



INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM

For Plan No. EID-0218-2020 & GENP-0217-2020

1. Project Title: General Plan Housing Element Update

2. Lead Agency Name and Address:

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

3. Contact Person and Phone Number:

Rachel Cohen, Associate Planner
(805) 781-7574

4. Project Location:

Citywide, City of San Luis Obispo

5. Project Sponsor's Name and Address:

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

6. General Plan Designations:

N/A

7. Zoning:

N/A

8. Description of the Project:

The project consists of the 6th Cycle Housing Element Update, an eight-year plan which explains the City's housing goals, policies, and programs. It updates the current Housing Element which was adopted in 2015. Once adopted, the Housing Element becomes part of the General Plan, which guides public and private decisions regarding housing, development review, land use, City budgets and capital improvement programs. The Draft includes policies and programs intended to increase housing opportunities for extremely low, very-low, low- and moderate-income households, while accommodating growth in a manner consistent with goals and policies contained in the Land Use Element and other elements of the General Plan. The content of housing elements is prescribed under State housing law, and this draft has been prepared to include the required sections and information.

The draft update addresses changes in State housing law and in regional housing needs. State, regional and local housing costs, supply and needs have changed since 2015, as evidenced by current information on real estate prices, affordable housing, and the widening "gap" between rental and purchase housing costs and consumers' incomes.

Although the update retains many of the same policies and programs in the 2015 Housing Element, there are also new policies and programs that address these changing conditions.

9. Project Entitlements:

General Plan Amendments approving the 6th Cycle Housing Element.

10. Surrounding Land Uses and Settings:

Citywide.

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, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

The California Native American Heritage Commission (NAHC) supplied a list of local Native America individuals and/or groups with interests and knowledge about the area. The City did not receive any requests for consultation from contacted individuals.

12. Other public agencies whose approval is required:

The 6th Cycle Draft Housing Element Update must be referred to the California Department of Housing and Community Development (HCD) for a determination of consistency with State housing law.

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.

<input type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Greenhouse Gas Emissions	<input type="checkbox"/>	Public Services
<input type="checkbox"/>	Agriculture and Forestry Resources	<input type="checkbox"/>	Hazards and Hazardous Materials	<input type="checkbox"/>	Recreation
<input type="checkbox"/>	Air Quality	<input type="checkbox"/>	Hydrology and Water Quality	<input type="checkbox"/>	Transportation
<input type="checkbox"/>	Biological Resources	<input type="checkbox"/>	Land Use and Planning	<input type="checkbox"/>	Tribal Cultural Resources
<input type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Mineral Resources	<input type="checkbox"/>	Utilities and Service Systems
<input type="checkbox"/>	Energy	<input type="checkbox"/>	Noise	<input type="checkbox"/>	Wildfire
<input type="checkbox"/>	Geology and Soils	<input type="checkbox"/>	Population and Housing	<input type="checkbox"/>	Mandatory Findings of Significance

FISH AND WILDLIFE FEES

<input checked="" type="checkbox"/>	The Department of Fish and Wildlife has reviewed the CEQA document and written no effect determination request and has determined that the project will not have a potential effect on fish, wildlife, or habitat (see attached determination).
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<input type="checkbox"/>	The project has potential to impact fish and wildlife resources and shall be subject to the payment of Fish and Game fees pursuant to Section 711.4 of the California Fish and Game Code. This initial study has been circulated to the California Department of Fish and Wildlife for review and comment.
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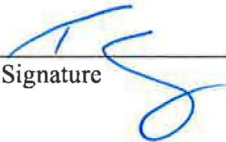
STATE CLEARINGHOUSE

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

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	<input checked="" type="checkbox"/>
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made, by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	<input type="checkbox"/>
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	<input type="checkbox"/>
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	<input type="checkbox"/>
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	<input type="checkbox"/>



 Signature

7/7/2020

 Date

Tyler Corey

 Printed Name

For: Michael Codron,

 Community Development Director

EVALUATION OF ENVIRONMENTAL IMPACTS

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

1. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:					
a) Have a substantial adverse effect on a scenic vista?	2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	14, 15	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Evaluation

a), b) Policies in the Draft Housing Element Update encourage the development of housing in urbanized areas within the City’s limits and sphere of influence. The Draft Housing Element policies are consistent with Land Use Element (LUE) policies in directing growth into those areas and sites that can accommodate residential development based on size, shape, topography, zoning and environmental sensitivity, as well as consistent with the Circulation Element and the Conservation Open Space Element that outline scenic roadways and vistas. New residential development would be guided by existing development standards regarding building height, creek and property line setbacks, and avoidance of important site and environmental features such as historic features or buildings, rock outcroppings, open space, and heritage trees.

c) The General Plan contains goals and policies that address the visual character and quality of new development. Within the Community Design Guidelines, General Principle 2.1, Site Design, states that each project should be designed with careful consideration of the site character and constraints and minimize changes to natural features rather than altering a site to accommodate a stock building plan. The Architectural Review Commission (ARC) uses this, among other policies and guidelines, to determine if new development is designed in a manner that is consistent with its surrounding structures and environment. The ARC and the development review process ensure, through required project modifications, conditions of approval or mitigation measures, that development plans are consistent with visual character and quality guidelines prior to project approvals.

d) Residential development projects are subject to the Night Sky Ordinance, which includes operational and development standards that mitigate light or glare impacts to a less than significant level.

Conclusion

Less than significant impact.

2. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

a), c), d), e) The City of San Luis Obispo is in the central portion of the County's coastal agricultural region. The City is, for the most part, urbanized with only a few small areas still engaged in agricultural production and forest land limited to areas zoned in the City as Open Space. Land Use Element Policy 1.8.1 calls for the preservation of prime agricultural land, productive agricultural land, and potentially productive agricultural land within the Urban Reserve and City limits. The Draft Housing Element follows the Land Use Element in terms of where housing should be developed and promotes compact urban form to reduce urban sprawl and loss of productive agricultural or forest lands. Agricultural and Conservation/Open Space designated lands allow limited residential use at very low densities of one dwelling per five or more acres, which is only suitable for rural housing. The Draft Housing Element Update will not result in the conversion of prime or unique farmland or forest land or involve other changes that would lead to conversion of farmland to non-agricultural uses or loss of forest land or conversion of forest land to non-forest use because it does not identify any new land that is subject to urbanization, rezoning from agricultural or forest land use to residential use or expansion of the City’s Urban Reserve Line beyond that already anticipated in the General Plan.

b) The City has established an Agricultural land use designation (AG) in its General Plan to help preserve important agricultural land. The General Plan has allocated sufficient land for urban uses to achieve housing goals and meet the Regional Housing Needs Allocation without expanding the current Urban Reserve Line into agricultural lands in the unincorporated County area. Draft Housing Element Policy 6.15 states the City will encourage residential development focused on infill development and densification within City Limits and designated expansion areas over new annexation of residential land to maximize housing potential in the City. There are no properties within City limits under Williamson Act contracts.

Conclusion

No impact.

