EXECUTIVE SUMMARY

ES-1 INTRODUCTION

JM Development Group, Inc. (Applicant) proposes the implementation of the Draft Froom Ranch Specific Plan (FSRP), including an amendment to the City's General Plan, pre-zoning, annexation to the City, and related actions to allow for the development of a 116.8-acre Project site with several offsite infrastructure improvements, which collectively comprise the Froom Ranch Specific Plan Project (Project). The Project is intended to implement the City of San Luis Obispo's (City's) vision for the Project site as guided by the City's 2014 Land Use Element (LUE) of the General Plan. The City's LUE specifically identifies the Project site as a Special Focus Area and requires preparation of a specific plan for this area to address key planning and environmental issues including: the designation of an appropriate land use mix, the need for a variety of housing types and levels of affordability, provision of both commercial and open space, an internal network of public and private roads, and the implementation of a complex stormwater management system. The Applicant proposes the adoption of the FSRP and related actions to permit a mix of residential uses (39.1 acres), open space and a public park (61.9 acres), and retail commercial uses (3.1 acres) within the approximately 109.7-acre Specific Plan area.

The proposed Project would allow for construction of up to 174 residential units and 404 senior independent living units as follows:

- 31.6 acres of R-3 SP medium-high density senior-living uses, with 366 independent-living units (700 to 2,000 sf in size), 38 assisted-living units (310 to 620 sf in size), and 51 beds for skilled nursing and memory care;
- 5.7 acres of R-3 SP medium-high density uses with 130 multi-family units on a minimum lot size of 1,000 sf;
- 1.8 acres of R-4 SP high density uses with 44 multi-family units on a minimum lot size of 1,000 sf;

The Project would also allow for up to 100,000 sf of commercial retail space, including approximately 70,000 sf of hotel use with up to 120 rooms and 30,000 sf of retail and office uses. The Project would retain approximately 55 percent of the Project site as open space and include a 2.9-acre public park that connects to the existing trail network within the adjacent Irish Hills National Reserve. The Project would include an internal network of public and private roads with some bicycle and pedestrian access. The Project would also

implement a complex stormwater management system, including realignment of Froom Ranch through the Specific Plan area, relocation and expansion of an existing onsite stormwater detention basin immediately south of the Specific Plan area, and onsite water quality retention and treatment areas.

ES-2 PROJECT OVERVIEW

This Environmental Impact Report (EIR) evaluates the potential environmental impacts of the proposed Project in the City of San Luis Obispo (City), California. The City prepared this EIR with assistance from its environmental planning consultant, Wood Environment and Infrastructure Solutions, Inc (Wood). This EIR discloses the findings of the City regarding potential environmental impacts of adoption and implementation of the proposed Project. The Project site consists of two parcels (APNs 067-241-030 and 067-241-031) and 7.1 acres outside the Specific Plan area, totaling 116.8 acres. The site is currently unincorporated in San Luis Obispo County (County), but is located within the City's adopted Sphere of Influence immediately southwest of the City limits and adjacent to Los Osos Valley Road (LOVR) between Calle Joaquin and Irish Hills Plaza. The City's 2014 LUE designates the Specific Plan area (109.7 acres within the Project site) as a Special Focus Area (SP-3) for provision of residential and small-scale commercial uses, along with open space and/or agricultural uses. The SP-3 designation requires a specific plan to guide development and operation within the Specific Plan area following annexation to the City, per Section 8.1.6 of the LUE.

The Project site is primarily undeveloped and used for agriculture (horse grazing) and stormwater management but contains historic farming structures, a construction office, and a permitted, but ~~inactive~~ red rock quarry in the northwestern portion used for construction materials storage and temporary stockpiling. Froom Creek traverses the Project site in a mostly north to south direction and joins San Luis Obispo Creek south of the Project site before flowing towards the Pacific Ocean.

ES-3 ENVIRONMENTAL IMPACT ANALYSIS

This EIR examines potential short- and long-term impacts of the Project. These impacts were determined through a rigorous process mandated by CEQA in which existing conditions are compared and contrasted with conditions that would exist once the project is implemented. For each impact topic, thresholds for determining impact significance are identified based on City and State CEQA Guidelines, along with descriptions of methodologies used for conducting the impact analysis. For some topics, such as air

quality, traffic, and noise, the analyses of impacts are more quantitative in nature and involve the comparison of effects against a numerical threshold. For other topics, such as land use/planning, the analyses of impacts are inherently more qualitative, involving the consideration of a variety of factors, such as adopted City policies.

The EIR impact discussions classify impact significance levels as:

1. **Significant and Unavoidable (Class I)** – a significant impact to the environment that remains significant even after mitigation measures are applied;
2. **Significant but Mitigable (Class II)** – a significant impact that can be avoided or reduced to a less than significant level with mitigation;
3. **Less Than Significant (Class III) –** a potential impact that would not meet or exceed the identified thresholds of significance for the resource area;
4. **No Impact (Class IV)** – no impact would occur for the resource area; and
5. **Beneficial (Class IV)** – a positive effect on the natural or human environment would occur.

Determinations of significance levels in the EIR are made based on impact significance criteria and applicable CEQA Guidelines for each resource area.

ES-4 NOTICE OF PREPARATION/SCOPING

The City prepared an Initial Study (IS) for the Project in July 2017, made publicly available through the Notice of Preparation (NOP) distribution process in July 2017. The IS found that the Project may have potentially significant impacts to the following resources: aesthetics, agriculture, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation and traffic, tribal cultural resources, and utilities (Appendix A). Pursuant to Section 21080(d) of the Public Resources Code and Section 15064(f)(1) of the CEQA Guidelines, if there is a fair argument supported by substantial evidence that a project may have a significant effect on the environment, the Lead Agency shall prepare an EIR, even when other substantial evidence has been presented that a project will not have a significant effect. Consequently, the City has determined that the preparation of an EIR would be required to analyze potential environmental impacts of the Project.

In compliance with the procedural requirements of CEQA, the City performed a public scoping process consistent with Section 15083 of the CEQA Guidelines. The public was provided an opportunity to comment on the scope of the EIR through a NOP released on July 10, 2017, which was distributed to federal, state, regional, and City agencies, and neighborhood groups. The NOP comment period ran from July 10, 2017 through August 14, 2017, and a public hearing was held on July 26, 2017. During the NOP comment period, City received 12 comment letters. Comments received during the NOP comment period were considered during EIR preparation and are included in Appendix B.

ES-5 SUMMARY OF PROJECT IMPACTS

The significance of each impact resulting from implementation of the Project has been determined based on impact significance criteria and applicable CEQA Guidelines for each impact topic. Table ES-1 presents a summary of the impacts, mitigation measures, and residual impacts from implementation of the Project. In summary, the proposed Project would result in significant and unavoidable construction-related and long-term impacts to aesthetics, air quality, historic resources, biological resources, wildfire risks, and long-term transportation and traffic. The Project would also result in potential inconsistency with several City General Plan policies.

Aesthetics and Visual Resources

Project implementation would change views of scenic resources, including hillsides, rock outcrops, open space, and historic buildings as viewed from an eligible State Scenic Highway and local scenic roadway. In addition, the Project would have significant and unavoidable impacts on the existing visual character of the site, which would be changed from a rural to a commercial and residential setting, especially as viewed from the Irish Hills Natural Reserve. Although the impacts to views from the Irish Hills cannot be fully attenuated, mitigation will include following the Landscape Screening Guidelines to provide effective screening of proposed structures as experienced from public views along LOVR and LOVR overpass.

Air Quality and Greenhouse Gas Emissions

In the long-term, the projected emissions for the Project were found to be above the established daily thresholds for operational emissions of ROG and NO_x, and projected increases in greenhouse gas emissions would result in inconsistencies with the local Clean Air Plan planning policies due to exceedance of projected population growth~~, vehicle trips, and vehicle miles traveled~~. Implementation of the Project and associate net increases in

greenhouse gas emissions would also result in inconsistencies with adopted local and statewide policies for reducing greenhouse gas emissions. Implementation of mitigation measures would reduce impacts to the maximum degree possible for operational-related air quality impacts; however, this impact would remain significant and unavoidable, even after mitigation.

Biological Resources

The Project would have significant and unavoidable impacts on sensitive habitats (riparian, wetland, and native grassland) identified under state and City policy. Substantial direct and indirect adverse impacts would occur to sensitive species, federally protected wetlands, and the movement of species along wildlife corridors. To mitigate these impacts, the Applicant shall prepare and implement a City-approved Biological Mitigation Plan (BMP) that identifies both construction and operational related mitigation measures for impacts to sensitive communities and species. The BMP shall also include a Habitat Mitigation and Monitoring Plan (HMMP) and address the movement of special-status species. Sensitive natural communities outside of approved development footprints shall be avoided. Chorro Creek Bog Thistle Management and the preparation of a Community Fire Protection Plan shall also occur. However, the Project would result in the direct and indirect loss or disturbance of sensitive species for which the avoidance, replacement, and/or mitigation is not considered feasible.

Land Use

Implementation of the Project that would allow development above the 150-foot elevation, and more specifically development within the environmentally sensitive Upper Terrace, would result in potentially significant and unavoidable impacts to aesthetic and visual resources, biological resources, and emergency access and fire hazards. After a review for consistency with City General Plan policies, this aspect of the Project would be potentially inconsistent with City LUCE and General Plan COSE policies that protect sensitive biological, open space, and visual resources include protections reflected in Policy 6.4.7, *Hillside Planning Areas*, which prohibits development above the 150-foot elevation within the Irish Hills area. Impacts are therefore significant and unavoidable.

Transportation and Traffic

Impacts to traffic and transportation upon implementation of the Project would consist of delays and/or exceedance of intersection capacities, resulting in poor levels of service for automobiles, pedestrians and bicycle modes of transportation. More specifically, Project

generated traffic would cause exceedance of intersection capacities at various intersections not subject to the City's authority or requiring completion of the Prado Road Overpass/Interchange project. Although the Project would implement mitigation measures and the Applicant would pay a fair share fee to offset Project contributions to this impact, as no County or Caltrans program for improvements is currently adopted, impacts would be significant and unavoidable.

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts

Impacts	Mitigation Measures	Residual Significance
3.1 Aesthetics and Visual Resources		
VIS-1. Project implementation would change views of scenic resources, including hillsides, rock outcroppings, open space, and historic buildings, from an eligible State Scenic Highway or local scenic roadway.	***MM VIS-1*** *The Draft Froom Ranch Specific Plan shall be revised to include the following Landscape Screening Guidelines to provide effective screening of proposed structural massing as experienced from public views along LOVR and the LOVR Overpass. The Project landscape plan shall be prepared by a qualified landscape architect and include the following:* *1. Maximize protection of existing vegetation along the Project site boundary to provide visual screening during Project construction and operation.* *~~1.~~2. Retain existing vegetation fronting the Project site along LOVR to the greatest extent feasible to screen construction activities.* *~~2.~~3. Specify a plant palette and landscape plan that ensure a vegetated site boundary of sufficient height and density to provide visual screening of the proposed development from public views. Robust riparian planting shall be included in landscape plans to achieve visual screening along the proposed realigned Froom Creek.* *~~3.~~4. Native tree specimens and shrubs capable of reaching or exceeding the heights of the adjacent proposed structures shall be planted along Project site boundaries visible from public views.* *~~4.~~5. Screening planting specimen selection and location shall emphasize the ability to interrupt the contiguous massing of structures as experienced from area roadways and scenic vistas. Spacing shall be sufficient to minimize views of structures within the Project site.* *~~5.~~6. Screening planting specimen selection shall emphasize the ability of planting species to effectively establish and thrive over the life of the Project, such that smaller sizes shall be considered rather than exclusively larger box sizes. Planting establishment rates shall be considered but shall not preclude the use of slower-growing species, such as coast valley oak and willows.* *~~6.~~7. Native tree specimens capable of reaching or exceeding the heights of adjacent structures shall be planted adjacent to multi-family and commercial structures located within the interior of the Specific Plan area consistent with the specifications above.* *~~7.~~8. A bond for screening landscaping and irrigation shall be provided to ensure establishment of plantings. The bond shall be revoked upon satisfactory establishment of screen planting vegetation according to the plan.*	Less than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Requirements and Timing. The Specific Plan Landscape Screening Guidelines and landscape bond shall be reviewed and approved by the City Community Development Department prior to vesting tract map recordation. Landscape plantings, including irrigation, outside of building sites shall be in place prior to issuance of building permits for each phase of the Project. Landscape plantings, including irrigation, within buildings sites shall be in place prior to occupancy for each phase. A landscape architect approved by the City shall provide verification of landscaping establishment pursuant to the Screening Plan to the City's Community Development Department for review and approval prior to relinquishment of the bond. **Monitoring.** The City Community Development Department shall review and approve the Specific Plan Landscape Screening Guidelines. The Applicant shall ensure that all landscape planting and irrigation are in place and shall prepare a memo verifying condition compliance. The City Community Development Department shall review and approve the landscaping establishment bond letter.	
VIS-2. The Project would significantly impact the existing visual character of the site by changing a rural setting to a commercial and residential setting, particularly as viewed from the Irish Hills Natural Reserve trail system.	***MM VIS-1*** *The Draft Froom Ranch Specific Plan shall be revised to include the following Landscape Screening Guidelines to provide effective screening of proposed structural massing as experienced from public views along LOVR and the LOVR Overpass. The Project landscape plan shall be prepared by a qualified landscape architect and include the following:* *1. Maximize protection of existing vegetation along the Project site boundary to provide visual screening during Project construction and operation.* *~~1.~~2. Retain existing vegetation fronting the Project site along LOVR to the greatest extent feasible to screen construction activities.* *~~2.~~3. Specify a plant palette and landscape plan that ensure a vegetated site boundary of sufficient height and density to provide visual screening of the proposed development from public views. Robust riparian planting shall be included in landscape plans to achieve visual screening along the proposed realigned Froom Creek.* *~~3.~~4. Native tree specimens and shrubs capable of reaching or exceeding the heights of the adjacent proposed structures shall be planted along Project site boundaries visible from public views.* *~~4.~~5. Screening planting specimen selection and location shall emphasize the ability to interrupt the contiguous massing of structures as experienced	Significant and Unavoidable

