

# APPENDIX A

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## Initial Study

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**CITY OF  
SAN LUIS OBISPO**

**INITIAL STUDY  
ENVIRONMENTAL CHECKLIST FORM  
For SPEC-0143-2017**

**1. Project Title:**

Froom Ranch Specific Plan Project

**2. Lead Agency Name and Address:**

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

**3. Contact Person and Phone Number:**

Emily Creel, Contract Planner and City Project Manager  
(805) 543-7095 x6814  
ecreel@swca.com

Shawna Scott, Associate Planner (Staff Liaison)  
(805) 781-7176  
sscott@slocity.org

**4. Project Location:**

The Froom Ranch Specific Plan Area consists of two parcels, totaling approximately 110 acres (APNs 067-241-030 and 067-241-031) within unincorporated San Luis Obispo County, and adjacent to City of San Luis Obispo (City) city limits. The Specific Plan Area is within the City's Sphere of Influence and a portion of the site is within the City's Urban Reserve Line. The site is located immediately west of Los Osos Valley Road between U.S. Highway 101 and the Irish Hills Plaza.

**5. Project Sponsor's Name and Address:**

John Madonna Construction, Inc.  
P.O. Box 5310  
San Luis Obispo, California, 93406

**6. General Plan Designations:**

Currently unincorporated; designated in 2014 Land Use and Circulation Elements (LUCE) of the City's General Plan as New Specific Plan Area 3 (SP-3, Madonna on LOVR).

**7. Zoning:**

Currently unincorporated; would require pre-zoning for Specific Plan. Currently proposed Specific Plan designations include Medium-High Density Residential, Medium-High Density Residential Life Plan Community, High Density Residential, Commercial Retail, Conservation/Open Space, and Public Facilities. Consideration of these proposed zones are under review by the City.

**8. Description of the Project:**

The project includes a Specific Plan, General Plan Amendment, and related actions that would allow for the development of the Froom Ranch Specific Plan Area. Froom Ranch is identified as Specific Plan 3 (SP-3, Madonna on LOVR) in the City's General Plan and is subject to preparation of a Specific Plan to accommodate development proposals and address pertinent issues within the Specific Plan Area. The Land Use Element requires that a Specific Plan be adopted prior to annexation. Guidance for the project is found in Chapter 8, Section 8.1.5, of the Land Use Element. This section states the following (in added italics):

***8.1.5. SP-3, Madonna on LOVR Specific Plan Area***

***Location:*** *This site includes just over 111 acres and is located directly west of the intersection of Los Osos Valley Road and Calle Joaquin.*

***Purpose:*** *The purpose of the specific plan is to provide design flexibility that will secure the appropriate development of the site while protecting sensitive environmental resources on the site. Development on the site should be a compact, mixed use project that provides workforce housing options and neighborhood commercial uses that support pedestrian and bicycle access. The specific plan for this area should consider and address the following land use and design issues.*

- a. Develop a design that is sensitive to environmental constraints and adjusts accordingly through design. Constraints include wetland protection, slope protection, historic structures, and open space protection.*
- b. Maintain viewshed of surrounding mountains and secure steeper hillsides as protected open space areas.*
- c. Variable height limits will be required to protect views of adjacent hills.*
- d. Provide access to trails.*
- e. Provide a plan for adequate and safe infrastructure, including appropriate points of access to Los Osos Valley Road.*
- f. Address neighborhood commercial needs of new neighborhood.*
- g. Provide connectivity to adjacent development.*

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

<b>Type</b>	<b>Designations Allowed</b>	<b>% of Site</b>	<b>Minimum<sup>1</sup></b>	<b>Maximum</b>
<i>Residential (Mixed Use)</i>	<i>MDR MHDR HDR</i>		<i>200 units</i>	<i>350 units</i>
<i>Commercial</i>	<i>NC CR</i>		<i>50,000 sf</i>	<i>350,000 sf</i>
<i>Parks</i>	<i>PARK</i>			
<i>Open Space/Agriculture</i>	<i>OS AG</i>	<i>Minimum 50%</i>		
<i>Public</i>	<i>n/a</i>			
<i>Infrastructure</i>	<i>n/a</i>			

<sup>1</sup> *There can be a reduction in the minimum requirement based on specific physical and/or environmental constraints.*

**Initiation of the Specific Plan and Advisory Body Review**

As described below (Proposed Project Overview), the applicant envisions a Specific Plan that differs somewhat from the performance standards identified in the Land Use Element. The City Council considered this change in vision for the area, and authorized initiation of the Specific Plan on April 5, 2016. The Council generally supported the concept to reduce the amount of commercial development within the Specific Plan area, and the development of a Continuing Care Retirement Community or Life Plan Community within the City. The City Council specifically identified the need for a Project Design Alternative that complies with existing Land Use Element Policy 6.4.7.H. (Hillside Planning Areas, The Irish Hills area), which states that “*The Irish Hills area should secure permanent open space with no building sites above the 150-foot elevation, in conjunction with any subdivision or development of the lower areas. (See also Section 8, Special Focus Areas)*”. Following initiation by the City Council, the applicant presented preliminary plans to the Parks and Recreation Commission and Cultural Heritage Committee. Past agenda report packages and meeting minutes are available at the following link: [www.slocity.org/government/department-directory/community-development/documents-online/environmental-review-documents/-folder-1911](http://www.slocity.org/government/department-directory/community-development/documents-online/environmental-review-documents/-folder-1911)

**Proposed Project Overview**

Froom Ranch is envisioned as a primarily residential project with some commercial development in the northeast portion of the site closest to Los Osos Valley Road and the adjacent Irish Hills Plaza. A major component of the planned residential uses is a Life Plan Community (LPC) known as Villaggio. Villaggio would provide a variety of different unit types for independent senior housing as well as access to higher levels of care such as Assisted Living, Memory Care, and Skilled Nursing, when needed. Additional residential uses in the northern portion of the site will be multiple-family. As required by the Land Use Element, a minimum of 50% of the project site must be designated Open Space; the current Plan designates approximately 51% of the site as Open Space. The Specific Plan also includes a Neighborhood Trailhead Park to connect to the Irish Hills Natural Reserve, which may incorporate on-site historic structures. The treatment and potential use of the historic structures is currently under evaluation by the applicant.

Table 1 identifies the land uses proposed within the Specific Plan area. The proposed project includes the following land use/zoning designations, currently under review by the City:

Residential Land Use Zones

- R-3-SP – Medium-High Density Residential
- R-3-SP – Medium-High Density Residential Life Plan Community
- R-4-SP – High-Density Residential

Non-Residential Land Use Zones

- CR-SP – Commercial Retail
- C/OS-SP – Conservation/Open Space
- PF-SP – Public Facilities

**Table 1 Proposed From Ranch Specific Plan Land Use and Zoning Summary**

Land Use	Zoning	Acres	Density	Potential Units	Potential Square Feet
<b>RESIDENTIAL</b>					
<b>Medium-High Density Residential</b> – Multi-family units	R-3-SP	5.3	20 du/ac	130	
<b>Medium-High Density Residential – Life Plan Community</b> – Independent living – Assisted living units – Health Center including assisted care, memory care, and skilled nursing – Ancillary facilities such as recreation center, restaurants, and theaters (26,000 sf)	R-3-SP	31.5	20 du/ac	– 61 villas – 108 garden apts. – 150 apts. – 47 village suites – 38 assisted living units – 51 memory care and skilled nursing beds	40,000
<b>High-Density Residential</b> – Multi-family apartments	R-4-SP	1.9	24 du/ac	44	
<b>Residential Subtotal</b>		<b>38.7</b>		<b>578</b>	
<b>NON-RESIDENTIAL</b>					
<b>Commercial Retail</b> – 30,000 sf commercial – 70,000 sf hotel (120 rooms)	CR-SP	3.5			100,000
<b>Conservation/Open Space</b>	C/OS-SP	59.0 <sup>1</sup>			
<b>Public Facilities</b> – Neighborhood Park	PF-SP	2.9			
<b>Other (Roads)</b>		5.6			
<b>Non-Residential Subtotal</b>		71.0			
<b>TOTAL</b>		<b>109.7</b>			

<sup>1</sup> Includes proposed project open space (51.3 acres) as well as existing open space easement (7.1 acres)

Additional project elements include:

- General Plan Amendment to modify Land Use Element Policy 6.4.7.H to allow for development above the 150-foot elevation;
- Realignment and restoration of Froom Creek;
- The creation of a new drainage/stormwater basin off-site (Mountainbrook Church property); and
- Internal circulation, trails, parking, utilities, and other infrastructure to support the project.

