N/A	N/A	2.13	B	N/A	N/A
	SB	2.93	C	N/A	N/A	1.49	A	5.85	F

1. HCM 2010 LOS score and LOS; 2. LOS is not established for segments without a sidewalk; 3. LOS is not established without a directional transit route.

Source: Draft Multimodal Transportation Impact Study (see Appendix E)

Table 22 Roadway Segments PM Peak Hour MMLOS[1] – Cumulative Plus Project

		Auto		Pedestrian[2]		Bicycle		Transit[3]	
Roadway Segment	**Direction**	**Score**	**LOS**	**Score**	**LOS**	**Score**	**LOS**	**Score**	**LOS**
1a. Tank Farm Road – Old Windmill Lane to Santa Fe Road	EB	2.34	E[4]	N/A	N/A	2.89	C	N/A	N/A
	WB	2.34		N/A	N/A	3.00	C	N/A	N/A
1b. Tank Farm Road – Santa Fe Road to Broad Street	EB	2.75	B	3.59	D	2.37	B	N/A	N/A
	WB	2.75	B	3.08	C	2.37	B	N/A	N/A
2a. Tank Farm Road – Broad Street to UPRR	EB	2.47	B	3.88	D	2.86	C	N/A	N/A
	WB	2.47	B	3.23	C	2.44	B	3.34	C
2b. Tank Farm Road – UPRR to Orcutt Road	EB	3.13	C	1.55	A	0.58	A	N/A	N/A
	WB	3.13	C	N/A	N/A	0.06	A	4.10	D
3a. Broad Street – Orcutt Road to Industrial Way	NB	2.14	F	4.26	E	2.56	B	4.81	E
	SB	2.14	F	N/A	N/A	2.24	B	N/A	N/A
3b. Broad Street – Industrial Way to Tank Farm Road	NB	2.14	F	3.23	C	2.30	B	5.60	F
	SB	2.14	F	3.36	C	2.22	B	N/A	N/A
4a. Broad Street – Tank Farm Road to Aero Vista Lane	NB	2.52	F	N/A	N/A	2.31	B	N/A	N/A
	SB	2.52	B	3.64	D	1.14	A	4.76	E
4b. Broad Street – Aero Vista Lane to Aero Drive	NB	2.14	B	3.27	C	1.19	A	N/A	N/A
	SB	2.14	F	3.13	C	1.34	A	N/A	N/A
4c. Broad Street – Aero Drive to South City Limits	NB	2.93	F	N/A	N/A	2.07	B	N/A	N/A
	SB	2.93	C	N/A	N/A	1.62	A	5.78	F

[1] HCM 2010 LOS score and LOS

[2] LOS is not established for segments without a sidewalk

[3] LOS is not established without a directional transit route; 4. The Draft Multimodal Transportation Impact Study evaluated segment LOS using a different methodology than was used in the 2014 Circulation Element Update. LOS for this segment is estimated using generalized LOS thresholds obtained from the U.S. Department of Transportation Quality/Level of Service Handbook.

Source: Draft Multimodal Transportation Impact Study (see Appendix E); 650 Tank Farm- Tank Farm Road Fair Share Calculation Memorandum

Roadway Facilities

Several segments in the study area would have a V/C ratio that is greater than one under the Cumulative plus Project scenario, which results in LOS F. The 650 Tank Farm- Tank Farm Road Fair Share Calculation memorandum evaluated the LOS on Tank Farm Road from Old Windmill Lane to Santa Fe Road segment, and identified that the LOS would be reduced to E under the methodology that was used in the 2014 Circulation Element Update (refer to Appendix E). The addition of project-added vehicles trips does not result in a decline in LOS at any study area roadway segment, and the nearby intersections along these segments would constrain flow before the segments. However, the project would be required to pay its fair share toward the widening of Tank Farm Road to four lanes between Santa Fe Road and Old Windmill Lane, where the existing LOS impact is exacerbated by project-added vehicle trips. Therefore, the project's contribution to the cumulative automobile LOS impacts at this intersection would be cumulatively considerable.

Pedestrian Facilities

Multiple segments in the study area do not have a pedestrian LOS reported due to the absence of pedestrian facilities, or currently have discontinuous pedestrian facilities. Under Cumulative conditions, multiple segments currently operate at unacceptable conditions. However, none of the segments in the study area would experience a substantial decrease in level of service as a result of

project-added traffic. Therefore, the project's impacts on pedestrian facilities would be less than significant.

Bicycle Facilities

All bicycle facilities operate at LOS C or better under Cumulative and Cumulative plus Project conditions. Therefore, impact on bicycle facilities would be less than significant.

Transit Facilities

Multiple segments in the study area would operate below the City's transit LOS thresholds due to the relatively infrequent service times and/or lack of bus stops on the specific segment under existing and cumulative conditions. The addition of project-generated transit trips would not further degrade the level of service at any of these facilities, or otherwise overburden or substantially decrease the effectiveness of the transit network under Cumulative plus Project conditions. Therefore, impact on transit facilities would be less than significant.

Mitigation Measures

Mitigation Measure T-1 would reduce the queueing impact at the Broad Street/Tank Farm Road intersection to a less than significant level. Mitigation Measure T-2 would address the project's contribution to significant cumulative intersection and segment level of service and queueing impacts.

The effectiveness of these improvements at reducing identified level of service and queueing impacts is discussed in Appendix E. With implementation of Mitigation Measures T-1 and T-2, identified impacts would be reduced to a less than significant level, and the project's contribution to significant cumulative impacts would not be cumulatively considerable.

T-1 **Broad Street/Tank Farm Road Intersection Improvements.** The project applicant shall pay fair share costs for required intersection improvements to address the project's identified queueing impact at the Broad Street/Tank Farm Road intersection. Required intersection improvements include:

- Broad Street/Tank Farm Road: Re-stripe the existing cross-sectional width to provide a second southbound left turn lane.

Alternatively, the identified queueing impact at the Broad Street/Tank Farm Road intersection would be eliminated if the applicant provides a vehicular connection to the adjacent site to the east, which would allow use of the traffic signal at Industrial Way.

Plan Requirements and Timing. The City shall calculate the fair share costs required for payment by the applicant. The applicant shall pay fair share costs upon acceptance by the City of final design plans and in accordance with the timing of improvements. A funding mechanism shall be established as a condition of project approval.

Otherwise, the City shall verify that a vehicular connection to the adjacent site to the east, which would allow use of the traffic signal at Industrial Way, is provided on project site plans.

Monitoring. The City shall verify payment of fair share costs (or inclusion of a vehicular connection to the adjacent site to the east on project site plans) upon acceptance by the City of final design plans.

T-2 **Fair Share Costs for Required Intersection Improvements.** The project applicant shall pay fair share costs for required intersection and segment improvements to address the project's contribution to identified cumulative intersection and segment level of service and queueing impacts. Required intersection improvements include:

- Tank Farm Road/South Higuera Street: Install a second southbound left turn lane.
- Tank Farm Road/Santa Fe Road: Install a multi-lane roundabout.
- Broad Street/Industrial Way: Convert the east and west approaches from split phasing to permissive phasing and restripe both approaches to provide dedicated left turn lanes and shared through/right turn lanes.
- Broad Street/Tank Farm Road: Add a second southbound left turn lane, add a dedicated northbound right turn lane, convert the westbound right turn lane to a shared through/right lane, and establish time-of-day timing plans.

Required segment improvements include:

- Tank Farm Road from Old Windmill Lane to Santa Fe Road: Roadway widening.

Plan Requirements and Timing. The City shall calculate the fair share costs required for payment by the applicant for development of the project site. The applicant shall pay fair share costs upon acceptance by the City of final design plans and in accordance with the timing of improvements. A funding mechanism shall be established as a condition of project approval.

Monitoring. The City shall verify payment of fair share costs upon acceptance by the City of final design plans and in accordance with the timing of improvements.

