



**CITY OF
SAN LUIS OBISPO**

**INITIAL STUDY
ENVIRONMENTAL CHECKLIST FORM
For ANNX-2030-2018 / EID-0006-2020**

1. Project Title:

East Airport Pre-Annexation Agreement and Annexation of Lands to the City of San Luis Obispo

2. Lead Agency Name and Address:

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

3. Contact Persons and Phone Number:

David Watson, Contract Planner
dave@watsonplanning.us (805) 704-8728

Shawna Scott, Senior Planner
sscott@slocity.org (805) 781-7176

4. Project Location:

Approximately 59 acres located immediately east of Broad Street between Farmhouse Lane and Kendall Road, including Allene Way, Morabito Place and Prospect Streets.

5. Project Sponsor's Name and Address:

East Airport Commerce Park / Senn-Glick
c/o C. M. Florence, AICP - Oasis Associates
3427 Miguelito Court, San Luis Obispo, CA 93401

6. General Plan Designation:

Services and Manufacturing Land Use Designation (Airport Area Specific Plan)

7. Zoning:

Current County of San Luis Obispo General Plan Designation: Commercial Service

Proposed Service Commercial zoning (Airport Area Specific Plan)

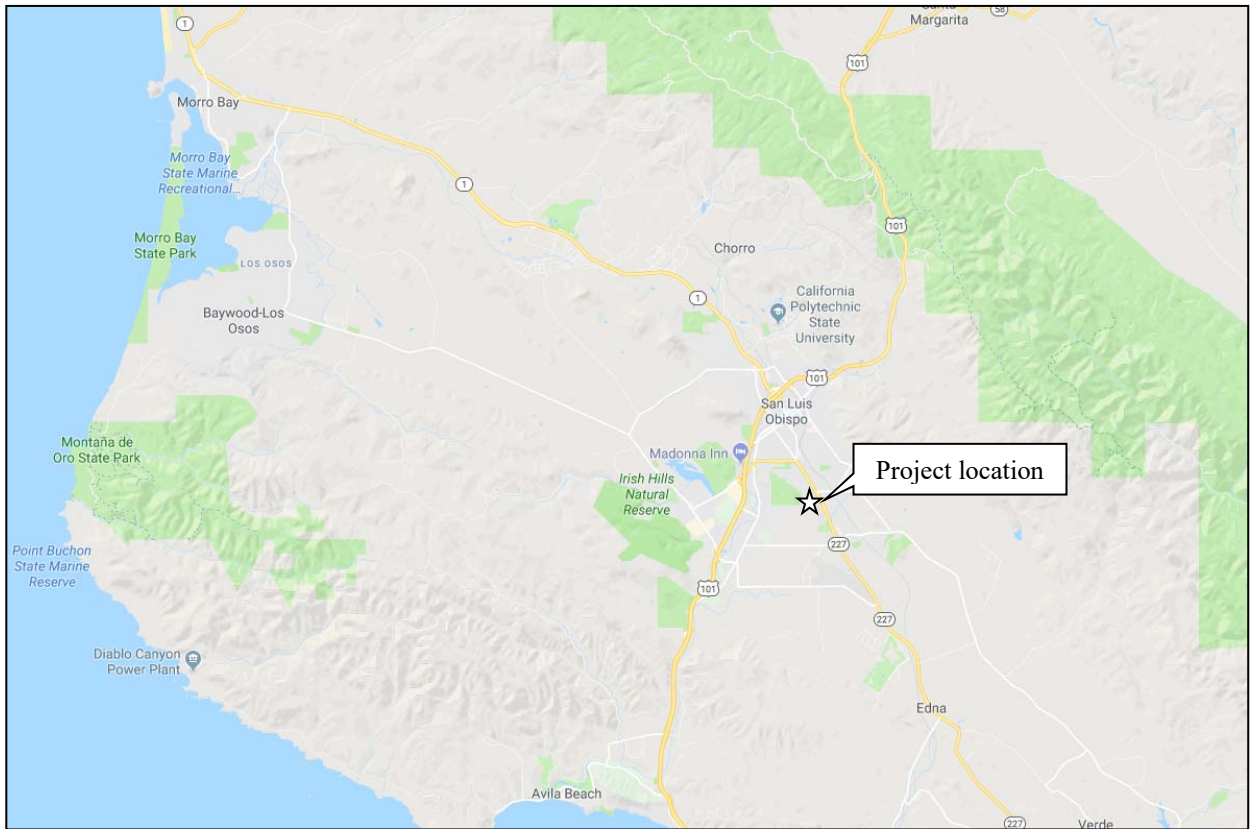
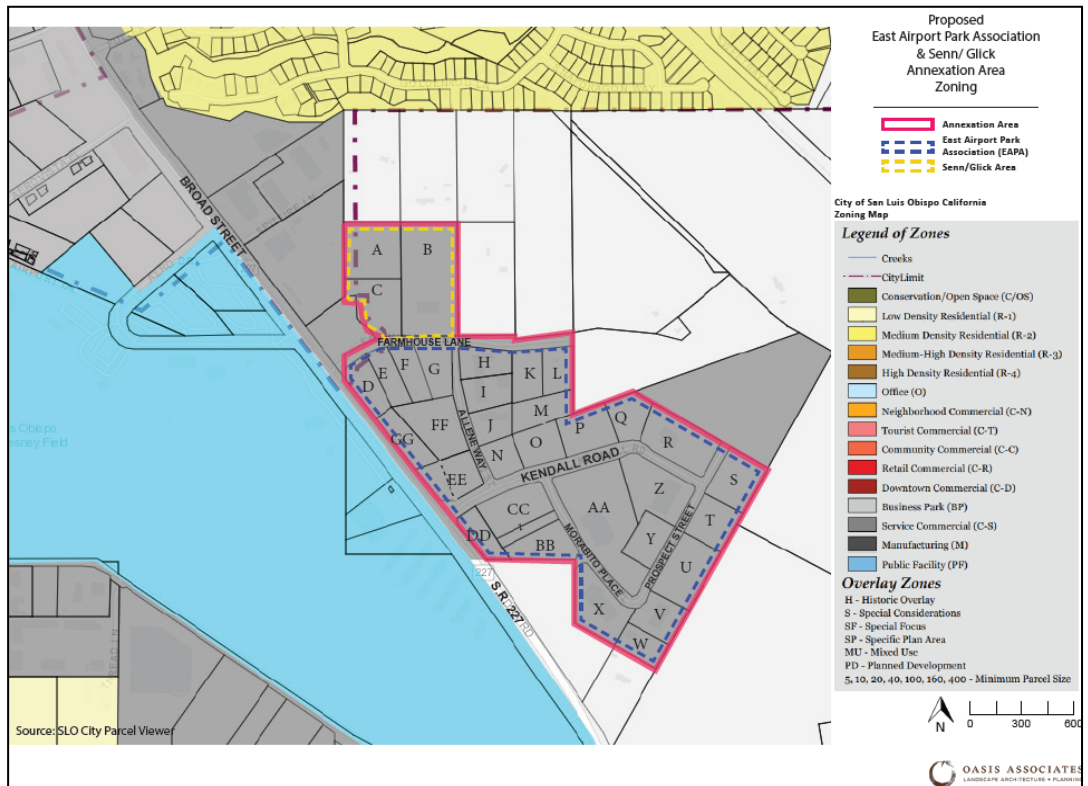


Figure 1: Regional Location

Figure 2:
Vicinity Map
and
Proposed
Annexation
Boundary



8. Description of the Project:

The East Airport annexation area consists of thirty-three (33) properties comprising approximately 59 acres located just outside the southern San Luis Obispo city limits, between Farmhouse Lane and Kendall Road just east of Broad Street (State Route 227) and located within the City's Urban Reserve Line (URL) (Attachment 1, Proposed Annexation Boundary Map).

The East Airport annexation area is located within the City's Airport Area Specific Plan (AASP) boundary, and is identified for annexation under the AASP¹ and City General Plan.² The East Airport annexation area is located within the adopted Local Agency Formation Commission (LAFCO) Urban Service Area for the City.

The East Airport annexation area includes 30 parcels totaling 48.58 acres within the area known as the East Airport Commerce Park (EACP) and the Peoples' Self-help Housing property (which was recently incorporated into the EACP), and three parcels totaling 9.73 acres within the area known as the Senn-Glick properties (S/G). The EACP was approved by the County of San Luis Obispo (County) in 2003 as the Morabito-Burke Tract Map (Tract 2368), permitting up to 500,000 SF of developed uses generally south of Farmhouse Lane;³ the County's approval included adoption of an Initial Study/Mitigated Negative Declaration (IS/MND). The S/G properties north of Farmhouse Lane were approved in 2003 by the County for 180,000 SF of commercial-service land use (Senn/Glick Conditional Use Permit D000336D and associated IS/MND). In 2018, the County approved Conditional Use Permit DRC2018-00131 (and an associated Addendum to the Tract 2368 IS/MND) for a 23,665 SF office building on the People's Self-help Housing property. The People's Self-help Housing property consisted of two lots, one included in Tract 2368 and the second outside of the tract boundary; the County Use Permit was conditioned such that the 23,665 SF of development counted towards the 500,000 SF limitation imposed by the County.

At present, developed buildings in the EACP totals 309,003 SF, and an additional 25,025 SF is currently under construction. In addition to existing development, two parcels have active entitlements issued and building permits under review by the County, which will result in an additional 9,783 SF and 23,665 SF of development within the EACP. 20,000 SF of development is present in the S/G area. Of the 33 parcels comprising the East Airport annexation area, 21 parcels are developed with a mix of office, business park, industrial and manufacturing uses, two stormwater basins, and the Fiero Lane Water Company (FLWC) facilities. As noted above, two properties (three parcels) have building permits under review by the County. Nine parcels are vacant.

The Project includes the following actions for consideration:

1. Adoption of a "Pre-annexation Agreement" detailing the infrastructure for the area in place, the needed infrastructure to be provided by the annexation area, the infrastructure to be

¹ AASP Chapter 9.1: <http://www.slocity.org/home/showdocument?id=4294>

² Land Use Element Policy 1.13.5 Annexation in Airport Area; Policy 7.7 City Annexation and Services; Policy 7.14 Growth Management: <http://www.slocity.org/home/showdocument?id=6635>

³ Tract 2368 originally included 26 parcels; subsequent subdivisions approved by the County have resulted in a total of 30 parcels within the original tract boundary.

provided by the City, phasing information outlining the schedule under which needed infrastructure would be provided, a plan for converting existing private services to City services, and a financing plan with appropriate guarantees to address the costs of the annexation, infrastructure and services called for in the Pre-Annexation Agreement (Attachment 2).

2. Adoption of a “Plan For Services” for the East Airport annexation area, including provisions for the interim planning, construction, and service of proposed projects administered by the County (and/or jointly with the City) until such time as the annexation is finalized (Attachment 3).
3. Adoption of a Request for Annexation of the subject properties to be submitted and processed with the LAFCO and State of California to finalize the incorporation of the subject properties within the City of San Luis Obispo.
4. A proposed Ordinance to address allowing non-conforming uses to remain and/or be replaced by similar uses, at the discretion of the Community Development Director. Conditions under which this discretion may be exercised includes (i) waiving the municipal code provision that ceasing such uses for periods of 12 months or more would not automatically invoke prohibitions on reestablishing the prior use or similar uses, and/or (ii) substituting new non-conforming office-government uses do not contribute to greater environmental impacts than the previous use (Attachment 4).

Following final approval of the annexation, City and AASP map amendments would show the updated City limit line and implement the pre-zoning that was approved by Ordinance No. 1481 upon adoption of the AASP in 2005.

The Project evaluated in this Initial Study consists of the proposed annexation of the East Airport area, and the physical infrastructure improvements that have been identified by the City’s Community Development, Public Works, Utilities, and Fire Departments. The Project does not entitle or approve new development or expansion of existing uses, and future build-out of the East Airport annexation area would be subject to additional review pursuant to the City’s Municipal Code, Zoning Regulations, AASP, and CEQA.

Overview of Required Infrastructure Improvements. Annexation of the East Airport area would involve the provision of full public services to an area that has been partially developed under County regulations. Necessarily, the annexation proposal includes a “Pre-Annexation Agreement” (Attachment 2) and “Plan For Services” (Attachment 3), both incorporated into this Project Description by reference, that identify current and needed infrastructure to support the annexation, and outlines how City services and needed infrastructure would be provided to the annexation area.

Exhibit D of the Pre-Annexation Agreement (Attachment 2) provides a complete detail of both the public and private infrastructure and utility improvements to be completed as part of the proposed annexation. The public service systems include water service, recycled water service, wastewater collection, treatment and disposal, and a variety of street-storm drainage facilities. Additionally, several private system improvements, such as private water services, sewer laterals, refuse facilities and drainage will be required to interface between the public systems to

be taken over by the City and those that will connect to the public systems but remain privately owned.