3. AIR QUALITY

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

a) Conflict with or obstruct implementation of the applicable air quality plan?	1, 5, 12, 13	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) 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?	12	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	1, 2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Evaluation

The project site is located in the South Central Coast Air Basin (the basin), which includes San Luis Obispo, Santa Barbara, and Ventura Counties. The project site is under the jurisdiction of the San Luis Obispo County Air Pollution Control District (SLOCAPCD). As the local air quality management agency, SLOCAPCD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether or not the standards are met or exceeded, San Luis Obispo County is classified as being in “attainment” or “non-attainment.” Under state law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-attainment. San Luis Obispo County is designated as non-attainment for the state standards for suspended particulate matter (PM10) and ozone (California Air Resources Board [CARB] 2017). San Luis Obispo County is designated as attainment or unclassified for all other federal and state standards.

In March 2002, SLOCAPCD adopted the 2001 Clean Air Plan. In July 2005, SLOCAPCD adopted a Particulate Matter Report in order to update the jurisdiction’s control measures for particulate matter, as required by S.B. 656. In 2015, SLOCAPCD adopted an Ambient Air Monitoring Network Assessment in order to identify and analyze its historic and current air monitoring sites. The Ambient Air Monitoring Network Assessment was updated in June 2019. In September 2019, SLOCAPCD adopted an Ozone Emergency Episode Plan, in compliance with the Federal Clean Air Act, in order to provide the basis for taking actions when ambient ozone concentrations reach a level that could endanger public health in San Luis Obispo County.

a), b) A significant impact would only occur if the project resulted in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment. The Draft Housing Element Update will not conflict or obstruct implementation of SLOCAPCD 2001 Clean Air Plan (CAP). The CAP calls for building compact communities to limit urban sprawl, mix complementary land uses, such as commercial services with higher density housing, increasing residential and commercial densities along transit corridors, and increase pedestrian-friendly and interconnected streetscapes, helping to make alternative means of transportation more convenient. The Draft Housing Element Update is consistent with this plan. Policies 9.1 through 9.5 promote sustainable development that will help reduce greenhouse gas emissions. Housing Element policies 7.4, 7.5, and 7.7 support walkable and bikeable neighborhoods, connected to shopping, schools and other neighborhoods. The Community Design Guidelines and Noise Element policies require setbacks and the installation and use of HVAC systems for residences located along high traffic corridors. These mitigations also serve to separate residences from potential exposure to vehicle-related pollutants.

c) The project will not result in a significant impact to air quality. The Housing Element Update anticipates population and housing growth consistent with the Land Use Element based on household size and dwelling unit potential for this planning period. The Draft has numerous policies and programs designed to promote compact urban growth, encourage mixed use,

promote housing within walking or biking distance of employment, and encourage downtown housing close to jobs, services, government, recreation and cultural opportunities.

d) The Draft Housing Element would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people because it does not establish new land uses or propose the development of any specific project. Individual residential development projects, especially those within a mixed-use project, would be required to comply with the City’s odor ordinance (SLOMC Chapter 8.22) and be subject to review based on the local Air Pollution Control District regarding the acceptability of adjacent land uses and addresses compatibility of land uses in mixed-use developments.

Conclusion

Less than significant impact.

4. BIOLOGICAL RESOURCES

Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	1, 5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 U.S. Fish and Wildlife Service?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

a)b)c) The General Plan Land Use and Conservation and Open Space Elements guide the preservation of biological resources. These resources include creeks and adjacent riparian corridors, vernal pools, marshes, endangered species or species of special concern, hillsides, open space and park areas, and Laguna Lake. General Plan Conservation and Open Space Element Policy 7.3.3 says that wildlife habitat and corridors that provide continuous wildlife habitat shall be preserved. The Draft Housing Element Update is consistent with those documents and anticipates new dwellings only in those areas suitable for residential development, with adequate guarantees to preserve natural and biological resources as part of new development. It says housing should be prevented on sites that are unsuitable for development due to the presence of open space resources, or natural or manmade hazards.

Individual development projects will be subject to development review by City staff and advisory bodies to ensure compliance with pertinent creek and wetland policies. Zoning Regulation Section 17.70.030 (Creek Setbacks) says that projects shall be consistent with the General Plan and require the protection of scenic resources, water quality and natural creekside habitat including opportunities for wildlife habitation, rest and movement; therefore, all new residential development must comply with the Creek Setback Ordinance and must avoid sensitive site resources. New projects are evaluated for compliance with the Creek Setback Ordinance and modifications are required through the development review process, conditions of approval or mitigation measures, as appropriate to ensure that any potential impacts are less than significant.

d) Development projects will be subject to applicable City standards and guidelines, the State and Federal Endangered Species Act (ESA), the Clean Water Act (CWA) and other local, state and federal regulatory programs to ensure significant impacts have mandated mitigation measures. Conservation and Open Space Element Policy 7.7.8 ensures the protection of wildlife corridors. The City conditions development permits in accordance with applicable mitigation measures to ensure that important corridors for wildlife movement and dispersal are protected. Important featured corridors include riparian corridors, wetlands, lake shorelines, and protected natural areas with cover and water.

e) Conservation and Open Space Element Policy 7.5.1 states that significant trees making substantial contributions to natural habitat or to the urban landscape due to their species, size or rarity shall be protected and their removal will be subject to specific criteria and mitigation requirements. Additionally, Municipal Code Chapter 12.24 outlines the City’s Tree regulations. Any housing projects proposed on sites with significant trees will be subject to these regulations and Conservation and Open Space Element policy and mitigation.

f) The Draft Housing Element does not conflict with any adopted Conservation Plan.

Conclusion

No Impact.

5. CULTURAL RESOURCES

Would the project:					
a) Cause a substantial adverse change in the significance of a historic resource pursuant to §15064.5?	14, 15, 16	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	5, 14	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	5, 14	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

a) Preservation of cultural resources is an important General Plan goal. The Conservation and Open Space Element (COSE) Chapter 3 includes policies and programs for the preservation of cultural resources. COSE Policies 3.3.1 and 3.3.5 discuss that significant historic and architectural resources should be identified, preserved and rehabilitated and that the City shall identify and protect neighborhoods or districts having historical character due to the collective effect of Contributing or Master List historic properties. The Draft Housing Element Update is consistent with COSE and any new residential development, additions, or rehabilitation will have to be reviewed to be consistent with these policies. In addition to compliance with the General Plan, new residential projects are evaluated for compliance with the Historic Preservation Ordinance (Municipal Code Chapter 14.01) and the Historic Preservation Program Guidelines through the development review process, conditions of approval or mitigation measures, as appropriate to ensure that any potential impacts are less than significant.

b) The City has established criteria to identify significant archeological resources and encourage the preservation of these archaeological resources and sites. The City’s Archeological Resource Preservation Guidelines are used to determine significant resources. These guidelines support General Plan COSE Policy 3.5.1 which says the City shall protect known and potential

archaeological resources. Meeting the community’s housing needs is also a key community goal, and the Draft Housing Element Update seeks to balance these sometime competing needs. It contains policies addressing the need to rehabilitate rather than demolishing housing and states that new residential development is to be compatible design with established neighborhoods. As new housing is developed, the Archaeological Resource Preservation Guidelines state that those features or characteristics that create or reinforce San Luis Obispo’s “sense of place” are to be preserved. Individual residential development projects will be evaluated for site-specific cultural resources and where necessary, appropriate mitigation included to protect those resources.

b), c) The City’s Archeological Resource Preservation Guidelines include specific criteria that address the discovery of unique resources or human remains during construction excavation. Development that is proposed on sensitive sites, which are mapped, requires a Phase 1 study to determine the likelihood of discovering resources during construction. These existing measures, which are in place for development city-wide, are sufficient to prevent impacts to archeological or paleontological resources, or any discovered human remains.