Residual Impacts Associated with Off-Site Improvements

Implementation of mitigation measures that require off-site improvements would generally not result in significant residual impacts, as these improvements would occur within existing roadway rights-of-way where possible, or within urbanized paved/landscaped areas immediately adjacent to existing roadway rights-of-way. Additional lanes, including roundabouts, may require new improvements outside of existing rights-of-way with the potential to result in residual impacts. At this time, because the specific details of these improvements are not known with certainty, a generalized analysis of potential impacts is provided herein.

During construction of these improvements, potential issue areas that may be temporarily affected would include air quality, cultural resources, hazards and hazardous materials, water quality, noise and transportation. Construction-related environmental impacts would be mitigated through compliance with City permitting and construction monitoring requirements and standard SLOAPCD dust and diesel emission control measures. Long-term impacts of these improvements would include land use impacts associated with acquisition of additional right-of-way.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The project would not result in any changes in air traffic patterns. Therefore, the project would not result in any new safety hazards or increased safety risks. Refer to Section 8, *Hazards and Hazardous Materials,* for a complete discussion of airport related hazards and risks.

NO IMPACT

d. Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

The Draft Multimodal Transportation Impact Study includes an analysis of hazardous conditions for the conceptual site plan (Figure 3). The Draft Multimodal Transportation Impact Study analysis is based on the conceptual site plan for the proposed project, since a final design for development on the project site has not yet been submitted to the City. The Draft Multimodal Transportation Impact Study determined there was no measurable increase in hazardous conditions. Final plans for future development on the project site would be subject to review and approval by the City of San Luis Obispo, and final plans for internal circulation would be required to adhere to applicable policies in the City's Access and Parking Management Plan (City of San Luis Obispo 2011). Since the proposed project would not result in on-site hazards, and final plans for internal circulation would require approval of City staff, including the Fire Department, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project result in inadequate emergency access?

The Draft Multimodal Transportation Impact Study includes an analysis of on-site circulation and site access for the conceptual site plan. The Draft Multimodal Transportation Impact Study determined that the layout depicting two intersections on Tank Farm Road, an arterial street, would be inconsistent with the City's Access and Parking Management Plan policies (Appendix E). The Draft Multimodal Transportation Impact Study analysis is based on the conceptual site plan for the proposed project, shown in Figure 3, since a final design for development on the project site has not been submitted to the City.

Final plans for future development on the project site would be subject to review and approval by the City of San Luis Obispo, and final plans for internal circulation and access would be required to adhere to the policies listed in the City's Access and Parking Management Plan (City of San Luis Obispo 2011). Internal circulation, including ingress and egress would be required to accommodate emergency vehicles, consistent with applicable Fire Department standards. Since the proposed project would not result in on-site hazards or inadequate emergency access, and final plans for site access and internal circulation would require approval of City staff, including the Fire Department, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

17 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	■	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Cod Section 2024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significant of the resource to a California Native American tribe.	☐	☐	■	☐

Setting

California Assembly Bill 52 of 2014 (AB 52), enacted in July 2015, establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). AB 52 further states that lead agencies shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

AB 52 establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

Discussion

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 2024.1?

Rincon staff contacted the Native American Heritage Commission (NAHC) on October 20, 2017 to request a Sacred Lands File (SLF) search of the project site and a contact list of Native Americans culturally affiliated with the project site that may have knowledge of cultural resources within the area. The NAHC responded on October 31, 2017, stating that the results of the SLF search was positive, and provided the telephone number of the Salinan Tribe of Monterey and San Luis Obispo Counties, whom they recommended be contacted for more information. The NAHC also provided a list of 10 groups and/or individuals who may have cultural resources concerns for the project. Rincon sent letters to these 10 contacts and left a voice message for the Salinan Tribe of Monterey and San Luis Obispo Counties on October 31, 2017. Rincon assisted the City of San Luis Obispo with AB 52 consultation by providing instructions, legislation information, draft letters, a project location map, and a correspondence tracking sheet to be used during consultation. Letters were sent to each of the groups listed on the NAHC's Tribal Consultation list on November 15, 2017. The City has not received any requests for consultation from any of these groups regarding the proposed project.

On November 11, 2017, Fred Collins of the Northern Chumash Tribal Council contacted Rincon requesting a copy of the report prepared for the project and stated he would review and make comments on the document. Rincon responded on the same day stating that the report was not yet complete but would coordinate with the City of San Luis Obispo to provide a final copy of the report.

On November 11, 2017, Patti Dunton of the of the Salinan Tribe of Monterey and San Luis Obispo Counties contacted Rincon regarding a recorded Sacred Site to the northeast of the project site at the Damon-Garcia Sports Complex, but stated that she was unaware of any cultural resources located at the project site. Ms. Dunton requested Native American monitoring for the project given the proximity of the Sacred Site to the project location and asked for a copy of the report. Mitigation Measures CR-2(a) through CR-2(c), in Section 5, *Cultural Resources*, require monitoring of the site during subsurface construction disturbance, and describe procedures for unanticipated discovery of cultural resources.

On November 14, 2017, Freddie Romero of the Santa Ynez Band of Chumash Indians contacted Rincon to verify if local Tribes had been notified of the project, and deferred comments to these local groups.

As of August 2018, Rincon has not received any additional responses from Native American contacts regarding Sacred Lands or cultural resources within the project area.

As no cultural resources (see Section 5, *Cultural Resources*) or tribal cultural resources have been identified on site, and as to date, no responses have been provided regarding Sacred Lands or cultural resources on site, impacts to tribal cultural resources are considered less than significant.

LESS THAN SIGNIFICANT IMPACT

18 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	■	☐	☐
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	■	☐	☐
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?	☐	☐	■	☐
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	■	☐	☐
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?	☐	■	☐	☐
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	■	☐
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	■	☐

Setting

Wastewater

The City's wastewater collection system and Water Resource Recovery Facility (WRRF) is managed by the Utilities Department. The wastewater collection system consists of approximately 141 miles

of gravity sewer lines, three miles of force main, and nine sewer lift stations. Wastewater is conveyed to the WRRF, located on Prado Road near U.S. 101.

The WRRF treats about 4.5 million gallons per day (mgd) during dry weather conditions. The current treatment capacity of the WRRF during dry weather conditions is 5.1 mgd. Average dry-weather treatment flows have been stable over the past several years due to a balance between increased population and improved water conservation. In 2015, average flows to the WRRF were approximately 3.5 mgd.

Water

The City Utilities Department provides water service throughout the City. The City obtains water from five sources: Salinas Reservoir (Santa Margarita Lake), Whale Rock Reservoir, Nacimiento Reservoir, and recycled water from the City's Water Resource Recovery Facility. Although groundwater is listed as a potential water source, the City of San Luis Obispo transitioned from utilizing groundwater for potable purposes with the last withdrawal occurring in April 2015. The groundwater wells remain in operable stand by position, but no groundwater is currently pumped (City of San Luis Obispo 2018b). Total annual water use in the City was 4,975 acre feet in 2017 (City of San Luis Obispo 2016a). The 2014 Land Use and Circulation Element Update estimated that water demand will increase to 7,815 acre feet per year (AFY) upon build-out (City of San Luis Obispo 2014c). The City's estimated total water supply is 10,130 AFY, including the City's primary water supply (7,496 AFY), reliability reserve (1,225 AFY), and secondary water supply (1,409 AFY) (City of San Luis Obispo 2018c).

Based on the City's Urban Water Management Plan and LUCE Update EIR, the City does not currently anticipate a need for supplemental water supplies through the year 2035. The City's 2015 Urban Water Management Plan incorporates mandated water conservation targets in response to the severe drought conditions. The City's 2015 budgeting gallons per capita per day (GPCD) was 117, and the actual 2015 GPCD was 92. As noted in the Plan, the City met and surpassed 2015 interim water use reduction targets.