Infrastructure improvements identified in the Pre-Annexation Agreement and Plan For Services are addressed under this Initial Study and generally include: resurfacing existing streets, replacing cracked sidewalk sections, upgrading curb ramps pursuant to the Americans with Disabilities Act (ADA); upgrading the public water and recycled water systems pursuant to City Standards; extending the Terrace Pressure Zone from the intersection of Broad and Fuller to the project area and reconstructing the water system piping at the intersection of Broad and Fuller with a new pressure reducing station, programmable logic controller, and telemetry; installation of approximately 2,100 feet of eight-inch recycled water main in Broad Street from Tank Farm Road to Aerovista (including a portion suspended from the bridge crossing the Upper Fork East Branch, San Luis Obispo Creek); replacement of fire hydrants; extension of main line recycled water service to the annexation area in two (2) stages (Stage 1 from Tank Farm to Aerovista, Stage 2 from Aerovista along property frontage); repairing the public sewer system as necessary; and installation of water meters, backflow devices, and recycled water signage (refer to Attachment 2 for a complete list of infrastructure improvements). Identified improvements would be located within existing streets, sidewalks, utility corridors, bridge, and areas previously disturbed with existing infrastructure.

Plan For Services. The proposed annexation area has been carefully analyzed to identify impacts on overall City services. To document this analysis and the recommendations derived from that analysis, a Plan For Services has been developed for the annexation area (Attachment 3). A summary of those conditions and services are noted below.

Current Conditions – East Airport Annexation Area. Broad Street/State Route 227 provides vehicular access to the area via Farmhouse Lane and Kendall Road. Internal circulation is supported by Allene Way, Morabito Place and Prospect Street.

Domestic water is delivered to the East Airport Area by on-site wells and private water distribution systems. Wastewater is collected within the annexation area by gravity lines to a location near Broad Street and Farmhouse Lane where a lift station operates, and then is conveyed by force main to the FLWC private treatment plant at the end of Fiero Lane (within the West Airport annexation area). Treated FLWC wastewater is disposed of in a leach field format in the County to the immediate south (and outside) the West Airport annexation area.

Emergency services are provided by the County, but these areas are also supported by the City under mutual aid agreements between the City and County. General government services are provided by the County. Storm water management, collection and disposal is handled by the private property owners under County-approved plans. Solid waste services are provided by the County via private contract with local waste and recycling providers.

Post-Annexation Conditions – East Airport Annexation Area. Roadway rehabilitation and upgrades are planned to bring the roads, sidewalks and signage up to City standards. Following annexation, the roads, curbs, gutters and sidewalks will be maintained by the City under the Pavement Management Plan.

Water system upgrades for the annexation area will include connecting to the Terrace Pressure Zone at Broad and Fuller Streets, installation of pressure reducing valves as appropriate and hydrant replacements. Valving and backflow prevention will be installed as directed by Utilities staff. City domestic water service will be provided under the annexation proposal.

The gravity wastewater system will be converted to interconnect with a gravity collection line in Broad Street, and from there wastewater is conveyed to the City's Water Resource Recovery Facility (WRRF). The force main and lift station currently serving the area would be abandoned. The timing of this work is contingent on the decommissioning of the FLWC wastewater treatment plant following the connections of the various properties in the West Airport annexation area.

Recycled water supplies are also included in the Plan For Services, with extensions made by the applicants within the annexation area, to facilitate connection to this supply when it can be made available.

Police and Fire emergency services would be provided by the City. It is expected the mutual aid agreements would remain between the City and County. General government services would be assumed by the City. Storm water management and solid waste services would continue as presently exist.

Relationship Between East Airport and West Airport (Fiero Lane-Clarion Court) Annexation Areas. On November 19, 2019, the City Council authorized proceeding with the West Airport annexation, which will be moving forward with the LAFCO in 2020. Annexation of the West Airport area would require removal of the FLWC wastewater treatment plant, which currently serves the East Airport area. Evaluation of the West Airport annexation included the potential relocation of the FLWC wastewater treatment plant to the East Airport area, which would only be necessary if the East Airport annexation is not approved and completed.

Based on the proximity of the East and West Airport annexation areas, and the connection of these areas related to the FLWC wastewater treatment plant, it is intended to bring both annexations forward at the same time. Should the City Council approve the East Airport annexation, staff will be working to consolidate the two annexation requests at LAFCO in order to coordinate the annexations, and related infrastructure design, construction and financing programs provided by various governing documents and agreements.

9. Planning Documents and Previous Environmental Documents Incorporated by Reference:

The City's General Plan addresses build-out of the City, including annexation areas (including the subject site). Land Use Element (LUE) Figure 2 (Urban Reserve), shows the East Airport annexation area located within the Urban Reserve Line (URL). LUE Figure 3 (Land Use Diagram) shows the properties within the City's Sphere of Influence (SOI) and identifies the land use designation for the subject parcels (Services and Manufacturing). Following annexation, development within the East Airport annexation area would be subject to the City's General Plan policies and additional documents including, but not limited to, the Zoning Regulations, the Airport Area Specific Plan, and Community Design Guidelines.

The Final Program Environmental Impact Report for the Land Use and Circulation Elements Update (LUCE EIR) (State Clearinghouse [SCH] No. 2013121019) Table 2.3-3 shows that buildout capacity of the AASP includes 3,604,649 square feet of non-residential development, and 9,585 jobs (Final EIR Page 3-5). LUCE EIR Table 2.4-3 shows non-residential capacity within the AASP is 1,791,815 square feet (excluding Avila Ranch, which was evaluated as a “Special Focus Area” in the EIR); future build-out of the East Airport annexation area would contribute to build-out of non-residential floor area, and would contribute to jobs. The LUCE EIR states that “annexations of properties in the Airport Area Specific Plan would not change existing physical conditions. Future development on land still to be annexed within the Airport Area Specific Plan has been planned for and addressed through the Specific Plan process and determined by the ALUC [Airport Land Use Commission] to be consistent with the County Airport Land Use Plan” (LUCE Draft EIR, Page 4-246).

Subsequent to adoption of the LUCE Update and certification of the LUCE EIR, the City adopted an updated Water and Wastewater Management Element (WWME) and associated Initial Study/Negative Declaration (IS/ND) (GPA 1454-2018 / EID 1455-2018). The City’s WWME translated the LUE’s capacity for development (including capacity within the AASP and subject area) into potential demand for water supply and wastewater services. The WWME outlines how the City plans to provide adequate water and wastewater services for its citizens, consistent with the goals and policies of other General Plan elements. The WWME IS/ND evaluated potential impacts of build-out as identified in the LUE. The AASP identifies the land use designation (Services and Manufacturing) and pre-zoning (Service Commercial) for the proposed annexation area. Following annexation, development within the East Airport annexation area would be subject to the guidelines, standards, and policies identified in the AASP and the City’s Municipal Code, including the Zoning Regulations.

The Final Program EIR for the Airport Area and Margarita Area Specific Plans and Related Facilities Master Plans (AASP/MASP FEIR, SCH No. 2000051062) evaluated future build-out of the AASP, including the subject area. As anticipated in the AASP Program EIR, this Initial Study tiers from the AASP Program EIR and addresses the physical changes that would occur as a result of implementation of the Pre-annexation Agreement and Plan for Services (infrastructure improvements). Following annexation, development within the East Airport annexation area would be subject to mitigation measures included in the Mitigation, Monitoring, and Reporting Program (MMRP) adopted by the City Council upon adoption of the AASP (Attachment 5, Resolution 9726) or as amended to reflect new information. Future development would also be subject to environmental analysis pursuant to CEQA,⁴ including consideration of the IS/MNDs and MMRPs adopted by the County for the Tract 2368 and the Senn/Glick properties.

City resources available online:

City of San Luis Obispo General Plan and LUCE EIR:
<https://www.slocity.org/government/departments-directory/community-development/planning-zoning/general-plan>

⁴ CEQA Guidelines Section 15162 (Subsequent EIRs and Negative Declarations) and Section 15164 (Addendum to an EIR or Negative Declaration)

WWME IS/ND: <http://www.slocity.org/home/showdocument?id=19127>

Airport Area Specific Plan: <http://www.slocity.org/home/showdocument?id=4294>

Final Program Environmental Impact Report for the Airport Area and Margarita Area Specific Plans and Related Facilities Master Plans: <https://www.slocity.org/government/department-directory/community-development/documents-online/environmental-review-documents/-folder-719>

In addition to the documents identified above, this Initial Study incorporates by reference the following environmental documents adopted by the County upon approval of projects within the East Airport annexation area:

Morabito-Burke Tract Map 2368 (EACP) Mitigated Negative Declaration (MND) (County ED01-322): <https://agenda.slocounty.ca.gov/IIP/sanluisobispo/file/getfile/82528>

Senn/Glick Conditional Use Permit D000336D MND (County ED01-273): Refer to document uploaded on the City website: <https://www.slocity.org/government/department-directory/community-development/documents-online/environmental-review-documents>

People's Self-help Housing Development Permit DRC2018-00131 (County ED18-077): <https://agenda.slocounty.ca.gov/IIP/sanluisobispo/agendaitem/details/9294>

Where applicable, this Initial Study references these previously-adopted environmental documents and associated MMRPs. Mitigation measures applicable to infrastructure improvements are incorporated into the MMRP for the proposed Project.

Annexation and build-out of the East Airport area is anticipated in the AASP and the City's Land Use, Circulation Element, and Water and Wastewater Management Element, and was evaluated in the associated environmental documents certified and adopted by the City Council. The proposed annexation is consistent with the City's General Plan, LUCE EIR, WWME IS/ND, AASP, AASP EIR, and does not include any changes to the land use designation, zoning, or development standards identified in the AASP. The proposed annexation does not include any development proposals or actions that would result in a physical change to the environment, with the exception of identified infrastructure improvements that are required as a part of the annexation. The physical changes that would occur as a result of identified infrastructure improvements are addressed in this Initial Study, which is a tiered document that incorporates by reference the noted certified EIRs, adopted IS/MNDs, and focuses on the physical changes resulting from the infrastructure improvements.

10. Other public agencies whose approval is required:

San Luis Obispo County Local Agency Formation Commission (LAFCO) – interim services agreement and annexation (Responsible Agency), Air Pollution Control District (APCD)

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources code section 21080.3.1? If so, has consultation begun?

Native American Tribes have been notified about the project consistent with City and State regulations. The Northern Chumash Tribal Council (February 8, 2019) noted that the existence of development and infrastructure within the annexation area does not preclude the presence of cultural resources.

Attachments

1. Proposed Annexation Boundary Map
2. Draft Pre-Annexation Agreement
3. Draft “Plan For Services”
4. Draft Ordinance
5. AASP Mitigation, Monitoring, and Reporting Program
6. Project Mitigation, Monitoring, and Reporting Program

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

FISH AND GAME FEES

	There is no evidence before the Department that the project will have any potential adverse effects on fish and wildlife resources or the habitat upon which the wildlife depends. As such, the project qualifies for a de minimis waiver with regards to the filing of Fish and Game Fees.
X	The project has potential to impact fish and wildlife resources and shall be subject to the payment of Fish and Game fees pursuant to Section 711.4 of the California Fish and Game Code. This initial study has been circulated to the California Department of Fish and Game for review and comment.

STATE CLEARINGHOUSE

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

On the basis of this initial evaluation:

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

Signature
David Watson, Contract Planner

1/14/20

Date

Tyler Corey, Principal Planner

For: Michael Codron
Community Development Director

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

1. AESTHETICS. Would the project:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	1,3, 11,12, 13,14, 25			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, open space, and historic buildings within a local or state scenic highway?	1,3, 11,12, 13,14, 25			X	
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	1,3, 11,12, 13,14, 25			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	1,3, 11,12, 13,14, 25			X	

Evaluation

The proposed annexation area is currently developed with a mix of light industrial and service manufacturing uses along with contractor and professional services. Views include the Santa Lucia Range, Islay Hill, and the hills located at the north end of the Margarita area that separate it from the city to the north. Views along Broad Street include existing development, Islay Hill to the northeast, with longer range views of the Santa Lucia Mountains towards the east. Views beyond the annexation area to the east include Edna Valley, and to the west is San Luis Obispo County Regional Airport and the southern limits of San Luis Obispo along Buckley Road. The developed properties in the annexation area inhibit most ground level views and the views noted above are of the general vicinity over and around the annexation area when traveling along Broad Street in either direction.

a) Based on City General Plan Conservation and Open Space Element Figure 11: Scenic Roadways and Vistas, there are no designed Scenic Cones of View within or facing towards the proposed annexation area, although the section of Broad Street fronting the annexation area is designated as having high or moderate scenic value. The AASP notes that the Santa Lucia Mountains and foothills are important features in establishing the character of the Airport Area, and AASP Chapter 5 (Community Design) includes design guidelines and performance standards, which are in place to protect views and the area's unique sense of place. Based on the presence of existing development and mature trees within and adjacent to the annexation area, views of surrounding hills and ridgelines are limited. The annexation action would not result in physical impacts on the environment, with the exception of infrastructure improvements identified in the Pre-annexation Agreement. Infrastructure improvements would occur within existing developed areas and do not include any facilities that would be visually different than existing above ground facilities (e.g. backflow preventors, fire hydrants, recycled water signage). The proposed annexation and associated infrastructure improvements support implementation of goals and policies contained within the AASP and would be fully consistent with both the AASP and the analysis contained in the AASP Final EIR. Therefore, this impact is considered less than significant.