## 9. **Project Entitlements:**

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

1. General Plan Amendment/Pre-Zoning
2. Specific Plan
3. Development Plan/Vesting Tentative Tract Map(s)
4. Architectural Review
5. Annexation

## 10. **Surrounding Land Uses and Settings:**

Lands surrounding the Specific Plan Area generally consist of the Irish Hills Natural Reserve (open space and recreation) and unincorporated undeveloped rural and agricultural lands to the west, urban development to the north and east in the City of San Luis Obispo, and a mix of urban development and undeveloped/agricultural land to the south. Development north, south and east of the Specific Plan Area in the City of San Luis Obispo includes large shopping centers, auto dealerships, hotels, roadways, parking lots, and other urban infrastructure. Existing uses surrounding the site are as follows:

- **West:** Irish Hills Natural Reserve
- **North:** Irish Hills Plaza shopping center and associated parking
- **East:** Los Osos Valley Road, auto dealerships, Bear Valley Commercial Center
- **South:** Hotel/lodging facilities, Margie's Diner, Mountainbrook Community Church, Calle Joaquin, U.S. Highway 101.

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

The project application has not been completed and the City has not yet sent formal notices or initiated consultation pursuant to California Public Resources Code Section 21080.3.1. Upon determining the application is complete, the City will provide formal notification to all tribes traditionally and culturally affiliated with the project area of the opportunity to request consultation pursuant to this section. The City will also conduct consultation pursuant to Senate Bill 18 (Government Code Sections 65352.3 and 65562.5).

**12. Other public agencies whose approval is required:**

- Local Agency Formation Commission (LAFCo) – annexation
- Airport Land Use Commission – Airport Land Use Plan consistency review
- U.S. Army Corps of Engineers – Nationwide or Individual Permit
- Regional Water Quality Control Board – Section 401 Water Quality Certification
- California Department of Fish and Wildlife –Section 1600 Lake and Streambed Alteration Agreement, State Endangered Species Act compliance
- Air Pollution Control District – possibly construction and operational permits
- U.S. Fish and Wildlife Service – Federal Endangered Species Act compliance
- National Oceanic and Atmospheric Administration (NOAA) Fisheries – Federal Endangered Species Act compliance



**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

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

**FISH AND WILDLIFE FEES**

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

**STATE CLEARINGHOUSE**

X	This environmental document must be submitted to the State Clearinghouse for review by one or more State agencies (e.g. Cal Trans, California Department of Fish and Wildlife, Department of Housing and Community Development). The public review period shall not be less than 30 days (CEQA Guidelines 15082).
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**DETERMINATION** (To be completed by the Lead Agency):

On the basis of this initial evaluation:

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Tyler Corey, Principal Planner  
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

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
SPEC/ER #0143-2017					

1. AESTHETICS. Would the project:					
a) Have a substantial adverse effect on a scenic vista?	4, 5, 34	X			
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, open space, and historic buildings within a local or state scenic highway?	1, 5, 34	X			
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	4, 34	X			
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	2	X			

a), b), c) The Froom Ranch Specific Plan Area is located immediately west of Los Osos Valley Road between U.S. Highway 101 and the Irish Hills Plaza. The project site is located within Hillside Planning Area H Irish Hills. The approximately 110-acre Froom Ranch Specific Plan area is characterized by relatively flat grassland areas that transition to steeper slopes before approaching City open space property at the base of the Irish Hills. The topography of the project site ranges from approximately 110-120 feet near Los Osos Valley Road to 450 feet in the upper elevations. The majority of the property is undeveloped but includes an assemblage of historic ranch and dairy structures on part of the site directly south of Home Depot in the adjacent Irish Hills Plaza shopping center. The existing structures are currently used as an office (main ranch house) and equipment storage yard to support the John Madonna Construction Company, Incorporated business. The property also includes unimproved roads, staging and materials storage areas, a quarry area, and a stormwater detention facility for the neighboring Irish Hills Plaza. Surrounding views consist of the Irish Hills Shopping Plaza and other commercial development, open space hillsides in the Irish Hills Natural Reserve, and surrounding roadways. The site is highly visible from Los Osos Valley Road and U.S. Highway 101, which is designated as a high value scenic resource in the City’s Circulation Element. The entire length of U.S. Highway 101 that extends from Highway 46 in Paso Robles to the southern boundary of San Luis Obispo County is also identified by the California Department of Transportation (Caltrans) as an eligible California State Scenic Highway (though not officially designated). Development of the site, as outlined in the Project Description, would result in increased urbanization of the existing viewshed along the Los Osos Valley Road and could potentially block or obstruct existing public views of the area and surrounding hillsides. This could represent a major change in the aesthetic character of the project site and an intensification of the urban character of the project vicinity.

A significant component of the project is the applicant’s request for a General Plan Amendment to allow development above the 150-foot elevation. The applicant’s current land use exhibit shows a portion of the LPC extending to the 250-foot elevation and residential uses extending to the 180-foot elevation. Approximately 44.3 percent (48.61 acres) of the project site is located above the 150-foot elevation. Modification of the existing development limit line would allow development in the upper elevations of the Irish Hills above the 150-foot elevation. The language specifying the 150-foot elevation development limit was carried forward into the 2014 LUE from the City’s previously adopted Land Use Element (adopted August 23, 1994 and revised June 15, 2010). The 1994 Land Use Element included a Hillside Planning Policies and Standards section; the purpose of this section was to “protect and preserve scenic hillside areas and natural features, set boundaries for commercial and residential development in sensitive hillside areas by creating a permanent open space greenbelt at the edge of the community, and to protect the health, safety and welfare of community residents by directing development away from areas with hazards”. The Hillside Policies identified in the 2014 LUE focus on “where and how some hillsides may be developed” (refer to LUE Chapter 6 Resource Protection).

The Land Use and Circulation Element Update (LUCE) EIR provides an analysis of each proposed Specific Plan area, including the project site. Potential visual impacts identified in the LUCE EIR, specific to SP-3 (the project site), include the following:

- Development of the site, as outlined in the proposed LUCE Update, could result in increased urbanization of the existing viewshed along the Los Osos Valley Road and could potentially block or obstruct existing public views. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.
- Development of the area, as outlined in the proposed LUCE Update, has the potential to result in increased urbanization of an undeveloped area which could degrade the existing visual character and its surroundings. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
SPEC/ER #0143-2017					

- Development of the area could result in increased ambient nighttime lighting through the addition of residential and commercial uses and associated structural development in a primarily undeveloped area. However, implementation of the proposed LUCE Update policies, and the existing City policies identified below, would reduce impacts to less than significant levels.

Therefore, the less than significant impact determinations in the LUCE FEIR specific to visual impacts were based on compliance with policies included in the LUE, such as the 150-foot development limit. The certified Final EIR for the LUCE Update states that the Specific Plan will be required to address several issues (as listed in the LUE), including environmental constraints, resource protection, hillside and open space protection, viewsheds, and views from off-site locations. The applicant’s preliminary project narrative states the project can be designed to minimize impacts to scenic resources by using the existing topography, which may provide a natural visual barrier between the development and public viewing areas. Variations in topography may provide opportunities to screen future development from view; however, certain components including lighting and grading cut slopes may be difficult to fully “hide”, and overall the project is anticipated to create some change in the visual environment, and may increase cumulative views of the existing structures and the proposed development in the upper elevations of the Irish Hills. Further environmental analysis in the EIR, including a viewshed study and photo-simulations, are required to determine if development above the 150-foot elevation would result in any significant, unavoidable, adverse impacts, and to determine appropriate mitigation measures.

Due to the visual sensitivity of the site, implementation of the proposed project could result in potentially significant project-specific and cumulative impacts to a scenic vista, scenic resources, and the visual character and/or quality of the site and its surroundings. These impacts are considered potentially significant and will require further examination in the EIR, in addition to an evaluation of the project’s consistency with hillside and scenic viewshed protection policies identified in the General Plan.

d) Although the project site is primarily undeveloped, it is located in an urbanized area with existing light sources from neighboring commercial development, parking areas and surrounding roadways, including Los Osos Valley Road and U.S. Highway 101. Development of the proposed project could result in increased ambient nighttime lighting and glare through the addition of residential and commercial uses and associated structural development in a primarily undeveloped area. The project will be required to comply with the Night Sky Preservation Ordinance (Zoning Regulations Chapter 17.23), which sets operational standards and requirements for lighting installations. These impacts are considered potentially significant and will require further examination in the EIR.

Conclusion: Potentially significant project-specific, secondary, and cumulative impacts related to aesthetics will be addressed in the Froom Ranch Specific Plan EIR.