Stormwater

The City's stormwater drainage system is a separate system that collects surface runoff and conveys it to community retention basins, and eventually out to the ocean. The project site is located in the San Luis Obispo Creek Watershed, between Orcutt Creek and Acacia Creek. Orcutt Creek joins Acacia Creek south of the project site. Acacia Creek serves as a tributary to the East Fork of San Luis Obispo Creek. San Luis Obispo Creek is the main tributary in the City, discharging into the Pacific Ocean at Avila Bay. The City's stormwater drainage system currently consists of 59 miles of storm sewer with 2,148 drainage inlets and 490 storm drain manholes (City of San Luis Obispo 2010).

Solid Waste

State Assembly Bill (AB) 939 requires that all communities in the State of California shall recycle at least 50% of the solid waste from the waste stream. With the passage of AB 341 the State has adopted a goal of recycling 75% by the year 2020. To meet these goals, the City has contracted with San Luis Garbage Company to offer the City's businesses and residents commingled single-stream recycling.

SB 1016 simplifies the waste reduction measurement process, by moving from diversion estimates to measuring disposal per capita. The purpose of the per capita disposal measurement system

(Chapter 343, Statutes of 2008 [Wiggins, SB 1016]) is to simplify the process of goal measurement as established by AB 939. SB 1016 accomplishes this by changing to a disposal-based indicator (the per-capita disposal rate) which uses only two factors: a jurisdiction's population (or in some cases employment) and its disposal as reported by disposal facilities (CalRecycle 2017a).

AB 1826 requires businesses to recycle their organic waste, depending on the amount of waste they generate per week. This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units (multifamily dwellings are not required to have a food waste diversion program) (CalRecycle 2018). The law phases in the requirements over time based on the amount and type of waste the business produces on a weekly basis, with full implementation realized in 2019. Additionally, the law contains a 2020 trigger that increases the scope of affected businesses if waste reduction targets are not met. The implementation schedule is as follows:

- January 1, 2016: Local jurisdictions shall have an organic waste recycling program in place.
- January 1, 2017: Businesses that generate 4 cubic yards of organic waste per week shall arrange for organic waste recycling services.
- January 1, 2019: Businesses that generate 4 cubic yards or more of commercial solid waste per week shall arrange for organic waste recycling services.
- Summer/Fall 2021: If CalRecycle determines that the statewide disposal of organic waste in 2020 has not been reduced by 50 percent of the level of disposal during 2014 (based on annual reports prepared by jurisdictions), the organic recycling requirements on businesses will expand to cover businesses that generate 2 cubic yards or more of commercial solid waste per week.

The San Luis Obispo County Integrated Waste Management Authority estimates that the daily per-capita solid waste disposal rate from all sources in the State of California is approximately 4 to 5 pounds. In the City, between 2007 and 2010, the population-related solid waste disposal rate ranged between 4.4 and 5.4 pounds per person, and the employment solid waste disposal rate ranged between 11.7 and 13.8 pounds per person (City of San Luis Obispo 2014c). The regional waste collection facility is Cold Canyon Landfill, located approximately six miles south of the City on Highway 227. The Cold Canyon Landfill operates with a remaining capacity of 3,915,000 tons (based on 2015 data) and annual throughput of 100,000 to 250,000 tons per year (CalRecycle 2017b). The landfill is expected to reach capacity in 2040.

Discussion

a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

b. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

e. Would the project 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?

The proposed new residential and commercial development would increase the amount of wastewater generated on site, and require service from the WRRF. The estimated net increase in wastewater generated by the project is shown in Table 23.

Table 23 Estimated Wastewater Generation

Land Use	Quantity	EDUs	Generation Rate	Amount (gpd)
Existing Use				
Mobile Homes	35 units	35	150 gpd/EDU	5,250
Proposed Uses				
Residential Units	249 units	211.10	150 gpd/EDU	31,665
Commercial Space	17,500 sf		60 gpd/1,000 sf	1,050
Proposed Subtotal				32,715
Net Change (Proposed – Existing)				27,465

EDU = equivalent dwelling unit

gpd = gallons per day

Source: City of San Luis Obispo 2018 Uniform Design Criteria – Section 7 Wastewater Design Standards

As shown in Table 23, potential future development under the proposed project would result in a net increase of 27,465 gallons per day (0.027 mgd). The WRRF has a current excess capacity of 0.6 mgd. The project's anticipated wastewater demand is within the current excess capacity of the WRRF, but the proposed project would increase wastewater generation beyond what is anticipated in the City's General Plan, based on the existing zoning allowances. The project applicant would be required by the City to pay wastewater impact fees to fund improvements to the City's wastewater conveyance system. However, because the project would increase wastewater generation beyond what is anticipated in the City's General Plan, future development may exceed the capacity of the City's wastewater systems.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Mitigation Measures

Mitigation Measure UT-1 is required to reduce wastewater flow generations associated with development under the proposed project, and would ensure capacity of wastewater system's collection, transmission, and treatment to a less than significant level. The application of this measure would also further reduce regional wastewater generation.

UT-1 **Wastewater Reduction Measures.** Prior to issuance of grading permits, the applicant shall define and incorporate into the project design an Inflow and Infiltration reduction strategy consistent with the City's *Wastewater Infrastructure Renewal Strategy*. Prior to issuance of a certificate of occupancy, the developer shall be required to implement, and demonstrate off-site sewer rehabilitation that results in quantifiable inflow and infiltration reduction in the City's wastewater collection system in sub-basin A1, A2, A3, A4, B.2 or B.3 in an amount equal to offset the project's wastewater flow increase. This may be satisfied by one of the following:

- Sufficient reductions in wastewater flow within sub-basins A1, A2, A3, A4, B.2 or B.3, commensurate with the additional wastewater flow contributed by the project, to be achieved by the verified replacement of compromised private sewer laterals, or public sewer mains, either by the developer, or any property owner located within said basins; or

- Participation in a sewer lateral replacement program, or similar inflow and infiltration reduction program to be developed by City if program is in place prior to issuance of certificate of occupancy; or any other off-site sewer rehabilitation proposed by the developer and approved by the Utilities Director, which will achieve a reduction in wastewater flow commensurate with the additional wastewater flow contributed by the project. The final selection of the inflow and infiltration reduction project will be approved by the Utilities Director.

Plan Requirements and Timing. The applicant shall incorporate wastewater reduction measures into development plans and submit evidence to the Utilities Department that these provisions would result in quantifiable inflow and infiltration reduction in the City's wastewater collection system in sub-basin A1, A2, A3, A4, B.2 or B.3 in an amount equal to offset the project's wastewater flow increase.

Monitoring. The Utilities Department shall verify compliance prior to issuance of building permits.

c. Would the project 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?

See Section 9, *Hydrology and Water Quality,* for a full discussion of stormwater generation, run off, impervious surfaces, and associated potential impacts. As discussed, the project includes an on-site retention basin, which would be designed to ensure that peak flows from the project would not exceed existing conditions, and would not necessitate the construction of new stormwater drainage facilities.

LESS THAN SIGNIFICANT IMPACT

d. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Water for existing uses on the project site is supplied by an on-site well. Future development under the proposed project would connect to the City's water supply. Table 24 compares the City's available water with the project's projected usage. Based on the current uses and wastewater generation at the site, and the conceptual land use plan for the project, annual water demand associated with future development of the project site is estimated at approximately 27.5 AFY.