The AASP Final EIR analyzed impacts related to aesthetics as a result of development of the AASP area, including the Project site. Regarding future build-out of the annexation area, future development subject to the AASP and City Zoning Regulations may result in more square-footage of development than what is currently allowed under County jurisdiction; however, implementation of the proposed annexation would not significantly change the existing visual character of the project area, as the area currently supports commercial, office, and light industrial uses, and the zoning designations under the AASP (Service Commercial) allow or conditionally allow for similar uses. Future development would require compliance with the AASP and previously adopted environmental determinations and associated mitigation measures applicable to the subject properties (AASP FEIR, Tract 2368 MND, S/G MND, and PSSH MND Addendum).

b) The affected section of Broad Street (State Route 227) is not designated a scenic route by the California Department of Transportation or the County of San Luis Obispo. As noted above, the City’s Conservation and Open Space Element identifies the section of Broad Street fronting the annexation area designated as having high or moderate scenic value. Implementation of the proposed annexation and associated infrastructure improvements would not result in the removal of any substantial trees, rock outcroppings, or buildings of historical significance, and future development would be subject to the adopted guidelines and performance standards identified in the AASP. Therefore, there is a less than significant impact.

c) The AASP Final EIR identified a significant and unavoidable impact (Impact LU-6: Change in Views) as a result of buildout of the AASP area and urbanization of the south end of the City. A Statement of Overriding Considerations was adopted upon certification of the AASP Final EIR and adoption of the AASP. As noted above, the proposed annexation area is currently urbanized and developed with commercial, office, and light industrial uses. Infrastructure improvements would occur within existing developed areas and do not include any facilities that would result in significant visual impacts or change the visual character of this urbanized area. Therefore, this is considered a less than significant impact.

Future development of the annexation area would be subject to adopted AASP design guidelines and performance standards, the City’s Community Design Guidelines, and mitigation measures adopted as part of the Tract 2368 MND, S/G MND, and PSSH MND Addendum, which address visual impacts resulting from structural development. For reference, previously adopted mitigation measures associated with the subject properties include providing view corridors for State Route 227/Broad Street southbound traffic, provision of trees along State Route 227; providing 50 percent vegetative screening of structures as seen from State Route 227 and railroad; parking and outdoor storage areas would be 100 percent screened; exterior colors would include a mix of darker exterior colors; and exterior lighting would be minimized.

d) Consistent with the analysis in the AASP Final EIR (Impact LU-7: Potential Increase in Daytime/Nighttime Light and Glare), future development within the proposed annexation area would contribute to an increase in light and glare from exterior lighting and materials. Pursuant to the AASP Final EIR and adopted AASP, future development shall comply with lighting guidelines and standards, consistent with AASP Final EIR Mitigation Measure LU-7.1 (Incorporate Lighting Design Standards into Margarita and Airport Area Specific Plans). In addition, future projects would comply with AASP guidelines that discourage reflective or shiny exterior finishes (see AASP Materials and Colors, Goal 5.14, Guideline C). Future projects would also be subject to Zoning Regulations Section 17.70.100 (Lighting and Night Sky Preservation), which requires shielding and other methods to minimize light intrusion. No additional street lighting is proposed as a component of infrastructure improvements. Therefore, potential impacts would be less than significant.

Conclusion: Less Than Significant Impact.

The Proposed Project addressed by this Initial Study is the adoption of a “Plan For Services”, “Pre-Annexation Agreement” and an annexation to the City of a largely developed business and industrial area in the County (East Airport Annexation Area), between Farmhouse Lane and Kendall Road, east of Broad Street (State Route 227). Continued existing uses in the County, infrastructure improvements, and the future annexation of those existing uses, do not result in changes to existing aesthetic conditions in the area. The area is designated for Service Manufacturing uses under the General Plan, and Service Commercial under the AASP. Future development would be subject to AASP guidelines, City Community Design Guidelines, and performance measures and standards identified in the Zoning Regulations that address aesthetics, and previously adopted mitigation measures associated with the subject parcels. Based on the scope of the proposed annexation project, no additional mitigation measures beyond these existing identified requirements are necessary.

2. AGRICULTURE RESOURCES. Would the project:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	1, 3, 4,5, 11,12, 13,14, 25			X	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	1,3, 4,5,			X	

Issues, Discussion and Supporting Information Sources
For the East Airport Annexation EID-0006-2020

	11,12, 13,14, 25				
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	1,4,5, 11,12, 13,14, 25			X	

Evaluation

The project site consists of developed and undeveloped land, existing roads, and infrastructure. Based on review of the San Luis Obispo County Important Farmland 2016 Map (California Department of Conservation, Division of Land Resource Protection, 2018), a mix of Urban and Build-up Land, Other Land, and Farmland of Local Potential is present within the project area. The proposed annexation area does not include any lands currently supporting agricultural uses, there is no agricultural zoning or Williamson Act Contract in effect over the subject properties, and no grazing exists on the subject site.

a, b, c) The proposed project does not affect any existing or future agricultural activities within or proximate to the site. The subject annexation area and areas identified for infrastructure improvements are not in agricultural use, and are not located on lands considered prime agricultural soils. Therefore, potential impacts would be less than significant.

The subject site is in an area long designated for annexation and infill development. Regarding future build-out of the project site, subdivision of the EACP and approval of existing uses (and uses currently entitled by the County) within the East Airport annexation area required environmental review, which addressed potential impacts to agricultural resources as a result of future development, including potential conflicts with existing agricultural uses to the south and east of the project area. For reference, previously adopted mitigation measures that would be applicable to future development include establishment of evergreen vegetation, incorporation of buffers when a conflict may occur, and provision of the County’s Right-to-Farm Ordinance to future landowners.

Conclusion: Less Than Significant Impact.

The proposed project addressed by this Initial Study is the adoption of a “Plan For Services”, “Pre-Annexation Agreement” and an Annexation to the City of a largely developed business and industrial area in the County (East Airport Annexation Area), between Farmhouse Lane and Kendall Road, east of Broad Street (State Route 227). Continued existing uses in the County, infrastructure improvements, and the future annexation of those existing uses, do not result in changes to existing agricultural resources outside of the annexation area.

The area is designated for Service Manufacturing uses under the General Plan, Zoning Ordinance, and AASP. Future development that may be proposed following annexation of the area to the City would be subject to review consistent with the policies and regulations included in these adopted documents, and previously adopted mitigation measures associated with the subject parcels. Based on the scope of the proposed annexation project, no additional mitigation measures beyond these existing identified requirements are necessary.

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

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	3,8,9, 11,12, 13,14, 25			X	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	3,8,7, 9,11, 12,13, 14,15,		X		

Issues, Discussion and Supporting Information Sources
For the East Airport Annexation EID-0006-2020

	25				
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 qualitative thresholds for ozone precursors)?	3,7,8,9,11,12,13,14,15,25		X		
d) Expose sensitive receptors to substantial pollutant concentrations?	3,7,8,9,11,12,13,14,25			X	
e) Create objectionable odors affecting a substantial number of people?	3,8,9,11,12,13,14,25			X	

Evaluation

As discussed in the AASP FEIR, local climate conditions are generally characterized by warm, dry summers and cooler, rainy winters. The Edna Valley in which the annexation area is located is generally affected by offshore cooling conditions and airflow through the valley from Morro Bay to the north. These wind patterns change frequently, but inversion conditions have a tendency to restrict dispersion of pollutants for a matter of days which has led to periodic higher ozone level readings. To address this, the City relies on San Luis Obispo County Air Pollution Control District (APCD) Federal-State-County air quality standards and monitoring, as well as a robust Climate Action Plan adopted by the City, which is currently being updated.

The Air Quality impacts and mitigation measures developed for the AASP FEIR identified thresholds for ground disturbance (such as 1,950 cu/yds per day or 4.0 acres of grading or larger) that would trigger additional environmental review. No new private development is permitted by this annexation, and any future development post-annexation would be subject to the AASP and the City's Municipal Code and Zoning Regulations, which stipulate required levels of review, in addition to CEQA and air quality mitigation measures incorporated into adopted MMRPs for the Tract 2368 MND, S/G MND, and PSSH MND Addendum. Infrastructure improvements identified for the proposed annexation, including infrastructure conversions and connections to bring private users into the City's utility system are located within previously disturbed street rights-of-way.

To address these factors, several protocols have been imposed to address both short-term quality concerns (generally construction-oriented emission mitigations) as well as longer-term emission reduction targets that rely on site design, traffic management, alternative energy techniques and similar options to minimize overall air quality impacts. Annexation of the East Airport area will not materially change these existing conditions. Future development proposed within the subject area would be required to address these requirements as individual projects are evaluated.

a) Annexation of the existing East Airport area would occur as anticipated in the AASP and will not materially change existing conditions. Infrastructure improvements would occur within developed roadways and utility corridors that currently serve urban development, and would not result in an expansion of urban areas beyond what was anticipated and analyzed in the AASP FEIR, which determined that implementation of the AASP would be consistent with the APCD's 1998 Clean Air Plan. While the Clean Air Plan was updated in 2001, the proposed annexation and associated pre-annexation infrastructure improvements would be consistent with this plan because the Transportation and Land Use Control Measures recommended in the 1998 plan to reduce emissions were incorporated into the attainment strategy for the 2001 Clean Air Plan. In addition, the proposed annexation would not change the anticipated zoning and land use designations identified in the AASP for the subject area. Therefore, the proposed project is consistent with the adopted Clean Air Plan.

b), c) Based on the APCD's San Luis Obispo County Attainment Status table (APCD, 2019), the County is in non-attainment with California standards for ozone and respirable particulate matter. Potential short-term impacts resulting from build-out of the AASP area (including the proposed annexation area) were determined to be less than significant based on implementation of APCD construction emission mitigations identified in the AASP FEIR (AASP FEIR: Impact AIR-1: Short-term Construction Impacts; Mitigation Measure AIR-1.1 Construction-related Combustion Emissions Mitigation; Mitigation Measure AIR-1.2 Construction-Related Fugitive Dust (PM10) Mitigation; Mitigation Measure AIR-1.3 Construction-Related Activity Management Techniques). Long-term operational emissions were determined to be less than significant (AASP

FEIR: Impact AIR-2 Long-term Operation Emissions; Mitigation Measure AIR-2.1 Implement Growth-Phasing Schedule). In addition, the Tract 2368 MND, S/G MND and PSHH MND Addendum each determined that build-out of the subject area, including infrastructure, would result in less than significant short-term, long-term, and cumulative impacts based on compliance with mitigation measures included in the APCD's CEQA Air Quality Handbook.

Construction of infrastructure improvements identified in the Pre-annexation Agreement would result in the short-term generation of air emissions, including ozone precursors, reactive organic gasses, and diesel and dust particulates, as identified in the analysis of tract improvements associated with the development of the EACP, S/G, and PSSH properties and build-out of the AASP area. In addition, ground disturbing activities and improvements to utility infrastructure has the potential to result in exposure to naturally occurring and materials containing asbestos. Land uses in the affected area consist of commercial, office, and light industrial uses, none of which are considered sensitive uses as defined by the APCD's CEQA Handbook. Infrastructure construction is subject to APCD mitigation measures, and consistent with the AASP FEIR and adopted MNDs, and Addendum, for the existing subdivision, and S/G and PSSH developments, compliance with these measures would reduce potential impacts to less than significant. Based on updates to the APCD's CEQA Air Quality Handbook in 2012 and 2017, mitigation measures applicable to the infrastructure improvements are identified below, and these measures are equal or more effective than the air quality measures previously-adopted in association with the AASP FEIR and Tract 2368 MND, S/G MND and PSHH MND Addendum:

Mitigation Measures

AQ-1: Naturally Occurring Asbestos. Naturally Occurring Asbestos (NOA) has been identified as a toxic air contaminant by the California Air Resources Board (ARB). Under the ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations, prior to any grading activities a geologic evaluation shall be conducted to determine if NOA is present within the area that will be disturbed. If NOA is not present, an exemption request must be filed with the District. If NOA is found at the site, the applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD. More information on NOA can be found at <http://www.slocleanair.org/business/asbestos.asp>.

AQ-2: Asbestos Material in Demolition. Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos containing material (ACM). ACMs could be encountered during demolition or remodeling of existing buildings. Asbestos can also be found in utility pipes/pipelines (transite pipes or insulation on pipes). If utility pipelines are scheduled for removal or relocation or a building(s) is proposed to be removed or renovated, various regulatory requirements may apply, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M - asbestos NESHAP). These requirements include but are not limited to: 1) notification to the APCD, 2) an asbestos survey conducted by a Certified Asbestos Inspector, and, 3) applicable removal and disposal requirements of identified ACM. More information on Asbestos can be found at <http://www.slocleanair.org/business/asbestos.php>.