**2. AGRICULTURE RESOURCES. Would the project:**

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	8			X	
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	4	X			
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	4	X			

a) The Froom Ranch Specific Plan area includes land designated as grazing land and farmland of local potential by the California Natural Resources Agency, Department of Conservation Farmland Mapping and Monitoring Program (FMMP). Currently, portions of the site are used for grazing purposes. Implementation of the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. These impacts are considered less than significant.

b) The Froom Ranch Specific Plan area does not include land currently under Williamson Act and no Williamson Act contracted lands are located within 0.5 mile of the Specific Plan area; therefore, no conflicts with an existing Williamson Act contract would occur as a result of the proposed project. The project site currently includes land designated for agriculture and

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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commercial retail land uses and land that is currently used for livestock grazing. A portion of the site is also subject to an existing agricultural conservation easement. Implementation of the proposed project would include pre-zoning the site prior to annexation into the City, with the anticipation that the proposed development would comply with the proposed underlying zoning. The EIR will evaluate the potential effects resulting from the anticipated pre-zoning, any potential direct or indirect effects to the existing agricultural conservation easement, and compatibility with adjacent properties.

c) The Froom Ranch Specific Plan area is surrounded by urbanized and developed land uses and public streets to the north, east, and south, and open space to the west and southwest. The property currently supports limited grazing and implementation of the proposed project could result in potential conflicts with grazing uses on the property. These impacts are considered potentially significant and will require further examination in the EIR.

Conclusion: Implementation of the proposed project has the potential to adversely affect onsite and adjacent agricultural uses and the existing agricultural conservation easement as a result of the anticipated pre-zoning and implementation of incompatible land uses. These potentially significant project-specific, secondary, and cumulative impacts will be further examined in the EIR.

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

a) Conflict with or obstruct implementation of the applicable air quality plan?	10, 11, 14	X			
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	10, 11, 14	X			
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	10, 11, 14	X			
d) Expose sensitive receptors to substantial pollutant concentrations?	11	X			
e) Create objectionable odors affecting a substantial number of people?	11	X			

a), b), c), d) The Clean Air Plan (CAP) for San Luis Obispo County was developed and adopted by the San Luis Obispo Air Pollution Control District (APCD) and is a comprehensive planning document designed to reduce emissions from traditional industrial and commercial sources, as well as from motor vehicle use. Conservation and Open Space Element Policy 2.3.2 states that the City will help the APCD implement the CAP. The EIR shall include an assessment of the project’s consistency with the CAP transportation, land use, and circulation policies.

Implementation of the proposed project would generate both short-term emissions associated with construction and long-term emissions associated with operation of the project. Construction and grading equipment would emit carbon monoxide and ozone precursors, such as nitrogen oxide and reactive organic compounds, as well as dust and suspended particulates. There is also a potential for exposure to naturally-occurring asbestos and asbestos containing materials. Construction and operation of the project would generate new vehicle trips and increase the combustion of natural gas and electricity in the area, thereby generating regional air pollutants. Implementation of the proposed project has the potential to result in significant impacts associated with air quality. Assessment of potential air quality impacts that may result from the proposed project will need to be conducted using the April 2012 CEQA Air Quality Handbook. These impacts are considered potentially significant and will require further examination in the EIR.

e) Implementation of the proposed project has the potential to generate odors during construction and operation. Odors that have the potential to be generated during construction activities would be associated with exhaust from construction equipment and would be short-term during the construction phase of the project. Odors that have the potential to be generated during operation of the project could include odors associated with solid waste generation and proposed commercial facilities. These impacts are considered potentially significant and will require further examination in the EIR.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
SPEC/ER #0143-2017					

**Conclusion:** Implementation of the proposed project has the potential to generate both short-term emissions associated with construction and long-term emissions associated with operation of the project. Potentially significant project-specific, secondary, and cumulative impacts will be further examined in the Froom Ranch Specific Plan EIR.

**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?	4, 5, 26	X			
b) Have a substantial adverse effect, on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	4, 5, 26, 44, 45, 46, 47	X			
c) Have a substantial adverse effect on federally protected wetlands as defined in Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	4, 5, 26, 27	X			
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	4, 5	X			
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	4, 5, 35	X			
f) Conflict with the provisions of an adopted habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	28, 31, 44, 45, 46, 47	X			

a) The Froom Ranch Specific Plan area is composed of a variety of plant communities including annual and native grasslands, coast live oak/California bay woodland, and coastal scrub/chaparral habitats. Non-native annual grassland is the dominant plant community on the property, primarily present in the flatter portions of the Specific Plan area where cattle and horse feeding activities occurred in the past. The site is bisected by various natural drainages. Froom Creek traverses the Specific Plan area in a mostly north-to-south direction and converges with San Luis Obispo Creek south of the Specific Plan area before flowing toward its outlet to the Pacific Ocean in Avila Beach. Wetland habitat is present in the flat grassland areas in the eastern portion of the site. The Los Osos Valley Road roadside channel is dominated by arroyo willow monoculture.

A Biological Resources Inventory was prepared for the proposed project in January 2016 (Kevin Merk Associates, LLC 2016), and a supplemental report is forthcoming that will include potential off-site improvements (drainage/stormwater basin); all biological reports submitted by the applicant shall be peer reviewed by a qualified biologist in association with the EIR. The floristic inventory conducted in support of the Biological Resources Inventory identified the following special-status plants occurring in the serpentine bunchgrass grassland, wetland habitat, and on scattered serpentine outcrops in the southwest portion of the site:

- Blochman’s dudleya (*Dudleya blochmaniae*; CRPR List 1B.1);
- Brewer’s spineflower (*Chorizanthe breweri*; CRPR List 1B.3);
- Cambria morning glory (*Calystegia subacaulis ssp. episcopalis*; CRPR List 4.2);
- Chaparral ragwort (*Senecio aphanactis*; CRPR List 2.2);
- Chorro Creek bog thistle (*Cirsium fontinale var. obispoense*; federal and state endangered and CRPR List 1B.2);
- Club haired mariposa lily (*Calochortus clavatus ssp. clavatus*; CRPR List 4.3);
- Congdon’s tarplant (*Centromadia parryi ssp. congonii*; CRPR List 1B.1);

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- Eastwood’s larkspur (*Delphinium parryi ssp. eastwoodiae*; CRPR List 1B.2);
- Jones’ layia (*Layia jonesii*; CRPR List 1B.2);
- Mouse-gray dudleya (*Dudleya abramsii ssp. murina*; CRPR List 1B.2);
- Palmer’s spineflower (*Chorizanthe palmeri*; CRPR List 4.2);
- San Luis mariposa lily (*Calochortus obispoensis*; CRPR List 1B.2); and,
- San Luis Obispo owl’s-clover (*Castilleja densiflora ssp. obispoensis*; CRPR List 1B.2).

No rare animals were observed on-site during the field surveys; however, based on a habitat suitability analysis, the following special-status animals were identified as having the potential to occur within the project area:

- American badger (*Taxidea taxus*; species of special concern);
- Burrowing owl (*Athene cunicularia*; species of special concern);
- California horned lark (*Eremophila alpestris actia*; watch list);
- Cooper’s hawk (*Accipiter cooperi*; watch list);
- Golden eagle (*Aquila chrysaetos*; watch list and CDFW Fully Protected);
- Loggerhead shrike (*Lanius ludovicianus*; species of special concern);
- Merlin (*Falco columbarius*; watch list);
- Northern harrier (*Circus cyaneus*; species of special concern);
- Purple martin (*Progne subis*; species of special concern);
- Sharp-shinned hawk (*Accipiter striatus*; watch list);
- Tricolored blackbird (*Agelaius tricolor*; candidate species and species of special concern);
- White-tailed kite (*Elanus leucurus*; CDFW Fully Protected);
- Yellow warbler (*Dendroica petechial brewsteri*; species of special concern);
- Big free-tailed bat (*Nyctinomops macrotis*; species of special concern);
- Hoary bat (*Lasiurus cinereus*; special animal);
- Pallid bat (*Antrozous pallidus*; species of special concern);
- San Diego woodrat (*Neotoma lepida intermedia*; species of special concern);
- Steelhead (*Oncorhynchus mykiss irideus*; federal threatened and species of special concern);
- Townsend’s western big-eared bat (*Corynorhynchus townsendi*; species of special concern);
- Western mastiff bat (*Eumops perotis californicus*; species of special concern);
- Western red bat (*Lasiurus blossevilli*; species of special concern); and,
- Yuma myotis (*Myotis yumanensis*; special animal).