Table 24 Comparison of City Water Supply to Project Use

City Water Supply	City Water Demand	City Water Availability	Existing Water Demand	Projected Water Demand	Projected Increase in Demand
10,130 AFY	7,815 AFY	2,315 AFY	5.5 AFY	32.8 AFY	27.5 AFY

AFY = acre feet per year

Sources: –Will-Serve letter for existing use on the project site; City of San Luis Obispo 2014c; City of San Luis Obispo 2018c

The project's estimated annual water demand would be 32.8 AFY. Based on the existing water demand on the site of 5.5 AFY, the net increase in water demand would be approximately 27.5 AFY, or 1.2 percent of the City of San Luis Obispo's current available potable water of 2,315 AFY. Accordingly, the City currently has sufficient existing municipal water supply to provide potable water to the project. However, the proposed project would increase water demand beyond what is anticipated in the City's General Plan, based on the existing zoning allowances.

Consistent with Ahwahnee Water Principles and the City's General Plan, Conservation and Open Space Policy 10.2.2, the project would be required to irrigate open space and landscaping with recycled water. Project irrigation design would be required to use available tools to ensure water efficiency, including utilizing dedicated landscape water meters, soil moisture sensors, central irrigation controllers and master valves combined with flow sensors as well as weather based irrigation controllers that are tied to California Irrigation Management Information System (CIMIS) weather data for the larger landscape areas. Because the project would increase water demand beyond what is anticipated in the City's General Plan, the impact to the City's water supply would be potentially significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Mitigation Measures

The following mitigation measures are required to reduce potable water demands associated with development under the proposed project, and would ensure capacity of the water system's treatment, storage, and distribution to a less than significant level. The application of the mitigation measures would also further reduce regional water demands.

UT-2 **Water Reduction Measures.** Prior to issuance of grading permits, the applicant shall define and incorporate into the project design water reduction measures consistent with the City's *Recycled Water Master Plan*. Prior to issuance of a certificate of occupancy, the developer shall be required to implement, and demonstrate water offsets that result in quantifiable water demand reductions in the City's potable water distribution system with an amount equal to offset the project's water flow increase. This may be satisfied by one of the following:

- Sufficient reductions in potable water demands, commensurate with the additional water demands contributed by the project, to be achieved by verified conversions of existing irrigation system from potable water to recycled water systems located within the City's potable water distribution system;
- Participation in the construction of new mains for the recycled water transmission system; or construction of any other recycled water main proposed by the developer and approved by the Utilities Director, which will achieve a reduction in potable water demands commensurate with the additional water demands contributed by the project.

Plan Requirements and Timing. The applicant shall incorporate water reduction measures into development plans and submit evidence to the Utilities Department that these provisions would result in quantifiable water demand reductions in the City's potable water distribution system with an amount equal to offset the project's water flow increase.

Monitoring. The Utilities Department shall verify compliance prior to issuance of building permits.

f. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

g. Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Solid waste would be generated during construction and demolition of the existing on-site structures. In accordance with AB 341, potential future development under the proposed project would divert a minimum of 50 percent of construction waste from landfills, which would reduce potential impacts to the Cold Canyon Landfill. The amount of waste generated from operation of the project is shown below in Table 25.

Table 25 Estimated Solid Waste Generation

Land Use	Size	Generation Factor	Total (lbs/day)	Total (tons/day)
Existing Uses				
Mobile Homes	35 coaches	4 lbs/du/day	140	0.070
Proposed Project				
Residential Unit	249 du	4 lbs/du/day	996	0.498
Commercial Space	17,500 sf	2.5 lbs/1000 sf/day	44	0.022
Proposed Project Subtotal			1,040	0.520
Total Net Solid Waste Generation (Proposed – Existing)			900	0.450
Total Solid Waste Sent to Landfill (Assuming 50% diversion rate)			450	0.225

Notes: sf = square feet, lbs = pounds, du= dwelling unit, ( ) denotes subtraction

Coaches conservatively estimated as dwelling units.

*CalRecycle Waste Generation Rates, available at http://www.calrecycle.ca.gov/wastechar/WasteGenRates/

As shown in Table 25, potential future development under the proposed project would generate approximately 450 pounds, or 0.225 tons, of solid waste per day. The project's incremental increase in solid waste (0.225 tons per day) would be within the remaining permitted capacities of Cold Canyon Landfill (3,915,000 tons). Therefore, the project would be served by entities with sufficient permitted capacity to accommodate the project's solid waste disposal needs, and would not result in a substantial physical deterioration of public solid waste facilities.

LESS THAN SIGNIFICANT IMPACT

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19 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, 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?	☐	■	☐	☐
b. 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 past projects, the effects of other current projects, and the effects of probable future projects)?	☐	■	☐	☐
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	■	☐	☐

Discussion

a. Does the project have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, 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?

As discussed in this Initial Study, development of the project has the potential to degrade the quality of the environment in several issue areas without the incorporation of the identified mitigation measures. As discussed in Section 4, *Biological Resources*, in order to avoid or reduce potential adverse impacts to special status plants and animals, implementation of Mitigation Measures BIO-1(a) through BIO-2(g) would be required to reduce impacts to a less than significant level. As discussed in Section 5, *Cultural Resources,* the project has the potential to uncover and disturb previously unidentified archaeological cultural resources. Mitigation Measures CR-1, and CR-2(a) through CR-2(c) would reduce these impacts to a less than significant level. In addition, due the

potential presence of paleontological resources on the project site, Mitigation Measures CR-3(a) through CR-3(e) are required to reduce impacts to a less than significant level. With the incorporation of the mitigation measures discussed throughout this Initial Study, impacts pertaining to plant and animal habitats and eliminating examples of California history would be less than significant.

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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 past projects, the effects of other current projects, and the effects of probable future projects)?

As described in the discussion of environmental checklist Sections 1 through 18, all environmental issues considered in this Initial Study were found to have either no impact, a less than significant impact, or a less than significant impact with mitigation incorporated. Cumulative impacts of several resource areas have been addressed in the individual resource sections, including Section 3, *Air Quality*, Section 7, *Greenhouse Gas Emissions*, Section 12, *Noise*, Section 16, *Transportation/Circulation*, and Section 18, *Utilities and Service Systems* (CEQA Guidelines Section 15064(h)(3)). Other issues (e.g., Geology/Soils, Hazards and Hazardous Materials) are by their nature project-specific and impacts at one location do not add to impacts at other locations or create additive impacts. Therefore, the impacts of development of the site under the proposed project would be individually limited and not cumulatively considerable.

Although incremental changes in certain issue areas would occur as a result of the project, development of the site under the proposed project would be required to be consistent with existing general plan goals, programs, and policies, and zoning ordinance requirements for the proposed service commercial zoning. All environmental impacts that could occur as a result of the project would be reduced to a less than significant level through compliance with existing regulations and applicable General Plan policies and Municipal Code requirements discussed in this Initial Study and implementation of the mitigation measures recommended in this Initial Study for the following resource areas: air quality, biological resources, cultural resources, geology and soils, hydrology and water quality, noise, transportation, and utilities and service systems.

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

Effects on human beings are generally associated with impacts related to such issue areas as air quality, geology and soils, hydrology and water quality, noise, traffic safety, and hazards. As discussed in this Initial Study, implementation of the project would result in potential environmental impacts with respect to air quality, hydrology and water quality, geology and soils, and transportation. As discussed in Section 3, *Air Quality,* the project would generate air quality pollutants above SLOAPCD operational thresholds (ROG + NO_X). However, Mitigation Measures AQ-1(a) through AQ-1(c) are required to reduce operational and construction emissions. As discussed in Section 6, *Geology and Soils,* Mitigation Measure GEO-1 would ensure that a geotechnical report is prepared, that any potential geologic hazards are documented and analyzed, and that all recommendations in the report are implemented as part of the project. This would ensure that geologic hazards are reduced, and impacts remain less than significant. As discussed in Section 9, *Hydrology and Water Quality*, since the project is located in a mapped 100-year flood zone,

Mitigation Measure HYD-1 is required, which would ensure that the site is removed from the FEMA 100-year flood plain, and that proposed future residents would not be exposed to special flood zone hazards. As discussed in *Section 16, Transportation,* Mitigation Measures T-1 and T-2 would introduce circulation improvements pertaining to the Tank Farm Road/Broad Street Intersection, as well as require the project applicant to pay their fair share of fees towards improvements necessary to reduce the project's contribution to cumulative automobile level of service and queueing impacts. As discussed in *Section 18, Utilities and Service Systems*, Mitigation Measure UT-1 and UT-2 would require wastewater reduction measures and water conservation measures. As discussed throughout this Initial Study, with implementation of identified Mitigation Measures, the project would not cause substantial adverse effects on human beings, either directly or indirectly and impacts would be less than significant.