AQ-3: Developmental Burning. APCD regulations prohibit developmental burning of vegetative material within San Luis Obispo County.

AQ-4: Permits. Portable equipment and engines 50 horsepower (hp) or greater, used during construction activities will require California statewide portable equipment registration (issued by the ARB) or an Air District permit. The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive: power screens, conveyors, diesel engines, and/or crushers; portable generators and equipment with engines that are 50 hp or greater; internal combustion engines; unconfined abrasive blasting operations; concrete batch plants; rock and pavement crushing; tub grinders; and, trommel screens.

AQ-5: Standard Mitigation Measures for Construction Equipment. The standard mitigation measures for reducing nitrogen oxides (NO_x), reactive organic gases (ROG), and diesel particulate matter (DPM) emissions from construction equipment are listed below:

- a. Maintain all construction equipment in proper tune according to manufacturer's specifications;
- b. Fuel all off-road and portable diesel powered equipment with ARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);
- c. 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;

- d. 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;
- e. 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 NOx exempt area fleets) may be eligible by proving alternative compliance;
- f. 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;
- g. Diesel idling within 1,000 feet of sensitive receptors is not permitted;
- h. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
- i. Electrify equipment when feasible;
- j. Substitute gasoline-powered in place of diesel-powered equipment, where feasible;
- k. Signs that specify no idling areas must be posted and enforced at the site; and,
- l. Use alternatively fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.

AQ-6: Best Available Control Technology (BACT) for Construction Equipment. If the estimated ozone precursor emissions from the actual fleet for a given construction phase are expected to exceed the APCD threshold of significance after the standard mitigation measures are factored into the estimation, then BACT needs to be implemented to further reduce these impacts. The BACT measures can include:

- a. Further reducing emissions by expanding use of Tier 3 and Tier 4 off-road and 2010 on-road compliant engines;
- b. Repowering equipment with the cleanest engines available; and
- c. Installing California Verified Diesel Emission Control Strategies. These strategies are listed at: <http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm>

AQ-7: Fugitive Dust Mitigation Measures. Projects with grading areas that are less than 4-acres and that are not within 1,000 feet of any sensitive receptor shall implement the following mitigation measures to minimize nuisance impacts and to significantly reduce fugitive dust emissions:

- a. Reduce the amount of the disturbed area where possible;
- b. Use of water trucks or sprinkler systems, in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the APCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water should be used whenever possible. Please note that during drought conditions, water use may be a concern and the contractor or builder shall consider the use of an APCD-approved dust suppressant where feasible to reduce the amount of water used for dust control (contact the APCD for a list of potential dust suppressants);
- c. All dirt stock-pile areas should be sprayed daily as needed;
- d. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible, and building pads should be laid as soon as possible after grading unless seeding or soil binders are used;
- e. All of these fugitive dust mitigation measures shall be shown on grading and building plans; and
- f. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20% opacity, and to prevent transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress.
- g. Projects with grading areas greater than 4 acres or within 1,000 feet of any sensitive receptor shall implement the measures above, in addition to the following additional mitigation measures to manage fugitive dust emissions such that they do not exceed the APCD's 20% opacity limit (APCD Rule 401) or prompt nuisance violations (APCD Rule 402):
 - 1) Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible, following completion of any soil disturbing activities;
 - 2) Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established;
 - 3) All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD;
 - 4) Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;
 - 5) All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code (CVC) Section 23114;
 - 6) "Track-Out" is defined as sand or soil that adheres to and/or agglomerates on the exterior surfaces of motor vehicles

and/or equipment (including tires) that may then fall onto any highway or street as described in CVC Section 23113 and California Water Code 13304. To prevent 'track out', designate access points and require all employees, subcontractors, and others to use them. Install and operate a 'track-out prevention device' where vehicles enter and exit unpaved roads onto paved streets. The 'track-out prevention device' can be any device or combination of devices that are effective at preventing track out, located at the point of intersection of an unpaved area and a paved road. Rumble strips or steel plate devices need periodic cleaning to be effective. If paved roadways accumulate tracked out soils, the track-out prevention device may need to be modified;

- 7) Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers shall be used with reclaimed water where feasible. Roads shall be pre-wetted prior to sweeping when feasible.

d, e) The AASP FEIR, Tract 2368 MND, S/G MND, and PSSH MND Addendum did not identify any sensitive receptors in the subject annexation area nor did these documents find any objectional odors would occur as a result of the annexation of these lands into the City. Identified infrastructure improvements do not include any actions that would generate objectionable odors. No new sensitive receptors are present within or adjacent to the subject area and future development would occur consistent with the adopted AASP. Therefore, potential impacts would be less than significant.

Conclusion: Less Than Significant Impact Upon Implementation of Mitigation Measures

Annexation of the subject area and service to existing uses will not result in changes in ambient air quality conditions in the vicinity. No new development is included as part of the contemplated service and annexation proposal, and implementation of infrastructure improvements is subject to the mitigation measures identified above. Future projects would be required to have independent CEQA review and requirements would be imposed as needed to comply with City and APCD Plans.

4. BIOLOGICAL RESOURCES. Would the project:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
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 Game or U.S. Fish and Wildlife Service?	3,10 11,12 13,14, 25		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	3,10 11,12 13,14, 25		X		
c) Have a substantial adverse effect on Federally protected wetlands as defined in Section 404 of the Clean Water Act (including, but not limited to, marshes, vernal pools, etc.) through direct removal, filling, hydrological interruption, or other means?	3,10 11,12 13,14, 25			X	
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	3,10 11,12 13,14, 25		X		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	3,10 11,12 13,14, 25			X	
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	3,10 11,12 13,14, 25		X		

Evaluation

The larger context Airport Area contains the following natural communities: non-native grasslands, including several large patches of valley needlegrass grassland; and a matrix of coyote brush scrub, open water, freshwater marsh and seasonal wetland, riparian woodland and scrub, agricultural fields, and developed and ruderal areas (Figure 3C-1 and Table 3C-2; AASP FEIR). The larger area analyzed in the FEIR comprised some 404 acres. The subject annexation comprises a smaller subset of approximately 59 acres. The specific habitat type noted in the FEIR for this area is annual grasslands. As noted in the FEIR, none of the smaller subset of subject properties represent a significant sensitive resource area. The adopted MNDs for Tract 2368, S/G, and PSSH note the presence of non-native grassland habitat, and the results of a botanical survey noted that no sensitive or special-status species are present within the subject area. On and off-site infrastructure improvements are limited to areas with existing development, infrastructure, and ground disturbance (i.e. sidewalks, roadways, bridge, utility corridors). Infrastructure improvements associated with the annexation include the installation of approximately 2,100 feet of eight-inch recycled water main in Broad Street from Tank Farm Road to Aerovista, which includes an approximately 100-foot section to be suspended from the bridge crossing Upper Fork East Branch, San Luis Obispo Creek, consistent with the City's Recycled Water Master Plan. No ground disturbance, vegetation removal, or direct impacts to the creek are proposed.

a, b, d) Based on the results of biological surveys and analysis conducted for previously-adopted MNDs, no modifications to established habitat areas or direct impacts to special-status species or wildlife corridors would result from the annexation of the subject properties and implementation of infrastructure improvements within the East Airport area. Infrastructure improvements would be located within urbanized and developed areas, and a majority of the required infrastructure would not impact any sensitive habitat or species. No modifications to existing stormwater basins are proposed.

As noted above, the project includes the installation of a recycled water line to be suspended from an existing bridge crossing the Upper Fork East Branch, San Luis Obispo Creek. This section of the creek supports dense riparian vegetation and is surrounded by existing development along Broad Street. The creek traverses urban development both up and downstream of the existing bridge. Species potentially present within the riparian corridor include: Coast range newt, California red-legged frog, Western pond turtle, silvery legless lizard, two-striped garter snake, and steelhead trout. The creek corridor may also provide nesting and foraging habitat for avian (bird) species adapted to the surrounding urban environment. Based on the proposed installation method for the recycled water line, which would not require any direct impacts to the riparian corridor, potential impacts to special-status species would be indirect, and can be mitigated to less than significant through implementation of the following measures:

Mitigation Measure

BR-1 Prior to installation of the recycled water main on the Broad Street bridge, the project proponent shall prepare and implement a Biological Mitigation Plan that identifies construction-related staging and maintenance areas and includes construction best management practices (BMPs) to avoid or minimize impacts to biological resources, including all measures needed to protect riparian woodland and avoid accidental discharge of fuels and/or materials into the creek. Such BMPs shall include (but not be limited to) the following:

- a. Prior to construction activities associated with the installation of a recycled water line on the Broad Street bridge, the project proponent shall retain a qualified biologist to ensure implementation of required biological mitigation measures.
- b. The Plan shall include the use of debris netting to avoid accidental spill of materials into the creek corridor. The debris netting shall be installed prior to installation of the recycled water line on the bridge and shall not be removed until the installation of the recycled water line is complete.
- c. Prior to construction activities, the project area shall be clearly flagged or fenced so that the contractor is aware of the limits of allowable site access, which shall not include areas within the bed or bank of the creek.
- d. Prior to the commencement of construction activities, the qualified biologist shall prepare and deliver a worker orientation and training program for all construction staff. This program shall include information on the protection of riparian habitat, special-status aquatic species, and avian species. The training shall also include any applicable regulatory policies and provisions regarding species protection and minimization measures to be implemented.
- e. A biological monitor shall be present during the recycled water line installation on the bridge, and shall have the authority to stop or redirect work as needed to protect biological resources. Prior to initiation of daily construction activities, and periodically during installation of the recycled water line on the bridge, the biological monitor shall survey the creek within 100 feet of the bridge. In the event any special-status species is present, construction activities shall cease until the biological monitor has determined that the special-status species is no longer present within 100 feet of the project site. If nesting birds are present within 500 feet of the project site, no operation of heavy equipment shall occur until the birds have fledged and left the nest.

- f. Construction shall occur during daylight hours (7:00 AM to 7:00 PM or sunset, whichever is sooner) to avoid impacts to nocturnal and crepuscular (dawn and dusk activity period) species.
 - g. No storage or fueling of equipment shall occur within 100 feet of the edge of riparian vegetation. 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 (RWQCB).
 - h. All trash and construction debris shall be picked up and properly disposed at the end of each day.
- c) There are no protected wetlands identified within the subject annexation area by the AASP FEIR, Tract 2368 MND, S/G MND, or PSSH MND Addendum. No removal, filling, hydrological interruptions or other direct impacts to wetland habitat are proposed with the annexation and infrastructure improvements noted herein. Therefore, potential impacts would be less than significant.
- e) The AASP FEIR, Tract 2368 MND, S/G MND, or PSSH MND Addendum did not identify any significant or sensitive biological resources located within the subject annexation area. No tree removal or other potentially adverse modifications to the lands are proposed by the annexation. The proposed infrastructure improvements would be conducted consistent with the AASP FEIR and the City’s Municipal Code. Therefore, potential impacts would be less than significant, and no mitigation measures are required.
- f) There are no adopted Habitat or Natural Community Conservation Plans that identify or address the subject area. Based on the land use category and zoning identified in the City’s General Plan and AASP (services and manufacturing, service commercial), lack of sensitive habitat within the project area (with the exception of the Broad Street bridge creek crossing noted above), and implementation of mitigation (BR-1) to avoid or minimize potential indirect impacts to the creek, the proposed annexation and implementation of infrastructure improvements would be consistent with the City’s Conservation and Open Space Element.

Conclusion: Less Than Significant Impact with Implementation of Mitigation Measures.

As noted in the County Environmental Determinations applicable to the subject annexation area (ref. Sources 12, 13 and 25) and accompanying Biological Studies for the site, the annexation area does not contain any significant biological communities. Based on the location of the proposed annexation and associated pre-annexation infrastructure improvements, and implementation of identified mitigation measures, the project would not adversely affect biological resources.

5. CULTURAL RESOURCES. Would the project:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historic resource? (See CEQA Guidelines 15064.5)	3,10 11,12 13,25		X		
b) Cause a substantial adverse change in the significance of an archaeological resource? (See CEQA Guidelines 15064.5)	3,10 11,12 13,25		X		
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	3,10 11,12 13,25		X		
d) Disturb any human remains, including those interred outside of formal cemeteries?	3,10 11,12 13,25		X		

Evaluation

The AASP FEIR noted that at that time, multiple field surveys had been conducted within the larger Airport Area and with the exception of a historic building near Buckley Road, no cultural resources were noted in the area. The AASP FEIR provides that any work conducted in areas where surveys have not been done shall include such surveys into their project planning and development. To the extent that road and utility installations occur within previously disturbed areas, it is

unlikely that any potential significant impacts to resources may occur. As is the case with all public works projects, in the event of unforeseen encounter of materials suspected to be of cultural significance, established protocols include suspending work pending more detailed review and consultation over such finds/findings.