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	from area roadways and scenic vistas. Spacing shall be sufficient to minimize views of structures within the Project site. *~~5.~~6. Screening planting specimen selection shall emphasize the ability of planting species to effectively establish and thrive over the life of the Project, such that smaller sizes shall be considered rather than exclusively larger box sizes. Planting establishment rates shall be considered but shall not preclude the use of slower-growing species, such as coast valley oak and willows.* *~~6.~~7. Native tree specimens capable of reaching or exceeding the heights of adjacent structures shall be planted adjacent to multi-family and commercial structures located within the interior of the Specific Plan area consistent with the specifications above.* *~~7.~~8. A bond for screening landscaping and irrigation shall be provided to ensure establishment of plantings. The bond shall be revoked upon satisfactory establishment of screen planting vegetation according to the plan.* **Requirements and Timing.** The Specific Plan Landscape Screening Guidelines and landscape bond shall be reviewed and approved by the City Community Development Department prior to vesting tract map recordation. Landscape plantings, including irrigation, outside of building sites shall be in place prior to issuance of building permits for each phase of the Project. Landscape plantings, including irrigation, within buildings sites shall be in place prior to occupancy for each phase. A landscape architect approved by the City shall provide verification of landscaping establishment pursuant to the Screening Plan to the City's Community Development Department for review and approval prior to relinquishment of the bond. **Monitoring.** The City Community Development Department shall review and approve the Specific Plan Landscape Screening Guidelines. The Applicant shall ensure that all landscape planting and irrigation are in place and shall prepare a memo verifying condition compliance. The City Community Development Department shall review and approve the landscaping establishment bond letter.	
VIS-3. The Project would introduce a new source of nighttime light, impacting the quality of the nighttime sky and increasing ambient light.	None required.	Less than Significant

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
3.2 Agricultural Resources		
AG-1. The Project would convert onsite Farmland of Local Potential and prime soils if irrigated to non-agricultural uses.	None required.	Less than Significant
AG-2. Implementation of the Project would create potential conflicts with existing agricultural zoning.	None required.	Less than Significant
AG-3. The Project would adjust the boundary of an existing open space and agricultural conservation easement to a location that would reduce the viability of agricultural operations within the recorded easement.	None required.	Less than Significant
3.3 Air Quality and Greenhouse Gas Emissions		
AQ-1. The Project would result in potentially significant construction-related emissions, including dust and air pollutant emissions.	***MM AQ-1*** *A Construction Activity Management Plan (CAMP) shall be included as part of Project grading and building plans and shall be submitted to SLO County APCD and to the City for review and approval prior to the start of construction. The plan shall include but not be limited to the following elements:* *1. A Dust Control Management Plan that encompasses the following dust control measures:* • *Reduce the amount of disturbed area where possible;* • *Water trucks or sprinkler trucks shall be used during construction to keep all areas of vehicle movement damp enough to prevent dust from leaving the site and from exceeding the APCD's limit of 20 percent opacity for greater than 3 minutes in any 60-minute period. At a minimum, this would require twice-daily applications. Increased watering frequency would be required when wind speeds exceed 15 miles per hour (mph). Reclaimed water or the onsite water well (non-potable) shall be used when possible. The contractor or builder shall consider the use of a SLO County APCD-approved dust suppressant where feasible to reduce the amount of water used for dust control;* • *All dirt stock-pile areas shall be sprayed daily as needed;* • *Permanent dust control measures identified in the approved Project revegetation and landscape plans of any development*	Less than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	within the Specific Plan area should be implemented as soon as possible following completion of any soil disturbing activities; • *Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating native grass seed and watered until vegetation is established;* • *All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by SLO County APCD;* • *All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used;* • *Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;* • *All trucks hauling dirt, sand, soil, or other loose materials are to be covered or shall maintain at least 2 feet of freeboard in accordance with California Vehicle Code Section 23114;* • *Designate access points and require all employees, subconsultants, and others to use them. Install and operate a "track-out prevention device" where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can be any device or combination of devices that are effective at preventing track-out, located at the point of intersection of any unpaved area and a paved road. If utilized, rumble strips or steel plate devices shall be cleaned periodically. If paved roadways accumulate tracked-out soils, the track-out prevention device shall be modified or replaced to prevent track-out;* • *Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where feasible;* • *All of these fugitive dust mitigation measures shall be shown on grading and building plans; and* • *The contractor or builder shall designate a person or persons to monitor the fugitive dust control emissions and enhance the implementation of the measures as necessary to minimize dust*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	complaints, reduce visible emissions below 20 percent opacity, and to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to SLO County APCD Compliance Division prior to the start of any grading, earthwork or demolition. 2. *Implementation of the following BACT for diesel-fueled construction equipment. The BACT measures shall include:* • *Use of at least Tier 3 off-road equipment and 2010 on-road compliant engines;* • *Repowering equipment with the cleanest engines available; and* • *Installing California Verified Diesel Emission Control Strategies.* 3. *Implementation of the following standard air quality measures to minimize diesel emissions:* • *Maintain all construction equipment in proper tune according to manufacturer's specifications;* • *Fuel all off-road and portable diesel-powered equipment with CARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road).* • *Use on-road heavy-duty trucks that meet the CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines and comply with the State On-Road Regulation;* • *Construction or trucking companies with fleets that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g. captive or NO_x exempt area fleets) may be eligible by proving alternative compliance;* • *On- and off-road diesel equipment shall not be allowed to idle for more than five minutes. Signs shall be posted in the designated queuing areas to remind drivers and operators of the five-minute idling limit;* • *Diesel idling within 1,000 feet of sensitive receptors is not permitted;* • *Staging and queing areas shall not be loated within 1,000 feet of sensitive receptors;* • *Electrify equipment when feasible;*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	• *Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and,* • *Use alternatively fueled construction equipment onsite where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.* 4. *Tabulation of on- and off-road construction equipment (age, horse-power, and miles and/or hours of operation);* 5. *Schedule construction truck trips during non-peak hours (as determined by the Public Works Director) to reduce peak hour emissions; and* 6. *Limit the length of the construction work-day period to 8 hours max.* **Plan Requirements and Timing.** The CAMP shall be submitted to SLO County APCD and to the City for review and City approval prior to issuance of grading and construction permits and recordation of the final VTM. All required fugitive dust and emissions control measures shall be noted on all grading and building plans and all construction activities shall adhere to measures throughout all grading, hauling, and construction activities. The contractor or builder shall provide the City Community Development Director and SLO County APCD with the name and contact information for an assigned onsite dust and emissions control monitor(s) who has the responsibility to: a) assure all dust control requirements are complied with including those covering weekends and holidays, b) order increased watering as necessary to prevent transport of dust offsite, and c) attend the pre-construction meeting. The dust monitor shall be designated prior to grading permit issuance for each Project phase. The dust control components apply from the beginning of any grading or construction throughout all development activities until occupancy is issued and landscaping is successfully installed. **Monitoring.** City staff shall ensure measures are depicted on the CAMP and all submitted grading and construction plans for each Project phase. The Applicant shall be responsible for compliance during construction activities, including holidays or weekends when work may not be in progress. City grading and building inspectors shall spot check and ensure compliance onsite. ***MM AQ-2*** *To reduce ROG and NO_x levels during the architectural coating phase, low or no Volatile Organic Compound (VOC)-emission paint shall be used with levels of 50 grams per liter (g/L) or less (Odorless, Zero VOC Paint). The schedule for architectural coatings application shall be extended,*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	limiting the daily coating activity to a level determined acceptable by SLO County APCD. **Plan Requirements and Timing.** The Applicant shall verify the measures through written documentation submitted to the City and SLO County APCD for review and approval. Measures shall be indicated on all building and construction plans and submitted to SLO County APCD and to the City for review and approval prior to issuance of building permits and recordation of the final VTM. **Monitoring.** City shall verify measures with the Applicant and SLO County APCD. City staff shall ensure measures are depicted on all building and construction plans. City building inspectors shall perform site inspections to ensure compliance. ***MM AQ-3*** *~~An~~ If required, an offsite mitigation strategy shall be developed and agreed upon by the Applicant, City, and SLO County APCD at least three months prior to the issuance of grading permits. Offsite mitigation strategies may be in the form of cash payment, circulation improvements above the Project's fair share, or funding for ongoing transit improvements. The Applicant ~~shall~~ may provide appropriate funding necessary to offset the Project's residual construction-related ROG+NO_x emissions beyond SLO County APCD's daily threshold; in the event funding is required, it shall be provided at least two months prior to the start of construction to help facilitate emission offsets that are as real-time as possible. ~~Cash~~If required, cash payment of offsite mitigation fees shall be calculated based on the most current ARB-approved Carl Moyer Guidelines at the time of commencement of each Project phase. Offsite mitigation strategies shall include one or more of the following:* • *Develop or improve park-and-ride lots;* • *Fund a program to buy and scrap older, higher emission passenger and heavy-duty vehicles;* • *Retrofit or repower heavy-duty construction equipment, or on-road vehicles;* • *Subsidize vanpool programs;* • *Contribute to funding of new bike lanes;* • *Replace/repower San Luis Obispo Regional Transit Authority (SLORTA) transit buses;*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	• *Purchase Verified Diesel Emission Control Strategies (VDECS) for transit buses or construction fleets; and* • *Fund expansion of existing SLORTA transit services.* **Plan Requirements and Timing.** The Applicant shall prepare and submit the offsite mitigation strategy to SLO County APCD for review and to the City for approval at least three months prior to the issuance of grading permits for Phase 1 construction. The Applicant shall provide any necessary funding to SLO County APCD at least two months prior to the start of construction. **Monitoring.** SLO County APCD and City staff shall ensure offsite mitigation measures are appropriate. If the Applicant elects to pay mitigation fees, SLO County APCD shall verify the receipt of funding to the City. If the Applicant elects to provide improvements, proposed improvements shall be ~~approved~~ reviewed by the City and SLO County APCD and approved by the City prior to implementation. City and SLO County APCD staff shall monitor proposed improvements to ensure compliance.	
AQ-2. The Project would result in potentially significant long-term operational emissions.	***MM AQ-4*** *Consistent with standard mitigation measures set forth by SLO County APCD, Projects generating more than 50 lbs/day of combined ROG + NOx shall implement all feasible measures within Table 3-5 of the Air Quality Handbook. The following mitigation measures shall apply to the Project (Table 3.3-9).* **Requirements and Timing.** The Applicant shall include the mitigation measures in Table 3-5 of the 2012 SLO County APCD CEQA Air Quality Handbook (as amended by the 2017 Clarification Memorandum), as indicated in the column "How the Project Will Include This Measure" in Table 3.3-9, above. All feasible standard mitigation measures shall be included in the FRSP prior to approval of the final FRSP and these measures shall also be included on the final VTM prior to recordation. City staff shall ensure the above measures are incorporated into the FRSP, final VTM, and building plans prior to permit issuance. **Monitoring.** City staff shall ensure measures are listed on final plans submitted for review and approval by the City. City staff shall work with the Applicant to ensure that these strategies are implemented. The City shall conduct periodic site visits to ensure compliance, in consultation with the SLO County APCD.	Significant and Unavoidable
AQ-3. Release of toxic diesel emissions or naturally occurring asbestos during construction of the Project	None Required.	Less than Significant

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
could expose sensitive receptors to emissions-related health risks.		
AQ-4. The Project would be consistent with the City's Climate Action Plan, but would result in potentially significant GHG emissions during construction and operation which would be inconsistent with other state and local goals for reducing GHG emissions.	***MM AQ-5*** *The Applicant shall revise the Draft FRSP to include measures necessary to reduce Project operational stationary-source GHG emissions to achieve net zero emissions, consistent with the City's 2035 net-zero GHG emissions target. These measures shall include Best Available Mitigation strategies for reducing operational emissions, including but not limited to the following:* • *Electricity shall be the only energy source for the entirety of Project operations including but not limited to space conditioning, water heating, illumination, cooking appliances, and plug loads (exemptions to this requirement shall be limited to appliances in commercial kitchens, emergency backup generators, and medical end-uses that have no viable electric alternative).* • *Electrical power for the entirety of Project operations including but not limited to illumination, heating, cooling, and ventilation shall be provided by alternative or carbon-free energy sources according to the following priority: 1) on-grid power with 100-percent renewable or carbon-free source (a planned product of Monterey Bay Community Power available to the City in 2020), or 2) a combination of grid power and on site renewable generation to achieve annual zero net electrical energy usage, or 3) purchase of carbon offsets of any portion of power not from renewable or carbon-free sources. As a first priority, carbon-free sourced energy shall be purchased from Monterey Bay Community Power.* • *For new buildings, onsite solar photovoltaic systems shall be required, and retrofitted buildings shall be encouraged to install onsite solar photovoltaic systems to offset energy demand, regardless of building size. At a minimum, for nonresidential, mixed-use, and mid-rise residential buildings, a solar photovoltaic system shall fill the entirety of the Solar Zone (as defined in Section 110.10 and specified in Joint Appendix JA1 of the 2019 California Energy Code). This requirement shall not apply to historic structures within the Froom Ranch Dairy Complex to be relocated to the proposed trailhead park.* • *All proposed commercial and health care facilities shall exceed the minimum standards of Title 24, Part 11 (Cal Green) by adopting all or*	Significant and Unavoidable