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Mitigation Summary

AQ-1(a) **SLOAPCD Operational Emissions Reduction Measures.** Prior to issuance of grading permits, the applicant shall define and incorporate into project design at least four of the standard emission reduction measures from the SLOAPCD *CEQA Air Quality Handbook* (Table 3-5). Emission reduction measures shall include, but would not be limited to:

- Provide a pedestrian friendly and interconnected streetscape with good access to/from the development for pedestrians, bicyclists, and transit users to make alternative transportation more convenient, comfortable, and safe.
- Provide shade over 50% of parking spaces to reduce evaporative emissions from parked vehicles.
- Incorporate traffic calming modification into project roads to reduce vehicle speeds and increase pedestrian and bicycle usage and safety.
- Work with SLOCOG to create, improve, or expand a nearby 'Park and Ride' lot with car parking and bike lockers in proportion to the size of the project.
- Exceed Cal Green standards by 25% for providing on-site bicycle parking: both short term racks and long term lockers, or a locked room with standard racks and access limited to bicyclists only.
- Provide improved public transit amenities (covered transit turnouts, direct pedestrian access, bicycle racks, covered bench, smart signage, route information displays, lighting, etc.)
- Provide bicycle-share program for development.
- Provide dedicated parking for carpools, vanpools, and/or high-efficiency vehicles to meet or exceed Cal Green Tier 2.

AQ-1(b) **Fugitive Dust Control Measures**. Construction projects shall implement the following dust control measures so as to reduce PM_{10} emissions in accordance with SLOAPCD requirements.

- Reduce the amount of the disturbed area where possible;
- Water trucks or sprinkler systems shall be used during construction in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency shall be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water shall be used whenever possible;
- All dirt stock pile areas shall be sprayed daily as needed;
- Permanent dust control measures identified in the approved project revegetation and landscape plans shall be implemented as soon as possible following completion of any soil disturbing activities;
- Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established;

- All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD;
- All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible after grading unless seeding or soil binders are used;
- Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered or shall maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code Section 23114;
- Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site;
- Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water shall be used where feasible;

AQ-1(c) **Standard Control Measures for Construction Equipment.** The following standard air quality mitigation measures shall be implemented during construction activities at the project site:

- Maintain all construction equipment in proper tune according to manufacturer's specifications;
- Fuel all off-road and portable diesel powered equipment with ARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);
- Use diesel construction equipment meeting ARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State Off-Road Regulation;
- Use on-road heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;
- Construction or trucking companies with fleets that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g. captive or NO_X exempt area fleets) may be eligible by proving alternative compliance;
- All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5 minute idling limit;
- Diesel idling within 1,000 feet of sensitive receptors is not permitted;
- Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
- Electrify equipment when feasible;
- Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and
- Use alternatively fueled construction equipment on-site where feasible, such as compressed natural gas, liquefied natural gas, propane or biodiesel.

Plan Requirements and Timing. The applicant shall incorporate operational emissions reduction measures into development plans and submit evidence to the Community Development Department that these provisions would reduce long-term operational emissions have been reduced to below daily threshold levels prior to issuance of grading permits. Fugitive dust control measures and standard control measures for construction equipment shall be shown on grading and construction plans prior to issuance of permits.

Monitoring. The Community Development Department shall verify compliance prior to issuance of grading or construction permits. The contractor or builder shall designate a person or persons to monitor fugitive dust emissions as necessary during construction to minimize dust complaints, reduce visible emissions below 20 percent opacity, and to prevent transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Compliance Division prior to the start of any grading, earthwork or demolition. The Community Development Department shall site inspect to ensure construction activities are completed in accordance with approved plans, and development is in accordance with approved plans prior to occupancy clearance. Community Development staff shall verify installation of operational emissions reduction measures in accordance with approved building plans.

BIO-1(a) **Special Status Plant Species Surveys.** Prior to the start of vegetation management activities on the project site, or prior to the start of any construction activity within potential off-site improvement areas, the developer shall ensure an approved biologist conducts surveys for special status plant species throughout suitable habitat. Surveys shall be conducted when plants with potential to occur are in a phenological stage conducive to positive identification (i.e., usually during the blooming period for the species), a qualified biologist shall conduct surveys for special status plant species throughout suitable habitat within all potential vegetation management areas. Reference sites must be visited prior to botanical surveys to confirm target species are detectable. Valid botanical surveys will be considered current for up to five years; if construction has not commenced within five years of the most recent survey, botanical surveys must be repeated.

BIO-1(b) **Special Status Plant Species Avoidance**. If special status plant species are discovered within the project site or potential off-site improvement areas, an approved biologist shall flag and fence these locations before construction activities start to avoid impacts. During vegetation management activities, any special status plants identified during the survey must be flagged for avoidance.

BIO-1(c) **Restoration Plan.** If avoidance is not feasible; all impacts shall be mitigated at a minimum ratio of 2:1 (number of acres or individuals restored to number of acres or individuals impacted) for each species as a component of habitat restoration. A qualified biologist shall prepare and submit a restoration plan to the City for approval. The restoration plan shall include, at a minimum, the following components:

- Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type);

- Goal(s) of the compensatory mitigation project [type(s) and area(s) of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type(s) to be established, restored, enhanced, and/or preserved];
- Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions and values);
- Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan [including species to be used, container sizes, seeding rates, etc.]);
- Maintenance activities during the monitoring period, including weed removal and irrigation as appropriate (activities, responsible parties, schedule);
- Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year, along with performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, and annual monitoring reports to be submitted to the City for a minimum of five years at which time the applicant shall demonstrate that performance standards/success criteria have been met;
- Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80% survival of container plants and 30% relative cover by vegetation type;
- An adaptive management program and remedial measures to address any shortcomings in meeting success criteria;
- Notification of completion of compensatory mitigation and agency confirmation; and
- Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism).

BIO-2(a) **Best Management Practices.** The following Best Management Practices (BMPs) shall be implemented for project construction activities within the work area.

- No pets or firearms shall be allowed at the project site during construction activities.
- All trash that may attract predators must be properly contained and removed from the work site. All such debris and waste shall be picked up daily and properly disposed of at an appropriate site.
- All refueling, maintenance, and staging of equipment and vehicles shall occur at least 50 feet from Acacia Creek and Orcutt Creek and in a location where a spill would not drain toward aquatic habitat. A plan must be in place for prompt and effective response to any accidental spills prior to the onset of work activities. All workers shall be informed of the appropriate measures to take should an accidental spill occur.
- Pallets or secondary containment areas for chemicals, drums, or bagged materials shall be provided. Should material spills occur, materials and/or contaminants shall be cleaned from the project site and recycled or disposed of to the satisfaction of the Regional Water Quality Control Board.

- Prior to construction activities within 30 feet of potentially jurisdictional features, including Acacia Creek and Orcutt Creek, the drainage features shall be fenced with orange construction fencing and signed to prohibit entry of construction equipment and personnel unless authorized by the City. Fencing should be located a minimum of 30 feet from the edge of the riparian canopy or top of bank and shall be maintained throughout the construction period for each phase of development. Once all phases of construction in this area are complete, the fencing may be removed.
- Erosion control and landscaping specifications allow only natural-fiber, biodegradable meshes and coir rolls, to prevent impacts to the environment and to fish and terrestrial wildlife.
- All vehicles and equipment shall be in good working condition and free of leaks.
- Construction work shall be restricted to daylight hours (7:00 AM to 7:00 PM) to avoid impacts to nocturnal and crepuscular (dawn and dusk activity period) species.
- Concrete truck and tool washout shall be limited to locations designated by a qualified biologist or a Qualified Storm-water Practitioner such that no runoff will reach Acacia Creek or Orcutt Creek.
- All open trenches shall be constructed with appropriate exit ramps to allow species that accidentally fall into a trench to escape. Trenches will remain open for the shortest period necessary to complete required work.
- No water will be impounded in a manner to attract sensitive species.