Conclusion

No Impact.

6. ENERGY

Would the project:					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	1, 3, 34	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	1, 3, 24	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

Pacific Gas & Electric Company (PG&E) has historically been the primary electricity provider for the City. In October of 2018, the City Council committed to joining the Monterey Bay Community Power (MBCP) and since January 2020, MBCP is the City’s primary electricity provider. MBCP provides 100 percent carbon-free electricity.

The California Building Code (CBC) contains standards that regulate the method of use, properties, performance, or types of materials used in the construction, alteration, improvement, repair, or rehabilitation of a building or other improvement to real property. The CBC includes mandatory green building standards (CALGreen) for residential and nonresidential structures, the most recent version includes the 2019 Building Energy Efficiency Standards. These standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to the exterior and vice versa), residential and nonresidential ventilation requirements, and non-residential lighting requirements.

The City is currently developing local amendments to the 2019 CBC to encourage all-electric new buildings. When paired with Monterey Bay Community Power’s carbon free electricity supply, all electric new buildings are carbon free and avoid health and safety issues associated with fossil fuels and GHGs. At its meeting on Tuesday, September 3, 2019, the City Council introduced the Clean Energy Choice Program and in June 2020 they voted to adopt the ordinance. Unlike other cities that are banning natural gas entirely, the proposed Clean Energy Choice Program provides options to people who want to develop new buildings with natural gas. New projects wishing to use natural gas will be required to build more efficient and higher performing buildings and offset natural gas use by performing retrofits on existing buildings or by paying an in-lieu fee that will be used for the same purpose.

The City COSE establishes goals and policies to achieve energy conservation and increase use of cleaner, renewable, and locally controlled energy sources. These goals include increasing the use of sustainable energy sources and reducing reliance on non-sustainable energy sources to the extent possible and encouraging the provision for and protection of solar access. Policies identified to achieve these goals include, but are not limited to, use of best available practices in energy conservation,

procurement, use and production, energy-efficiency improvements, pedestrian- and bicycle-friendly facility design, fostering alternative transportation modes, compact, high-density housing, and solar access standards.

The City Climate Action Plan also identifies strategies and policies to increase use of cleaner and renewable energy resources in order to achieve the City’s greenhouse gas emissions reduction target. These strategies include promoting a wide range of renewable energy financing options, incentivizing renewable energy generation in new and existing developments, and increasing community awareness of renewable energy programs.

a) Energy conservation is an important General Plan goal and, as noted above, the COSE outlines goals and policies to achieve energy conservation and increase use of cleaner, renewable, and locally controlled energy sources. The Draft Housing Element Update is consistent with COSE and includes Policy 9.1 which supports that new residential projects are consistent with the City’s CAP and the State’s CalGreen requirements. The Draft Housing Element itself does not establish new land uses or propose the development of any specific project that would require energy to operate or an increase in vehicle trips that would result in a substantial increase in off-site energy consumption. Individual residential development projects will be evaluated for site-specific compliance with the CBC, CalGreen, and any other requirements included as part of the City’s Municipal Code, CAP and General Plan.

b) The Draft Housing Element would not conflict with goals and policies set forth in the City’s CAP or General Plan associated with renewable energy or energy efficiency and would not result in a conflict with or obstruction of a state or local plan for renewable energy or energy efficiency. The City of San Luis Obispo Climate Action Plan (CAP) was adopted by the City Council in 2012. The CAP promotes pedestrian- and bicycle-friendly neighborhoods, diverse transportation options, energy efficiency, reduction in waste and increased recycling, protection of open space, and quantifies the estimated greenhouse gas (GHG) reductions savings of such programs. Draft Housing Element Policy 7.4 supports new residential developments that incorporate pedestrian and bicycle linkages that provides direct, convenient and safe access to adjacent neighborhoods, schools, parks, and shopping areas and Policy 9.1 states that that residential developments should promote sustainability consistent with the Climate Action Plan (CAP) and CALGreen in their design, placement, and functionality.

Conclusion

No impact.

7. GEOLOGY AND SOILS

Would the project:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:					
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	6, 35, 36	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	6, 35	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	6	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Landslides?	6	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	1, 6	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	6	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

d) Be located on expansive soil, as defined in Table 1802.3.2 of the California Building Code (2013), creating substantial direct or indirect risks to life or property?	6	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	14, 36	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

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

The City Safety Element identifies active, potentially active, and inactive mapped and inferred faults with the potential to affect the city in the event of rupture. The Los Osos Fault, adjacent to the City of San Luis Obispo, is identified under the State of California Alquist-Priolo Fault Hazards Act and is classified as active. The West Huasna, Oceanic, and Edna faults are considered potentially active and present a moderate fault rupture hazard to developments near them. The San Andreas Fault and the offshore Hosgri Fault, which present the most likely source of ground shaking for San Luis Obispo, have a high probability of producing a major earthquake within an average lifespan. The highest risk from ground shaking is found on deep soils that were deposited by water, are geologically recent, and have many pore spaces among the soil grains. These are typically in valleys.

Faults capable of producing strong ground shaking motion in San Luis Obispo include the Los Osos, Point San Luis, Black Mountain, Riconada, Wilmar, Pecho, Hosgri, La Panza, and San Andreas faults. Engineering standards and building codes set minimum design and construction methods for structures to resist seismic shaking. Based on the Department of Conservation Fault Activity Map and the City Safety Element Earthquake Faults – Local Area map, the project site is not located within or within the immediate vicinity of an active fault zone.

The Draft Housing Element Update is consistent with the Safety Element and the 2019 San Luis Obispo County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) which includes policies to prevent development on sites with natural hazards, such as geological or seismic risks, including soil erosion, landslides, or liquefaction. The Draft Housing Element itself does not establish new land uses or propose the development of any specific project, however individual residential development projects will be evaluated for site-specific compliance with City policies and regulations. City policies and development standards encourage housing where appropriately zoned land exists with the necessary public services and infrastructure (or can be served), and where the land is physically and environmentally suited for residential development. Community Development Department (planning and building) review of projects will ensure they are developed in a manner that is safe and consistent with City standards, guidelines and policies.

e) The City maintains a sewer system that has adequate capacity to meet current housing needs, plus residential growth anticipated during the planning period.

f) The City’s Archeological Resource Preservation Guidelines include specific criteria that address the discovery of unique resources or paleontological resources during construction excavation. Development that is proposed on sensitive sites, which are mapped, requires a Phase 1 study to determine the likelihood of discovering resources during construction. The Draft Housing Element itself does not establish new land uses or propose the development of any specific project, however individual residential development projects will be evaluated for site-specific paleontological resource or site or unique geologic feature and where necessary, appropriate mitigation included to protect those resources.

Conclusion

Less than significant impact.

8. GREENHOUSE GAS EMISSIONS

Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	12	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	3, 12, 24	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

a), b) Greenhouse gases (GHG) are any gases that absorb infrared radiation in the atmosphere, and are different from the criteria pollutants discussed in Section III, Air Quality, above. The primary GHGs that are emitted into the atmosphere as a result of human activities are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated gases. In 2012, the City of San Luis Obispo established a Climate Action Plan (CAP) that identified measures and implementation strategies in order to achieve the City’s GHG reduction target of 1990 emission levels by 2020. In addition, the City is currently developing a plan for achieving carbon neutrality by 2035. The City of San Luis Obispo 2005 Community Wide GHG emissions inventory showed that 50% of the city’s GHG emissions came from transportation, 22% came from commercial and industrial uses, 21% came from residential uses, and 7% from waste.