In addition, California red-legged frog (*Rana draytonii*; state species of special concern and federal threatened) and mountain lion (*Puma concolor*; state “specially protected species”) have been observed on adjacent properties. Additional information is provided in the Recovery Plan for the California Red-legged Frog (USFWS 2002), Chorro Creek Bog Thistle: 5-Year Review Summary and Evaluation (USFWS 2007), South-Central California Coast Steelhead Recovery Plan (NOAA 2013), and Recovery Plan for the Morro Shoulderband Snail and Four Plants from Western San Luis Obispo County (USFWS 1998).

A variety of birds and bats could also utilize the larger trees within the oak/bay woodland and riparian habitat for nesting and roosting activities, and several bird species could potentially use the grassland habitat in the project area for nesting.

Implementation of the proposed project could result in direct and indirect impacts to special-status species through the conversion of land that currently supports special-status plants and changes to proximate habitat conditions (e.g. hydrological changes that may adversely affect Chorro Creek bog thistle or Congdon’s tarplant); and land that provides suitable habitat for special-status animals, including direct conversion of habitat and construction and operational effects (e.g., noise, lighting) that could affect the behavior or special-status wildlife. Potentially significant short-term and long-term impacts to aquatic species could also occur as a result of the proposed relocation and realignment of Froom Creek. The EIR shall consider and assess feasible mitigation measures to address potentially significant impacts, including avoidance, on and off-site mitigation, and preservation of land above the 150-foot elevation for habitat enhancement or restoration. These impacts are considered potentially significant and will require further examination in the EIR.



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b) Three sensitive natural communities have been identified within the project area: arroyo willow riparian scrub (1.87 acres), wetland (7.25 acres), and serpentine bunchgrass grassland (13.46 acres). Implementation of the proposed project could result in direct and indirect impacts to these sensitive natural communities through direct conversion or indirect impacts associated with construction activities and operation of the project, including but not limited to grading and development, hydrological modifications, realignment of Froom Creek, and long-term fire safety vegetative fuel reductions. These impacts are considered potentially significant and will require further examination in the EIR.

c) Based on the Biological Resources Inventory prepared by the applicant, the project area supports approximately 7.25 acres of wetland habitat and 2.66 acres of drainage features (also refer to the Preliminary Jurisdictional Determination submitted by the applicant). The wetland habitat present on-site is a combination of coastal and valley freshwater marsh and vernal marsh vegetation communities. Implementation of the proposed project could result in direct and indirect impacts to federally-protected wetlands through construction activities, grading, modification of existing drainage patterns and detention basins, development of new impervious surfaces, and the realignment of Froom Creek, hydrological modifications, and long-term fire safety vegetative fuel reductions. These impacts are considered potentially significant and will require further examination in the EIR.

d) Implementation of the proposed project would convert land that is currently undeveloped and provides suitable habitat for a variety of native resident and migratory fish and wildlife species. The project area is identified in the Conservation and Open Space Element of the City's General Plan as supporting a designated wildlife zone and wildlife corridor. Therefore, implementation of the proposed project could result in direct and indirect interference with the movement of wildlife species and their use of existing wildlife corridors and habitat resources within the area. These impacts are considered potentially significant and will require further examination in the EIR.

e) The Conservation and Open Space Element of the City's General Plan includes policies related to species of local concern, wildlife habitat and corridors, trees and other plants, natural communities, and creek setbacks. In addition, the City's Tree Ordinance (Ordinance 1544) establishes regulations related to tree protection, tree removal, and designation and protection of heritage trees. Implementation of the proposed project would likely require tree removal, which shall be quantified and assessed in the EIR. The EIR shall include preliminary identification of the project's consistency with General Plan policies related to natural and biological resources.

f) The project site is located between property covered by the Irish Hills Natural Reserve Conservation Plan and the Johnson Ranch Open Space Conservation Plan. Implementation of the proposed project has the potential to result in conflicts between land uses on the project site and the adjacent conservation plan areas if development were to impact sensitive habitat, encroach into conserved areas, or otherwise indirectly affect conserved areas. These impacts are considered potentially significant and will require further examination in the EIR.

**Conclusion:** Implementation of the proposed project has the potential to result in direct and indirect impacts to existing undeveloped habitat, sensitive natural communities and riparian habitat, federally-protected wetlands, special-status plants and animals, and wildlife corridors, and could conflict with local policies, ordinances, and identified Conservation Plans. Preparation of the EIR will include peer review of the biological reports provided by the applicant, and coordination meetings with resource agencies including, but not limited to the City Natural Resources Manager and City Biologist, California Department of Fish and Wildlife (CDFW), U.S. Fish and Wildlife Service (USFWS), National Oceanic and Atmospheric Administration, Fisheries (NOAA Fisheries), Regional Water Quality Control Board (RWQCB), and U.S. Army Corps of Engineers. Potentially significant project-specific, secondary, and cumulative impacts will be further examined in the EIR.

**5. CULTURAL RESOURCES. Would the project:**

a) Cause a substantial adverse change in the significance of a historic resource as defined in §15064.5.	4, 12, 32, 36, 37	X			
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5)	4, 12, 32	X			
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	4	X			

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d) Disturb any human remains, including those interred outside of formal cemeteries?		X			
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a), b), d) A Section 106 Prehistoric and Historic Report was prepared by FirstCarbon Solutions (FCS) for the Froom Ranch Specific Plan area (FCS 2015). This report and additional information and analysis provided by the applicant shall be peer reviewed by a qualified architectural historian and a qualified archaeologist in association with the EIR.

The Froom Ranch Historic Complex is located in the northwest portion of the project site, and with the exception of a historic dairy barn, the complex is located below the 150-foot elevation. This historic resource (P-40-040991) was evaluated for National Register of Historic Properties eligibility by a qualified architectural historian and was found to meet identified criteria for an historic resource. The applicant's team, including an architectural historian and structural engineer, are working on a plan to address the individual structures and the complex as a whole. Preliminary concepts include repositioning and/or reconstruction of structures onsite, possibly in association with the proposed trailhead park, potential removal of structures, and incorporation of interpretive and educational elements. The EIR shall include a preliminary assessment of the project's consistency with General Plan policies specific to cultural resources, the City's Historic Preservation Ordinance and Historic Preservation Program Guidelines, and Secretary of Interior Standards. The EIR shall evaluate the project's potential impacts to historic (built environment) resources, pursuant to CEQA and City regulations and policies.

Based on the Section 106 Report prepared by the project applicant, a records search was conducted for the project area and a 0.5-mile radius by staff at the Central California Information Center (CCIC), located at the University of California, Santa Barbara on January 5, 2015. Results from the records search indicate that two prehistoric resources and one historic resource have been previously recorded within the area of potential effect (APE). The two prehistoric resources are CA-SLO-783, a bedrock mortar site, and CA-SLO-1195, a lithic/bone/shell scatter. The historic resource, P-40-040991, is the complex of buildings comprising the Froom Ranch and Dairy (see above). Five studies have been previously conducted within the APE; three of the study/survey reports (E-590, E2723, and E-3708) detail the findings of the two previously recorded prehistoric resources and the one historic resource, while the other two studies conducted within the APE (E-4663 and E-4706) did not produce any findings of cultural resources.

FCS Archaeologists conducted an intensive pedestrian survey of the project APE from January 6-8, 2015. Two previously recorded prehistoric resources (CA-SLO-783 and CA-SLO-1195) located within the project APE were investigated to ascertain the current condition of the resources. In addition, Department of Parks and Recreation (DPR) Archaeological Site Records for each site were updated to reflect current findings for both resources. No additional prehistoric resource sites were discovered during the course of the survey; however, isolate prehistoric lithic tools and debitage (waste flakes from the manufacture of stone tools) were encountered and mapped during the survey. In addition, four rock walls, a stone revetment/retaining wall, and a recent stone fire pit were mapped and photographed. It is currently unknown when these rock features were constructed; however, the property owner, John Madonna, believes they are related to the historic era Froom Ranch and Dairy.

Due to the history of the area and known presence of previously recorded prehistoric and historic sites within the project area, the potential for additional cultural resources to be present on-site is considered high. Implementation of the proposed project could result in direct and/or indirect impacts to historic resources, archaeological resources, and/or human remains, if present, during ground-disturbing construction activities and project operation. These impacts are considered potentially significant and will require further examination in the EIR.

c) Three vertebrate localities have been identified along the coast within 9 miles of the project site. These localities occur in Pleistocene fluvial deposits overlying marine terraces, and include assemblages of the Rancholabrean mammals *Equus sp. and E. occidentalis* (horse); *Camelops sp. and C. hesternus* (camel); *Bison antiquus and B. latifrons* (bison), and *Mammut americanum* (mammoth). Other, more distal localities in San Luis Obispo County have been identified as well. Due to the known presence of previously recorded significant paleontological resources in the project vicinity, the potential project-related impacts on paleontological resources is considered potentially significant. The paleontological sensitivity of the project site and potential effects on paleontological resources will be further examined in the EIR.