In addition, as documented in the Tract 2368 MND, S/G MND, and PSSH MND Addendum, previous studies conducted in the subject area including a Phase I surface survey have not identified the presence of significant historical or cultural resources in the subject area.

Native American Tribes have been notified about the project consistent with City and State regulations. The Northern Chumash Tribal Council (February 8, 2019) has noted that the existence of development and infrastructure within the annexation area does not preclude the presence of cultural resources. No evidence has been provided that would suggest any known resources are located within the subject annexation area.

a, b, c, d) Based on the certified AASP FEIR and adopted MNDs noted above, no cultural resources were documented within the subject area. Infrastructure improvements would occur within existing roadways, sidewalks, and utility corridors. In the unlikely event of resource discovery, City of San Luis Obispo Archaeological Resource Preservation Program Guidelines Section 4.60.1 requires that all construction activities that may disrupt those materials shall cease and the Community Development Director shall be notified immediately of the discovery of archaeological materials. In addition, the conditions of approval for the People’s Self-help Housing Conditional Use Permit (County Exhibit B-2 Conditional Use Permit Conditions) includes a mitigation measure requiring that in the event of a discovery, construction activities shall cease, local agencies shall be contacted, and the resource shall be evaluated (see CR-1, below, with clarification to include historic and paleontological resources, and to identify the current CEQA lead agency). Based on the results of cultural resource studies within the subject area, location of infrastructure improvements, and compliance with adopted Guidelines and the adopted mitigation measure in place to protect cultural resources upon inadvertent and unlikely discovery, potential impacts would be less than significant.

Mitigation Measure

CR-1: Unanticipated cultural resource discovery. In the event archaeological, historic, or paleontological resources are unearthed or discovered during any construction activities, the following standards apply:

- a. Construction activities shall cease, and the Community Development Director shall be notified so that the extent and location of discovered materials may be recorded by a qualified archaeologist, and disposition of artifacts may be accomplished in accordance with state and federal law, and in consultation with local Native American tribal organizations.
- b. In the event archaeological resources are found to include human remains, or in any other case where human remains are discovered during construction, the County Coroner is to be notified in addition to the Community Development Director so that proper disposition may be accomplished.

Conclusion: Less Than Significant Impact with Implementation of Mitigation Measures

Based on documentation noted above, the annexation area does not contain evidence of cultural resources. Mitigation is identified, which would be required during implementation of infrastructure improvements. Therefore, potential impacts to cultural resources as a result of implementation of infrastructure improvements as described in the Pre-annexation Agreement would be less than significant.

6. GEOLOGY AND SOILS. Would the project:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including risk of loss, injury or death involving:					
I. Rupture of a known earthquake fault, as delineated in the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area, or based on other substantial evidence of a known fault? Refer to Division of	3,10, 11,12, 13,14, 16,17,			X	

Issues, Discussion and Supporting Information Sources
For the East Airport Annexation EID-0006-2020

Mines and Geology Special Publication 42.	25				
II. Strong seismic ground shaking?	3,10, 11,12, 13,14, 16,17, 25			X	
III. Seismic-related ground failure, including liquefaction?	3,10, 11,12, 13,14, 16,17, 25			X	
IV. Landslides or mudflows?	3,10, 11,12, 13,14, 16,17, 25			X	
b) Result in substantial soil erosion or the loss of topsoil?	3,10, 11,12, 13,14, 16,17, 25,28			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off site landslides, lateral spreading, subsidence, liquefaction, or collapse?	3,10, 11,12, 13,14, 16,17, 25,28			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	3,10, 11,12, 13,14, 16,17, 25			X	
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?	3,10, 11,12, 13,25				X

Evaluation:

San Luis Obispo lies within the southern Coast Range Geomorphic Province, between the Central California Valley and Pacific Ocean. Rock types in the San Luis Obispo area are mainly comprised of volcanic, metavolcanics, and melanges of serpentinite and graywacke sandstone. These rocks are highly fractured and are part of the Mesozoic aged Franciscan Formation. The predominant northwest-southeast trending structures of the Coast Range Province are related to the San Andreas Fault Transform Boundary. According to the Geologic Map of California, San Luis Obispo Sheet published by the California Division of Mines and Geology (CDMG) in 1978, the site vicinity is underlain by the Franciscan Formation and Tertiary intrusive rocks. The nearest fault mapped in the site vicinity by Jennings (1994) is the Edna Fault, which is actually a fault zone that lies approximately 1-2 miles to the northwest of the project site. This fault zone generally trends along the northern flank of the Irish Hills.

Certified FEIRs for the AASP and LUCE Update note that for the general conditions in the subject area, individual geologic studies are required to consider any proposed development projects. These studies have not identified specific areas within the AASP that would be prohibited from development due to geologic conditions or significant adverse conditions; this determination is consistent with the adopted MNDs for Tract 2368 (the East Airport area subdivision) and Senn-Glick development project, and the People's Self-help Housing project MND Addendum. Detailed geologic analysis specific to any future proposed site or development would be provided consistent with city regulations to identify potential impacts and mitigation measures accordingly as build-out occurs consistent with the AASP.

a) The subject annexation property has not been identified to be subject to significant seismic constraints in the AASP FEIR.

Based on this, no significant impacts related to seismic activity, landslides, or mudflow would occur during implementation of infrastructure improvements, and future analysis for project specific development will be conducted to analyze such potential impacts as appropriate with new development, as required by the California Building Code.

b, c, d, e) The action of annexation will not result in physical impacts on the environment, with the exception of infrastructure improvements identified in the Pre-annexation Agreement. Based on the location of infrastructure improvements, which would occur in areas with existing roads, sidewalks, and utility corridors, and compliance with erosion and stormwater control measures as dictated by the City’s Municipal Code, Waterway Management Plan, and Standard Specifications and Engineering Standards (May 2018), potential impacts related to soil erosion, expansive soils, or unstable geologic soils conditions would be less than significant. No septic tanks are proposed as part of the annexation area, as existing and future development would connect to City sewer infrastructure.

Conclusion: Less Than Significant Impact

Infrastructure improvements would occur within the locations of existing infrastructure, including roadways, sidewalks, and utility corridors. Based on required compliance with the California Building Code, City’s Municipal Code, and the City’s Standard Specifications and Engineering Standards, potential impacts related to geology and soils would be less than significant.

7. GREENHOUSE GAS EMISSIONS. Would the project:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	3,8,9 10,11, 18, 19			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	3,8,9 10,11, 18, 19			X	

Evaluation

In response to an increase in man-made greenhouse gas (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) CO₂e by 2030 and two MT CO₂e by 2050 (ARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, sub-regional, 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]).

a, b) The action of annexation would not result in the generation of GHGs. Construction-related emissions would occur during the implementation of infrastructure improvements; however, these emissions would be short-term, and based on the limited scope of the action, would not have a significant impact on the environment or impair the achievement of GHGs by 2050. Furthermore, compliance with mitigation measures identified in Section 3 (Air Quality) would reduce the project’s contribution to air emissions during construction of infrastructure improvements. The LUCE EIR, which evaluated build-out

of the City, determined that adherence to the City’s General Plan and Climate Action Plan would reduce any GHG impacts, including build-out of Specific Plan areas (such as the AASP). Regarding future build-out of the annexation area, future development subject to the AASP and City Zoning Regulations may result in more square-footage of development than what is currently allowed under County jurisdiction; however, future development would be subject to updated Building Codes (such as the Green Building Code) that would reduce operational emissions beyond what was originally anticipated in the AASP and LUCE Update, and noted County MNDs for projects within the subject area.

Conclusion: Less Than Significant Impact

Annexation of the subject area would not result in development exceeding the scope of the AASP, the action will not result in changes to GHG emissions generated by existing uses, and future development would be subject to the California Building Code (including the Green Building Code) and further analysis pursuant to the AASP and City’s Climate Action Plan. No new development is included as part of the annexation proposal, and implementation of infrastructure improvements would not generate significant levels of greenhouse gas emissions due to the short-term nature of the action, and compliance with noted air quality mitigation measures.

8. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	1,2,10 11,12 13,14, 22,23, 25			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	1,2,10 11,12 13,14, 20,21, 22,23, 25			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	1,2,10 11,12 13,14, 22,23, 25			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, it would create a significant hazard to the public or the environment?	1,2,10 11,12 13,14, 20,21, 22,23, 25			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	1,2,10 11,12 13,14, 22,25			X	
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	1,2,10 11,12 13,14, 22,25			X	
g) Impair implementation of, or physically interfere with, the adopted emergency response plan or emergency evacuation plan?	1,2,10 11,12 13,14, 25			X	

Issues, Discussion and Supporting Information Sources
For the East Airport Annexation EID-0006-2020

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 residents are intermixed with wildlands?	1,2,10 11,12 13,14, 22,25			X	
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Evaluation

The subject annexation area and area to be affected by infrastructure improvements are located on the eastern edge of the San Luis Obispo County Regional Airport, on the east side of Broad Street (State Route 227). Previous studies conducted for the AASP FEIR and LUCE Update FEIR acknowledge significant contamination of soils within the Airport Area as a result of the Unocal Tank Farm lightning strike and fire, almost 90 years ago (1926). Ongoing remediation efforts and planning have been actively underway since the late 1980's along Tank Farm Road. The subject annexation area does not fall within the documented contaminated areas from these prior studies, and the adopted Tract 2368 MND, S/G MND, and People's Self-help Housing MND Addendum for the approved subdivision and development of the area did not document the presence of hazardous materials. In addition, based on review of the GeoTracker and Envirostor databases, no hazardous material sites are located within areas proposed for infrastructure improvements or within the annexation area.

The project site is located within the boundaries of the AASP, which was reviewed and approved by the Airport Land Use Commission. The annexation area is located within Airport Safety Zones S-1a, S-1b, and S-1-c. Following annexation, future development would be subject to development limitations and standards identified in the AASP and Zoning Regulations Chapter 17.64 (Airport [AOZ] Overlay Zone), which are required to ensure compatibility with existing and future airport operations, and to prohibit the establishment of incompatible uses and further expansion of incompatible uses what could detrimentally affect long-term economic viability of the airport, and to avoid or minimize exposure of persons to potential hazards associated with current and future airport operations.

a, b) The proposed annexation will not create a hazard to the public as there will be no transport, use or disposal of hazardous chemicals permitted by the annexation action. Implementation of infrastructure improvements would consist of standard construction practices and 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. Therefore, based on the limited scope and location of the infrastructure improvements and compliance with existing regulations, potential impacts would be less than significant.

c) No hazardous emissions would be permitted by the annexation and there is not a school located within ½ mile of the annexation area or location of infrastructure improvements. Therefore, potential impacts would be less than significant.

d) The subject annexation and infrastructure improvement areas are not located on a designated hazardous site nor listed to include materials that would represent a significant hazard to the public. Therefore, potential impacts would be less than significant.

e) The property is located near the Regional Airport but the continued operation of existing uses, and any proposals for new uses following annexation, must be consistent with City General Plan, Zoning Regulations, and AASP (which was reviewed and approved by the Airport Land Use Commission). Application of those standards will prevent development within the subject annexation area from becoming a hazard to airport operations. Implementation of infrastructure improvements would not result in the creation of any features or involve any activities that would result in a hazard related to air traffic. Therefore, potential impacts would be less than significant.

f) The property is not located near a private airstrip; therefore, potential impacts would be less than significant.

g) The subject annexation area will be subject to San Luis Obispo city emergency response and evacuation plans. Annexation of this area and implementation of infrastructure improvements will not impair the ability of the city to implement its designated plans and exercise its public safety responsibilities in the area. Therefore, potential impacts would be less than significant.

h) The subject annexation area and areas identified for infrastructure improvements are located within a low fire hazard area, as identified on the City’s Safety Element Wildland Fire Hazard Map, and the area consists of a largely developed industrial area, which does not contain wildland fuels that could expose persons to significant risk from wildland fires. Therefore, potential impacts would be less than significant.

Conclusion: Less Than Significant Impact.

Annexation of the subject area would not result in development exceeding the scope of the AASP, and future development would be subject to existing regulations and limitations identified in the AASP and City Zoning Regulations. No new development is included as part of the annexation proposal, and implementation of infrastructure improvements would not result in any significant impacts related to hazards or hazardous materials.