Statewide legislation, rules, and regulations have been adopted to reduce GHG emissions from significant sources. Senate Bill (SB) 32 and Executive Order (EO) S-3-05 extended the State’s GHG reduction goals and required the California Air Resources Board (ARB) to regulate sources of GHGs to meet a state goal of reducing GHG emissions to 1990 levels by 2020, 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050. Other statewide policies adopted to reduce GHG emissions include AB 32, SB 375, SB 97, Clean Car Standards, Low Carbon Fuel Standard, Renewable Portfolio Standard, California Building codes, and the California Solar Initiative.

Plans, policies, and guidelines have also been established at the regional and local levels to address GHG emissions and climate change effects within the city. In March 2012, the SLOAPCD approved thresholds for Greenhouse Gas (GHG) emission impacts, and these thresholds have been incorporated into the CEQA Air Quality Handbook and updated in 2017 with a clarification memorandum. The Bright-Line Threshold of 1,150 Metric Tons CO₂/year (MT CO₂e/year) is the most applicable GHG threshold for most projects. Table 1-1 in the SLOAPCD CEQA Air Quality Handbook (updated November 2017) provides a list of general land uses and the estimated sizes or capacity of those uses expected to exceed the GHG Bright Line Threshold of 1,150 Metric Tons of carbon dioxide per year (MT CO₂/year). Projects that exceed the criteria or are within ten percent of exceeding the criteria presented in Table 1-1 are required to conduct a more detailed analysis of air quality impacts. It is important to note the Bright-Line Threshold of 1,150 MT CO₂/year was developed to meet the state goal of reducing GHG emissions to 1990 levels by 2020.

As described in the 2012 CAP, State policies to reduce GHG emissions associated with energy use would reduce anticipated emissions associated with future development projects. In addition, the City’s General Plan, Community Design Guidelines, and Zoning Regulations include policies and standards that reduce energy use from buildings and equipment, including design standards that maximize passive ventilation and cooling systems and use of natural lighting within buildings, and energy efficiency performance standards for proposed buildings taller than 50 feet. Development projects within the Draft Housing Element Update planning period would be required to comply with these existing policies and standards.

The Draft Housing Element Update would result in development consistent with the anticipated growth under the inventory and assumptions of the 2012 CAP and the 2014 Land Use Element. The Draft includes policies and programs designed to promote compact urban growth, encourage mixed use, promote housing within walking or biking distance of employment, and encourages housing in the Downtown and the Mid-Higuera and Upper Monterey Focus Areas close to jobs, services, government, recreation and cultural opportunities. Draft program 6.15 states the City will encourage residential development focused on infill development and densification. Policies 9.1 through 9.5 promote sustainable development that will help reduce greenhouse gas emissions. Policies 7.4, 7.5 and 7.7 support walkable and bikeable neighborhoods, connected to shopping, schools and other neighborhoods.

Conclusion

Less than significant impact.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	1, 2, 6, 26	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	26	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 or excessive noise for people residing or working in the project area?	25	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	26, 31	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	3, 6, 26	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

a)b)c)d) The General Plan Land Use and Safety Elements are the primary policy documents addressing hazards and hazardous materials. Within the Safety Element, Policy 5.2 states that new residential projects should minimize people’s exposure to hazardous materials and substances. Policy 5.3 says the City should avoid using hazardous materials in its own operations to the greatest extent practical and will follow all established health and safety practices when they are used. In addition, the 2019 San Luis Obispo County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) addresses all hazards applicable to the City including: earthquakes, wildland fires, adverse weather, hazardous materials events, floods, and landslides. The MJHMP also addresses mitigation strategies to best reduce negative effects from these identified hazards. The Draft Housing Element Update is consistent with these documents.

e) Airport compatibility issues are of special concern because much of the City’s vacant residential land is located in the southern part of the City, near the San Luis Obispo County Airport. The Airport Land Use Commission adopted the San Luis Obispo County Airport Land Use Plan (ALUP) to guide where and what types of land uses are compatible with airport operations. Generally, residential development is not appropriate within flight approach and take-off areas, and where safety or noise considerations dictate greater spacing between housing and airport activities. As a part of the 2014 Land Use Element, certain areas of the City became a part of an Airport Overlay Zone (AOZ) that allows for different residential densities than are outlined in the ALUP. Zoning Regulations Chapter 17.64 ensures that land uses and development within the airport overlay zone (AOZ) are compatible with existing and future airport operations, consistent with State Aeronautics Act, State law, Federal Aviation

Administration Regulations, and guidance of the California Airport Land Use Planning Handbook. Individual developments are evaluated for their consistency with the ALUP or the AOZ depending on where the project site is located. The anticipated residential growth, outlined in the Draft Housing Element, is located outside of airport hazard areas, or within areas where residential use is allowed with appropriate design and safety considerations. There are no private airstrips within the City’s Urban Reserve line.

f) Fire Code regulations, emergency response and evacuation plans are reviewed with any new residential development to ensure the safety of the community.

g) Safety Element Policy 3.0 addresses adequate fire services and Policy 3.1 addresses housing and wildland fire safety. It says that developments should be approved only when adequate fire suppression services and facilities are available. Maintaining consistency with Fire Department standards will ensure the safety and well-being of the community and exclude development from areas of “very high” wildland fire hazards. In 2019 the City implemented the Community Wildfire Protection Plan (CWPP). The CWPP provides a citywide strategic planning level framework for hazardous fuel assessment and reduction within the City of San Luis Obispo so that structures and assets are provided additional protection, reducing the potential of ignitions and contains goals of improving fire prevention and suppression efforts, reducing hazardous fuels, restoring fire-adapted ecosystems, and promoting community assistance. In addition, Chapter 15.04.100 of the City’s Municipal Code (Construction and Fire Prevention Regulations) provides amendments to the California Fire Code stating specific development standards required for fire safety and prevention within the City of San Luis Obispo.

Conclusion

Less than significant impact.

10. HYDROLOGY AND WATER QUALITY

Would the project:					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	1, 5, 9	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	9, 27	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	22, 31	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Result in substantial erosion or siltation on or off site;		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. 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; or		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Impede or redirect flood flows?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	28	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	22	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

a), b) Per Water and Wastewater Management Element (WWME) Policy A 2.2.1, the City utilizes multiple water resources to meet its water supply needs. Having several sources of water avoids dependence on any one source that may not be available during a drought or other water supply reduction or emergency. The City has five water sources, including Salinas & Whale Rock Reservoirs, Nacimiento Reservoir, Recycled Water, and Groundwater, achieving the goal of diversifying its water supply portfolio to meet current and future community needs. Per WWME Policy A 3.2.3, the City will continue to use limited amounts of groundwater for domestic purposes when available, but will not consider this source of supply as part of its water resources availability due to limitations for the use of groundwater resources.

c)(i-iv), d) The City is enrolled in the State General Permit National Pollutant Discharge Elimination System (NPDES) permit program governing stormwater. As part of this enrollment, the City is required to implement the Central Coast RWQCB’s adopted Post Construction Stormwater Management requirements through the development review process. The primary objective of these post-construction requirements is to ensure that the permittee is reducing pollutant discharges to the maximum extent practicable and preventing stormwater discharges from causing or contributing to a violation of receiving water quality standards in all applicable development projects that require approvals and/or permits issued.