Conclusion: Implementation of the proposed project could result in direct and/or indirect impacts to historic resources, archaeological resources, paleontological resources, and/or human remains, if present, during ground-disturbing construction

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activities and project operation. These impacts are considered potentially significant and will require further examination in the EIR.

**6. GEOLOGY AND SOILS. Would the project:**

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:	3, 4, 6, 9, 13				
I. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.		X			
II. Strong seismic ground shaking?		X			
III. Seismic-related ground failure, including liquefaction?		X			
IV. Landslides?		X			
b) Result in substantial soil erosion or the loss of topsoil?		X			
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off site landslide, lateral spreading, subsidence, liquefaction or collapse?	3, 4, 6, 9, 13	X			
d) Be located on expansive soil, as defined in Table 1802.3.2 of the California Building Code (2013), creating substantial risks to life or property?	3, 4, 6, 9, 13	X			
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?					X

a), b, c), d) The project area is located within the Coast Range Geomorphic Province, which extends along the coastline from central California to Oregon. This region is characterized by extensive folding, faulting, and fracturing of variable intensity. In general, the folds and faults of this geomorphic province comprise the pronounced northwest trending ridge-valley system of the central and northern coast of California. According to the Geologic Map of California, San Luis Obispo Sheet published by the California Division of Mines and Geology (CDMG) in 1978, the site vicinity is underlain by Quaternary-aged alluvium (unconsolidated deposits of sand, silt, clay, and gravel). The surrounding hills are comprised of the Franciscan and Monterey Formations and Quaternary aged non-marine terrace deposits.

Recent geological analysis conducted by the project applicant indicates that potentially active fault trace(s) traverse the project site. The project area is identified in the Safety Element of the City’s General Plan as being located in an area with moderate landslide potential and high liquefaction potential. Implementation of the proposed project could expose people and structures to potential substantial adverse effects, including the risk of loss, injury or death involving geologic hazards such as fault rupture, ground shaking, liquefaction, and landslides. Geologic hazards of concern that are not seismically-induced events at the site include soil hazards such as settlement, expansive soils, subsidence, and slope stability. Construction activities such as grading, modification of existing slopes and drainage channels, and development of new impervious surfaces could contribute to non-seismic geologic hazards in the project area. These impacts are considered potentially significant and will require further examination in the EIR.

e) The project does not propose the use of septic tanks or alternative wastewater disposal systems; the project proposes extension and connection to the City’s existing wastewater facilities. No geologic impacts related to the alternative disposal of wastewater would occur.

Conclusion: Implementation of the proposed project has the potential to expose people and structures to potential substantial adverse effects, including the risk of loss, injury or death involving seismic and non-seismic geologic hazards. These impacts are considered potentially significant and will require further examination in the EIR.

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**7. GREENHOUSE GAS EMISSIONS. Would the project:**

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	4, 10, 11, 14	X			
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	4, 10, 11, 14	X			

a), b) The state of California passed Assembly Bill 32, the California Global Warming Solution Act of 2006 and Executive Order S-3-05 (June 1, 2005), both requiring reductions of greenhouse gases in the state of California and establishing goals to reduce greenhouse gas emissions to 1990 levels by 2020, and to be 80% below 1990 levels by 2050. More recently, the state of California passed Senate Bill 32 (SB 32), which established goals to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030. Implementation of the proposed project has the potential to generate greenhouse gas emissions during construction and operation, including through short-term construction and long-term operational vehicle emissions and point-source emissions. These impacts are considered potentially significant and will require further examination in the EIR, consistent with the methodologies identified in the SLO APCD CEQA Handbook. In addition, the EIR shall assess the project's consistency with the City's Climate Action Plan.

Conclusion: Implementation of the proposed project has the potential to generate greenhouse gas emissions during construction and operation. These impacts are considered potentially significant and will require further examination in the EIR.

**8. HAZARDS AND HAZARDOUS MATERIALS. Would the project:**

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	1, 4			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	1, 4, 15, 16	X			
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	1, 4	X			
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	1, 4, 15, 16			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	4, 17, 18	X			
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	4, 17, 18			X	
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	1, 4, 6	X			
h) Expose people or structures to a significant risk of-loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	4, 6	X			

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a), b), c), d) The proposed project includes the development of new residential and commercial uses, which are not anticipated to involve the routine use, transportation, disposal or emission of hazardous materials. Hazardous materials such as fuel, oil, and other materials may be stored and used for maintenance and operation of equipment used during construction and operation of the proposed project; therefore, implementation of the proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

The Froom Ranch Specific Plan Area is primarily undeveloped with the exception of some agricultural support development and offices associated with John Madonna Construction, Inc. Pacific Beach High School, located at 11950 Los Osos Valley Road, is located within 0.25 mile of the project site. There are no records of previous or existing sources of contamination in this area and, based on a preliminary review, the project site is not on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, historic agricultural use on-site may have resulted in undocumented residual quantities of presently-banned agricultural chemicals, which could pose a health hazard to construction workers or future residents or visitors. It is also possible that existing hazardous materials releases from off-site properties could potentially affect the project site. Although there are no documented hazardous materials sites located on the project site, based on the State Water Resources Control Board (SWRCB) Geotracker database, there are several documented closed cases of leaking underground storage tank (LUST) sites, and one permitted underground storage tank (UST), located on the east side of Los Osos Valley Road, opposite the project site. The potential exposure of construction workers, and future residents and visitors to the site could result in potential impacts.

These impacts are considered potentially significant and will require further examination in the EIR.

e) The project area is primarily located within Safety Zone 2 of the County’s current Airport Land Use Plan (ALUP), with a small portion close to Los Osos Valley Road located within ALUP Zones S-1b (3 acres) and S-1c (4 acres). Safety Zone 2, where the residential development is envisioned to occur within the Specific Plan Area, allows 6 to 12 dwelling units per acre. The applicant requested a pre-application review by the Airport Land Use Commission (ALUC) and the ALUC considered the project on April 19, 2017. Although portions of the project are within Safety Zones S-1b and S-1c per the current ALUP, a corrected version of the analog map used in Figure 3 of the ALUP has been more recently utilized by the ALUC to review the consistency of other recent specific plans (San Luis Ranch and Avila Ranch) with the ALUP. The new map has adjusted the locations of safety zones to the true GIS bearings of Runways 7-25 and 11-29. When the project site is overlain on the revised safety zones map, it is located outside of both Safety Zones S-1b and S-1c.

Although no formal direction was provided, the ALUC indicated that consistency with the requirements of Safety Zone 2 throughout the entire site would be appropriate. Implementation of the proposed project has the potential to conflict with the County’s ALUP. These impacts are considered potentially significant and will require further examination in the EIR.

f) The Specific Plan Area is not located in the vicinity of a private airstrip; therefore, potential impacts would be less than significant.

g), h) The project site is designated as moderate and high wildland fire hazard areas due primarily to its location along the outskirts of the city where the wildland and urban areas interface. Future development and human occupation could therefore be exposed to potential wildland fire hazards, and in turn, increased human presence may increase the potential for wildfire. Development of the proposed project could interfere with emergency evacuation routes if potential traffic impacts are not adequately mitigated. In addition, the LPC component of the project may require additional provisions for safe evacuation of residents, staff, patients, and guests. The EIR shall assess whether compliance with applicable Uniform Fire Code (UFC), California Building Code (CBC) and General Plan policies would reduce potential impacts to less than significant levels, or if additional mitigation is necessary. These impacts are considered potentially significant and will require further examination in the EIR.

Conclusion: Implementation of the proposed project has the potential to result in significant impacts related to upset and accident conditions involving the release of hazardous materials into the environment, inconsistencies with the County’s ALUP, wildland fire hazards, and interference with emergency evacuation routes. These impacts are considered potentially significant and will require further examination in the EIR.