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	some elements of Cal Green Tier 1 and/or 2 voluntary elective measures to increase energy efficiency in new buildings, remodels and additions. These measures shall prioritize upgrading lighting (e.g., using light-emitting diode [LED] lights), heating and cooling systems, appliances, equipment and control systems to be more energy efficient. This requirement shall not apply to historic structures within the Froom Ranch Dairy Complex to be relocated to the proposed trailhead park. **Requirements and Timing.** The Applicant shall include the above measure in the Final FRSP prior to approval and shall include the above measure on the final VTM prior to recordation. Plans submitted for building permits shall incorporate Best Management Strategies, and for the selected Best Management Strategies, the Applicant shall work with City and SLO County APCD staff to calculate estimated stationary-source emissions to ensure achievement of net-zero stationary source operational emissions for the Project. City and SLO County APCD staff shall ensure the above measures are incorporated into the FRSP, final VTM, and building plans prior to permit issuance. **Monitoring.** City staff shall ensure measures are listed on final plans submitted for review and approval by the City. City and SLO County APCD staff shall work with the Applicant to ensure that these strategies are implemented. The City shall verify compliance in consultation with the SLO County APCD. ***MM AQ-6*** *The Applicant shall revise the FRSP to include measures necessary to reduce the Project's operational, mobile-source emissions, and VMT to the maximum extent feasible, including, but not limited to the following:* • *Rideshare and Employee Ridership Programs: The FRSP shall be amended to include measures for encouraging and incentivizing residents and employees of the proposed development participate in the San Luis Obispo Regional Rideshare program.* • *Senior Shuttle Service: Villaggio shall provide clean fuel shuttle services and shall provide sufficient onsite electric vehicle charging infrastructure to support the services. Electric vehicle charging infrastructure included to meet requirements for personal vehicles may not be used to fulfill this requirement~~or coordinate with existing shuttle services such as Dial-A-Ride and the Senior Go! Shuttle to provide curb-to-curb shuttle service for residents of the Villaggio Life Community Plan~~.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	• *All Electric Small Vehicles*: *The FRSP shall require all personal small vehicles (e.g., golf carts) be 100 percent electric powered.* • ~~*Car Share: Provide car-sharing opportunities within the Villaggio Life Community Plan and Madonna Froom Ranch areas.*~~ • *Promote Carpools, Vanpools, and Electric Vehicle (EV) Vehicles: Provide dedicated parking for carpools, vanpools, and high-efficiency vehicles in exceedance of Cal Green Tier 2 standards.* • ~~*Offsite EV Improvements: Work with SLO County APCD to expand or fund the expansion of EV charging stations throughout the City.*~~ **Requirements and Timing.** The Applicant shall include all feasible Best Management Strategies as part of the final FRSP~~ and final VTM~~. For the selected Best Management Strategies, the Applicant shall work with City and SLO County APCD staff to calculate estimated mobile-source emissions to ensure emissions are reduced to the maximum extent feasible as vehicles are the largest source of operational emissions, noting that vehicle emissions are regulated on a state and federal level. City and SLO County APCD staff shall ensure the above measures are incorporated into the FRSP ~~and final VTM~~ prior to recordation. **Monitoring.** City staff shall ensure measures are listed on the final ~~VTM~~ FRSP submitted for review and approval by the City. City and SLO County APCD staff shall work with the Applicant to ensure that these strategies are implemented. The City shall verify compliance in consultation with the SLO County APCD.	
AQ-5. The Project is potentially inconsistent with the SLO County APCD's Clean Air Plan.	***MM AQ-2*** *To reduce ROG and NO_x levels during the architectural coating phase, low or no Volatile Organic Compound (VOC)-emission paint shall be used with levels of 50 grams per liter (g/L) or less (Odorless, Zero VOC Paint). The schedule for architectural coatings application shall be extended, limiting the daily coating activity to a level determined acceptable by SLO County APCD.* **Plan Requirements and Timing.** The Applicant shall verify the measures through written documentation submitted to the City and SLO County APCD for review and approval. Measures shall be indicated on all building and construction plans and submitted to SLO County APCD and to the City for review and approval prior to issuance of building permits and recordation of the final VTM. **Monitoring.** City shall verify measures with the Applicant and SLO County APCD. City staff shall ensure measures are depicted on all building and	Significant and Unavoidable

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	construction plans. City building inspectors shall perform site inspections to ensure compliance. ***MM AQ-4*** *Consistent with standard mitigation measures set forth by SLO County APCD, Projects generating more than 50 lbs/day of combined ROG + NOx shall implement all feasible measures within Table 3-5 of the Air Quality Handbook. The following mitigation measures shall apply to the Project (Table 3.3-9).* **Requirements and Timing.** The Applicant shall include the mitigation measures in Table 3-5 of the 2012 SLO County APCD CEQA Air Quality Handbook (as amended by the 2017 Clarification Memorandum), as indicated in the column "How the Project Will Include This Measure" in Table 3.3-9, above. All feasible standard mitigation measures shall be included in the FRSP prior to approval of the final FRSP and these measures shall also be included on the final VTM prior to recordation. City staff shall ensure the above measures are incorporated into the FRSP, final VTM, and building plans prior to permit issuance. **Monitoring.** City staff shall ensure measures are listed on final plans submitted for review and approval by the City. City staff shall work with the Applicant to ensure that these strategies are implemented. The City shall conduct periodic site visits to ensure compliance, in consultation with the SLO County APCD. ***MM TRANS-5*** *The Project Applicant shall pay a fair share mitigation fee towards bicycle improvements at South Higuera/Tank Farm to be constructed by the Avila Ranch development, which include extending the westbound bike lane on Tank Farm Road to the South Higuera Street/Tank Farm Road intersection and installation of a bike box (with loop detection) to facilitate bicycle left-turn movements. Fair share contribution is satisfied through participation in the Citywide Transportation Impact Fee program.* *If the planned bicycle improvements have not yet been completed prior to development of the Villaggio Lower Area, the Applicant shall be responsible for design and installation of the bicycle improvements.* ~~*The Project Applicant shall extend the westbound bike lane on Tank Farm Road approaching the South Higuera Street/Tank Farm Road intersection to the intersection and install a bike box to facilitate bicycle left-turn movements. If improvements are constructed sooner by others, the Applicant may be responsible for a fair share contribution towards improvement costs.*~~	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Plan Requirements and Timing. Prior to the issuance of building permits for each development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements through payment of Citywide Transportation Impact Fees. If the planned improvements have not yet been completed by others prior to issuance of first building permits for Villaggio's Lower Area development, the Applicant shall be responsible for design and installation of the bicycle improvements prior to first occupancy permits for the Villaggio Lower Area development.~~Prior to grading and recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of a certificate of occupancy or building permits for Villaggio's Lower Area development. If improvements are completed sooner by others, the Applicant may be responsible for a fair share contribution prior to issuance of building permits for Villaggio's Lower Area development.~~ **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City. ***MM TRANS-8*** *The Project Applicant shall design and install Class IV bikeways (protected bike lanes) along LOVR to provide a physical buffer between the sidewalk and vehicular traffic lanes. Improvement extents shall occur in the northbound direction between Laguna Lane and Diablo Drive, and in the southbound direction between Diablo Drive and Madonna Road. Some gaps in physical separation may remain due to right-of-way limitations or other design constraints.~~*Project is responsible for fair share contribution towards improvement costs.*~~ **Plan Requirements and Timing**. Prior ~~to grading and~~ recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of ~~a~~ first certificates of occupancy ~~or building permits~~ for Villaggio's Lower Area development. Improvement costs exceeding the Project's proportional share may be eligible for ~~fee credits or reimbursements~~private reimbursement. **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans~~ or contributes an appropriate fair share as approved by the City~~.	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	MM TRANS-9 *The Project Applicant shall design and install ADA-compliant curb, gutter and sidewalk along the west side of LOVR to complete the sidewalk connection between the Irish Hills Plaza and Calle Joaquin. The Project Applicant shall also design and install Class IV bikeways (protected bike lanes) along LOVR to provide a physical buffer between the sidewalk and vehicular traffic lanes in the northbound and southbound directions between Madonna Road and South Higuera Street. This mitigation measure requires Caltrans approval and coordination for improvements near the LOVR/U.S. 101 interchange. If Class IV bikeways are not approved for segments within Caltrans right-of-way, or are deemed infeasible for short segments due to other geometric constraints, alternative treatments to improve pedestrian levels of service may be approved to the satisfaction of the Public Works Director. Potential alternative treatments include installation of striped bike lane buffers, street trees or other features that further buffer pedestrians from street traffic.* ~~*The Project is responsible for all costs related to construction of sidewalks, curb and gutter, and a fair share contribution towards Class IV bikeway improvements. This mitigation measure requires Caltrans approval and coordination for improvements near LOVR/U.S. 101 interchange.*~~ **Plan Requirements and Timing.** Prior to ~~grading and~~ recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of ~~a~~ first certificates of occupancy ~~or building permits~~ for Villaggio's Lower Area development. Applicable construction costs for improvements along LOVR between Calle Joaquin and Froom Ranch Way consistent with the planned Bob Jones Trail (Calle Joaquin to Oceanaire) Connection Project may be eligible for credits or reimbursement through the City's Transportation Impact Fee program. Costs exceeding the Project's proportional share for improvements along other segments may be eligible for private reimbursement only. ~~Bikeway improvement costs exceeding the Project's proportional share may be eligible for fee credits or reimbursements.~~ **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans ~~or contributes an appropriate fair share as approved by the City~~. ***MM TRANS-10*** *The Project Applicant shall pay fair share mitigation fees towards Madonna Road improvements to be constructed by the San Luis Ranch development, which include installation of a Class I Multi-Use Path*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	parallel to Madonna Road between Oceanaire Drive and the U.S. 101 southbound ramps intersection. This project is in construction currently. Fair share contributions are satisfied through participation in the Citywide Transportation Impact Fee program.~~The Project Applicant shall design and install a Class I Multi-Use Path parallel to Madonna Road between Oceanaire Drive and the U.S. 101 southbound ramps intersection. The Project is responsible for a fair share contribution towards improvements through payment of City Traffic Impact Fees.~~ **Plan Requirements and Timing.** Prior to the issuance of building permits for each development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements through payment of Citywide Transportation Impact Fees.~~Prior to grading and recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of a certificate of occupancy or building permits for Villaggio's Lower Area development. Improvement costs exceeding the Project's proportional share may be eligible for fee credits or reimbursements. If improvements are completed sooner by others, the Applicant shall make a fair share contribution through participation in the Citywide Transportation Impact Fee program prior to issuance of building permits for Villaggio's Lower Area development.~~ **Monitoring.** The City shall verify that the Applicant pays fair share costs in accordance to the approved phase and design plans.~~The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City.~~	
3.4 Biological Resources		
BIO-1. Project implementation would impact sensitive riparian, wetland, and native grassland habitats identified as sensitive natural communities under state and City policy.	***MM HAZ-2*** *In accordance with PRC Section 4291, the Applicant shall hire a City-qualified team that consists of appropriate specialists (i.e., fire management professionals, biologists) to prepare a Community Fire Protection Plan to design the creation and maintenance of required fire buffers and fuel management zones around developable areas and detail methods for achieving fire safety around new buildings while preserving the integrity and function of affected native plant communities to the maximum extent feasible, and that ensures that consistent fire fuel management practices are applied throughout the City. The Plan shall incorporate*	Significant and Unavoidable