New development projects will be in accordance with NPDES as well as Chapter 12.08 of the City’s Municipal Code, which includes Urban Stormwater Quality Management and Discharge Control, and State, and Federal standards relating to drainage, runoff, water quality and flood zones. The City’s development review process will ensure future residential developments will be in accordance with all applicable standards and requirements.

d) Current code requirements include designing for various FEMA defined flood elevations. Individual projects would require consistency with these regulations, based on the FIRM, and show that hazardous materials beyond standard cleaning products would be securely stored in a fully enclosed area per FEMA Flood Plain Management Criteria for Flood Prone Areas. Based on the San Luis Obispo County Tsunami Inundation Maps, the City of San Luis Obispo site is not located in an area with potential for inundation by a tsunami. The City of San Luis Obispo is not located within close proximity to a standing body of water with the potential for a seiche to occur.

e) The project would not deplete groundwater supplies or interfere substantially with groundwater recharge because the Draft Housing Element is a policy document and does not establish new land uses or propose the development of any specific project. However individual residential development projects will be evaluated for compliance with stormwater treatment and storage facilities that do not conflict with the Central Coastal Basin Plan, or other water quality control plans. The Draft Housing Element would not conflict with SGMA, or other local or regional plans or policies intended to manage water quality or groundwater supplies.

Conclusion

No Impact.

11. LAND USE AND PLANNING

Would the project:					
a) Physically divide an established community?	1, 4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

a)b) The Draft Housing Element Update includes numerous programs to implement its goals and policies. For example, policies in the Draft encouraging higher density, infill housing close to jobs and employment centers are consistent with existing policies in the Land Use Element that encourage compact urban form. A few programs that identify non-residential sites as potential areas to consider residential zoning would be implemented, in part, through changes to the General Plan Land Use Map and

Zoning Map but do not involve activities that would conflict with a regulation adopted for the purpose of avoiding an environmental effect. Sites that may be appropriate for multi-family housing are identified in the Draft, with subsequent review and action needed to evaluate and implement the change, however, no circumstance can be envisioned where an encouraged project would physically divide an established community.

Conclusion

No Impact.

12. MINERAL RESOURCES

Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	1, 5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

a), b) There are no known mineral resources of value to the region identified in the General Plan, specific plan or other land use plan. The Draft Housing Element Update would not result in the loss of a locally-important mineral resource.

Conclusion

No impact.

13. NOISE

Would the project result in:					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	7, 31	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	7, 31	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	4, 25	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Evaluation

a), b) The General Plan Noise Element establishes standards and procedures for protecting noise-sensitive uses from stationary and mobile noise sources. Noise attenuation measures identified in the General Plan include land use limitations, separation between land uses (i.e. noise buffers), earth berms, and where appropriate and no other feasible measure exists, sound attenuation walls. New residential development must be consistent with the Noise Element and Noise Ordinance standards. Noise Element Policy 1.1 says that the City will work to minimize noise exposure based on the established numerical noise standards, or thresholds, contained in the document. The Draft encourages the production of affordable housing through the development of

non-conventional housing, including mixed residential-commercial housing and high-density housing above commercial uses in Downtown and Mid-Higuera and Upper Monterey Special Focus Areas. In these types of housing, special attention must be paid to use compatibility.

Per the City Municipal Code Chapter 9.12 Noise Control, operating tools or equipment used in construction between weekday hours of 7:00 p.m. and 7:00 a.m., or any time on Sundays or holidays, is strictly prohibited, except for emergency work of public service utilities or by exception issued by the Community Development Department. The Municipal Code also states that construction activities shall be conducted in such a manner, where technically and economically feasible, that the maximum noise levels at affected properties will not exceed 75 dBA at single-family residences, 80 dBA at multi-family residences, and 85 dBA at mixed residential/commercial uses. Based on the City Municipal Code, operating any device that creates vibration which is above the vibration perception threshold of an individual at or beyond 150 feet from the source if on a public space or right-of-way is prohibited (9.12.050.B.7).

Advancements in construction methods, coupled with energy conservation practices, have had a vast performance impact on the way buildings are constructed today. Interior noise levels are substantially reduced through compliance with existing building code requirements. At the most conservative level, a typical structure covered with siding will have a Sound Transmission Class (STC) rating of 39 dBA based on current methods. Basic dual-pane vinyl windows will achieve an STC rating of 28 dBA. Averaged out, this comes to a combined STC rating of about 33, meaning a typical exterior wall assembly will reduce 33dB of sound transfer. These numbers are based off of a 2x4 wall cavity with insulation and the rating improves with increased wall thickness and/ or stucco or other siding materials. In using the example of the previous Noise Element and Noise Guidebook standards from the 1990s, compliance with current required conventional building standards would double, or even triple, the noise reduction requirements.

Individual housing projects would be evaluated to ensure compliance with applicable Noise Element policies and the Noise Ordinance standards.

c) The City’s General Plan and Zoning Regulations are consistent with the standards contained in the San Luis Obispo County Regional Airport Land Use Plan (ALUP) and the Airport Overlay Zone (AOZ), which is consistent with State Aeronautics Act, State law, Federal Aviation Administration Regulations, and California Airport Land Use Planning Handbook. These standards ensure that uses near the airport are developed in a manner that is safe and compatible with aircraft operations. Noise levels are one of the key considerations and all development with the Plan area must be developed in a manner that eliminates noise exposure in excess of the standards, including through the imposition of noise attenuation measures where necessary. There are no private airstrips within the City’s Urban Reserve line.

Conclusion

Less than significant impact.

14. POPULATION AND HOUSING

Would the project:					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	1, 4	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The City of San Luis Obispo currently has a population of 46,802 residents, and 21,403 housing units (Department of Finance, 2019). The City currently has a residential density of 2.44 persons per household.

Evaluation

a) General Plan policies seek to achieve a sustainable level of growth through the City’s planned buildout of 25,762 dwellings and 57,200 persons, anticipated to occur by 2035. Land Use Element Policy 1.11.2 says that the City’s housing supply is to grow no faster than one percent per year, averaged over 5 year increments, based on thresholds established by Land Use Element Table 3, excluding dwellings affordable to residents with extremely low, very low or low incomes as defined by the Housing Element, new dwellings in the Downtown Commercial (C-D) zone, and legally established accessory dwelling units (SLOMC, Section 17.144.020). This rate of growth may continue so long as the City’s basic service capacity is assured. Table 3 shows the approximate number of dwellings and residents which would result from the one percent maximum average annual growth rate over the planning period. Approved specific plan areas may develop in accordance with the phasing schedule adopted by each specific plan provided thresholds established by Table 3 are not exceeded. The City Council shall review the rate of growth on an annual basis in conjunction with the General Plan annual report to ensure consistency with the City’s gradual assimilation policy. This will assure population growth does not exceed the City’s ability to assimilate new residents and ensure municipal services are available for new and existing residents.