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**9. HYDROLOGY AND WATER QUALITY. Would the project:**

a) Violate any water quality standards or waste discharge requirements?	1, 4, 5, 21, 26, 27	X			
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?		X			
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site?	1, 38	X			
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?	1, 38	X			
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	38	X			
f) Otherwise substantially degrade water quality?		X			
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?		X			
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?		X			
i) Expose people or structures to significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?		X			
j) Inundation by seiche, tsunami, or mudflow?					X

a), f) The proposed project is subject to the current stormwater regulations as set forth by the RWQCB. The proposed project is also subject to the requirements for Interim Low Impact Development. Implementation of the proposed project could result in an increase of point and non-point sources of contamination during construction and operation of the project, including realignment of Froom Creek, that could affect water quality onsite and in the vicinity of the project area. These impacts are considered potentially significant and will require further examination in the EIR.

b) The Froom Ranch Specific Plan Area is located within and drains to the San Luis Obispo Valley Groundwater Basin. The project is anticipated to be served by the City's sewer and water systems and is not expected to deplete groundwater resources. However, increase demand on City water supplies and development of the project would increase the amount of impervious surfaces within the Specific Plan Area, which could result in impacts related to groundwater supply, percolation, recharge, and the alteration of existing drainage patterns. These impacts are considered potentially significant and will require further examination in the EIR. Preparation of a Water Supply Assessment that meets the requirements of SB 610 will be required; this assessment will be provided by the applicant and peer reviewed by the EIR consultant in coordination with the City Utilities Department.

c), d), e) Implementation of the proposed project would result in physical modifications to the existing project area including construction activities such as grading, modification of existing slopes and drainage channels, realignment and relocation of the existing creek and detention basin, the potential creation of a new drainage/stormwater basin offsite (on the Mountainbrook Church property), and development of new impervious surfaces. The applicant has submitted a preliminary

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Stormwater Memorandum (RRM 2015), and will provide additional analysis in compliance with the City’s Waterways Management Plan Drainage Design Manual; these documents shall be peer reviewed by the EIR consultant in coordination with the City Public Works Department. Physical modification of the project site would be required to comply with the drainage requirements of the City’s Waterways Management Plan (City of San Luis Obispo 2003). This plan was adopted for the purpose of insuring water quality and proper drainage within the City’s watershed. The Waterways Management Plan requires that site development be designed so that post-development site drainage does not significantly exceed pre-development runoff. Implementation of the proposed project could substantially alter the existing drainage pattern on-site through the realignment and relocation of the existing creek and detention basin in the eastern portion of the site, which could result in substantial erosion and siltation on- and off-site. Modification of existing drainage patterns and development of new impervious surfaces on-site has the potential to substantially increase the rate and amount of surface runoff in a manner that could result in flooding on- and off-site. Additionally, modification of existing drainage patterns and development of new impervious surfaces on-site has the potential to contribute runoff water, which could exceed the capacity of existing or planned stormwater drainage systems or create substantial additional sources of polluted runoff. These impacts are considered potentially significant and will require further examination in the EIR.

g), h), i) A portion of the low-lying areas within the Froom Ranch Specific Plan Area are within the 100-year flood zone, as identified by the Federal Emergency Management Agency (FEMA). The low-lying portions of the site near Los Osos Valley Road include wetland areas that are subject to flooding during heavy storm events. Implementation of the proposed project could place housing or other structures within a 100-year flood hazard area and expose people and structure to significant risk of loss, injury or death involving flooding. These impacts are considered potentially significant and will require further examination in the EIR.

j) The project area is located outside the zone of impacts from seiche or tsunamis, and the existing site conditions do not create a potential for inundation from mudflow.

Conclusion: Implementation of the proposed project has the potential to violate water quality standards and waste discharge requirements; interfere with groundwater percolation and recharge; alter existing drainage patterns in a manner which could result in erosion, siltation, increased runoff, and flooding; degrade water quality; place housing within a 100-year floodplain; and, expose people and structures to flooding hazards. These impacts are considered potentially significant and will require further examination in the EIR.

**10. LAND USE AND PLANNING. Would the project:**

a) Physically divide an established community?	1, 4			X	
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	1, 4, 5, 6, 7	X			
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	4, 5, 28, 31	X			

a) Lands surrounding the Specific Plan Area generally consist of the Irish Hills Natural Reserve (open space and recreation) and unincorporated undeveloped rural and agricultural lands to the west, and urban development to the north and east in the City of San Luis Obispo, and a mix of urban development and undeveloped/agricultural land to the south. Development north, south and east of the Specific Plan Area in the City of San Luis Obispo includes large shopping centers, auto dealerships, hotels, and roadways, parking lots, and other urban infrastructure. The project site is located adjacent to City limits, is located within the City’s Sphere of Influence, and was anticipated to be considered for annexation as identified in the City’s General Plan. Therefore, implementation of the proposed project would not physically divide an established community, and potential impacts would be less than significant.

b) As noted above, the City’s General Plan Land Use Map designates the Froom Ranch Specific Plan Area as a Special Focus Area in the City’s Sphere of Influence and anticipates annexation of this area into the City. The Land Use and Circulation Element (LUCE) Update and certified Final EIR assumed a certain level and type of development when assessing potential impacts and mitigation measures associated with build-out of the City and Specific Plan Area 3 (project site). The EIR shall

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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consider the scale and intensity of the applicant's project scope relative to the General Plan, and shall work with the City to determine how policies should be applied to the LPC, and whether the LPC should be considered residential, commercial, or a combination of both. Preparation of the EIR shall include a preliminary assessment of the project's consistency with applicable land use plans, policies, and regulations.

c) The project site is located between property covered by the Irish Hills Conservation Plan and the Johnson Ranch Conservation Plan. Implementation of the proposed project has the potential to result in conflicts between land uses on the project site and the adjacent conservation plan areas if development were to impact sensitive habitat, encroach into conserved areas, or otherwise indirectly affect conserved areas. These impacts are considered potentially significant and will require further examination in the EIR.

Conclusion: Preparation of the EIR shall include a preliminary assessment of the project's consistency with applicable land use plans, policies, and regulations. The Land Use section of the EIR shall identify any potentially significant land use impacts that would occur as a result of potential inconsistencies with policies and/or regulations specifically in place to avoid or mitigate environmental impacts.

**11. MINERAL RESOURCES. Would the project:**

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	5			X	
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	5			X	

a), b) There are no known mineral resources that are of known value to the region and residents of the state within the project area and the project site is not identified as a locally-important mineral resource recovery site. However, the site currently contains a small quarry to support the operations of John Madonna Construction, Inc.

Conclusion: Potentially significant impacts related to mineral resources are not anticipated; however, these impacts will be evaluated further in the EIR, as warranted.

**12. NOISE. Would the project result in:**

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	7	X			
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	7	X			
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	7	X			
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	7	X			
e) For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	17, 18	X			
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?					X

a), b), c), d) The Noise Element of the City's General Plan includes noise exposure standards for noise-sensitive land uses, and performance standards for new commercial and industrial uses. Noise-sensitive uses generally include residences, hotels,



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motels, hospitals, nursing homes, theaters, auditoriums, music halls, churches, meeting halls, office buildings, mortuaries, schools, libraries, museums, neighborhood parks, and playgrounds. The nearest noise-sensitive receptors to the project site include Mountainbrook Community Church, Courtyard by Marriot San Luis Obispo, Hampton Inn & Suites San Luis Obispo, and Motel 6 located immediately south of the Froom Ranch Specific Plan Area. The Noise Element indicates that acceptable noise exposure levels in the vicinity of motels, hotels and churches is 50 to 60 dB and conditionally acceptable noise levels are 60 to 75 dB. The ambient noise environment within the Froom Ranch Specific Plan Area ranges from 60 to 70 dB with primary sources of noise being traffic along U.S. Highway 101 and Los Osos Valley Road. Implementation of the proposed project has the potential to generate short-term construction noise as well as long-term operational noise and result in temporary and permanent increased ambient noise levels that could exceed the City's noise exposure standards for noise-sensitive land uses. Additionally, construction activities have the potential to generate excessive groundborne vibration and groundborne noise levels. These impacts are considered potentially significant and will require further examination in the EIR.

e) The project site is located within the projected 50-55 dB contour from the County Airport, based on the ALUP. Table 1 of the General Plan Noise Element indicates that the maximum noise exposure for outside residential activities is 60 dB. Therefore, implementation of the Froom Ranch Specific Plan is not anticipated to expose people residing or working in the project area to excessive noise levels associated with the County Airport. Although significant impacts are not expected, this issue will require further examination in the EIR.

f) The Froom Ranch Specific Plan Area is not located within the vicinity of a private airstrip.

Conclusion: Implementation of the proposed project has the potential to generate short-term construction noise and groundborne vibration as well as long-term operational noise and result in temporary and permanent increased ambient noise levels that could exceed the City's noise exposure standards for noise-sensitive land uses. These impacts are considered potentially significant and will require further examination in the EIR.