9. HYDROLOGY AND WATER QUALITY. Would the project:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	1,3,10 11,12, 13,25, 28			X	
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. The production rate of pre-existing nearby wells would drop to a level which would not support existing land uses for which permits have been granted)?	1,3,10 11,12, 13,25, 28			X	
c) Substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation onsite or offsite?	1,3,10 11,12, 13,25, 28			X	
d) Substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial flooding onsite or offsite?	1,3,10 11,12, 13,25, 28			X	
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	1,3,10 11,12, 13,25, 28			X	
f) Otherwise substantially degrade water quality?	1,3, 10,11,			X	

Issues, Discussion and Supporting Information Sources
For the East Airport Annexation EID-0006-2020

	12,13,25,28				
g) Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	1,3,10 11,12, 13,14, 25,28			X	
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	1,3,10 11,12, 13,14, 25,28			X	
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	1,3,10 11,12, 13,14, 25,28			X	
j) Inundation by seiche, tsunami, or mudflow?	1,3,10 11,12, 13,25			X	

Evaluation

The principal drainage for the Airport Area is the East Branch San Luis Obispo Creek, which joins San Luis Obispo Creek southwest of the project area. Drainage from the Airport area is collected into Tank Farm Creek and the East Branch San Luis Obispo Creek approximately two miles west of the East Airport area. Drainage travels through the area on a generally southwesterly course until the East Branch San Luis Obispo Creek joins San Luis Obispo Creek. The nearest creeks and tributaries are approximately 600 feet to the north/northeast of the annexation area. The annexation area is not located within any flood zones. The stormwater basins and associated stormwater infrastructure located within the annexation area would remain.

a, f) As analyzed in the AASP FEIR and adopted MNDs for Tract 2368, the S/G development, and Addendum for the People’s Self-help Housing project, potential impacts related to stormwater and water quality concerns are addressed by imposing established permit activity requirements, such as the State Water Board’s National Pollutant Discharge Elimination System (NPDES) construction activity stormwater permit and best management practices (BMPs). The AASP and City requirements (including the Municipal Code, the Waterway Management Plan, and City Engineering Standards), impose these analyses and permitting requirements before allowing projects to proceed. Such analysis would be undertaken as required by the AASP for any future development project within the subject annexation area. As the annexation action does not include physical development beyond infrastructure improvements, and construction activities associated with infrastructure improvements would be subject to existing erosion control and water quality regulations, potential impacts would be less than significant and no mitigation is required.

b) The annexation action and construction of infrastructure improvements as identified in the Pre-annexation Agreement would not require the use of wells resulting in groundwater extraction; therefore, potential impacts would be less than significant.

c, d) No alteration of drainage patterns is permitted or proposed by the subject annexation and infrastructure improvements. No siltation or other alterations of drainage patterns will be permitted with the annexation. Therefore, potential impacts would be less than significant.

e) The proposed annexation and infrastructure improvements would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff because no new impervious surfaces would be created. Therefore, potential impacts would be less than significant.

g, h, i, j) The subject area is not located within a mapped flood zone, or in a location at risk of seiche, tsunami, or mudflows; therefore, potential impacts would be less than significant.

Conclusion: Less Than Significant Impact

The proposed annexation of the existing uses in the East Airport area and implementation of infrastructure improvements would not result in significant impacts related to hydrology or flood hazards, because no development is associated with the action, and infrastructure improvements conducted pursuant to City Engineering Standards would be located within existing roadways, sidewalks, bridge, and utility corridors. Future build-out of the annexation area would be subject to the AASP and City regulations regarding water quality and stormwater.

10. LAND USE AND PLANNING. Would the project:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?	1,3, 10, 11				X
b) Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?	1,3, 10, 11			X	
c) Conflict with any applicable habitat conservation plan or natural community conservation plans?	1,3, 10, 11,14				X

Evaluation

The area is designated for service and manufacturing uses under the General Plan and AASP. Annexation of the East Airport area was anticipated in the AASP, which identified pre-zoning for the site (service commercial) at the time the AASP was adopted. The proposed annexation does not include any changes to the identified land use designation or zoning. The City LUE notes that the purpose and application of the Services and Manufacturing land use designation is to provide “for a wide range of service and manufacturing uses to meet the needs of the city and some demands of the region.”

a) The subject annexation area is located within a largely developed area proximate to the Regional Airport, and immediately southeast of San Luis Obispo City Limits. The subject area is a continuation of development surrounding the general vicinity and the annexation of the site would bring it officially into the City Limits as anticipated and planned for in the AASP without modifying any of the current land uses of the area. The annexation will not physically divide this established community, as it is currently included in the AASP and associated long-term planning maps for the area. Therefore, no impact would occur.

b) As noted in the AASP FEIR, the subject annexation is consistent with City policies established under the General Plan and AASP and complies with the San Luis Obispo County Airport Land Use Plan (ALUP). No changes to pre-zoning or land use categories are proposed. The proposed annexation is consistent with applicable land use planning documents for the area. Existing uses that are non-conforming would be subject to the City’s Legal Non-conforming regulations in the Zoning Code. The Pre-annexation Agreement addresses continuation of an existing government office use, and notes that “the existing use or subsequent non-conforming uses may be replaced with an ‘Office-Government’ use as long as the new use has similar or less severe impacts on its surroundings in terms of noise, traffic, parking demand, hours of operation, and visual incompatibility compared to the immediate prior use, as determined by the Director pursuant to Chapter 17.108 of the City Municipal Code [Director’s Action], with the exception of Section 17.108.020 which shall not limit the application of this Section of this Agreement.” A proposed Ordinance to address allowing non-conforming uses to remain and/or be replaced by similar uses, at the discretion of the Community Development Director is a component of the proposed annexation. Conditions under which this discretion may be exercised includes (i) waiving the municipal code provision that ceasing such uses for periods of 12 months or more would not automatically invoke prohibitions on reestablishing the prior use or similar uses, and/or (ii) substituting new non-conforming office-government uses do not contribute to greater environmental impacts than the previous use (Attachment 4). Therefore, existing uses that would be annexed into the City would not result in any land use inconsistency resulting in a significant impact.

c) As noted in Section 4 (Biological Resources) there are no Habitat or Natural Community Conservation Plans applicable to the subject property.

Conclusion: Less than significant Impact.

The proposed annexation is consistent with the AASP, which anticipated annexation of this area. No changes to approved pre-zoning or land use categories, as identified in the AASP, are proposed. The proposed annexation is consistent with adopted plans, and the proposed infrastructure improvements are consistent with City Engineering Standards.

11. MINERAL RESOURCES. Would the project:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
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?	1,3, 10,11				X
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	1,3, 10,11				X

Evaluation

The properties subject to the annexation are located in an urbanized area bounded by Farmhouse Lane, Kendall Road and State Route 227. There are no known mineral resources in the area, and there has not been any mining or mineral extraction uses of the subject properties.

a, b) Based on the location of the proposed annexation and infrastructure improvements, no impact to mineral resources would occur.

Conclusion: No Impact.

Based on the lack of mineral resources within the subject area, no impact to mineral resources would occur.

12. NOISE. Would the project result in:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
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?	1,3, 10,11, 12,13, 16,24, 25			X	
b) Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?	1,3, 10,11, 12,13, 16,24, 25			X	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	1,3, 10,11, 12,13, 16,24, 25			X	
d) A substantial temporary, periodic, or permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	1,3, 10,11, 12,13, 16,24, 25			X	
e) For a project located within an airport land use plan or, where	1,3,			X	

Issues, Discussion and Supporting Information Sources
For the East Airport Annexation EID-0006-2020

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?	10,11, 12,13, 16,24, 25				
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	1,3, 10,11, 12,13, 16,24			X	

Evaluation

Noise-sensitive land uses are those land uses that can be adversely affected by elevated or increased noise levels. Sensitive land uses generally include residences, schools, libraries, nursing homes, and churches. The primary sources of noise within the subject area include traffic on Broad Street (State Route 227), the Union Pacific Railroad, which carries freight and passenger trains, and aircraft operating in and out of the Regional Airport. Stationary noise sources include the day-to-day activities associated with the existing land uses in the proposed annexation area.

The subject annexation area is designated for service and manufacturing uses under the General Plan and AASP. Potentially sensitive receptors include existing offices in the area. Noise generation occurs most significantly from roadway traffic on Broad Street (State Route 227). Noise from nearby airport operations occurs on an intermittent basis. Increases in traffic or airport operations will cause incremental increases in background ambient noise levels. As indicated in Table 3F-3 of the AASP FEIR, properties within 100 feet of Broad Street (State Route 227) are predicted to be exposed to traffic noise levels that exceed the planning standard of 60 dBA-Ldn. More current noise contour modeling conducted for the LUCE Update EIR show that upon City buildout, the noise level 50 feet from the roadway centerline would be 71 decibels.

a, b, c, d) The LUCE Update FEIR models a noise level of approximately 71 dB within 50 feet of the Broad Street centerline (transportation-related noise). As documented in the LUCE Update EIR Background Report and County Airport Land Use Plan, the annexation area is located with the 60 dB noise contour. The AASP FEIR identified potential impacts due to exposure to traffic noise (Impact N-1: Exposure of Land Uses to Traffic Noise in Excess of the Standards for Exterior Noise Exposure specified in Table 3F-1; Impact N-2: Increase in Permanent or Temporary Ambient Noise Levels as Indicated in Table 3F-3, Substantial Increases in Noise Would Occur Along Some Roadways) and aircraft noise (Impact N-3: Exposure of Residential uses to Aircraft Noise). The AASP FEIR determined that implementation of mitigation measures identified in the City's Noise Element would mitigate impacts related to noise exposure to less than significant.

Implementation of identified infrastructure improvements would be short-term, and limited to areas within existing roadways, sidewalks, and utility corridors. Implementation of the annexation would not result in any long-term increase in noise. Therefore, potential impacts would be less than significant.

While the annexation action does not permit or approve future development, discretionary review of future projects would occur, and would be subject to the requirements of the City's Municipal Code, including Chapter 17.74 (Zoning Regulations, Airport Overlay Zone, Noise) and Chapter 9.12 (Noise Control), consistent with the AASP FEIR. The Tract Map 2368 MND, S/G MND, and People's Self-help Housing MND Addendum identify similar potential noise impacts for lots proximate to Broad Street, and include mitigation that requires a noise study if a sensitive use is proposed that would be affected by transportation-related noise, or if future uses would include loud, noise generating equipment, similar to what is required by existing City regulations.

e) Existing background noise conditions include instantaneous increases from airport operations. The County's ALUP, AASP, and AASP FEIR recognize the need to minimize noise generation, while balancing the viability of the airport with local land uses. On-going operations at the County airport consistent with present regulations will continue to minimize conflicts between nearby and adjoining uses. Increases in noise levels as analyzed by the AASP FEIR, Tract Map 2368 MND, S/G MND, and People's Self-help Housing MND Addendum did not find these conditions to be adverse and unavoidable. Instead the AASP FEIR acknowledged various building and site planning techniques, along with land use restrictions, that have been incorporated into the AASP, and the County MNDs note that acoustical treatment of buildings would mitigate potential noise exposure from aircraft. While the proposed action does not include development of land uses, future development would be subject to mitigation requirements identified in the City's Noise Element and Municipal Code, which regulate noise exposure. Therefore, potential impacts would be less than significant.

f) The subject site is not located in the vicinity of a private airstrip; therefore, impacts would be less than significant.

Conclusion: Less than Significant Impact

The proposed annexation is consistent with the AASP, which anticipated annexation of this area. No changes to approved pre-zoning or land use categories, as identified in the AASP, are proposed. The proposed annexation is consistent with adopted plans, and future development would be subject to existing regulations regarding noise exposure and noise attenuation. Implementation of infrastructure improvements would be short-term, and based on compliance with the Municipal Code, would not result in significant noise impacts.

13. POPULATION AND HOUSING. Would the project:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example by proposing new homes or businesses) or indirectly (for example, through extension of roads or other infrastructure)?	1,2,3			X	
b) Displace substantial numbers of existing housing or people necessitating the construction of replacement housing elsewhere?	1,3				X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	1,3				X

Evaluation

The AASP and City General Plan designate the subject annexation area for services and manufacturing uses. These uses would not include residential occupancies of the area. These designations preclude new residential growth, or displacement of existing housing, within the subject annexation area.

a-c) The proposed annexation will not result in new residential development or the relocation of existing housing within the annexation area. Only new uses consistent with the AASP and General Plan would be permitted. Implementation of the annexation would be consistent with the AASP and General Plan, and would therefore not induce substantial population growth.

Conclusion: Less than significant impact.

The proposed annexation would be implemented as anticipated in the AASP, and no residential uses exist or are allowed within the area.

14. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision, or need, of new or physically altered government 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:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Fire protection?	1,3 6, 10, 11, 14			X	
b) Police protection?	1,3 6,10,			X	

Issues, Discussion and Supporting Information Sources
For the East Airport Annexation EID-0006-2020

	11,14				
c) Schools?	1,3 6,10, 11,14			X	
d) Parks?	1,3 6,10, 11,14			X	
e) Roads and other transportation infrastructure?	1,3 6,10, 11,14			X	
f) Other public facilities?	1,3 6,10, 11,14			X	

Evaluation

The project area is currently served by the County Sheriff and County Fire/California Department of Forestry (CDF). There is also a mutual aid agreement between the County and City for fire service response. The project area is within the San Luis Coastal School District.

a) Fire protection for the subject annexation area would be provided by the nearest staffed City Station #1 located at 2160 Santa Barbara Avenue and the County Fire/CDF Station #21 at the airport runway. Response times to and within the annexation area are considered four minutes or less, based on LUCE EIR Figure 4.13-1 (Fire Department Four-Minute Response Times), which meets the City’s Safety Element response time standard of four minutes. The AASP provides that the City will consider increases to staffing subject to budgetary analysis and overall city needs. The AASP notes that interim improvements may be provided at the Chevron and Avila Ranch development areas until permanent facilities are available. The City has completed the creation of a Community Facilities District (CFD) in association with the Avila Ranch development project (also located within the AASP) to facilitate funding for a new fire station in the area, in response to approval of the Avila Ranch development project. The CFD is limited to the Avila Ranch development area, and does not include the annexation site. As noted above, the annexation area is located within the four-minute response time range; therefore, the annexation does not necessitate the need for a new facility. The AASP FEIR, AASP, and the proposed Plan for Services and Pre-annexation Agreement for this proposed annexation address fire service needs for this area of the City, and do not identify additional infrastructure needs beyond upgrades to existing fire hydrants and hose connections. Therefore, implementation of the proposed annexation would not result in a significant impact to fire services, such that construction of a new facility would be required. Regarding future build-out, development would contribute to the cumulative demand for fire protection services, and future development would be subject to Citywide Fire impact fees, which will contribute towards the renovation of existing fire stations, the construction of a new fire station, and replacement of vehicles and equipment needs to serve the City.

b) The City Police Department currently provides mutual aid response to the proposed annexation area. The LUCE EIR determined that buildout of the General Plan, including buildout of the AASP, would increase the demand for police protection services by increasing population and development in the City, resulting in a less than significant impact (Impact PS-2). The LUCE EIR notes that if a substantial number of officers are hired in the future, reconfiguration, reconstruction, or new construction of facilities may be needed to accommodate them. Potential changes in needs for the City Police Department staffing plan are considered as part of overall standard Citywide budget priorities. Implementation of the annexation would not result in new dwelling units or directly increase the City’s population, and based on the level of existing and future development, would not warrant construction of a new police facility. Regarding the annexation’s contribution to a cumulative demand for police services, the City has a system of required developer impact fees and dedications established to address direct demand for new facilities associated with new development, while potential increases in property tax revenue associated with valuation of new businesses and other revenues (e.g., sales tax) would help offset the increased ongoing cost of provision of public services. Regarding future build-out, development would contribute to the cumulative demand for Police services, and future development would be subject to Citywide Police impact fees, which will contribute towards the construction of a new Police Department Headquarters and new vehicles to serve the City.

c, d) No direct impacts from the proposed annexation are anticipated for existing schools and parks in the area as no residential population will occur within the annexation area. The MND adopted by the County for Tract 2368 and the S/G

development noted that future development would be subject to Public Facility Fees, of which a portion goes towards the acquisition and improvement of parks. Regardless of jurisdiction, new residential, commercial, and industrial development projects require payment of school district developer fees, which address each project’s cumulative contribution towards impacts on public schools.

Regarding future build-out, future development would result in an increase in the number of jobs in the City, which may increase demand on parks and potentially on schools if new employees relocate to the City. This potential contribution to a cumulative impact on parkland and schools would be addressed through the payment of Citywide Parkland In-lieu and development impact fees, required for new residential development, and school district developer fees, required for both residential and commercial/industrial projects.

e) Roads and transportation infrastructure are addressed in Section 16 below.

f) Utility services for the annexation areas will be connected to existing City services at multiple locations. Public water service will be connected to the Terrace Pressure Zone at the intersection of Broad Street and Fuller Road, or at such other location as may be approved by the Utilities Director following detailed engineering designs by the applicants. Pressure reducing systems, hydrants, air release valves and other improvements will be completed as provided with the detailed Project Description under the Pre-Annexation Agreement and Plan For Services attachments to this Initial Study. Recycled water will be extended to the East Airport Annexation area from Broad at Tank Farm in and along Broad Street. Wastewater service for the annexation area is presently provided by the FLWC. Upon annexation and completion of the improvements referred to herein, the gravity wastewater system will be converted to interconnect with a gravity collection line in Broad Street, and from there is conveyed to the City’s WRRF. The force main and lift station currently serving the area would be abandoned. The timing of this work is contingent on the decommissioning of the FLWC wastewater treatment plant following the connections of the various properties in the West Airport annexation area. These extensions will occur within established streets and rights-of-way and will involve no significant potential for adverse impacts to the Utility systems of the City.

Other public services, such as transit, solid waste and recycling and general city administrative services are not considered to be significantly impacted by the addition of the subject annexation area, based on the project’s consistency with the AASP and General Plan.

Conclusion: Less than significant impact.

Based on the inclusion of the items noted above in the Project Description, and attached Plan For Services, and pursuant to the direction of the Pre-annexation Agreement, the completion of the identified infrastructure improvements will adequately address infrastructure needs upon annexation. Any potential effects on the environment as a result of the completion of these infrastructure improvements are addressed in this Initial Study.

15. RECREATION. Would the project:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) 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?	1,3, 10,11, 14			X	
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	1,3, 10,11, 14			X	

Evaluation

a, b) The annexation of the project area and existing uses would result in less than significant impacts from new or increased residential demands for added parks and recreation services because there are no residential zones within the proposed annexation area. As noted in Section 14 there will be no significant demands for school or parks and recreation services based on annexation of the subject properties. The annexation of existing land uses, and implementation of infrastructure

Issues, Discussion and Supporting Information Sources
For the East Airport Annexation EID-0006-2020

improvements would not result in impacts from new or increased residential demands for added parks and recreation services. Therefore, potential impacts would be less than significant.

Conclusion: Less than significant impact

As noted above, implementation of the proposed annexation would occur as planned for in the AASP. No new residential uses would be developed in the area following annexation, and the proposed project would not result in an increased demand for recreational facilities.

16. TRANSPORTATION/TRAFFIC. Would the project:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
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?	1,2,3, 6,10, 11			X	
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	1,2,3, 6,10, 11			X	
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	1,2,3, 6,10, 11			X	
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	1,2,3, 6,10, 11			X	
e) Result in inadequate emergency access?	1,3			X	
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	1,2,3, 6,10, 11			X	

Evaluation

The annexation area is accessed via Broad Street (State Route 227), and internal roads were constructed pursuant to County standards upon the County’s approval of Tract 2368 and associated public improvement plans. The project area is currently subject to a Memorandum of Agreement (MOA) between the City and County, which allows for the collection and distribution of development/mitigation fees (including traffic impact fees) needed to offset the impacts from projects within a specified Sphere of Influence (SOI), including the subject area. As identified in the Pre-annexation Agreement, the East Airport and Senn/Glick property owners will be required to contribute \$1,000,000 (one million dollars) to the City to fulfill the property’s participation in the City’s Citywide Transportation Impact Fee program (TIF) and/or other area transportation improvement reimbursement obligations. The TIF Payment is based upon the existing and future buildable development area and intensity on each of the lots within the East Airport annexation area as approved by the County, up to a total of 680,000 square feet of building floor area. The Pre-annexation agreement requires that additional floor area or intensities proposed beyond 680,000 square feet (as distributed across each lot within the annexation area) would require contribution to the TIF program. These fees are specifically designated for transportation-related improvements.

In addition, the Pre-annexation Agreement calls for specific infrastructure improvements within the annexation area prior to the City’s acceptance of internal roadways and sidewalks. These improvements are for the most part directed at pavement upgrades and bringing the roadway infrastructure for the annexation area up to City standards. These improvements are noted as traffic control and striping, sidewalk replacements, accessibility ramps and walks, and pavement maintenance. With these

improvements the project will address its needs as a part of the annexation process outlined in the Pre-annexation Agreement.

a, b) Transportation improvements provided under the Pre-annexation Agreement and Plan For Services include upgrading street signs, striping, sidewalk repairs, American with Disabilities Act (ADA) access features and curb painting to reflect city standards. The annexation area does not include street lighting that would conflict with City Lighting and Night Sky Preservation standards identified Zoning Regulations Chapter 17.70.100. The proposed annexation will not conflict with City Circulation Element policies, the circulation plan identified in the AASP, nor be contrary to established transportation management, public transit and roadway improvement policies of the City. Furthermore, the Pre-annexation Agreement identifies payment of a fee that will be applied to City transportation projects, which addresses existing and future development's contribution to vehicular, bicycle, and pedestrian trips. Therefore, potential impacts would be less than significant.

Regarding future build-out of the annexation area, the LUCE EIR and AASP EIR evaluated build-out of the City including the annexation area based on compliance with the approved pre-zones and General Plan land use designations. These documents evaluated traffic and identify required improvements associated with build-out. Any infrastructure improvements required as a component of the annexation are identified in the project description and evaluated in the Initial Study. As noted above, payment of TIF fees as identified in the Pre-annexation Agreement would mitigate both existing and future transportation impacts.

c) The subject site is a developed subdivision and will not require new public roads to access the subject properties. The annexation of the subject property does not include changes in traffic patterns for vehicles or aircraft. Therefore, potential impacts would be less than significant.

d) No changes in design of existing roadways are required by the proposed annexation; therefore, potential impacts would be less than significant.

e) The subject site is a developed subdivision and will not require new access to provide for emergency response. Therefore, potential impacts would be less than significant.

f) Existing public transit services and bicycle/pedestrian ways will not be changed. Increased improvements to sidewalks, handicapped accessibility and similar facilities are anticipated as part of the final annexation improvement plan. The proposed annexation will not conflict with established public transit, bicycle or pedestrian facilities or policies and regulations governing same.

Conclusion: Less than significant impact.

The proposed project addressed by this Initial Study is the annexation of a largely developed business and industrial area to the City. Annexation of those existing uses do not result in changes to traffic generation and circulation conditions in the area that were not previously considered in the AASP Final EIR the City's LUCE updates in 2014, and as contemplated by the proposed Pre-annexation Agreement concerning traffic mitigations and impact fees. The subject annexation area is included in the City's Circulation Element and recently updated City-wide TIF Program, designed to mitigate adverse transportation impacts of any future development beyond 680,000 square feet of development area.

17. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in 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:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
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	1,3, 12,13, 25		X		
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to	1,3, 12,13,				

Issues, Discussion and Supporting Information Sources
For the East Airport Annexation EID-0006-2020

criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	25		X		
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Evaluation

On December 21, 2018, local Native American tribal groups were formally notified that an Initial Study of Environmental Impact was being completed for the proposed project and invited to provide consultation on the proposed project. The Northern Chumash Tribal Council engaged in a tribal consultation meeting on February 8, 2019 and noted that the existence of development and infrastructure within the annexation area does not preclude the presence of cultural resources.

a) Based on the certified AASP FEIR and adopted MNDs noted above, no cultural resources were documented within the subject area. Infrastructure improvements would occur within existing roadways, sidewalks, and utility corridors. In the unlikely event of resource discovery, City of San Luis Obispo Archaeological Resource Preservation Program Guidelines Section 4.60.1 requires that all construction activities that may disrupt those materials shall cease and the Community Development Director shall be notified immediately of the discovery of archaeological materials. In addition, the adopted MND for Tract 2368 (the East Airport area subdivision) includes a mitigation measure requiring that in the event of a discovery, construction activities shall cease, local agencies shall be contacted, and the resource shall be evaluated (see CR-1, below, with clarification to include historic and paleontological resources, and to identify the current CEQA lead agency). Based on the results of cultural resource studies within the subject area, location of infrastructure improvements, and compliance with adopted Guidelines and the adopted mitigation measure in place to protect cultural resources upon inadvertent and unlikely discovery, potential impacts would be less than significant with implementation of mitigation.

Mitigation Measure

CR-1: Unanticipated cultural resource discovery. In the event archaeological, historic, or paleontological resources are unearthed or discovered during any construction activities, the following standards apply:

- a. Construction activities shall cease, and the City Community Development Director shall be notified so that the extent and location of discovered materials may be recorded by a qualified archaeologist, and disposition of artifacts may be accomplished in accordance with state and federal law, and in consultation with local Native American tribal organizations.
- b. In the event archaeological resources are found to include human remains, or in any other case where human remains are discovered during construction, the County Coroner is to be notified in addition to the City Community Development Director so that proper disposition may be accomplished.

b) No tribal cultural resources have been identified in the subject area. In the event of unanticipated discovery, compliance with the requirements summarized above would be required to protect and assess the resource (see CR-1, above). Therefore, potential impacts would be less than significant with implementation of mitigation measures.

Conclusion: Less Than Significant Impact with Implementation of Mitigation Measures

Based on documentation noted above, the annexation area does not contain evidence of cultural resources. Mitigation is identified above (CR-1), which would be required during implementation of infrastructure improvements. Therefore, potential impacts to cultural resources as a result of implementation of infrastructure improvements as described in the Pre-annexation Agreement would be less than significant with implementation of mitigation measures.