As required by State law, the Draft Housing Element Update includes Quantified Objectives showing the number of units the City expects to accommodate in each income group during the 6th Cycle planning period. Under the Draft, the City would expect to accommodate up to 3,354 new, in-city dwellings, based on the City’s Regional Housing Need Allocation (RHNA). Of the total, 58%, or 1,949 units, will be affordable to extremely low, very-low, low- and moderate-income households. The remaining 1,405 units can be constructed within the allowed average residential growth rate and will be credited towards meeting RHNA by 2028. Regional Housing Needs Plan adopted by the San Luis Obispo Council of Governments, San Luis Obispo’s RHNA during the planning period is 3,354 dwellings as shown in the table below.

Income Category	RHNA need, # of dwelling units
Extremely Low/Very Low (<31% - 50% of AMI*)	825
Low (51% - 80% of AMI)	520
Moderate (81% - 120% of AMI)	604
Above Moderate (over 121% of AMI)	1,405
Total	3,354

* Area Median Income
 Source: City of San Luis Obispo, Community Development Department

b) San Luis Obispo has evaluated its ability to accommodate the 3,354 dwelling units by 2028 and determined it has sufficient zoned land, water and infrastructure to accommodate its assigned RHNA without the need to rezone property or annex new land to the City. New State housing laws have placed greater responsibility on local government to address housing needs, including SB 166 which does not allow a net loss of housing units. The Draft Housing Element includes updated information, policies and programs to address new state law regarding housing. Individual housing development projects would be reviewed for consistency with the Draft Housing Element and state law, and include mitigation, if required, for the displacement of significant number of existing people or housing.

Conclusion

Less than significant impact.

15. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
Fire protection?	1, 38, 39	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	1, 38, 39	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	1, 38, 39	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	1, 38, 39	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	1, 38, 39	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Evaluation

a) The Draft Housing Element itself does not establish new land uses or propose the development of any specific project that would require public services. The City of San Luis Obispo Police Department (SLOPD) provides public safety services for the city which consists of 85.5 employees, 59 of which are sworn police officers. The SLOPD operates out of one main police station which is located at 1042 Walnut Street at the intersection of Santa Rosa (Highway 1) and U.S. Highway 101. The City of San Luis Obispo is located within the San Luis Coastal Unified School District and public parks and recreation trails within the city are managed and maintained by the City of San Luis Obispo Department of Parks and Recreation. All new residential and non-residential development within the City is subject to payment of Development Impact Fees, which are administered by and paid through the Community Development Department. Development Impact Fees provide funding for maintaining City emergency services, infrastructure, and facilities. For example, fire protection impact fees provide funding for projects such as the renovation of the City’s fire stations and the replacement of fire service vehicles and equipment.

Draft Housing Element Update policies and programs call for the City to utilize Federal, State, and local funding sources to assist in the development of affordable housing. The City has an Affordable Housing Fund that can be used to offset costs and provide infrastructure and services to affordable housing developments. City utilities, parking and recreation facilities and programs, and public schools are funded by service users and new development. City fees on new development, including water, wastewater, traffic, park, affordable housing, and school are collected at the time of construction permit issuance to offset the costs borne by the City to meet the service needs of new development.

Fire protection: The City of San Luis Obispo is served by the City of San Luis Obispo Fire Department. While the Draft Housing Element would not directly result in the need for construction of new fire service facilities, new residential would result in a marginal cumulative increase of demand on City services, including fire protection. Individual residential development would be required to participate in the City’s system of required developer impact fees and dedications established to address direct demand for new facilities associated with new development.

Police protection: The City of San Luis Obispo is served by the City of San Luis Obispo Police Department. The Draft Housing Element would not result in a direct increase in residents within the City and would be consistent with the projected population growth outlined in Section 1.11 of the Land Use Element. Individual residential development projects would be subject to the developer impact fees and dedications established to address direct demand for new facilities associated with new development.

Schools: The City is located within the San Luis Coastal Unified School District (SLCUSD). The Draft Housing Element itself does not establish new land uses or propose the development of any specific project that would require schools. However individual residential development projects would be subject to payment of SLCUSD developer fees to offset the potential marginal increase in student attendance in the district’s schools as a result of the project. These fees would be directed towards maintaining sufficient service levels, which include incremental increases in school capacities.

Parks: The Draft Housing Element itself does not establish new land uses or propose the development of any specific project. However individual residential development projects would be subject to park development impact fees, which would offset the project’s contribution to increased demand on park and recreational facilities. The Parks and Recreation Element of the General Plan also requires new, large development areas to allocate 10 acres of developed park land for every 1000 residents to ensure that sufficient parkland is developed along with new residential development.

Other public facilities: The Draft Housing Element itself does not establish new land uses or propose the development of any specific project that would require other public facilities. However individual residential development projects could result in a marginal increase in use of other City public facilities, such as roadways and public libraries and that project would be subject to transportation development impact fees, which would offset the project’s contribution to increased use of City roadways.

Conclusion

Less than significant.

16. RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	1, 8	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	1, 8	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Evaluation

a), b) The General Plan Parks and Recreation Element Policy 3.13.1 says the City shall develop and maintain a park system at a rate of 10 acres of parkland per 1,000 residents. The City monitors the adequacy of its recreational facilities and evaluates each new residential development to determine if additional service capacity is needed. New development is responsible for providing funding or facilities in proportion to the need generated by the development project. This would help to ensure sufficient open space and recreational areas are allocated for the community. In addition, each residential development project that includes recreation facilities would be required to evaluate any adverse impacts the facilities would have on the environment.

Conclusion

Less than significant impact.

17. TRANSPORTATION

Would the project:					
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	4, 29, 30,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	1, 14	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	1, 31	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	1, 6	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

The City Circulation Element identifies current traffic levels and delays of public roadways and identifies transportation goals and policies to guide development and express the community's preferences for current and future conditions. Goals included in the plan include, but are not limited to, maintaining accessibility and protecting the environment throughout San Luis Obispo while reducing dependence on single-occupant use of motor vehicles, reducing use of cars by supporting and promoting alternatives such as walking, riding buses and bicycles, and using car pools, promotion of the safe operation of all modes of transportation, and widening and extending streets only when there is a demonstrated need and when the projects would cause no significant, long-term environmental problems.

The City's 2013 Bicycle Transportation Plan outlines the City's official policies for the design and development of bikeways within the City and in adjoining territory under County jurisdiction but within the City's Urban Reserve and includes specific objectives for reducing vehicle use and promoting other modes. SLO Transit operates transit service in the City of San Luis Obispo and San Luis Obispo Regional Transit Authority (SLORTA) operates transit service throughout San Luis Obispo County and adjacent areas.

In 2013, Senate Bill 743 was signed into law with the intent to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions" and required the Governor's Office of Planning and Research (OPR) to identify new metrics for identifying and mitigating transportation impacts within CEQA. As a result, in December 2018, the California Natural Resources Agency certified and adopted updates to the State CEQA Guidelines. The revisions included new requirements related to the implementation of Senate Bill 743 and identified vehicle miles traveled (VMT) per capita, VMT per employee, and net VMT as new metrics for transportation analysis under CEQA (as detailed in Section 15064.3 [b]).