**13. POPULATION AND HOUSING. Would the project:**

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	4, 29	X			
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?					X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?					X

a) Implementation of the proposed project would directly induce population growth within the Froom Ranch Specific Plan Area through the development of new residential uses and commercial businesses and annexation of the property into the City. The Froom Ranch Specific Plan is currently envisioned as a primarily residential project with some commercial development in the northeast portion of the site closest to Los Osos Valley Road and the adjacent Irish Hills Plaza. A major component of the planned residential uses is a Life Plan Community (LPC) known as Il Villaggio. Il Villaggio would provide a variety of different unit types for independent senior housing, recreation and dining facilities, as well as access to higher levels of care such as Assisted Living, Memory Care, and Skilled Nursing, when needed. Additional residential uses in the northern portion of the site will be multiple-family. Impacts related to inducing population growth are considered potentially significant and will require further examination in the EIR.

b), c) Implementation of the project would not displace existing houses or residents.

Conclusion: Implementation of the proposed project would directly induce population growth within the Froom Ranch Specific Plan Area through the development of new residences and commercial businesses. These impacts are considered potentially significant and will require further examination in the Froom Ranch Specific Plan EIR.

Issues, Discussion and Supporting Information Sources  SPEC/ER #0143-2017	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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**14. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

a) Fire protection?	4, 6	X			
b) Police protection?	4, 6	X			
c) Schools?		X			
d) Parks?		X			
e) Other public facilities?		X			

a), b) The Froom Ranch Specific Plan Area is located approximately 3 miles southwest of the City's Police Department, 0.5 mile south of City Fire Station No. 4, and is within the four-minute response area of the fire station. Development of the Froom Ranch Specific Plan would increase the population and sources of fire ignition within the Specific Plan Area and could place an increased demand on the City's fire protection and police services, which could require the provision of new or physically altered governmental facilities. In addition, the creation of a LPC may require new or modified facilities to serve residents and patients. These impacts are considered potentially significant and will require further examination in the EIR.

c) Implementation of the Froom Ranch Specific Plan would induce population growth within the Specific Plan Area through the development of new residential units, including multi-family residential units. Therefore, development of the project could place an increased demand on local schools, which could require the provision of new or physically altered governmental facilities. These impacts are considered potentially significant and will require further examination in the EIR.

d), e) Implementation of the Froom Ranch Specific Plan would induce population growth within the Specific Plan Area through the development of new residential units, including multi-family residential units and independent housing associated with the LPC. The Froom Ranch Specific Plan is anticipated to include approximately 58.4 acres of conservation/open space and a new neighborhood trailhead park encompassing approximately 2.9 acres. However, implementation of the proposed project could place an increased demand on off-site local park facilities, including the adjacent Irish Hills Natural Reserve and Open Space area, which could require the provision of new or physically altered governmental facilities. These impacts are considered potentially significant and will require further examination in the EIR.

Conclusion: Implementation of the Froom Ranch Specific Plan would induce population growth within the Specific Plan Area through the development of new residential units, which could place an increased demand on the City's fire and police protection services, as well as local schools, parks, and other public facilities. These impacts are considered potentially significant and will require further examination in the EIR.

**15. RECREATION.**

a) Would the project increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	4, 5	X			
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?		X			

a), b) Implementation of the Froom Ranch Specific Plan would induce population growth within the Specific Plan Area through the development of new residential units, including multi-family residential units and independent housing associated with the LPC. The Froom Ranch Specific Plan is anticipated to include 58.4 acres of conservation/open space and a new public neighborhood/trailhead park encompassing approximately 2.9 acres, which would connect to the Irish Hills Natural Reserve and potentially incorporate on-site historic structures. However, implementation of the proposed project could place an increased demand on existing local and regional recreation facilities, including the adjacent Irish Hills Natural Reserve and Open Space area, which could require the provision of new or physically altered governmental facilities. These impacts are considered potentially significant and will require further examination in the EIR.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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**Conclusion:** Implementation of the proposed project could place an increased demand on existing local and regional recreation facilities, which could require the provision of new or physically altered governmental facilities, and includes the construction of new private and public recreational facilities which could have an adverse physical effect on the environment. These impacts are considered potentially significant and will require further examination in the EIR.

**16. TRANSPORTATION/TRAFFIC. Would the project:**

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	4, 23, 24, 25, 30	X			
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	4, 23, 24, 25, 30	X			
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	17			X	
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	30	X			
e) Result in inadequate emergency access?		X			
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	4, 23, 24, 25, 30	X			

a), b) Implementation of the proposed project would generate short-term construction trips as well as long-term operational trips to and from the Froom Ranch Specific Plan Area. Project trips have the potential to result in impacts to local roadways and intersections. The LUCE EIR identified the following areas near the proposed project as being potentially adversely impacted by future development within the City, including development within the Froom Ranch Specific Plan Area:

- Los Osos Valley Road (just west of the City Limits). Due to land use changes in the vicinity of the interchange and changes in traffic patterns, these segments will experience significant increases in volume.
- Prado (US 101 – Higuera and Higuera – Broad). Due to the construction of the interchange at US 101/Prado Road, these segments will experience significant increases in volume.
- Higuera & Tank Farm (#85). Due to increases in traffic along Higuera Street and Tank Farm Road, the SB left-turn movement experiences significant delay.

A Preliminary Transportation Analysis was prepared for the proposed project by Central Coast Transportation Consulting in April 2015 (Central Coast Transportation Consulting 2015), which did not assess the currently-proposed project and associated mix and intensity of land uses, and notes that the proposed project includes more residential units and less retail square footage than the City’s LUCE provided for. Based on the analysis included in the Preliminary Transportation Analysis, the proposed project has the potential to generate trip levels that could exceed the levels evaluated as part of the Circulation Element’s technical analysis, but would be below the daily and PM peak hour trips that would be generated at the maximum intensity in the Land Use Element. This suggests that the project may result in additional multi-modal transportation impacts beyond those identified in the LUCE EIR. Implementation of the proposed project has the potential to generate increased short-term and long-term trips, contribute to local congestion and operational deficiencies, and increase traffic volumes and vehicle speeds in the vicinity of the Specific Plan Area. These impacts are considered potentially significant and will require further examination in the EIR. The City Public Works Department will issue a separate Request for Proposals for preparation of multi-modal transportation study, which shall be reviewed and approved by City Public Works and incorporated in the EIR.

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c) The majority of the project site is within Safety Zone 2 of the ALUP with a smaller portion close to Los Osos Valley Road located within the 1B (3 acres) and 1C (4 acres) Zones. Development of the project site is not anticipated to result in increased risks associated with air traffic, and it is the applicant's intention to demonstrate consistency with the ALUP (as determined by the Airport Land Use Commission). These impacts are anticipated to be less than significant; however, this issue will require further examination in the EIR.

d) Final project design has the potential to increase hazards due to a design feature or incompatible use. The proposed project will be required to meet City Engineering Standards to avoid safety risks; however, project-specific impacts related to site design and potential safety hazards will require additional analysis. These impacts are considered potentially significant and will require further examination in the EIR.

e) Access to the site is constrained by surrounding development/alternative ownership, topography, and natural site conditions (i.e., the presence of drainages, floodplains, wetlands) and final project design has the potential to result in inadequate emergency access to all developed portions of the site. The project design will be reviewed by the City Fire Marshal to ensure adequate emergency access has been provided; however, project-specific impacts related to site design and potential safety hazards will require additional analysis. These impacts are considered potentially significant and will require further examination in the EIR.

f) The project will be required to be consistent with policies supporting alternative transportation, as described in the City's Circulation Element. Consistent with the goal of promoting alternative modes of transportation, the proposed project includes bicycle circulation routes, sidewalks, public trails, private trails, and public transit service connection. Potential impacts related to conflicts with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities will require additional analysis. These impacts are considered potentially significant and will require further examination in the EIR.

Conclusion: Implementation of the proposed project could result in changes in traffic volumes or traffic patterns; increase hazards due to a design feature or incompatible use; and result in conflicts with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. These impacts are considered potentially significant and will require further examination in the EIR. The City Public Works Department will issue a separate Request for Proposals for preparation of multi-modal transportation study, which shall be reviewed and approved by City Public Works and incorporated in the EIR.

**17. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register as defined in Public Resources Section 5020.1(k)?	4, 12, 32	X			
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.	4, 12, 32	X			

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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a), b) Previously conducted studies within the project area have identified prehistoric and historic sites within the Specific Plan Area; therefore, the project site is considered sensitive for tribal cultural resources. Upon determining the application is complete, the City will provide formal notification to all tribes traditionally and culturally affiliated with the project area of the opportunity to request consultation pursuant to Public Resources Code Section 21080.3.1 and the requirements of Assembly Bill 52. In addition, the City will conduct consultation under Senate Bill 18 (SB 18), as required for Specific Plans and General Plan Amendments. Potential impacts to tribal cultural resources and associated avoidance and mitigation measures and pre-zoning to protect significant resources identified through the AB 52 and SB 18 consultation processes will be identified, examined, and respectfully disclosed in the EIR.