BIO-2(b) **Worker Environmental Awareness Program.** Prior to the initiation of construction activities (including staging and mobilization), all personnel associated with project construction shall attend a Worker Environmental Awareness Program (WEAP) training.

The training shall be conducted by a qualified biologist, to aid workers in recognizing special status resources that may occur in the project area. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and avoidance measures required to reduce impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction of the project. All employees shall sign a form provided by the trainer documenting they have attended the training.

BIO-2(c) **California Red-legged Frog Impact Avoidance and Minimization.** The following shall be implemented to avoid and minimize potential impacts to CRLF.

- A pre-construction survey of the proposed disturbance footprint (within the project site or potential off-site improvement areas) for California red-legged frog shall be conducted by a qualified biologist within 48 hours prior to the start of project construction to confirm this species is not present in the work area.
- In the event the pre-construction survey identifies the presence of individuals of CRLF, or if individuals of these species are encountered during construction,

then the applicant shall stop work and comply with all relevant requirements of the Federal Endangered Species Act prior to resuming project activities.

- Only City- and USFWS-approved biologists shall participate in activities associated with the capture, handling, and monitoring of CRLF.
- If activities occur between November 1 and April 30, the qualified biologist shall conduct a pre-activity clearance sweep prior to start of project activities on the morning following any rain events of 0.1 inch or greater.

BIO-2(d) **Coast Range Newt, Two-striped Garter Snake, and Western Pond Turtle Impact Avoidance and Minimization**. A qualified biologist shall conduct a pre-construction survey within 48 hours of initial ground disturbing activities associated with any off-site improvements, including modifications to the existing crossing over Acacia Creek or the development of a new crossing over Orcutt Creek. The survey area shall include any proposed disturbance area(s) and all proposed ingress/egress routes. If any of these species are found and individuals may be injured or killed by work activities, the biologist shall be allowed sufficient time to move them from the project site before work activities begin. The biologist(s) shall relocate any coast range newts, two-striped garter snakes, and/or western pond turtles the shortest distance possible to a location that contains suitable habitat that is not likely to be affected by activities associated with the project.

BIO-2(e) **Steelhead – South-central California Coast DPS Impact Avoidance and Minimization**. The applicant shall implement the following to avoid and minimize potential impacts to steelhead.

- Construction associated with the widening of the existing crossing over Acacia Creek shall be restricted to periods of dry weather from April 16 through October 31, and shall not be conducted within 48 hours after a rain event of 0.25 inch or greater, or until an approved biologist confirms there is no longer a chance for flowing water to enter the work area.
- Widening of the existing crossing shall follow the design standards developed by the City of San Luis Obispo and shall be developed in a manner that does not impede wildlife movement.

BIO-2(f) **Nesting Birds Impact Avoidance and Minimization**. The following actions shall be undertaken to avoid and minimize potential impacts to nesting birds:

- For construction activities occurring during the nesting season (generally February 1 to September 15), surveys for nesting birds covered by the California Fish and Game Code and the Migratory Bird Treaty Act shall be conducted by a qualified biologist no more than 14 days prior to vegetation removal. The surveys shall include the disturbance area plus a 500-foot buffer around the site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of 50 feet for non-raptor bird species and at least 300 feet for raptor species. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer.

- If feasible, removal of vegetation within suitable nesting bird habitats will be scheduled to occur in the fall and winter (between September 1 and February 14), after fledging and before the initiation of the nesting season.
- If a suspected American bald eagle nest is discovered during the pre-construction survey, then the applicant shall consult with the City, USFWS, and CDFW regarding appropriate nest buffers and nest monitoring. If a nest is discovered with construction underway, a no-activity buffer a minimum of 660 feet from the nest must be implemented, or as otherwise directed by CDFW and USFWS, until appropriate authorizations are obtained. Any subsequent buffer adjustments shall be made in consultation with the City, CDFW and USFWS and shall rely on monitoring observations and activity at the site. Additional avoidance measures for special status bird nests such as American bald eagle nests are often required, and would be developed in consultation with the City, CDFW and USFWS.

BIO-2(g) **Roosting Bat Impact Avoidance and Minimization.** The following actions shall be undertaken to avoid and minimize potential impacts to roosting bats:

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

Plan Requirements and Timing. Special status species protection plans and surveys shall be prepared by the applicant and shall be submitted to for review and approval by the City prior to the approval of grading and construction permits. Any required permits shall be obtained from the state and federal agencies prior to issuance of grading permits.

Monitoring. The Environmental Monitor shall monitor environmental compliance of the construction activities throughout the construction period or as stipulated in the

species- or resource-specific mitigation measure and provide monitoring reports to the City.

BIO-3 **Wetland, Stream, and Riparian Habitat Mitigation and Monitoring**. Temporary impact areas shall be restored at a one to one (1:1) ratio (one acre of restoration for each acre of impact) to offset temporary losses in wetland, stream, or riparian function. Permanent impacts on jurisdictional areas shall be offset through creation, restoration, and/or enhancement of in-kind habitats at a minimum ratio of 2:1. Permitting agencies (CDFW, USACE, RWQCB) may require a higher mitigation ratio associated with applicable permits.

A Mitigation and Monitoring Plan is required to outline the approach that will be taken for restoration and habitat creation or enhancement. The plan shall be prepared by a qualified restoration ecologist. The plan shall include, but not be limited to the following components:

- Description of the project/impact site,
- Goal(s) of the compensatory mitigation,
- Description of the proposed compensatory mitigation-site,
- Implementation plan for the compensatory mitigation-site,
- Maintenance activities during the monitoring period,
- Monitoring plan for the compensatory mitigation-site,
- Success criteria and performance standards,
- Reporting requirements, and
- Contingency measures and funding mechanisms.

Plan Requirements and Timing. Crossing structure designs and the Mitigation and Monitoring Plan shall be prepared by the applicant and shall be submitted to for review and approval by the City prior to the approval of grading and construction permits. Any required permits shall be obtained from the state and federal agencies prior to issuance of grading permits.

Monitoring. The Environmental Monitor shall monitor environmental compliance of the construction activities throughout the construction period or as stipulated in the Mitigation and Monitoring Plan and provide monitoring reports to the City.

CR-2(a) **Retain a Qualified Principal Investigator.** In accordance with the City's Conservation and Open Space Policies 3.5.6 and 3.5.7, a qualified principal investigator, defined as an archaeologist who meets the Secretary of the Interior's Standards for professional archaeology (hereafter qualified archaeologist), shall be retained to carry out all mitigation measures related to archaeological resources.

Monitoring shall involve inspection of subsurface construction disturbance in the immediate vicinity of known sites, or at locations that may harbor buried resources that were not identified on the site surface. A Native American monitor shall also be present because the area is a culturally-sensitive location. The monitor(s) shall be on-site on a full-time basis during earthmoving activities, including grading, trenching, vegetation removal, or other excavation activities.

CR-2(b) **Extended Phase I (XPI) Testing Program.** An extended phase I (XPI) testing program, utilizing standard shovel test pits and/or hand auguring at arbitrary levels, shall be conducted for development activity that would require ground disturbance within the potential off-site improvement areas, including riparian areas associated with the Orcutt Creek and Acacia Creek corridors, and in riparian areas immediately north of the project site.