On June 16, 2020, the City Council adopted resolutions to replace Level of Service (LOS) with Vehicle Miles Traveled (VMT) as the City's performance measure for CEQA analysis of transportation impacts, and approved revisions to the City's Multimodal Transportation Impact Study Guidelines. Beginning July 1, 2020, the newly adopted VMT criteria for determining significance of transportation impacts will be implemented.

a) Using alternative means of transportation is a key way to minimize congestion and reduce health and environmental impacts. The City's General Plan discusses transportation with goals that are supported by specific policies to encourage alternative modes of travel throughout the City. Goal 6 of the Circulation Element includes policies that focus directly on the development and maintenance of a circulation system that supports all modes of transportation, like complete streets (Policy 6.1.1). Through this and many other transportation-related policies, transportation impacts due to level of service, vehicle miles traveled, road damage and traffic capacity can be successfully mitigated.

b) In June 2020, the City Council adopted VMT Thresholds. As the Draft Housing Element itself does not establish new land uses or propose the development of any specific project, the project does not trigger new VMT. However individual residential development projects would be subject to the City's VMT thresholds. SFR, multi-family and mobile home park projects would have a threshold of 14.25 VMT per capita. Consistent with State technical guidance, this threshold represents a value 156 percent below the existing regional (Countywide) average residential VMT per capita. The existing average residential VMT per capita within the City is 8.51, approximately 40 percent below the City's adopted residential VMT threshold. Thus, it is likely that most residential development proposals consistent with the City's currently adopted land use plans will result in a less-than-significant VMT impact under CEQA. Mixed-use projects would be evaluated per each use independently. The new Thresholds provide exceptions for affordable housing. Adding affordable housing to infill locations generally improves jobs-housing balance, in turn shortening commutes and reducing VMT. A project consisting of a high percentage of affordable housing (greater than 50%) may be assumed to cause a less-than-significant impact on VMT. Other affordable housing projects, or mixed-use projects with affordable housing components may be screened from detailed VMT analysis if supporting evidence is provided demonstrating low VMT-generating characteristics of similar affordable housing sites within the City.

c) The Draft Housing Element does not change the City's process for evaluating new residential development projects to ensure that vehicle circulation is accomplished without creating design hazards or conflicts with incompatible use. Individual residential development projects would be evaluated to ensure that hazards due to design features are reduced or eliminated.

d) Emergency access to a new residential development project would be reviewed through the development review process. Safety Element Policy 10.1 and Program 10.3 states that the Fire Department has set a response-time objective of four (4)

minutes. Safety Element Policies 9.20 through 9.23 lists the precautionary measures the City will take when evaluating a development plan. The City conducts safety inspections for fire safety, including enforcement of fire lanes, for multi-family residential developments.

Conclusion

Less than significant impact.

18. 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, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	5, 16	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources 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.	5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

On February 25, 2020, NAHC supplied a list of local Native American individuals and/or groups with interests and knowledge about the area. On April 2, 2020, local Native American tribal groups that have a cultural and traditional affiliation to the area of the City of San Luis Obispo were formally noticed that an Initial Study of Environmental Review was being completed for the update of the City’s Housing Element. None of the noticed Tribal Groups requested consultation or identified any Tribal Cultural Resource (TCR) that would be impacted by the Draft Housing Element.

a) b) The 6th Cycle Draft Housing Element update does not establish new land uses or propose the development of any specific project. As such, the Draft would not have an impact on any known tribal cultural resources that have been listed or been found eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5024.1. No specific site is under consideration.

Conclusion

No Impact.

19. UTILITIES AND SERVICE SYSTEMS

Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	1, 9	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	9, 27	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	9, 13	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	31	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

The City of San Luis Obispo Utilities Department is the sole water provider within the city, provides potable and recycled water to the community, and is responsible for water supply, treatment, distribution, and resource planning. The City is served by four primary water sources, including the Whale Rock Reservoir, Salinas Reservoir, Nacimiento Reservoir, and recycled water (for irrigation), with groundwater serving as a fifth supplemental source. As of June 2020, both the Salinas Reservoir and Whale Rock Reservoir are above 82% storage capacity, and Nacimiento is at 48% storage capacity. The City's Water Treatment Plant is designed to produce up to 16 million gallons daily.

The City Water Resource Recovery Facility (WRRF) treats all of the wastewater from the City, Cal Poly, and the County airport. The WRRF treated an average of 3.57 million gallons of wastewater per day in 2019. During times of wet weather, the City's wastewater collection system and WRRF experience a significant increase in volume due to storm-related flows. Though not intended to be conveyed or treated by the wastewater system, stormwater enters wastewater pipes directly through improperly plumbed drains (inflow) and/or as groundwater that seeps through cracked wastewater pipes (infiltration). Significant inflow and infiltration (I/I) in the collection system can result in sanitary sewer overflows (SSOs). Under these conditions, peak flows to the City's WRRF have exceeded 20 million gallons a day (mgd) in a 24-hour period, where normal flows are under 4 mgd in a 24-hour period.

A comprehensive flow study completed by the City in 2012 identified multiple locations in the collection system that experienced flows at a rate of 20 to 30 times of normal flow during wet weather events, with the highest area experiencing flow at a rate of 36.3 times normal flow, due to I/I. These capacity constrained areas are identified in the City's General Plan Water and Wastewater Management Element. A wastewater flow offset program was approved in 2019 to mitigate potential environmental impacts of new or intensified development in capacity constrained areas.

Construction of major upgrades to the WRRF began in 2019 to meet stringent discharge requirements and replace aged infrastructure. The project will take approximately four years to complete and will increase treatment capacity to 5.4 million gallons per day (mgd) during average flows.

a) The Draft Housing Element itself does not establish new land uses or propose the development of any specific project that would require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. Individual projects relocation or expansion of the above-mentioned utilities would be reviewed through the development review process for environmental effects. Any projects located within an area that has capacity constraints would be required to comply with offset requirements.

b) Per Water and Wastewater Management Element (WWME) Policy A 2.2.1, the City utilizes multiple water resources to meet its water supply needs. Having several sources of water avoids dependence on any one source that may not be available during a drought or other water supply reduction or emergency. The City's primary water supply is defined as the amount of water needed to serve the build-out population identified in the General Plan, Land Use Element (2014). Table 3 in the Land Use Element identifies an urban reserve capacity of 57,200 people. The quantity of water needed for the primary water supply is calculated per WWME Policy A 5.2.2, using 117 gallons per capita per day (gpcd). The City's 2019 Water Resources Status

Report states that the City maintains a robust water supply portfolio with greater than five years of water available. Per capita water use (obtained from adding up all water used by visitors, residents, commercial uses, etc.) decreased during the 2019 Water Year to 91 gallons per capita per day (gpcd) from 100 gpcd during the 2018 Water Year.

c) Per Water and Wastewater Management Element Policy B 2.2.3, new development will only be permitted if adequate capacity is available within the wastewater collection system and/or WRRF. The City’s current wastewater treatment facility has a design capacity of 5.1 million gallons per day and will have a design capacity of 5.4 mgd when the construction of the WRRF Project is complete in 2023. According to the City’s Utility Department, this is adequate capacity to meet current needs, plus residential growth anticipated during the planning period.

d, e) City of San Luis Obispo’s Municipal Code Chapter 8.05 states the City’s Construction Debris Diversion and Recycling Ordinance which requires that all new development include a recycling plan to reduce the amount of debris disposed of at the Cold Canyon Landfill, which serves the City. The City’s development review process will ensure future residential developments will be in accordance with these standards. Cold Canyon Landfill has sufficient capacity to accommodate the City’s anticipated build-out population.