Conclusion: Implementation of the proposed project could result in direct and/or indirect impacts to a tribal cultural resource, if present, during ground-disturbing construction activities and project operation and maintenance. These impacts are considered potentially significant and will require further examination in the EIR.

**18. UTILITIES AND SERVICE SYSTEMS. Would the project:**

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	3, 39, 40, 41, 42, 43	X			
b) Require or result in the construction or expansion of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	39, 40, 41, 42, 43	X			
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?		X			
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed?	39, 40, 41, 42, 43	X			
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	39, 40, 41, 42, 43	X			
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?		X			
g) Comply with federal, state, and local statutes and regulations related to solid waste?	33	X			

a), b), c), e) The From Ranch Specific Plan Area would be required to be served by City water, recycled water, and wastewater services. This would require development of private facilities within the Il Villaggio Life Plan Community that connect to nearby public infrastructure, as well as construction of new public facilities to serve the additional proposed residential, commercial, and public facility uses. Implementation of the proposed project would place an increased demand on existing City infrastructure, including potable water treatment and distribution, recycled water, wastewater collection and treatment, and stormwater facilities. The new on-site water, recycled water, wastewater, and stormwater facilities would be required to comply with the Uniform Plumbing Code and the City standards. The City Utilities Department will review the applicant-prepared Water Supply Assessment and water demand and sewer flow analyses and provide feedback to the applicant. These impacts are considered potentially significant and will require further examination in the EIR.

d) Implementation of the proposed project would result in a substantial increase in water demand to support proposed development. Project-specific impacts related to water supply, based on final project design, are considered potentially significant and will require further examination in the EIR. Preparation of a Water Supply Assessment that meets the requirements of SB 610 will be required; the assessment will be peer reviewed by the EIR consultant in coordination with the City Utilities Department.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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f), g) The proposed project would be served by San Luis Garbage Company, which maintains standards for access to ensure that collection is feasible, which will be reviewed by the Architectural Review Commission. San Luis Garbage is supported by Cold Canyon Landfill and assisted by South County Sanitary, Mission County Garbage, Morro Bay Garbage, and Coastal Roll-off. Solid waste is disposed of at the Cold Canyon Landfill located approximately 7 miles south of the City of San Luis Obispo on State Route 227. The Landfill site is comprised of a total of 209 acres, with waste disposal limited to a 121-acre permitted waste disposal footprint. Cold Canyon Landfill currently has an estimated closure date of 2064 (SWRCB 2015). Implementation of the proposed project would generate solid waste during construction and operation. To help reduce waste generated by the project, consistent with the City's Source Reduction and Recycling Element, recycling facilities must be accommodated on the project site and a solid waste reduction plan for recycling discarded construction materials must be submitted with the building permit application. Impacts associated with solid waste are considered potentially significant and will require further examination in the Froom Ranch Specific Plan EIR.

Conclusion: Implementation of the proposed project would place an increased demand on utilities and service systems. Impacts to utilities and service systems are considered potentially significant and will require further examination in the Froom Ranch Specific Plan EIR.

**19. MANDATORY FINDINGS OF SIGNIFICANCE.**

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X			
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As discussed above, impacts related to biological resources are considered potentially significant and will require further examination in the EIR.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects)?		X			
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Implementation of the proposed project has the potential to result in cumulative considerable impacts when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects. Cumulative impacts are considered potentially significant and will require further examination in the Froom Ranch Specific Plan EIR.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X			
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If potentially significant impacts cannot be mitigation to less-than-significant levels, the project could result in substantial direct and/or indirect adverse impacts on human beings. These impacts are considered potentially significant and will require further examination in the Froom Ranch Specific Plan EIR.

<b>20. EARLIER ANALYSES.</b>	
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:	
<b>a) Earlier analysis used.</b> Identify earlier analyses and state where they are available for review.	
The Draft and Final Program EIRs prepared for the 2035 Land Use and Circulation Elements (LUCE) Update (certified September 2014) and existing technical studies (refer to Source References below) were used as the basis for identifying potential project impacts. Project files are available for review at the City of San Luis Obispo's Community Development Department.	
<b>b) Impacts adequately addressed.</b> Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.	
These are noted above in the analysis of specific impacts for each issue.	
<b>c) Mitigation measures.</b> For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions of the project.	
These are noted above in the analysis of specific impacts for each issue.	
<b>21. SOURCE REFERENCES.</b>	
1.	Draft Project Plans [2/2/2017]
2.	City of San Luis Obispo Zoning Regulations, March 2015
3.	California Building Code, 2016
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.	California Department of Conservation Farmland Mapping and Monitoring Program, San Luis Obispo County Important Farmland Map 2014, published October 2016
9.	Natural Resources Conservation Service Web Soil Survey, Accessed March 21, 2017
10.	Clean Air Plan for San Luis Obispo County, Air Pollution Control District, 2001.
11.	CEQA Air Quality Handbook, Air Pollution Control District, 2012.
12.	City of San Luis Obispo Archaeological Resource Preservation Program Guidelines, October 2009
13.	San Luis Obispo Quadrangle Map, prepared by the State Geologist in compliance with the Alquist-Priolo Earthquake Fault Zoning Act, effective January 1, 1990
14.	City of SLO 2012 Climate Action Plan, August 2012
15.	California Department of Toxic Substances Control, Envirostor Accessed March 21, 2017
16.	State Water Resources Control Board, Geotracker Accessed March 21, 2017
17.	County of San Luis Obispo Airport Land Use Plan dated May 18, 2005.
18.	City of SLO Airport Compatible Open Space Plan, April 2005
19.	City of SLO Local Hazard Mitigation Plan
20.	City of SLO 2015 Urban Water Management Plan, June 2016
21.	Waterway Management Plan, City and County of San Luis Obispo, 2003
22.	Federal Emergency Management Agency, FIRM, November 16, 2012
23.	City of San Luis Obispo Bicycle Transportation Plan, November 5, 2013
24.	City of San Luis Obispo Multimodal Transportation Impact Study Guidelines, March 2015
25.	2014 Regional Transportation Plan/Sustainable Communities Strategy Connecting Communities, April 2015
26.	From Ranch Project, San Luis Obispo County, California, Biological Resources Inventory. Kevin Merk Associates, LLC (KMA). 2016.
27.	Preliminary Jurisdictional Determination. US Army Corps of Engineers dated September 24, 2015
28.	Conservation Guidelines for Open Space Lands of the City of San Luis Obispo. October 2002

29.	Report E-5: City/County Population and Housing Estimates. California Department of Finance 2016.
30.	Froom/El Villaggio Specific Plan Preliminary Transportation Analysis. Central Coast Transportation Consulting. 2015.
31.	Irish Hills Natural Reserve Conservation Plan. City of San Luis Obispo 2011.
32.	Froom Ranch/El Villaggio Specific Plan Section 106 Prehistoric Report, San Luis Obispo. FirstCarbon Solutions. February 20, 2015.
33.	Waste Discharge Requirements Order No. r3-2015-0021 for Cold Canyon Class III Landfill. State Water Resources Control Board (SWRCB), Central Coast Region. 2015.
34.	Applicant-prepared photo-simulations
35.	City of San Luis Municipal Code
36.	City of San Luis Obispo Historic Preservation Ordinance
37.	City of San Luis Obispo Historic Preservation Program Guidelines
38.	Stormwater Memorandum, RRM Design Group, February 26, 2015
39.	City of San Luis Obispo General Plan Water and Wastewater Element, June 2016
40.	City of San Luis Obispo 2016 Water Resources Status Report
41.	City of San Luis Obispo Final Potable Water Distribution System Operations Master Plan, December 2015
42.	2017 Recycled Water Master Plan
43.	Wastewater Collection System Infrastructure Renewal Strategy, December 2015
44.	U.S. Fish and Wildlife Service Recovery Plan for the California Red-legged Frog, 2002
45.	U.S. Fish and Wildlife Service Chorro Creek Bog Thistle: 5-Year Review Summary and Evaluation, 2007
46.	National Oceanic and Atmospheric Administration (NOAA) South-Central California Coast Steelhead Recovery Plan, 2013
47.	U.S. Fish and Wildlife Service Recovery Plan for the Morro Shoulderband Snail and Four Plants from Western San Luis Obispo County, 1998 ( <i>Note: includes Chorro Creek bog thistle</i> )

**Additional Information:** [www.slocity.org/government/department-directory/community-development/documents-online/environmental-review-documents/-folder-1911](http://www.slocity.org/government/department-directory/community-development/documents-online/environmental-review-documents/-folder-1911)