If the XPI program identifies subsurface deposits that cannot be avoided by project design, a Phase II evaluation program shall be prepared to determine whether development would significantly impact identified resources.

If the Phase II evaluation program identifies identified resources as significant, a Phase III data recovery program shall be prepared and implemented. The purpose of the Phase III data recovery program is to recover, analyze, interpret, report, curate, and preserve archaeological data that would otherwise be destroyed.

The testing and evaluation programs shall be prepared by a qualified archaeologist prior to the issuance of grading permits, and shall be submitted for review and approval by the City prior to the approval of grading and construction permits. The qualified archaeologist shall monitor compliance with testing and evaluation program requirements during implementation of the testing and evaluation programs.

CR-2(b) **Unanticipated Discovery of Cultural Resources.** If cultural resources are encountered during ground-disturbing activities, work in the immediate area must halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (NPS 1983) should be contacted immediately to evaluate the find. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation and Native American consultation may be warranted to mitigate any significant impacts.

Plan Requirements and Timing. The project applicant shall retain a qualified archaeologist prior to the issuance of grading permits. If resources are found, the project applicant shall retain a qualified archaeologist and Native American monitor prior to the issuance of grading permits. The requirement that construction work be stopped in the event of discovery of archaeological resources shall be included on construction plans prior to the issuance of grading permits.

Monitoring. The City shall confirm the qualifications of and approve the applicant's choice of a qualified archaeologist. The City shall inspect the site periodically during grading and demolition to ensure compliance with this measure. The City shall review construction plans and periodically inspect project construction to ensure compliance with these measures.

CR-3(a) **Paleontological Monitoring**. Prior to the commencement of ground disturbing activities under the project, a qualified professional paleontologist shall be retained to conduct paleontological monitoring during project ground disturbing activities. The Qualified Paleontologist (Principal Paleontologist) shall have at least a Master's Degree or equivalent work experience in paleontology, shall have knowledge of the local paleontology, and shall be familiar with paleontological procedures and techniques.

Ground disturbing construction activities (including grading, trenching, drilling with an auger greater than 3 feet in diameter, and other excavation) within previously undisturbed sediments at depths greater than six feet shall be monitored on a full-time basis. Monitoring shall be supervised by the Qualified Paleontologist and shall be conducted by a qualified paleontological monitor, who is defined as an individual who meets the minimum qualifications per standards set forth by the SVP (2010), which includes a B.S. or B.A. degree in geology or paleontology with one year of monitoring experience and knowledge of collection and salvage of paleontological resources.

The duration and timing of the monitoring shall be determined by the Qualified Paleontologist. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, he or she may recommend reducing monitoring to periodic spot-checking or cease entirely. Monitoring would be reinstated if any new ground disturbances are required and reduction or suspension would need to be reconsidered by the Qualified Paleontologist. Ground-disturbing activity that does not exceed six feet in depth within Quaternary alluvium would not require paleontological monitoring.

CR-3(b) **Fossil Discovery, Preparation, and Curation**. In the event that a paleontological resource is discovered, the monitor shall have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and collected. Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection along with all pertinent field notes, photos, data, and maps. Curation fees are assessed by the repository, and are the responsibility of the project owner.

CR-3(c) **Final Paleontological Mitigation Report**. At the conclusion of laboratory work and museum curation, a final report shall be prepared describing the results of the paleontological mitigation monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. The report shall be submitted to the lead agency(s) for the project. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.

Plan Requirements, Timing, and Monitoring. The project applicant shall retain the qualified paleontologist prior to the issuance of grading permits. Prior to the issuance of any construction related permits, the City shall confirm that the training of construction personnel has occurred. During initial ground disturbance, the project applicant shall ensure that the qualified paleontologist is on-site and monitoring during these activities. The Final Paleontological Monitoring Report shall be submitted to the City of San Luis Obispo once ground-disturbing activities are finished.

Monitoring. Prior to initial ground disturbance, the City shall confirm the qualifications of and approve the applicant's choice of the qualified paleontologist. The City shall inspect the site periodically during grading and demolition to ensure compliance with this measure. The City shall review construction plans and

periodically inspect project construction to ensure compliance with these measures. The City shall review and approval the Final Paleontological Monitoring Report.

GEO-1 **Site Geotechnical Study.** 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. In addition to a liquefaction analysis, the Geotechnical Study shall include an evaluation of the potential for soil settlement and soil expansion beneath the project site. All on-site structures shall comply with applicable methods of State and Local Building Codes.

Future development of the site shall incorporate all applicable engineering requirements and recommendations as presented in the Geotechnical Study. Suitable measures to reduce liquefaction, settlement, and soil expansion impacts may 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;
- In-situ densification of soils or other alterations to the ground characteristics; or
- Other alterations to the ground characteristics.
- Excavation and re-compaction of on-site or imported soils;
- Treatment of existing soils by mixing a chemical grout into the soils prior to re-compaction; 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.

Plan Requirements and Timing. The Applicant shall submit a geotechnical study in accordance with this mitigation measure for approval prior to site development. Applicable engineering requirements shall be incorporated into project site plans submitted for approval before the issuance of grading and building permits.

Monitoring. The Community Development Department shall verify compliance prior to issuance of grading permits. The Community Development Department shall site inspect to ensure development is in accordance with approved plans prior to occupancy clearance. Community Development staff shall verify installation in accordance with approved building plans.

HYD-1 **Conditional Letter of Map Revision/Letter of Map Revision**. The applicant shall prepare the CLOMR application and obtain a LOMR from FEMA.

Plan Requirements and Timing. The applicant shall prepare the CLOMR application and submit it to FEMA.

Monitoring. The City will confirm that FEMA has approved the CLOMR prior to issuance of a grading permit, and LOMR prior to issuance of a building permit.

N-1 **Interior Noise Reduction**. If the final project site design includes residential units facing Tank Farm Road in the structures located closest to Tank Farm Road, the project site developer shall implement the following measures, or similar combination of measures, which demonstrate that interior noise levels in residences facing Tank Farm Road would be reduced below the City's 45 dBA CNEL interior noise standard. The required interior noise reduction shall be achieved through a combination of standard interior noise reduction techniques, which may include (but are not limited to):

- In order for windows and doors to remain closed, mechanical ventilation such as air conditioning shall be provided for all units facing Tank Farm Road (passive ventilation may be provided, if mechanical ventilation is not necessary to achieve interior noise standards, as demonstrated by a qualified acoustical consultant).
- All exterior walls shall be constructed with a minimum STC rating of 50, consisting of construction of 2 inch by 4 inch wood studs with one layer of 5/8 inch Type "X" gypsum board on each side of resilient channels on 24 inch centers and 3 ½ inch fiberglass insulation.
- All windows and glass doors shall be rated STC 39 or higher such that the noise reduction provided will satisfy the interior noise standard of 45 dBA CNEL.
- An acoustical test report of all the sound-rated windows and doors shall be provided to the City for review by a qualified acoustical consultant to ensure that the selected windows and doors in combination with wall assemblies would reduce interior noise levels sufficiently to meet the City's interior noise standard.
- All vent ducts connecting interior spaces to the exterior (i.e., bathroom exhaust, etc.) shall have at least two 90 degree turns in the duct.
- All windows and doors facing Tank Farm Road shall be installed in an acoustically-effective manner. Sliding window panels shall form an air-tight seal when in the closed position and the window frames shall be caulked to the wall opening around the perimeter with a non-hardening caulking compound to prevent sound infiltration. Exterior doors shall seal air-tight around the full perimeter when in the closed position.
- The applicant shall submit a report to the Community Development Department by a qualified acoustical consultant certifying that the specific interior noise reduction techniques included in residential, hotel, and office components of the project would achieve interior noise levels that would not exceed 45 dBA CNEL.

Plan Requirements and Timing**.** These requirements shall be incorporated into all the building plan submittals.