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	management strategies in coordination with adjacent property owners, including Mountainbrook Church and the Irish Hills Natural Reserve. The Plan shall outline the removal and control of invasive, non-native vegetation, and conservation of sensitive habitats and rare species, while developing fire fuel management practices that will discourage or prevent non-native grasses and other non-native invasive species from dominating surrounding areas. Landscaping shall be maintained by the Applicant and periodically inspected by the SLOFD during fire inspections in each of the fuel management zones to avoid the buildup of deadwood and leaf litter, which, if left to accumulate, would reduce the mitigating effect of the Plan. Specifically, the Plan shall include, but not be limited to, the following elements: • *Vegetation coverage and type;* • *Setbacks between structures, sensitive wildlife species, and access routes;* • *Development plan landscaping and planting standards within the setback areas;* • *Native trees and shrubs, such as coast live oak, coastal scrub, and grassland shall be thinned and limbed up but left in place;* • *All allowable weed abatement techniques, qualifications, and requirements for weed abatement contractors, as well as measures and techniques that ensure the required fuel management and vegetation clearance, shall be designed and implemented to provide adequate structure protection and avoid degradation of sensitive biological habitat; and* • *Invasive species shall be removed and controlled.* **Plan Requirements and Timing.** Prior to approval of the final development plan, the Community Fire Protection Plan shall be prepared and submitted to the City Natural Resources Manager and SLOFD for review and approval, with coordination from the San Luis Obispo County Fire Department. The Plan shall be implemented consistent with the approved maintenance schedule. **Monitoring.** The City-qualified biologist shall submit a monitoring report to the City Natural Resources Manager and SLOFD at the end of the first year following Project occupancy documenting the fuel management activities that took place. Conformance with the Community Fire Protection Plan shall be demonstrated through the submittal of annual photo documentation by the	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Applicant or site visits as necessary at the discretion of the Compliance monitoring staff. ***MM BIO-1*** *The Applicant shall prepare and implement a Biological Mitigation and Monitoring Plan that identifies both construction and operational related avoidance, reduction, and mitigation measures for impacts to sensitive natural communities. The Biological Mitigation and Monitoring Plan shall include Best Management Practices (BMPs) to avoid or minimize impacts to biological resources, and implementation of on and offsite habitat replacement as follows:* *1) The Biological Mitigation and Monitoring Plan shall include the following construction-related measures and BMPs:* *a) Construction equipment and vehicles shall be stored at least 100 feet away from existing and proposed drainage features and adjacent riparian habitat, and all construction vehicle maintenance shall be performed in a designated offsite vehicle storage and maintenance area approved by the City.* *b) Prior to commencement of construction, Drainages 1, 2, 3, and 4 and all associated springs, seeps, and wetlands shall be protected with construction fencing located a minimum of 25 feet from the edge of the stream channel or top of bank and signed to prohibit entry of construction equipment and personnel unless authorized by the City. Fencing shall be maintained throughout the construction period for each phase of development. Fencing and signage shall be removed following completion of construction.* *c) During any construction activities within 50 feet of the existing Froom Creek channel, realigned Froom Creek channel, LOVR ditch, Drainages 1, 2, 3, or 4, or other existing or proposed drainage features, a City-approved biological monitor shall be present and have the authority to stop or redirect work as needed to protect biological resources.* *d) All construction materials (e.g., fuels, chemicals, building materials) shall be stored at designated construction staging areas, which shall be located outside of designated sensitive areas. Should spills occur, or if any unanticipated hazardous materials are discovered, materials and/or contaminants shall be cleaned immediately and recycled or disposed of to the satisfaction of the RWQCB, Department of Toxic Substances Control, and/or San*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Luis Obispo County Public Health Environmental Services, as applicable. *e) All trash and construction debris shall be properly disposed at the end of each day and dumpsters shall be covered either with locking lids or with plastic sheeting at the end of each workday and during storm events. All sheeting shall be carefully secured to withstand weather conditions.* *f) The Applicant shall implement measures designed to minimize construction-related erosion and retain sediment on the Project site, including installation of silt fencing, straw waddles, or other acceptable construction erosion control devices. Such measures shall be installed along the perimeter of disturbed areas and along the top of the bank of the existing and proposed Froom Creek channel and other existing or proposed drainage features and 25 feet from the edge of Drainages 1, 2, 3, and 4. All drainage shall be directed to sediment basins designed to retain all sediment onsite.* *g) Concrete truck and tool washout shall occur in a designated location such that no runoff will reach the creek, onsite drainages, or other sensitive areas.* *h) All open trenches shall be constructed with appropriate exit ramps to allow species that fall into a trench to escape. All open trenches shall be inspected at the beginning of each work day to ensure that no wildlife species is present. Any sensitive wildlife species found during inspections shall be gently encouraged to leave the Project site by a qualified biologist or otherwise trained and City-approved personnel. Trenches will remain open for the shortest period necessary to complete required work.* *i) Existing disturbed areas shall be used for construction staging and storage to the maximum extent possible to minimize disturbance of undeveloped habitats. All construction access roads and staging areas shall be located to avoid known/mapped habitat and minimize habitat fragmentation.* **Plan Requirements and Timing.** The Biological Mitigation and Monitoring Plan shall be submitted for review and approval by the City prior to issuance of grading permits and recordation of the final VTM. The plan shall incorporate any additional measures or requirements identified by state and	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	federal agencies, including but not limited to CDFW, RWQCB, NMFS, and USFWS. The Applicant shall prepare a Biological Mitigation Plan that identifies and incorporates all required measures identified in MM BIO-2 through MM BIO-12 below. The plan shall specify all mitigation site locations, timing of surveys and activities, species composition, habitat compensation, species avoidance measures, and other required information, including identification of appropriate onsite construction staging locations. The plan shall demonstrate compliance with all required measures and any required permits shall be obtained from state and federal regulatory agencies prior to the issuance of grading or building permits. A 7-year site mitigation monitoring plan shall also be prepared by the City-approved biologist and incorporated into the Biological Mitigation and Monitoring Plan prior to issuance of grading permits and recordation of the final VTM, with annual reports submitted to the City Natural Resources Manager and Community Development Department. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan to ensure that all BMPs and appropriate mitigation measures have been included. The City shall ensure compliance with requirements of the Biological Mitigation and Monitoring Plan through frequent monitoring and inspection, and receipt of quarterly monitoring reports provided by the Applicant's Environmental Coordinator required per MM BIO-2. The Applicant's Environmental Coordinator shall also ensure compliance during habitat compensation and/or restoration activities through routine monitoring, inspection, and reporting of restoration activities. ***MM BIO-2*** *The Applicant shall retain a qualified Environmental Coordinator/qualified biologist, subject to review and approval by the City to oversee compliance with the Biological Mitigation and Monitoring Plan. The Applicant's Environmental Coordinator shall monitor all construction activities, conduct a biological resources education program for all construction workers prior to the initiation of any clearing or construction activities, and provide quarterly reports to the City regarding construction activities, enforcement issues, and remedial measures. The Applicant's Environmental Coordinator shall be responsible for conducting inspections of the work area each work day to ensure that excavation areas and sensitive or restored habitats do not exhibit construction-related impacts or hazards to wildlife. If any exposure risk is identified, the Environmental Coordinator*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	shall implement measures that could include, but not be limited to, hazing, fencing, and wildlife removals to eliminate the exposure risk. *In addition, the Applicant's Environmental Coordinator shall monitor and regulate all construction occurring within 50 feet of the existing and proposed Froom Creek channel, other existing or proposed drainage features, riparian habitat, Drainages 1, 2, 3, and 4, and seasonal or permanent wetlands. During appropriate flowering, nesting, breeding, migration, and dispersal seasons, the Environmental Coordinator shall also conduct sensitive species surveys immediately prior to construction activities and shall monitor construction activities in the vicinity of habitats to be avoided.* *The work area boundaries and other off-limit areas shall be identified by the biologist and/or Environmental Coordinator on a daily basis. The biologist and/or Environmental Coordinator shall inspect construction and sediment control fencing each work day during construction activities. Any vegetation clearing activities shall be monitored by the biologist and/or Environmental Coordinator.* **Plan Requirements and Timing.** The City shall approve the Applicant's qualified Environmental Coordinator/qualified biologist prior to issuance of grading and building permits for each phase of construction. The Environmental Coordinator shall be present onsite to monitor construction activities pursuant to the approved Biological Mitigation and Monitoring Plan. **Monitoring.** The Environmental Coordinator shall monitor all grading and construction activities occurring within the vicinity of sensitive habitats or known location of sensitive species, shall conduct regular site inspections throughout the entire site, and shall be responsible for compliance of the construction activities and the above BMPs within MM BIO-1 and MM BIO-3 through MM BIO-8. During construction, the Environmental Coordinator shall submit quarterly monitoring reports to the City to ensure compliance with the Biological Mitigation and Monitoring Plan and applicable laws, regulations, and policies. The Environmental Coordinator/qualified biologist shall be onsite during all construction activities which take place within 50 feet of sensitive creek, wetland, and riparian habitat areas. ***MM BIO-3*** *The Biological Mitigation and Monitoring Plan shall include a Habitat Mitigation and Monitoring Plan (HMMP) with details on timing and implementation of required habitat restoration, enhancement, or creation measures. The Biological Mitigation and Monitoring Plan and HMMP shall*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	be prepared under the direction of, and approved by, the City's Natural Resources Manager in conjunction with regulatory agencies with permitting authority over the Project. The HMMP shall contain, at a minimum, the following components (or as otherwise modified by regulatory agency permitting conditions): *a) Pre-construction surveys and delineation of vegetation communities, habitat, and wetland features, including clear maps and a summary of onsite habitats to be protected and acreage, design, and locations of required habitat mitigation sites.* *b) A description of the location and boundaries of the mitigation site and description of existing site conditions.* *c) A description of measures to be undertaken to enhance the mitigation site for the target species and to protect sensitive resources.* *d) Record necessary replacement of disturbed, altered, and/or lost area of habitat.* *e) A binding long-term agreement with the Applicant to implement and maintain protected and restored sensitive habitats, including native bunch grassland, wetlands, springs, seeps, tributary drainages, and other sensitive or restored native habitats. These measures shall identify typical performance and success criteria deemed acceptable by the City and CDFW based on measurable goals and objectives. Said criteria for restored habitats shall be, at a minimum, at least 70-percent survival of container plants and 70-percent relative cover by vegetation type.* *f) A description of habitat and species restoration and monitoring measures, including specific and objective performance criteria, monitoring methods, data analysis, reporting requirements, and monitoring schedule. (At a minimum, success criteria shall be at least 70-percent survival of container plants and 70-percent relative cover by vegetation type and will include a replacement ratio of 2:1 and determination by a City-approved biologist that the mitigation site provides ecological functions and values for the focal species equal to or exceeding the impacted habitat.)* *g) Plan requirements that ensure mitigation elements that do not meet performance or final success criteria within 5 years are completed through an extension of the plan for an additional 2 years or at the*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	discretion of the City Natural Resources Manager with the goal of completing all mitigation requirements prior to the HMMP end date. *h) Monitoring of the mitigation and maintenance areas shall occur for the period established in the HMMP, or until success criteria are met; an endowment may be required in some cases as determined by the City. If success criteria cannot be met through the HMMP, the City Natural Resources Manager shall specify appropriate commensurate measures (e.g., onsite or offsite restoration, endowment, or bond to the City for completion of necessary mitigation).* *i) A binding long-term agreement with the Villaggio Life Plan Community to fund and retain a qualified biologist to train all landscaping crew staff hired over the life of the development on sensitive plant species and habitat within the vicinity of the development, including the identification and avoidance of sensitive plants and habitat. The qualified biologist shall conduct annual monitoring of vegetation surrounding the development and prepare a report summarizing the avoidance or disturbance of sensitive resources from operational activities of the Villaggio development, and identifying necessary replacement or restoration of affected resources. Necessary mitigation shall be subject to the same standards for performance, monitoring, and success identified in subitems b through h, above. The report shall be submitted to the City annually for review and approval.* *j) A plan for fencing and/or signage around the Upper Terrace of the Villaggio development, prohibiting residents, guests, and employees from accessing and disturbing the surrounding sensitive resources.* *k) Requirements for payment of annual fees to the City to fund City review and inspection of the site and Biological Mitigation and Monitoring Plan and HMMP requirements.* **Plan Requirements and Timing.** All requirements shall be included on the Biological Mitigation and Monitoring Plan to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP to ensure that all BMPs and appropriate mitigation measures have been included. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan through	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	frequent monitoring and inspection. The Environmental Coordinator shall also ensure compliance during habitat compensation and/or restoration activities through routine monitoring and inspection of restoration activities. ***MM BIO-4*** *The Biological Mitigation and Monitoring Plan shall require avoidance of sensitive natural communities outside approved development footprints such as the Nassella pulchra Herbaceous Alliance, Central Coast Arroyo Willow Scrub Community, Coastal and Central Valley Freshwater Marsh, and wetland areas to the maximum extent feasible. Mitigation for impacted sensitive natural communities that cannot be avoided shall be achieved through one or more of the following options, subject to City approval:* *a) Onsite restoration, enhancement, or creation of suitable replacement habitat, if feasible onsite restoration opportunities exist and at ratios consistent with those identified in MM BIO-5;* *b) Offsite restoration or creation of suitable habitat for the impacted species at the minimum replacement ratio of 2:1 for sensitive natural communities, native grasslands, and riparian habitat;* *c) Financial contribution to an in-lieu fee program that results in restoration or creation of suitable habitat for the impacted natural communities and/or species; and/or* *d) Purchase of mitigation credits at a USFWS- and/or CDFW-approved mitigation bank.* **Plan Requirements and Timing.** All requirements shall be included in the Biological Mitigation and Monitoring Plan and HMMP to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the BMMP and HMMP to ensure that all BMPs and appropriate mitigation measures have been included. The Applicant's Environmental Coordinator shall ensure compliance during habitat compensation and/or restoration activities through routine monitoring, inspection, and reporting of restoration activities pursuant to the approved Biological Mitigation and Monitoring Plan and HMMP. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan and HMMP through receipt and review of monitoring reports, and site inspections.	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	MM BIO-5 *The Biological Mitigation and Monitoring Plan shall require all temporary and permanent direct and indirect impacts to wetlands, grasslands, and riparian habitat be mitigated, as follows:* *a) Temporary direct impacts to wetland, native grassland, and riparian habitat ~~impacts~~ shall be mitigated at a minimum 1:1 mitigation ratio (area of restored habitat to impacted habitat).* *b) Permanent direct impacts to sensitive natural communities, such as native grasslands, and riparian habitat shall be mitigated at a 2:1 ratio (area of restored and enhanced habitat to impacted habitat).* *c) Permanent direct impacts to wetlands shall be mitigated at a minimum 3:1 ratio unless otherwise directed by state and federal agencies, including but not limited to the CDFW, RWQCB, NMFS, and USFWS (as appropriate).