Conclusion

Less Than Significant Impact.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	1, 40	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	1, 3, 31	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	4, 9	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	1, 6	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Evaluation

The Draft Housing Element covers the area with the City limits of San Luis Obispo and sphere of influence which is almost all urbanized. Urban fire hazards result from the materials, size, and spacing of buildings, and from the materials, equipment, and activities they contain. Additional factors are access, available water volume and pressure, and response time for fire fighters. Based on the Multi-Jurisdictional Hazard Mitigation Plan, the risk of wildland fires is greatest near the City limits where development meets rural areas of combustible vegetation. Most of the community is within one mile of a designated High or Very High Fire Hazard Severity Zone which indicates significant risk to wildland fire.

The City Safety Element identifies four policies to address the potential hazards associated with wildfire, included approving development only when adequate fire suppression services and facilities are available, classification of Wildland fire hazard severity zones as prescribed by CAL FIRE, prohibition of new subdivisions located within “Very High” wildland fire hazard severity zones, and continuation of enhancement of fire safety and construction codes for buildings.

- a) Implementation of the Draft Housing Element Update would not result in a significant temporary or permanent impact on any adopted emergency response plans or emergency evacuation plans. No breaks in utility service would occur as a result of adoption of the updated element. Individual residential development projects would be evaluated for impact on emergency services and would be required to prepare and implement the necessary plans to significantly reduce the safety risks in and around the project site during construction activities and/or emergency events.
- b) The Draft Housing Element itself does not establish new land uses or propose the development of any specific project that would change the existing topography of the area covered by the document. Individual projects would be evaluated during the development review process for any project elements that would expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Projects would be required to meet all applicable standards for fire prevention within the California Building Code and California Fire Code.
- c) The Draft Housing Element itself does not establish new land uses or propose the development of any specific project that would require the installation of new water, emergency water, wastewater, stormwater, and natural gas infrastructure and connections to City infrastructure. Any new infrastructure components would occur as part of a specific project; the individual project would be reviewed for compliance with applicable CBC and California Fire Code regulations.
- d) The Draft Housing Element would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes because it does not establish new land uses or propose the development of any specific project. Individual projects would be reviewed for design elements that would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Conclusion

Less than significant impact.

21. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to substantially 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, substantially 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?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The Draft Housing Element would not have the potential to substantially degrade the quality of natural, biological, and cultural resources because it does not establish new land uses or propose the development of any specific project. Individual development project would be reviewed for impacts on natural and cultural resources and evaluated and mitigated, consistent with CEQA and with all General Plan policies. The proposed Draft Housing Element Update does not include any policies or programs that conflict with City policies on protecting and enhancing biological or cultural resources or preclude the City from achieving resource protection goals.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The Draft Housing Element Update would accommodate up to 3,354 in-city dwelling units in an eight-year period. Over half of these units are targeted to be affordable to extremely low, very-low, low and moderate income households and are exempt from the Residential Growth Management Regulations. The Draft is consistent with General Plan Land Use policies regarding

residential growth. Cumulative impacts of General Plan policies and anticipated growth are addressed in the Land Use Element Final EIR.					
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The Draft Housing Element Update will meet the City’s Regional Housing Needs Allocation for the planning period. There is no evidence that the Draft Element’s policies and programs will have significant, adverse impacts on humans, either directly or indirectly.					

22. 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.	
Final Environmental Impact Report, Land Use and Circulation Element Updates; available online at: https://www.slocity.org/government/department-directory/community-development/planning-zoning/general-plan or at the Community Development Department, 919 Palm Street, San Luis Obispo, CA 93401.	
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.	
Resolution No. 10567 (2014 Series) summarizes the environmental impact, mitigation, monitoring and overriding considerations for the 2014 Land Use and Circulation Element update: http://opengov.slocity.org/WebLink/DocView.aspx?id=26033&dbid=0&repo=CityClerk .	
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.	
The Draft Housing Element Update is consistent with the General Plan Land Use Element and must also be guided by the mitigation that applies to that document.	

23. SOURCE REFERENCES

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3.	California Building Code, 2019.
4.	City of San Luis Obispo Land Use and Circulation Element and Final EIR, last revised December 2014.
5.	City of San Luis Obispo Conservation & Open Space Element, 2006.
6.	City of San Luis Obispo General Plan Safety Element, July 2000.
7.	City of San Luis Obispo Noise Element, 1996
8.	City of San Luis Obispo Parks and Recreation Element, 2001.
9.	City of San Luis Obispo Water and Wastewater Element, 2018.
10.	Noise Guidebook, City of San Luis Obispo, May 1996
11.	Community Design Guidelines, City of San Luis Obispo, June 2010.
12.	Clean Air Plan for San Luis Obispo County, Air Pollution Control District, 2001.
13.	CEQA Air Quality Handbook, Air Pollution Control District, 2012.
14.	City of San Luis Obispo Archaeological Resource Preservation Program Guidelines, October 2009.
15.	Historic Preservation Program Guidelines, City of San Luis Obispo, November 2010.
16.	Historic Preservation Ordinance, City of San Luis Obispo, December 2010.
17.	Regional Housing Needs Plan for San Luis Obispo County, SLOCOG, June 2019.

18.	Building Blocks: A Comprehensive Housing Element Guide, HCD, Accessed June 2020 at: https://www.hcd.ca.gov/community-development/building-blocks/index.shtml
19.	U.S. Census Bureau, Census 2010
20.	American Community Survey, U.S. Census Bureau, 2014-2018.
21.	City of San Luis Obispo Land Use Inventory and Geographic Information System, current database
22.	City of San Luis Obispo Stormwater website, accessed June 2020 at: https://www.slocity.org/government/department-directory/community-development/engineering-development-review/stormwater
23.	
24.	City of SLO 2012 Climate Action Plan, August 2012.
25.	County of San Luis Obispo Airport Land Use Plan dated May 18, 2005.
26.	San Luis Obispo County Multi-Jurisdictional Hazard Mitigation Plan, 2019 (adopted June 2, 2020).
27.	2019 Water Resources Status Report, October 1, 2018 – September 30, 2019. Available at: https://www.slocity.org/home/showdocument?id=25195
28.	Federal Emergency Management Agency, FIRM, November 16, 2012.
29.	2019 Regional Transportation Plan, June 2019.
30.	City of San Luis Obispo Bicycle Transportation Plan, 2013
31.	Municipal Code, City of San Luis Obispo
32.	Building Blocks for Effective Housing Elements, HCD, 2019
33.	General Plan Guidelines, State Governor’s Office of Planning and Research, 2019
34.	City of San Luis Obispo Website Community Choice Energy; Accessed November 18, 2019. Available at: https://www.slocity.org/government/department-directory/city-administration/sustainability/community-choice-energy
35.	California Department of Conservation Fault Activity Map of California, 2010.
36.	Geologic Map of the San Luis Obispo Quadrangle, San Luis Obispo County, California, 2004
37.	San Luis Obispo Valley Groundwater Basin, County of San Luis Obispo Webpage, 2019.
38.	City of San Luis Obispo General Plan Annual Report, 2015-2019
39.	Community Development Department Development Impact Fees, 2018.
40.	Diablo Canyon Emergency Planning Zone Map, accessed November 2019

Attachments

1. 2020 Draft Housing Element