18. UTILITIES AND SERVICE SYSTEMS. Would the project:

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	1,3,6,10,11			X	
b) Require or result in the construction or expansion of new water	1,3,6,			X	

Issues, Discussion and Supporting Information Sources
For the East Airport Annexation EID-0006-2020

treatment, wastewater treatment, water quality control, or storm drainage facilities, the construction of which could cause significant environmental effects?	10,11				
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	1,3,6,10,11			X	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded water resources needed?	1,3,6,10,11,14,26			X	
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitment?	1,3,6,10,11,14,26			X	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	1,3,6,10,11			X	
g) Comply with federal, state, and local statutes and regulations related to solid waste?	1,3,6,10,11			X	

Evaluation

The proposed annexation site is currently served by the FLWC, groundwater wells, collection system and a community wastewater treatment plant. The proposed project involving annexation of the subject properties would require the service of water, wastewater and recycled water for irrigation from the City. Existing groundwater wells may be retained and used for irrigation purposes only.

The City adopted the General Plan Water and Wastewater Management Element (WWME) to address water resources and wastewater services because of the vital role of these resources and the far-reaching impacts of water policies on community growth and character. The City's WWME translates the Land Use Element's (LUE) capacity for development into potential demand for water supply and wastewater services, and outlines how the City plans to provide adequate water and wastewater services for its citizens, consistent with the goals and policies of other General Plan elements. The 2018 Amendment to the WWME includes updated water supply information and background information to reflect current conditions within the City's wastewater collection system and WRRF. The 2018 WWME concludes that the City has adequate water supply and wastewater treatment capacity to meet projected water demand upon build-out of the LUE, which includes build-out of the AASP and the subject annexation area.

Regarding water, the City's water resource availability (total water supply) consists of 10,130 acre-feet (AF), which includes:

- 7,496 AF of primary water supply (the amount needed to meet the General Plan build-out of the City, including the AASP and subject annexation area);
- 1,209 AF of reliability reserve (to provide a buffer for future unforeseen or unpredictable long-term impacts to the City's available water resources); and
- 1,425 AF of secondary water supply (the amount of water needed to meet peak water demand periods or short-term loss of City water supply sources).

Regarding wastewater, the annexation area is not located within a wastewater collection system capacity constrained area (refer to 2018 WWME Figure 3). The WRRF currently treats 4.5 million gallons of wastewater daily (mgd), and is designed for an average dry-weather flow of 5.1 mgd (2018 WWME). The WRRF is currently being upgraded to provide sufficient capacity (5.4 million gallons per day) to serve the City upon build-out of the LUE (including the AASP and the subject annexation area).

a, b, e) The Plan for Services and Pre-annexation Agreement identify infrastructure improvements and testing requirements, to be reviewed and verified by the City Utilities Department and Utilities Director, including but not limited to the following (refer to Attachment 2, Pre-annexation Agreement and Attachment 3, Plan for Services):

The gravity wastewater system will be converted to interconnect with a gravity collection line in Broad Street, and from there is conveyed to the City's WRRF. The force main and lift station currently serving the area would be abandoned. The timing of this work is contingent on the decommissioning of the FLWC wastewater treatment plant following the connections of the various properties in the West Airport annexation area. Infrastructure improvements include upgrading the public water and recycled water systems pursuant to City Standards, extending the Terrace Pressure Zone from the intersection of Broad and Fuller to the project area and reconstructing the water system piping at the intersection of Broad and Fuller with a new pressure reducing station, programmable logic controller, and telemetry, installation of approximately 2,100 feet of eight-inch recycled water main in Broad Street from Tank Farm Road to Aerovista (including a portion suspended from the bridge crossing the Upper Fork East Branch, San Luis Obispo Creek), replacement of fire hydrants, extension of main line recycled water service to the annexation area in two (2) stages (Stage 1 from Tank Farm to Aerovista, Stage 2 from Aerovista along property frontage), repairing the public sewer system as necessary, and installation of water meters, backflow devices, and recycled water signage. Identified improvements would be located within existing streets, sidewalks, utility corridors, and areas previously disturbed with existing infrastructure.

Regarding future build-out, as noted above, the 2018 WWME concluded that the City has adequate water supply to serve build-out of the General Plan, which includes build-out of the AASP and subject annexation area. The proposed annexation does not include any changes to the identified land use designation or zoning designation as identified in the LUE and AASP; therefore, the City has adequate water supply to serve the annexation area. As noted above, pursuant to the 2018 WWME, the City's WRRF will have the capacity to serve build-out of the City, including the AASP and subject annexation area. Based on consultation with City Utilities staff, the WRRF currently has capacity to serve uses within the annexation area, as the plant currently treats 4.5 million gallons of wastewater daily (mgd), and is designed for an average dry-weather flow of 5.1 mgd (2018 WWME).

Based on the City's available capacity to serve the annexation area, and completion of infrastructure improvements and testing requirements identified in the Pre-annexation Agreement (and incorporated into the Project Description), potential impacts would be less than significant.

c) The existing subdivision was constructed with storm drain infrastructure, which will continue to function in the same capacity following annexation. As parcels are developed following annexation, compliance with City Engineering Standards and the AASP will be required at the time future development proposals are submitted to the City. Therefore, potential impacts would be less than significant.

d) Water service to the area is included in the City's Urban Water Management Plan (Source 26) and General Plan documents. The City Utilities Department has reviewed the proposed annexation proposal, and necessary improvements to potable and recycled water distribution system infrastructure are identified in the Pre-annexation Agreement, with the intention of providing recycled water to property owners upon completion of annexation and increasing potable water pressure in this area. As noted above under (a, b, e), the City has availability and capacity to provide water and wastewater service to the annexation area under existing and build-out conditions.

Based on the City's available capacity to serve the annexation area, and completion of infrastructure improvements and testing requirements identified in the Pre-annexation Agreement (and incorporated into the Project Description), potential impacts would be less than significant.

f, g) Evidence documented in the AASP FEIR and supplemental contacts with the local waste hauler and landfill operators reflects sufficient capacity to continue serving the largely developed annexation area (personal contact San Luis Garbage May, 2019). Therefore, potential impacts would be less than significant.

Conclusion: Less than significant impact.

Annexation of the subject area would not result in development exceeding the scope of the AASP. No new development is included as part of the annexation proposal, and with the provisions included in the Project Description (which incorporates the Pre-annexation Agreement), water and wastewater infrastructure conditions will be adequately addressed and can be found to comply with City infrastructure standards at the time of annexation. As noted above, based on the City's 2018 WWME, the City has sufficient water availability and wastewater treatment capacity to serve the project under existing conditions and build-out conditions.

19. MANDATORY FINDINGS OF SIGNIFICANCE.

	Sources	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X		
Based on the findings provided in this Initial Study, the proposed project would not substantially degrade the quality of the environment. See Sections 3 Air Quality, 4 Biological Resources, 5 Cultural Resources, and 17 Tribal Cultural Resources for further discussion of the proposed project's potential impacts on these environmental issue areas and mitigation measures that reduce those impacts. As noted in the Biological Resources section of the Initial Study, infrastructure improvements include installation of a recycled water line on a bridge over a creek; mitigation measures are identified that would ensure no significant impacts to fish or wildlife species would occur.					
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects)				X	
No evidence suggests that impacts of the proposed project are identified that would be considered "individually limited" or "cumulatively considerable." The proposed project is consistent with the existing AASP, Land Use Element and Zoning for the development and the cumulative impacts of developing this site were analyzed as a part of the AASP FEIR and Land Use and Circulation Element (LUCE) EIR.					
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				X	
No evidence has been presented or identified that suggests the annexation of the subject area would have a negative effect or substantial adverse effect directly or indirectly on humans.					

20. EARLIER ANALYSES.

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

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

Airport Area Specific Plan and Final EIR (2014), City of San Luis Obispo Land Use and Circulation Element (LUCE) Update EIR (2014), AASP FEIR Addendum (2015), available for review at the City Community Development Department (919 Palm Street, San Luis Obispo, CA 93401), or at the following websites:

City of San Luis Obispo General Plan and LUCE EIR: <https://www.slocity.org/government/department-directory/community-development/planning-zoning/general-plan>

Airport Area Specific Plan: <http://www.slocity.org/home/showdocument?id=4294>

Final Program Environmental Impact Report for the Airport Area and Margarita Area Specific Plans and Related Facilities Master Plans: <https://www.slocity.org/government/department-directory/community-development/documents-online/environmental-review-documents/-folder-719>

In addition to the documents identified above, this Initial Study incorporates by reference the following environmental documents adopted by the County upon approval of projects within the East Airport annexation area:

Issues, Discussion and Supporting Information Sources
For the East Airport Annexation EID-0006-2020

The Morabito-Burke Tract 2368 Environmental Determination (Source 12), the Senn/Glick Conditional Use Permit Environmental Determination (Source 13), and People's Self-help Housing Development Permit Environmental Determination (Source 25) are incorporated herein in their entirety and available on the following websites:

Morabito-Burke Tract Map 2368 (EACP) Mitigated Negative Declaration (MND) (County ED01-322):
<https://agenda.slocounty.ca.gov/IIP/sanluisobispo/file/getfile/82528>

Senn/Glick Conditional Use Permit D000336D MND (County ED01-273): Refer to document uploaded on the City website:
<https://www.slocity.org/government/departments-directory/community-development/documents-online/environmental-review-documents>

People's Self-help Housing Development Permit DRC2018-00131 (County ED18-077) and Addendum:
<https://agenda.slocounty.ca.gov/IIP/sanluisobispo/agendaitem/details/9294>

These documents are available at 919 Palm Street, San Luis Obispo, California (City of San Luis Obispo Community Development Department), for review.

b) Impacts adequately addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

Applicable excerpts, analysis and conclusions from the AASP and LUCE Update EIRs and County MNDs as noted above have been added to each impact issue area discussion.

c) Mitigation measures. For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions of the project.

Refer to the Mitigation Monitoring and Reporting Program, which identifies required mitigation measures as incorporated or modified to be more efficient and effective at avoiding or reducing potential impacts to less than significant.

21. SOURCE REFERENCES.	
1.	City of SLO General Plan Land Use Element, December 2014 and Final EIR, October 2014
2.	City of SLO General Plan Circulation Element, December 2014 and Final EIR, October 2014
3.	Airport Area Specific Plan Updated 2014
4.	City of San Luis Obispo, Land Use Inventory Database
5.	Website of the Farmland Mapping and Monitoring Program of the California Resources Agency: http://www.consrv.ca.gov/dlrp/FMMP/ (2018); accessed June 26, 2019
6.	Draft East Airport Commerce Park / Senn-Glick Pre-Annexation Agreement and Plan for Services
7.	San Luis Obispo Air Pollution Control District CEQA Handbook
8.	City of SLO Climate Action Plan, August 2012
9.	Clean Air Plan for San Luis Obispo County, Air Pollution Control District, 2001
10.	Addendum to FEIR for the Airport Area and Margarita Area Specific Plans, November 2015
11.	FEIR Airport Area and Margarita Area Specific Plans, 2005
12.	Morabito-Burke Tract 2368 Environmental Determination ED01-322, Mitigated Negative Declaration, San Luis Obispo County, May 23, 2003
13.	Senn/Glick Conditional Use Permit Environmental Determination ED01-273, Mitigated Negative Declaration, San Luis Obispo County, May 23, 2003
14.	City of San Luis Obispo General Plan (updates through 2018)
15.	San Luis Obispo County Attainment Status; APCD, January 29, 2019
16.	City of San Luis Obispo Municipal Code: https://sanluisobispo.municipal.codes/Code (accessed June 26, 2019)
17.	City of San Luis Obispo Standard Specifications & Engineering Standards (May 2018)
18.	California Air Resources Board (ARB). Frequently Asked Questions About Executive Order B-30-15. April 2015. Available at: http://www.arb.ca.gov/newsrel/2030_carbon_target_adaptation_faq.pdf (accessed June 26, 2019)
19.	California Air Resources Board (ARB). 2017. California's 2017 Climate Change Scoping Plan. December 14, 2017. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf . (accessed June 26, 2019)
20.	Geotracker, State Water Resources Control Board, 2015. https://geotracker.waterboards.ca.gov/ (accessed June 26, 2019)
21.	Envirostor, Department of Toxic Substances Control. 2015. https://www.envirostor.dtsc.ca.gov/public/ (accessed June 26, 2019)
22.	City of San Luis Obispo Safety Element, December 2014
23.	California Legislative Information. https://leginfo.legislature.ca.gov/faces/codes.xhtml . (accessed June 27, 2019)
24.	City of San Luis Obispo Noise Element, December 2014
25.	People's Self-Help Housing SLO County Permit and Mitigated Negative Declaration Addendum DRC2018-00131, December 13, 2018
26.	City of San Luis Obispo, Urban Water Management Plan, 2016. https://www.slocity.org/home/showdocument?id=13618
27.	Recycled Water Master Plan, 2017: https://www.slocity.org/home/showdocument?id=14955
28.	City of San Luis Obispo Waterway Management Plan, 2003: https://www.slocity.org/government/department-directory/public-works/documents-online/waterway-management-plan

Note: All documents listed above are available for review at the City of San Luis Obispo Community Development Department, 919 Palm Street, San Luis Obispo, California (805) 781-7101.