* *d) Potential indirect impacts to the Calle Joaquin wetlands affected by the Froom Creek realignment and changes to site hydrology shall be mitigated as follows. As a part of the HMMP prepared for the Project, the Applicant shall prepare and implement a Long-Term Wetland Monitoring Plan that is designed to quantitatively and qualitatively assess the effectiveness of the HMMP over time to ensure its objectives are achieved. The Long-Term Wetland Monitoring Plan shall be supported by a Baseline Conditions Assessment that identifies the pre-construction condition of the Calle Joaquin wetlands and establishes success criteria for sustained wetland conditions. The Baseline Conditions Assessment shall provide qualitative and quantitative information that will be used in comparing data obtained during subsequent monitoring years to determine if a significant deviance from baseline conditions has occurred at the site. The Long-Term Wetland Monitoring Plan will establish the parameters of a significant deviance from baseline conditions. A significant deviance from baseline may be defined as a "change in wetland area greater than 10%". The Baseline Conditions Assessment shall be updated prior to the start of construction to support agency permitting and guide implementation of the Long-Term Wetland Monitoring Plan. This updated baseline shall be considered in combination with existing and past baseline documentation to provide an expanded baseline reflective of a range of acceptable conditions to compare post Project conditions. The Baseline Conditions Assessment shall include a focused description of*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	the site's hydrologic setting, vegetative cover and composition, quantified wetland areas and classifications, and shall establish the threshold for a significant deviance from wetland area based on the presence of hydrophytic plant species, hydric soil indicators, and wetland hydrology. *At minimum, the condition of the wetland shall be evaluated on an annual basis through completion of a wetland assessment using a regulatory agency approved model (such as, but not limited to, the California Rapid Assessment Method [CRAM]) to document and facilitate long-term monitoring of changes to the wetland. The annual evaluation shall determine and document any degree of change to the wetland as a result of the proposed changes to site hydrology and development throughout build-out under the Specific Plan. Reports documenting the annual wetland assessment shall be provided to the City and relevant regulatory agencies.* *Long-Term Wetland Monitoring for the Calle Joaquin wetlands shall occur continuously for a period of no less than 7 years following Phase I build-out of the Froom Ranch Specific Plan area. After the initial 7-years of minimum annual monitoring, the frequency of long-term evaluations shall be determined in coordination with regulatory agencies and per the requirements of the Long-Term Wetland Monitoring Plan.* *The Long-Term Wetland Monitoring Plan shall include (at minimum) the following requirements. Additional detailed criteria and performance standards will be established in the HMMP prepared for the project and approved by regulatory agencies, but they shall not be any less stringent than the following criteria and performance standards:* *i. Annual monitoring shall evaluate and track the wetland health and biological integrity of the Calle Joaquin wetlands.* *ii. Annual evaluations shall utilize intensive site assessments to provide a more thorough and detailed measure of wetland condition by gathering direct measurements of biological taxa and hydrogeomorphic functions.* *iii. Typical industry standards for the quantitative evaluation of plant cover will be used (e.g., Bonham 1989 and Daubenmire 1968) to*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	evaluate plant composition and structure as well as direct inspections of soil conditions and hydrologic functions. *iv. Annual or semi-annual evaluations shall observe and document the following, at a minimum:* ▪ *whether groundwater recharge from Froom Creek to the shallow aquifer is being sustained,* ▪ *whether the onsite artesian well has been discharging to the wetland,* ▪ *evidence of overflows entering the Calle Joaquin wetland from the realigned Froom Creek,* ▪ *excessive ponding, as evidenced by changes in vegetation related to increased duration of ponding,* ▪ *measured depth to groundwater in the onsite artesian well and the relationship of these conditions with conditions in the wetland,* ▪ *specific conductance and temperature in the wetland and other surface sources,* ▪ *the presence or absence of salt efflorescences in the wetland,* ▪ *any persistent green vegetation patches or changes in willow/grass ecotone, and* ▪ *representative photo points.* *v. Monitoring of the realigned creek's hydrology would be required following large storm events during the rain season that are sufficient to initiate flowing water through the site. If after the 3rd year of monitoring, vegetation has successfully established along the creek corridor and sedimentation and erosion are not observed beyond what is determined to be a normal level, then the rainy season monitoring could be scaled back to occur on a quarterly or as-needed basis for the remainder of the monitoring schedule, upon review and approval of the City's Natural Resources Manager and applicable regulatory agencies and consistent with the Long-Term Wetland Monitoring Plan.* *vi. Success criteria to determine whether the Calle Joaquin wetland functions are sustained shall include the following, at a minimum:* ▪ *The constructed bank between the realigned Froom Creek channel and the Calle Joaquin wetlands remains functional*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	and does not recurrently scour or fill to a degree that impairs its operation or impedes circulation through the wetland, ▪ *Excessive surface water does not pond for periods of long duration,* ▪ *Salts do not accumulate such that discernible increases in salt efflorescences at the ground surface are not visible,* ▪ *Evidence of deposition by high flows is not found within the wetland (e.g., silt, organics, or other flood deposits).* *vii. If success criteria are not achieved within the 7-year initial monitoring period, a hydrologic assessment will be conducted by a USACE-approved specialist in groundwater supported wetlands to establish whether non-attainment is attributable to onsite conditions or actions beyond the effective control of the Project Applicant. The specialist shall be a registered hydrologist or certified hydrogeologist with statewide expertise, familiarity with groundwater supported wetlands in central coastal California and verifiable experience conducting functional analyses of such wetlands. Recommendations for remedial actions will be submitted by the groundwater specialist to the USACE for review and written approval prior to implementation. If wetland failures are determined to be directly related to the realignment of Froom Creek and development within the Froom Creek Specific Plan area, possible remedial actions would include, at minimum, the following:* ▪ *Engineering controls include biotechnical erosion controls such as the installation of willow wattles and brush mattressing and addition of native cobble to reinforce the low flow berm separating the creek channel from the wetland area to help contain flows into the wetland area.* ▪ *If vegetation establishment is taking longer than expected, remedial measures such as re-seeding bare soils, replanting areas of mortality, and increased maintenance and monitoring may be prescribed.* ▪ *If there is significant evidence of scouring, collapse, or filling of the overflow bank between the realigned low-flow Froom Creek channel and the Calle Joaquin wetlands, a registered professional engineer shall re-evaluate bank type, size, and*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	slope and recommend a solution, such as augmentation or replacement. ▪ *If there is excessive ponding (spatial or temporal), a registered professional engineer shall assess access to and capacity of existing drainage outlets and recommend a solution, such as augmentation or replacement if necessary.* ▪ *If salt efflorescence is observed and specific conductance in the wetland is greater than baseline conditions, a registered professional engineer shall re-evaluate the bank type, slope, size, and conveyance between the realigned Froom Creek low-flow channel and the Calle Joaquin wetlands to increase the frequency of salt flushing, such as altering surface flows to more frequently overflow to the wetland area.* *viii. If through monitoring it is determined that the Project does not adversely impact the Calle Joaquin wetland areas (as defined above), the Applicant shall provide documentation annually (at minimum) to the City, for review and approval by the City's Natural Resources Manager, that no significant signs of hydrological interruption, erosion (including bank failure), or sedimentation have occurred, that the wetland is sustained in biological integrity and health with existing hydrologic inputs, and that channel migration has not adversely affected existing wetland features adjacent to Calle Joaquin.* *ix. If through monitoring it is determined that the Project adversely impacts the Calle Joaquin wetland area, recommendations shall be made for modifications to the Project design in consultation with the City and appropriate regulatory agencies for review and concurrence, as described in subsection viii above. The annual reports would detail the issue or problem area and proposed remedial actions.* *x. If through monitoring it is determined that the Calle Joaquin wetland condition and function cannot be remediated with implementation of all feasible remedial actions and recommendations identified through long-term monitoring and as described in subsection vii above and the Long-Term Wetland Monitoring Plan, then adversely affected wetland areas shall be delineated and mitigated on- or offsite at a minimum 3:1 ratio*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	unless otherwise directed by state and federal agencies, including but not limited to the CDFW, RWQCB, NMFS, and USFWS (as appropriate), consistent with subsection (c) above. ~~*i.*~~*xi. Funding for long-term wetland monitoring, adaptive management, and any recommended contingency measures shall be the responsibility of the Applicant. Payment of a bond by the Applicant would be required to ensure the availability of adequate funds to ensure successful implementation and completion of the Long-Term Wetland Monitoring Plan throughout build-out under the Specific Plan.* ~~*at a minimum 2:1 ratio and require mitigation of at least 10.24 acres. For the purpose of this mitigation, the area of the Calle Joaquin wetlands potentially affected by the Project include those wetlands northwest of Calle Joaquin within the Specific Plan area and southeast of the proposed Froom Creek low flow channel.*~~ ~~*d)*~~*e) Habitat revegetation or creation shall occur in the fall or winter no more than 1 year following habitat disturbance. Revegetation shall be monitored monthly for 7 years with a goal of at least 70-percent survival of container plants and 70-percent relative cover by vegetation type at the end of the 7-year period. Irrigation shall be provided during this period or until otherwise determined necessary by the Applicant's Environmental Coordinator.* ~~*e)*~~*f) Riparian vegetation along Froom Creek shall be maintained in perpetuity to the satisfaction of the City by the Applicant or a City-approved designee. Froom Creek conditions shall be monitored annually following winter storm seasons to assess damage to riparian vegetation and need for maintenance restoration. Monitoring and maintenance of riparian vegetation conditions shall be conducted consistent with the requirements of the Habitat Mitigation and Monitoring Plan outlined in MM BIO-3.* **Plan Requirements and Timing.** All requirements shall be included in the Biological Mitigation and Monitoring Plan to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP (including the Long-Term Wetland Monitoring Plan) to ensure that all BMPs and appropriate mitigation measures have been	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	included. The Environmental Coordinator shall ensure compliance during habitat compensation and/or restoration activities through routine monitoring, inspection, and reporting of restoration activities. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan and Long-Term Wetland Monitoring Plan through receipt of monitoring reports and site inspections. ***MM BIO-6*** *The Biological Mitigation and Monitoring Plan shall detail timing and implementation of required habitat restoration and shall be submitted to the City's Natural Resources Manager for review and approval, including requirements for consultation with CDFW, NMFS, and USACE as needed. A copy of the final plan shall be submitted to the City for review and approval. The plan shall be implemented by the Project Applicant, under supervision by the City and the Applicant's Environmental Coordinator, and shall:* *a) Describe replacement of sensitive natural community habitats removed, lost, or adversely impacted by the Project, including a list of the soil, plants, and other materials that will be necessary for successful habitat restoration/ replacement, and a description of planting methods, location, spacing, erosion protection, and irrigation measures that will be needed. Restoration and habitat enhancement shall be limited to use of appropriate native species. Habitat restoration or enhancement areas shall be designed to facilitate establishment of appropriate native plants such as willows, cottonwoods, bunchgrass, and rushes.* *b) Habitat restoration or enhancement areas shall be established within the Project boundaries, adjacent to and contiguous with existing habitats to the maximum extent possible.* *c) Habitat restoration or enhancement sites shall be placed within existing or additional necessary deed-restricted area(s) and shall be maintained and monitored for a minimum of 7 years. If sufficient onsite mitigation area is not practicable, an offsite mitigation plan shall be prepared as part of the Biological Mitigation and Monitoring Plan and approved by permitting agencies.* *d) The Biological Mitigation and Monitoring Plan shall identify appropriate restoration and enhancement activities to compensate for impacts to creek, wetland, native bunch grass and riparian habitat, including a detailed planting plan and maintenance plans using locally*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	obtained native species, and shall include habitat enhancement to support native wildlife and plant species. *e) A weed management plan and weed identification list shall be included in the Biological Mitigation and Monitoring Plan.* *f) Habitat restoration or enhancement areas shall be maintained weekly for the first three years after Project completion and quarterly thereafter. Maintenance shall include replacement of unsuccessful planted specimens and eradication of noxious weeds found on California Department of Food and Agriculture (CDFA) Lists A and B. Noxious weeds on CDFA List C may be eradicated or otherwise managed.* *g) Quarterly and annual reports documenting site inspections and site recovery status shall be prepared and sent to the City and appropriate agencies.* **Plan Requirements and Timing.** All requirements shall be included on the Biological Mitigation and Monitoring Plan and HMMP to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP to ensure that all BMPs and appropriate mitigation measures have been included. The Environmental Coordinator shall ensure compliance during habitat compensation and/or restoration activities. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan and HMMP through receipt of monitoring reports and site inspections. ***MM BIO-7*** *Utility line installation shall be timed so that sensitive habitat areas are not disturbed (e.g., prior to the development and restoration of the new Froom Creek realignment, after removal of riparian areas along the LOVR Ditch due to LOVR widening). In the event a~~All~~ utility line~~s~~ is proposed to be installed across the existing or realigned Froom Creek, or the sensitive riparian areas along the LOVR Ditch, while these features are in their natural or restored conditions, installation ~~from LOVR to the Project site shall be installed~~ via horizontal directional drilling (HDD) to avoid impacts to sensitive habitats. Prior to installation of utility lines, a site-specific geotechnical investigation and frac-out clean-up plan shall be completed in areas proposed for HDD. The geotechnical investigation shall provide recommendations for avoidance of frac-outs and/or other HDD related	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	impacts and to determine appropriate HDD methods (i.e., appropriate drilling mud mixtures for specific types of sediments). The investigation shall include results from at least three borings, a geologic cross-section, a discussion of drilling conditions, and frac-out clean-up plan. The frac-out clean-up plan shall identify methods for minimizing potential for frac-outs and addressing any necessary clean-up or remediation in case of a frac-out. The boring operation would be stopped immediately if a frac-out occurs and steps would be taken to contain and minimize the effects of any spill of drilling mud. The Applicant shall comply with all recommendations of the geotechnical investigation. **Plan Requirements and Timing.** Geotechnical investigations shall be conducted, and a report of findings submitted to the City for approval. The findings shall be incorporated into the final Utilities Plan prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review the findings of the geotechnical investigations and final Utilities Plan and confirm compliance through review of grading and improvement plans. ***MM BIO-8*** *The Applicant shall submit a Froom Creek restoration plan that identifies measures for securing the proposed low-flow channel berm along the stretch of Froom Creek proposed adjacent to the Calle Joaquin wetlands to protect the bank from erosion and prevent migration of the Froom Creek channel into these wetlands. Measures for securing the bank may include a mix of natural and biotechnical measures capable of prevention erosion based on the anticipated erosive velocity of the creek under 100-year storm conditions.* **Plan Requirements and Timing.** The Applicant shall submit a Froom Creek restoration plan for review and approval by the City, which incorporates these requirements in addition to all requirements identified by state and federal resource agencies. The proposed bank stabilization measures shall be depicted on final plans prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review the final plans, and shall inspect the Project site during construction to confirm installation of proposed stabilization measures.	
BIO-2. Project implementation would have substantial direct and indirect adverse impacts on	***MM HAZ-2*** *In accordance with PRC Section 4291, the Applicant shall hire a City-qualified team that consists of appropriate specialists (i.e., fire management professionals, biologists) to prepare a Community Fire*	Significant and Unavoidable