Monitoring**.** The Community Development Department shall verify compliance prior to approval of the building plans and shall verify installation in accordance with approved building plans.

N-2(a) **Construction Equipment Best Management Practices.** For all construction activity at the project site, noise attenuation techniques shall be employed to ensure that noise levels are maintained within levels allowed by the City of San Luis Obispo Municipal Code, Title 9, Chapter 9.12 (Noise Control). Such techniques shall include:

- Sound blankets on noise-generating equipment.
- Stationary construction equipment that generates noise levels above 60 dBA at the project boundaries shall be shielded with barriers that meet a sound transmission class (a rating of how well noise barriers attenuate sound) of 25.
- All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers.
- For stationary equipment, the applicant shall designate equipment areas with appropriate acoustic shielding on building and grading plans. Equipment and shielding shall be installed prior to construction and remain in the designated location throughout construction activities.
- Electrical power shall be used to power air compressors and similar power tools.
- The movement of construction-related vehicles, with the exception of passenger vehicles, along roadways adjacent to sensitive receptors shall be limited to the hours between 7:00 AM and 7:00 PM, Monday through Saturday. No movement of heavy equipment shall occur on Sundays or official holidays (e.g., Thanksgiving, Labor Day).
- Temporary sound barriers shall be constructed between the construction site and the single-family residence to the southeast.

N-2(b) **Neighboring Property Owner Notification and Construction Noise Complaints.** The contractor shall inform the property owner of the single-family residence to the southeast of the project site of proposed construction timelines and noise complaint procedures to minimize potential annoyance related to construction noise. Proof of mailing the notice shall be provided to the Community Development Department before the City issues a zoning clearance. Signs shall be in place before beginning of and throughout grading and construction activities. Noise-related complaints shall be directed to the City's Community Development Department.

Plan Requirements and Timing**.** Construction plans shall note construction hours, truck routes, and construction Best Management Practices (BMPs) and shall be submitted to the City for approval prior to grading and building permit issuance for each project phase. BMPs shall be identified and described for submittal to the City for review and approval prior to building or grading permit issuance. BMPs shall be adhered to for the duration of the project. The applicant shall provide and post signs stating these restrictions at construction site entries. Signs shall be posted prior to commencement of construction and maintained throughout construction. Schedule and neighboring property owner notification mailing list shall be submitted 10 days prior to initiation of any earth movement. The Community Development department shall confirm that construction noise reduction measures are incorporated in plans prior to approval of grading/building permit issuance.

All construction workers shall be briefed at a pre-construction meeting on construction hour limitations and how, why, and where BMP measures are to be implemented. A workday schedule will be adhered to for the duration of construction for all phases.

Monitoring**.** City staff shall ensure compliance throughout all construction phases. Building inspectors and permit compliance staff shall periodically inspect the site for compliance with activity schedules and respond to complaints.

T-1 **Broad Street/Tank Farm Road Intersection Improvements.** The project applicant shall pay fair share costs for required intersection improvements to address the project's identified queueing impact at the Broad Street/Tank Farm Road intersection. Required intersection improvements include:

- Broad Street/Tank Farm Road: Re-stripe the existing cross-sectional width to provide a second southbound left turn lane.

Alternatively, the identified queueing impact at the Broad Street/Tank Farm Road intersection would be eliminated if the applicant provides a vehicular connection to the adjacent site to the east, which would allow use of the traffic signal at Industrial Way.

Plan Requirements and Timing. The City shall calculate the fair share costs required for payment by the applicant. The applicant shall pay fair share costs upon acceptance by the City of final design plans and in accordance with the timing of improvements. A funding mechanism shall be established as a condition of project approval.

Otherwise, the City shall verify that a vehicular connection to the adjacent site to the east, which would allow use of the traffic signal at Industrial Way, is provided on project site plans.

Monitoring. The City shall verify payment of fair share costs (or inclusion of a vehicular connection to the adjacent site to the east on project site plans) upon acceptance by the City of final design plans.

T-2 **Fair Share Costs for Required Intersection Improvements.** The project applicant shall pay fair share costs for required intersection improvements to address the project's contribution to identified cumulative intersection level of service and queueing impacts. Required intersection improvements include:

- Tank Farm Road/South Higuera Street: Install a second southbound left turn lane.
- Tank Farm Road/Santa Fe Road: Install a multi-lane roundabout.
- Broad Street/Industrial Way: Convert the east and west approaches from split phasing to permissive phasing and restripe both approaches to provide dedicated left turn lanes and shared through/right turn lanes.
- Broad Street/Tank Farm Road: Add a second southbound left turn lane, add a dedicated northbound right turn lane, convert the westbound right turn lane to a shared through/right lane, and establish time-of-day timing plans.

Plan Requirements and Timing. The City shall calculate the fair share costs required for payment by the applicant for development of the project site. The applicant shall pay fair share costs upon acceptance by the City of final design plans and in accordance with the timing of improvements. A funding mechanism shall be established as a condition of project approval.

Monitoring. The City shall verify payment of fair share costs upon acceptance by the City of final design plans and in accordance with the timing of improvements.

UT-1 **Wastewater Reduction Measures.** Prior to issuance of grading permits, the applicant shall define and incorporate into the project design an Inflow and Infiltration reduction strategy consistent with the City's *Wastewater Infrastructure Renewal Strategy*. Prior to issuance of a certificate of occupancy, the developer shall be required to implement, and demonstrate off-site sewer rehabilitation that results in quantifiable inflow and infiltration reduction in the City's wastewater collection system in sub-basin A1, A2, A3, A4, B.2 or B.3 in an amount equal to offset the project's wastewater flow increase. This may be satisfied by one of the following:

- Sufficient reductions in wastewater flow within sub-basins A1, A2, A3, A4, B.2 or B.3, commensurate with the additional wastewater flow contributed by the project, to be achieved by the verified replacement of compromised private sewer laterals, or public sewer mains, either by the developer, or any property owner located within said basins; or
- Participation in a sewer lateral replacement program, or similar inflow and infiltration reduction program to be developed by City if program is in place prior to issuance of certificate of occupancy; or any other off-site sewer rehabilitation proposed by the developer and approved by the Utilities Director, which will achieve a reduction in wastewater flow commensurate with the additional wastewater flow contributed by the project. The final selection of the inflow and infiltration reduction project will be approved by the Utilities Director.

Plan Requirements and Timing. The applicant shall incorporate wastewater reduction measures into development plans and submit evidence to the Utilities Department that these provisions would result in quantifiable inflow and infiltration reduction in the City's wastewater collection system in sub-basin A1, A2, A3, A4, B.2 or B.3 in an amount equal to offset the project's wastewater flow increase.

Monitoring. The Utilities Department shall verify compliance prior to issuance of building permits.

UT-2 **Water Reduction Measures.** Prior to issuance of grading permits, the applicant shall define and incorporate into the project design water reduction measures consistent with the City's *Recycled Water Master Plan*. Prior to issuance of a certificate of occupancy, the developer shall be required to implement, and demonstrate water offsets that result in quantifiable water demand reductions in the City's potable water distribution system with an amount equal to offset the project's water flow increase. This may be satisfied by one of the following:

- Sufficient reductions in potable water demands, commensurate with the additional water demands contributed by the project, to be achieved by verified conversions of existing irrigation system from potable water to recycled water systems located within the City's potable water distribution system;
- Participation in the construction of new mains for the recycled water transmission system; or construction of any other recycled water main proposed by the developer and approved by the Utilities Director, which will achieve a reduction in potable water demands commensurate with the additional water demands contributed by the project.

Plan Requirements and Timing. The applicant shall incorporate water reduction measures into development plans and submit evidence to the Utilities Department that these provisions would result in quantifiable water demand reductions in the City's potable water distribution system with an amount equal to offset the project's water flow increase.

Monitoring. The Utilities Department shall verify compliance prior to issuance of building permits.

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