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
candidate, sensitive, or special-status species that are known to or may occur on the Project site.	*Protection Plan to design the creation and maintenance of required fire buffers and fuel management zones around developable areas and detail methods for achieving fire safety around new buildings while preserving the integrity and function of affected native plant communities to the maximum extent feasible, and that ensures that consistent fire fuel management practices are applied throughout the City. The Plan shall incorporate management strategies in coordination with adjacent property owners, including Mountainbrook Church and the Irish Hills Natural Reserve. The Plan shall outline the removal and control of invasive, non-native vegetation, and conservation of sensitive habitats and rare species, while developing fire fuel management practices that will discourage or prevent non-native grasses and other non-native invasive species from dominating surrounding areas. Landscaping shall be maintained by the Applicant and periodically inspected by the SLOFD during fire inspections in each of the fuel management zones to avoid the buildup of deadwood and leaf litter, which, if left to accumulate, would reduce the mitigating effect of the Plan. Specifically, the Plan shall include, but not be limited to, the following elements:* • *Vegetation coverage and type;* • *Setbacks between structures, sensitive wildlife species, and access routes;* • *Development plan landscaping and planting standards within the setback areas;* • *Native trees and shrubs, such as coast live oak, coastal scrub, and grassland shall be thinned and limbed up but left in place;* • *All allowable weed abatement techniques, qualifications, and requirements for weed abatement contractors, as well as measures and techniques that ensure the required fuel management and vegetation clearance, shall be designed and implemented to provide adequate structure protection and avoid degradation of sensitive biological habitat; and* • *Invasive species shall be removed and controlled.* **Plan Requirements and Timing.** Prior to approval of the final development plan, the Community Fire Protection Plan shall be prepared and submitted to the City Natural Resources Manager and SLOFD for review and approval, with coordination from the San Luis Obispo County Fire Department. The	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Plan shall be implemented consistent with the approved maintenance schedule. **Monitoring.** The City-qualified biologist shall submit a monitoring report to the City Natural Resources Manager and SLOFD at the end of the first year following Project occupancy documenting the fuel management activities that took place. Conformance with the Community Fire Protection Plan shall be demonstrated through the submittal of annual photo documentation by the Applicant or site visits as necessary at the discretion of the Compliance monitoring staff. ***MM BIO-1*** *The Applicant shall prepare and implement a Biological Mitigation and Monitoring Plan that identifies both construction and operational related avoidance, reduction, and mitigation measures for impacts to sensitive natural communities. The Biological Mitigation and Monitoring Plan shall include Best Management Practices (BMPs) to avoid or minimize impacts to biological resources, and implementation of on and offsite habitat replacement as follows:* *1) The Biological Mitigation and Monitoring Plan shall include the following construction-related measures and BMPs:* *a) Construction equipment and vehicles shall be stored at least 100 feet away from existing and proposed drainage features and adjacent riparian habitat, and all construction vehicle maintenance shall be performed in a designated offsite vehicle storage and maintenance area approved by the City.* *b) Prior to commencement of construction, Drainages 1, 2, 3, and 4 and all associated springs, seeps, and wetlands shall be protected with construction fencing located a minimum of 25 feet from the edge of the stream channel or top of bank and signed to prohibit entry of construction equipment and personnel unless authorized by the City. Fencing shall be maintained throughout the construction period for each phase of development. Fencing and signage shall be removed following completion of construction.* *c) During any construction activities within 50 feet of the existing Froom Creek channel, realigned Froom Creek channel, LOVR ditch, Drainages 1, 2, 3, or 4, or other existing or proposed drainage features, a City-approved biological monitor shall be present and have the authority to stop or redirect work as needed to protect biological resources.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	d) All construction materials (e.g., fuels, chemicals, building materials) shall be stored at designated construction staging areas, which shall be located outside of designated sensitive areas. Should spills occur, or if any unanticipated hazardous materials are discovered, materials and/or contaminants shall be cleaned immediately and recycled or disposed of to the satisfaction of the RWQCB, Department of Toxic Substances Control, and/or San Luis Obispo County Public Health Environmental Services, as applicable. *e) All trash and construction debris shall be properly disposed at the end of each day and dumpsters shall be covered either with locking lids or with plastic sheeting at the end of each workday and during storm events. All sheeting shall be carefully secured to withstand weather conditions.* *f) The Applicant shall implement measures designed to minimize construction-related erosion and retain sediment on the Project site, including installation of silt fencing, straw waddles, or other acceptable construction erosion control devices. Such measures shall be installed along the perimeter of disturbed areas and along the top of the bank of the existing and proposed Froom Creek channel and other existing or proposed drainage features and 25 feet from the edge of Drainages 1, 2, 3, and 4. All drainage shall be directed to sediment basins designed to retain all sediment onsite.* *g) Concrete truck and tool washout shall occur in a designated location such that no runoff will reach the creek, onsite drainages, or other sensitive areas.* *h) All open trenches shall be constructed with appropriate exit ramps to allow species that fall into a trench to escape. All open trenches shall be inspected at the beginning of each work day to ensure that no wildlife species is present. Any sensitive wildlife species found during inspections shall be gently encouraged to leave the Project site by a qualified biologist or otherwise trained and City-approved personnel. Trenches will remain open for the shortest period necessary to complete required work.* *i) Existing disturbed areas shall be used for construction staging and storage to the maximum extent possible to minimize disturbance of*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	undeveloped habitats. All construction access roads and staging areas shall be located to avoid known/mapped habitat and minimize habitat fragmentation. **Plan Requirements and Timing.** The Biological Mitigation and Monitoring Plan shall be submitted for review and approval by the City prior to issuance of grading permits and recordation of the final VTM. The plan shall incorporate any additional measures or requirements identified by state and federal agencies, including but not limited to CDFW, RWQCB, NMFS, and USFWS. The Applicant shall prepare a Biological Mitigation Plan that identifies and incorporates all required measures identified in MM BIO-2 through MM BIO-12 below. The plan shall specify all mitigation site locations, timing of surveys and activities, species composition, habitat compensation, species avoidance measures, and other required information, including identification of appropriate onsite construction staging locations. The plan shall demonstrate compliance with all required measures and any required permits shall be obtained from state and federal regulatory agencies prior to the issuance of grading or building permits. A 7-year site mitigation monitoring plan shall also be prepared by the City-approved biologist and incorporated into the Biological Mitigation and Monitoring Plan prior to issuance of grading permits and recordation of the final VTM, with annual reports submitted to the City Natural Resources Manager and Community Development Department. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan to ensure that all BMPs and appropriate mitigation measures have been included. The City shall ensure compliance with requirements of the Biological Mitigation and Monitoring Plan through frequent monitoring and inspection, and receipt of quarterly monitoring reports provided by the Applicant's Environmental Coordinator required per MM BIO-2. The Applicant's Environmental Coordinator shall also ensure compliance during habitat compensation and/or restoration activities through routine monitoring, inspection, and reporting of restoration activities. ***MM BIO-9*** *Construction and grading of the realigned portion of Froom Creek, including planting of riparian vegetation, watering, and bank stabilization, shall be conducted prior to removal of the existing creek segment to ensure a habitat for special-status species within the creek is maintained through the Project site with no interruption during construction.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Project phasing shall be adjusted as needed to accommodate this sequence of construction activities. **Plan Requirements and Timing.** The Applicant shall demonstrate phasing and creek restoration within the final VTM, and the Biological Mitigation and Monitoring Plan. The Applicant shall submit the plan to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review the Biological Mitigation and Monitoring Plan, and final VTM for compliance. The Applicant's Environmental Coordinator shall monitor creek realignment activities to ensure compliance with this mitigation measure. ***MM BIO-10*** *Chorro Creek Bog Thistle and Special-Status Plant Management. Prior to issuance of grading and building permits, the Applicant shall submit or fund a site survey for special-status plants, including Chorro Creek bog thistle, and:* 1. *All individual locations of special-status species, including Chorro Creek bog thistle, and suitable habitat areas shall be mapped using GPS coordinates. No construction activities or disturbance shall occur within 50 feet of mapped special-status species, including Chorro Creek bog thistle, or suitable habitat areas. This setback shall be delineated and maintained with construction fencing and clear signage for the duration of grading and construction. If the site survey results identify Chorro Creek bog thistle that may be disturbed or lost from Project construction, the Project shall be redesigned to ensure a minimum 50 foot buffer from mapped Chorro Creek bog thistle occurrences.* ~~2. If the site survey results identify Chorro Creek bog thistle that may be disturbed or lost from Project construction, the Project shall be redesigned to ensure a minimum 50 foot buffer from mapped Chorro Creek bog thistle occurrences.~~ ~~3.~~2. *Development adjacent to Drainages 1, 2, and 3 shall be set back a minimum of 50 feet from the top of the bank of these drainages and the edge of delineated associated wetlands.* 3. *Drainages 1, 2, and 3 and associated wetlands shall be fenced a minimum of 50 feet from the top of the bank or edge of delineated wetland during construction. The Applicant shall ensure and demonstrate to the City through frequent reporting requirements*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	approved by the City that these areas are managed and maintained in perpetuity to maintain wetland and Chorro Creek bog thistle habitat values to the extent feasible. 4. *If the site survey results identify special-status plant species, including Chorro Creek bog thistle, or suitable habitat that may be disturbed or lost from Project construction, the Project shall be redesigned to ensure a minimum 50-foot buffer from mapped individual occurrences and suitable habitat areas. If buffers cannot be maintained, then consultation with CDFW shall occur to determine appropriate minimization and mitigation measures for impacts to special-status plant species, or in the case of plant species listed pursuant to CESA or the Native Plant Protection Act, to determine if take can be avoided. If take cannot be avoided, take authorization prior to any ground-disturbing activities may be warranted. Take authorization would occur through issuance of an ITP by CDFW, pursuant to Fish and Game Code section 2081(b).* **Plan Requirements and Timing.** All requirements shall be included on the Biological Mitigation and Monitoring Plan to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP to ensure that all BMPs and appropriate mitigation measures have been included. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan. The Applicant's Environmental Coordinator shall also ensure compliance during habitat compensation and/or restoration activities. ***MM BIO-11*** *The Biological Mitigation and Monitoring Plan shall address special-status wildlife species management. Grading and construction activities shall avoid the rainy season (typically October 15 to April 15) to the extent practicable, particularly within 50 feet of the existing and proposed Froom Creek channel, and other existing or proposed drainage features, riparian or wetland habitat, and any suitable nesting sites as determined by the City-approved biologist. Injury, mortality to, or significant disturbance of onsite sensitive species, including the California red-legged frog, south-central California coast steelhead, and white-tailed kite, shall be avoided. The plan shall include the following measures: pre-construction surveys; worker awareness; cessation of work in occupied areas if individuals are identified;*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	relocation (if necessary) of frogs and steelhead from the work area by a professional biologist authorized by the USFWS and/or CDFW; and monitoring of construction activities within the vicinity of sensitive habitats by a qualified biologist during construction, consistent with MM BIO-2. Necessary permits shall be obtained from the state (CDFW) and federal (USACE and USFWS) regulatory agencies with jurisdiction and/or permitting authority over a portion of the Project. Any other sensitive species observed during the pre-construction surveys shall be relocated by the qualified biologist into the nearest suitable habitat outside the disturbance area as determined in consultation with the appropriate jurisdictional resource agency. **Plan Requirements and Timing.** All requirements shall be included on the Biological Mitigation and Monitoring Plan to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP to ensure that all BMPs and appropriate mitigation measures have been included. The City shall ensure compliance with requirements in the Biological Mitigation and Monitoring Plan. The Applicant's Environmental Coordinator shall also ensure compliance during habitat compensation and/or restoration activities. ***MM BIO-12*** *The Biological Mitigation and Monitoring Plan shall address the habitation and movement of special-status wildlife species, as follows:* *1. Migratory and Nesting/Burrowing Bird Management. Grading and construction activities shall avoid the breeding season (typically from February 15 to August 15) to the extent practicable, particularly within 50 feet of riparian or wetland habitat and mature trees and within onsite grasslands. If Project activities must be conducted during this period and within the vicinity of riparian or wetland habitat, grasslands, and/or mature trees, pre-construction nesting/burrowing bird surveys shall take place no more than one week prior to habitat disturbance associated with each phase; if active nests or burrows are located during these surveys, the following measures shall be implemented:* *a. Construction activities within 50 feet of active nests shall be restricted until chicks have fledged, unless the nest belongs to a*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	raptor or burrowing owl, in which case a minimum 500-foot activity restriction buffer shall be observed. *b. Construction shall be limited to daylight hours (7:00 AM to 7:00 PM or sunset, whichever is sooner).* *c. A pre-construction survey report shall be submitted to the City immediately upon completion of the survey. The report shall detail appropriate fencing or flagging of the buffer zone and make recommendations on additional monitoring requirements. A map of the Project site and nest locations shall be included with the report. If any sensitive species are observed during pre-construction surveys, the Project biologist shall coordinate with appropriate resource agencies to determine appropriate procedure for handling or avoidance of the specimen.* *d. The Project biologist conducting the nesting survey shall have the authority to reduce or increase the recommended buffer depending upon site conditions and the species involved. A report of findings and recommendations for bird protection shall be submitted to the City prior to vegetation removal. If sensitive or special-status species are observed during pre-construction surveys, the Project biologist shall coordinate with appropriate resource agencies to determine appropriate procedures for handling or avoidance of the specimen.* *~~d.~~e. If burrowing owls are found onsite and avoidance is not possible, burrow exclusion shall be conducted by City-approved qualified biologists and only during the non-breeding season, before breeding behavior is exhibited and after the burrow is confirmed empty through non-invasive methods, such as surveillance. CDFW recommends replacement of occupied burrows with artificial burrows at a ratio of one burrow collapsed to one artificial burrow constructed (1:1) To avoid recolonization, ongoing surveillance shall be provided by the City-approved Project biologists throughout Project construction at a rate that is sufficient to detect burrowing owls if they return.* *2. Bat Colony Management. Prior to removal of any trees over 20 inches diameter-at-breast-height (DBH) or demolition/relocation of existing onsite structures, a survey shall be conducted by a City and CDFW-approved biologist to determine if any tree or structure proposed for*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	removal, trimming, demolition, or relocation harbors sensitive bat species or maternal bat colonies. Maternal bat colonies shall not be disturbed, and grading and construction activities shall avoid the bat breeding season to the extent feasible. If disturbance of structures must occur during the bat breeding season, buildings must be inspected and deemed clear of bat colonies/roosts within 7 days of demolition and an appropriately trained and approved biologist must conduct a daily site-clearance during demolition. If bats are roosting in a structure or tree in the Project site during the daytime but are not part of an active maternity colony, then exclusion measures shall be utilized and must include one-way valves that allow bats to leave but are designed so that the bats may not re-enter the structure. For each occupied roost removed, one bat box shall be installed in similar habitat as determined by the Project biologist and shall have similar cavities or crevices to those which are removed, including access, ventilation, dimensions, height above ground, and thermal conditions. If a bat colony would be eliminated from the Project site, appropriate alternate bat habitat shall be installed within the Project site. To the extent practicable, alternate bat house installation shall occur near onsite drainages. **Plan Requirements and Timing.** The Biological Mitigation and Monitoring Plan shall include a management plan for migrating and nesting birds and bat colonies and shall be submitted for review and approval by the City prior to issuance of grading and construction permits and recordation of the final VTM. Construction shall be conducted between August 16 and February 14 unless pre-construction surveys are completed. Reports summarizing pre-construction species surveys (i.e., nesting, bat surveys, etc.) shall be submitted to the City within 10 days of survey completion. Construction work shall not commence until after the completion of surveys and City review of corresponding reports. Any required permits shall be obtained from appropriate state and federal agencies prior to issuance of grading and construction permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP to ensure that appropriate requirements have been included to address potential impacts to bird and bat species. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan. The Applicant's Environmental Coordinator shall also ensure compliance during habitat compensation and/or restoration activities.	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
BIO-3. Project implementation would have a substantial adverse impact on state and federally protected wetlands.	***MM BIO-1*** *The Applicant shall prepare and implement a Biological Mitigation and Monitoring Plan that identifies both construction and operational related avoidance, reduction, and mitigation measures for impacts to sensitive natural communities. The Biological Mitigation and Monitoring Plan shall include Best Management Practices (BMPs) to avoid or minimize impacts to biological resources, and implementation of on and offsite habitat replacement as follows:* *1) The Biological Mitigation and Monitoring Plan shall include the following construction-related measures and BMPs:* *a) Construction equipment and vehicles shall be stored at least 100 feet away from existing and proposed drainage features and adjacent riparian habitat, and all construction vehicle maintenance shall be performed in a designated offsite vehicle storage and maintenance area approved by the City.* *b) Prior to commencement of construction, Drainages 1, 2, 3, and 4 and all associated springs, seeps, and wetlands shall be protected with construction fencing located a minimum of 25 feet from the edge of the stream channel or top of bank and signed to prohibit entry of construction equipment and personnel unless authorized by the City. Fencing shall be maintained throughout the construction period for each phase of development. Fencing and signage shall be removed following completion of construction.* *c) During any construction activities within 50 feet of the existing Froom Creek channel, realigned Froom Creek channel, LOVR ditch, –Drainages 1, 2, 3, or 4, or other existing or proposed drainage features, a City-approved biological monitor shall be present and have the authority to stop or redirect work as needed to protect biological resources.* *d) All construction materials (e.g., fuels, chemicals, building materials) shall be stored at designated construction staging areas, which shall be located outside of designated sensitive areas. Should spills occur, or if any unanticipated hazardous materials are discovered, materials and/or contaminants shall be cleaned immediately and recycled or disposed of to the satisfaction of the RWQCB, Department of Toxic Substances Control, and/or San Luis Obispo County Public Health Environmental Services, as applicable.*	Significant and Unavoidable

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	e) All trash and construction debris shall be properly disposed at the end of each day and dumpsters shall be covered either with locking lids or with plastic sheeting at the end of each workday and during storm events. All sheeting shall be carefully secured to withstand weather conditions. *f) The Applicant shall implement measures designed to minimize construction-related erosion and retain sediment on the Project site, including installation of silt fencing, straw waddles, or other acceptable construction erosion control devices. Such measures shall be installed along the perimeter of disturbed areas and along the top of the bank of the existing and proposed Froom Creek channel and other existing or proposed drainage features and 25 feet from the edge of Drainages 1, 2, 3, and 4. All drainage shall be directed to sediment basins designed to retain all sediment onsite.* *g) Concrete truck and tool washout shall occur in a designated location such that no runoff will reach the creek, onsite drainages, or other sensitive areas.* *h) All open trenches shall be constructed with appropriate exit ramps to allow species that fall into a trench to escape. All open trenches shall be inspected at the beginning of each work day to ensure that no wildlife species is present. Any sensitive wildlife species found during inspections shall be gently encouraged to leave the Project site by a qualified biologist or otherwise trained and City-approved personnel. Trenches will remain open for the shortest period necessary to complete required work.* *i) Existing disturbed areas shall be used for construction staging and storage to the maximum extent possible to minimize disturbance of undeveloped habitats. All construction access roads and staging areas shall be located to avoid known/mapped habitat and minimize habitat fragmentation.* **Plan Requirements and Timing.** The Biological Mitigation and Monitoring Plan shall be submitted for review and approval by the City prior to issuance of grading permits and recordation of the final VTM. The plan shall incorporate any additional measures or requirements identified by state and federal agencies, including but not limited to CDFW, RWQCB, NMFS, and USFWS. The Applicant shall prepare a Biological Mitigation Plan that	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	identifies and incorporates all required measures identified in MM BIO-2 through MM BIO-12 below. The plan shall specify all mitigation site locations, timing of surveys and activities, species composition, habitat compensation, species avoidance measures, and other required information, including identification of appropriate onsite construction staging locations. The plan shall demonstrate compliance with all required measures and any required permits shall be obtained from state and federal regulatory agencies prior to the issuance of grading or building permits. A 7-year site mitigation monitoring plan shall also be prepared by the City-approved biologist and incorporated into the Biological Mitigation and Monitoring Plan prior to issuance of grading permits and recordation of the final VTM, with annual reports submitted to the City Natural Resources Manager and Community Development Department. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan to ensure that all BMPs and appropriate mitigation measures have been included. The City shall ensure compliance with requirements of the Biological Mitigation and Monitoring Plan through frequent monitoring and inspection, and receipt of quarterly monitoring reports provided by the Applicant's Environmental Coordinator required per MM BIO-2. The Applicant's Environmental Coordinator shall also ensure compliance during habitat compensation and/or restoration activities through routine monitoring, inspection, and reporting of restoration activities. ***MM BIO-2*** *The Applicant shall retain a qualified Environmental Coordinator/qualified biologist, subject to review and approval by the City to oversee compliance with the Biological Mitigation and Monitoring Plan. The Applicant's Environmental Coordinator shall monitor all construction activities, conduct a biological resources education program for all construction workers prior to the initiation of any clearing or construction activities, and provide quarterly reports to the City regarding construction activities, enforcement issues, and remedial measures. The Applicant's Environmental Coordinator shall be responsible for conducting inspections of the work area each work day to ensure that excavation areas and sensitive or restored habitats do not exhibit construction-related impacts or hazards to wildlife. If any exposure risk is identified, the Environmental Coordinator shall implement measures that could include, but not be limited to, hazing, fencing, and wildlife removals to eliminate the exposure risk.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	In addition, the Applicant's Environmental Coordinator shall monitor and regulate all construction occurring within 50 feet of the existing and proposed Froom Creek channel, other existing or proposed drainage features, riparian habitat, Drainages 1, 2, 3, and 4, and seasonal or permanent wetlands. During appropriate flowering, nesting, breeding, migration, and dispersal seasons, the Environmental Coordinator shall also conduct sensitive species surveys immediately prior to construction activities and shall monitor construction activities in the vicinity of habitats to be avoided. *The work area boundaries and other off-limit areas shall be identified by the biologist and/or Environmental Coordinator on a daily basis. The biologist and/or Environmental Coordinator shall inspect construction and sediment control fencing each work day during construction activities. Any vegetation clearing activities shall be monitored by the biologist and/or Environmental Coordinator.* **Plan Requirements and Timing.** The City shall approve the Applicant's qualified Environmental Coordinator/qualified biologist prior to issuance of grading and building permits for each phase of construction. The Environmental Coordinator shall be present onsite to monitor construction activities pursuant to the approved Biological Mitigation and Monitoring Plan. **Monitoring.** The Environmental Coordinator shall monitor all grading and construction activities occurring within the vicinity of sensitive habitats or known location of sensitive species, shall conduct regular site inspections throughout the entire site, and shall be responsible for compliance of the construction activities and the above BMPs within MM BIO-1 and MM BIO-3 through MM BIO-8. During construction, the Environmental Coordinator shall submit quarterly monitoring reports to the City to ensure compliance with the Biological Mitigation and Monitoring Plan and applicable laws, regulations, and policies. The Environmental Coordinator/qualified biologist shall be onsite during all construction activities which take place within 50 feet of sensitive creek, wetland, and riparian habitat areas. ***MM BIO-4*** *The Biological Mitigation and Monitoring Plan shall require avoidance of sensitive natural communities outside approved development footprints such as the Nassella pulchra Herbaceous Alliance, Central Coast Arroyo Willow Scrub Community, Coastal and Central Valley Freshwater Marsh, and wetland areas to the maximum extent feasible. Mitigation for impacted sensitive natural communities that cannot be avoided shall be*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	achieved through one or more of the following options, subject to City approval: *a) Onsite restoration, enhancement, or creation of suitable replacement habitat, if feasible onsite restoration opportunities exist and at ratios consistent with those identified in MM BIO-5;* *b) Offsite restoration or creation of suitable habitat for the impacted species at the minimum replacement ratio of 2:1 for sensitive natural communities, native grasslands, and riparian habitat;* *c) Financial contribution to an in-lieu fee program that results in restoration or creation of suitable habitat for the impacted natural communities and/or species; and/or* *d) Purchase of mitigation credits at a USFWS- and/or CDFW-approved mitigation bank.* **Plan Requirements and Timing.** All requirements shall be included in the Biological Mitigation and Monitoring Plan and HMMP to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the BMMP and HMMP to ensure that all BMPs and appropriate mitigation measures have been included. The Applicant's Environmental Coordinator shall ensure compliance during habitat compensation and/or restoration activities through routine monitoring, inspection, and reporting of restoration activities pursuant to the approved Biological Mitigation and Monitoring Plan and HMMP. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan and HMMP through receipt and review of monitoring reports, and site inspections. ***MM BIO-5*** *The Biological Mitigation and Monitoring Plan shall require all temporary and permanent direct and indirect impacts to wetlands, grasslands, and riparian habitat be mitigated, as follows:* *a) Temporary direct impacts to wetland, native grassland, and riparian habitat ~~impacts~~ shall be mitigated at a minimum 1:1 mitigation ratio (area of restored habitat to impacted habitat).* *b) Permanent direct impacts to sensitive natural communities, such as native grasslands, and riparian habitat shall be mitigated at a 2:1 ratio (area of restored and enhanced habitat to impacted habitat).* *c) Permanent direct impacts to wetlands shall be mitigated at a minimum 3:1 ratio unless otherwise directed by state and federal agencies,*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	including but not limited to the CDFW, RWQCB, NMFS, and USFWS (as appropriate). *g) Potential indirect impacts to the Calle Joaquin wetlands affected by the Froom Creek realignment and changes to site hydrology shall be mitigated as follows. As a part of the HMMP prepared for the Project, the Applicant shall prepare and implement a Long-Term Wetland Monitoring Plan that is designed to quantitatively and qualitatively assess the effectiveness of the HMMP over time to ensure its objectives are achieved. The Long-Term Wetland Monitoring Plan shall be supported by a Baseline Conditions Assessment that identifies the pre-construction condition of the Calle Joaquin wetlands and establishes success criteria for sustained wetland conditions. The Baseline Conditions Assessment shall provide qualitative and quantitative information that will be used in comparing data obtained during subsequent monitoring years to determine if a significant deviance from baseline conditions has occurred at the site. The Long-Term Wetland Monitoring Plan will establish the parameters of a significant deviance from baseline conditions. A significant deviance from baseline may be defined as a "change in wetland area greater than 10%". The Baseline Conditions Assessment shall be updated prior to the start of construction to support agency permitting and guide implementation of the Long-Term Wetland Monitoring Plan. This updated baseline shall be considered in combination with existing and past baseline documentation to provide an expanded baseline reflective of a range of acceptable conditions to compare post Project conditions. The Baseline Conditions Assessment shall include a focused description of the site's hydrologic setting, vegetative cover and composition, quantified wetland areas and classifications, and shall establish the threshold for a significant deviance from wetland area based on the presence of hydrophytic plant species, hydric soil indicators, and wetland hydrology.* *At minimum, the condition of the wetland shall be evaluated on an annual basis through completion of a wetland assessment using a regulatory agency approved model (such as, but not limited to, the California Rapid Assessment Method [CRAM]) to document and facilitate long-term monitoring of changes to the wetland. The annual evaluation shall determine and document any degree of change to the*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	wetland as a result of the proposed changes to site hydrology and development throughout build-out under the Specific Plan. Reports documenting the annual wetland assessment shall be provided to the City and relevant regulatory agencies. *Long-Term Wetland Monitoring for the Calle Joaquin wetlands shall occur continuously for a period of no less than 7 years following Phase I build-out of the Froom Ranch Specific Plan area. After the initial 7-years of minimum annual monitoring, the frequency of long-term evaluations shall be determined in coordination with regulatory agencies and per the requirements of the Long-Term Wetland Monitoring Plan.* *The Long-Term Wetland Monitoring Plan shall include (at minimum) the following requirements. Additional detailed criteria and performance standards will be established in the HMMP prepared for the project and approved by regulatory agencies, but they shall not be any less stringent than the following criteria and performance standards:* *i. Annual monitoring shall evaluate and track the wetland health and biological integrity of the Calle Joaquin wetlands.* *ii. Annual evaluations shall utilize intensive site assessments to provide a more thorough and detailed measure of wetland condition by gathering direct measurements of biological taxa and hydrogeomorphic functions.* *iii. Typical industry standards for the quantitative evaluation of plant cover will be used (e.g., Bonham 1989 and Daubenmire 1968) to evaluate plant composition and structure as well as direct inspections of soil conditions and hydrologic functions.* *iv. Annual or semi-annual evaluations shall observe and document the following, at a minimum:* ▪ *whether groundwater recharge from Froom Creek to the shallow aquifer is being sustained,* ▪ *whether the onsite artesian well has been discharging to the wetland,* ▪ *evidence of overflows entering the Calle Joaquin wetland from the realigned Froom Creek,* ▪ *excessive ponding, as evidenced by changes in vegetation related to increased duration of ponding,*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	▪ *measured depth to groundwater in the onsite artesian well and the relationship of these conditions with conditions in the wetland,* ▪ *specific conductance and temperature in the wetland and other surface sources,* ▪ *the presence or absence of salt efflorescences in the wetland,* ▪ *any persistent green vegetation patches or changes in willow/grass ecotone, and* ▪ *representative photo points.* *v. Monitoring of the realigned creek's hydrology would be required following large storm events during the rain season that are sufficient to initiate flowing water through the site. If after the 3rd year of monitoring, vegetation has successfully established along the creek corridor and sedimentation and erosion are not observed beyond what is determined to be a normal level, then the rainy season monitoring could be scaled back to occur on a quarterly or as-needed basis for the remainder of the monitoring schedule, upon review and approval of the City's Natural Resources Manager and applicable regulatory agencies and consistent with the Long-Term Wetland Monitoring Plan.* *vi. Success criteria to determine whether the Calle Joaquin wetland functions are sustained shall include the following, at a minimum:* ▪ *The constructed bank between the realigned Froom Creek channel and the Calle Joaquin wetlands remains functional and does not recurrently scour or fill to a degree that impairs its operation or impedes circulation through the wetland,* ▪ *Excessive surface water does not pond for periods of long duration,* ▪ *Salts do not accumulate such that discernible increases in salt efflorescences at the ground surface are not visible,* ▪ *Evidence of deposition by high flows is not found within the wetland (e.g., silt, organics, or other flood deposits).* *vii. If success criteria are not achieved within the 7-year initial monitoring period, a hydrologic assessment will be conducted by a USACE-approved specialist in groundwater supported wetlands to establish whether non-attainment is attributable to onsite conditions or actions beyond the effective control of the*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Project Applicant. The specialist shall be a registered hydrologist or certified hydrogeologist with statewide expertise, familiarity with groundwater supported wetlands in central coastal California and verifiable experience conducting functional analyses of such wetlands. Recommendations for remedial actions will be submitted by the groundwater specialist to the USACE for review and written approval prior to implementation. If wetland failures are determined to be directly related to the realignment of Froom Creek and development within the Froom Creek Specific Plan area, possible remedial actions would include, at minimum, the following: ▪ *Engineering controls include biotechnical erosion controls such as the installation of willow wattles and brush mattressing and addition of native cobble to reinforce the low flow berm separating the creek channel from the wetland area to help contain flows into the wetland area.* ▪ *If vegetation establishment is taking longer than expected, remedial measures such as re-seeding bare soils, replanting areas of mortality, and increased maintenance and monitoring may be prescribed.* ▪ *If there is significant evidence of scouring, collapse, or filling of the overflow bank between the realigned low-flow Froom Creek channel and the Calle Joaquin wetlands, a registered professional engineer shall re-evaluate bank type, size, and slope and recommend a solution, such as augmentation or replacement.* ▪ *If there is excessive ponding (spatial or temporal), a registered professional engineer shall assess access to and capacity of existing drainage outlets and recommend a solution, such as augmentation or replacement if necessary.* ▪ *If salt efflorescence is observed and specific conductance in the wetland is greater than baseline conditions, a registered professional engineer shall re-evaluate the bank type, slope, size, and conveyance between the realigned Froom Creek low-flow channel and the Calle Joaquin wetlands to increase the frequency of salt flushing, such as altering surface flows to more frequently overflow to the wetland area.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	viii. *If through monitoring it is determined that the Project does not adversely impact the Calle Joaquin wetland areas (as defined above), the Applicant shall provide documentation annually (at minimum) to the City, for review and approval by the City's Natural Resources Manager, that no significant signs of hydrological interruption, erosion (including bank failure), or sedimentation have occurred, that the wetland is sustained in biological integrity and health with existing hydrologic inputs, and that channel migration has not adversely affected existing wetland features adjacent to Calle Joaquin.* ix. *If through monitoring it is determined that the Project adversely impacts the Calle Joaquin wetland area, recommendations shall be made for modifications to the Project design in consultation with the City and appropriate regulatory agencies for review and concurrence, as described in subsection viii above. The annual reports would detail the issue or problem area and proposed remedial actions.* x. *If through monitoring it is determined that the Calle Joaquin wetland condition and function cannot be remediated with implementation of all feasible remedial actions and recommendations identified through long-term monitoring and as described in subsection vii above and the Long-Term Wetland Monitoring Plan, then adversely affected wetland areas shall be delineated and mitigated on- or offsite at a minimum 3:1 ratio unless otherwise directed by state and federal agencies, including but not limited to the CDFW, RWQCB, NMFS, and USFWS (as appropriate), consistent with subsection (c) above.* ~~i.~~xi. *Funding for long-term wetland monitoring, adaptive management, and any recommended contingency measures shall be the responsibility of the Applicant. Payment of a bond by the Applicant would be required to ensure the availability of adequate funds to ensure successful implementation and completion of the Long-Term Wetland Monitoring Plan throughout build-out under the Specific Plan.* ~~*at a minimum 2:1 ratio and require mitigation of at least 10.24 acres. For the purpose of this mitigation, the area of the Calle Joaquin wetlands potentially affected by the Project include those wetlands*~~	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	~~*northwest of Calle Joaquin within the Specific Plan area and southeast of the proposed Froom Creek low flow channel.*~~ *d) Habitat revegetation or creation shall occur in the fall or winter no more than 1 year following habitat disturbance. Revegetation shall be monitored monthly for 7 years with a goal of at least 70-percent survival of container plants and 70-percent relative cover by vegetation type at the end of the 7-year period. Irrigation shall be provided during this period or until otherwise determined necessary by the Applicant's Environmental Coordinator.* *e) Riparian vegetation along Froom Creek shall be maintained in perpetuity to the satisfaction of the City by the Applicant or a City-approved designee. Froom Creek conditions shall be monitored annually following winter storm seasons to assess damage to riparian vegetation and need for maintenance restoration. Monitoring and maintenance of riparian vegetation conditions shall be conducted consistent with the requirements of the Habitat Mitigation and Monitoring Plan outlined in MM BIO-3.* **Plan Requirements and Timing.** All requirements shall be included in the Biological Mitigation and Monitoring Plan to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP (including the Long-Term Wetland Monitoring Plan) to ensure that all BMPs and appropriate mitigation measures have been included. The Environmental Coordinator shall ensure compliance during habitat compensation and/or restoration activities through routine monitoring, inspection, and reporting of restoration activities. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan and Long-Term Wetland Monitoring Plan through receipt of monitoring reports and site inspections. ***MM BIO-6*** *The Biological Mitigation and Monitoring Plan shall detail timing and implementation of required habitat restoration and shall be submitted to the City's Natural Resources Manager for review and approval, including requirements for consultation with CDFW, NMFS, and USACE as needed. A copy of the final plan shall be submitted to the City for review and approval. The plan shall be implemented by the Project Applicant, under*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	supervision by the City and the Applicant's Environmental Coordinator, and shall: *a) Describe replacement of sensitive natural community habitats removed, lost, or adversely impacted by the Project, including a list of the soil, plants, and other materials that will be necessary for successful habitat restoration/ replacement, and a description of planting methods, location, spacing, erosion protection, and irrigation measures that will be needed. Restoration and habitat enhancement shall be limited to use of appropriate native species. Habitat restoration or enhancement areas shall be designed to facilitate establishment of appropriate native plants such as willows, cottonwoods, bunchgrass, and rushes.* *b) Habitat restoration or enhancement areas shall be established within the Project boundaries, adjacent to and contiguous with existing habitats to the maximum extent possible.* *c) Habitat restoration or enhancement sites shall be placed within existing or additional necessary deed-restricted area(s) and shall be maintained and monitored for a minimum of 7 years. If sufficient onsite mitigation area is not practicable, an offsite mitigation plan shall be prepared as part of the Biological Mitigation and Monitoring Plan and approved by permitting agencies.* *d) The Biological Mitigation and Monitoring Plan shall identify appropriate restoration and enhancement activities to compensate for impacts to creek, wetland, native bunch grass and riparian habitat, including a detailed planting plan and maintenance plans using locally obtained native species, and shall include habitat enhancement to support native wildlife and plant species.* *e) A weed management plan and weed identification list shall be included in the Biological Mitigation and Monitoring Plan.* *f) Habitat restoration or enhancement areas shall be maintained weekly for the first three years after Project completion and quarterly thereafter. Maintenance shall include replacement of unsuccessful planted specimens and eradication of noxious weeds found on California Department of Food and Agriculture (CDFA) Lists A and B. Noxious weeds on CDFA List C may be eradicated or otherwise managed.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	g) Quarterly and annual reports documenting site inspections and site recovery status shall be prepared and sent to the City and appropriate agencies. **Plan Requirements and Timing.** All requirements shall be included on the Biological Mitigation and Monitoring Plan and HMMP to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP to ensure that all BMPs and appropriate mitigation measures have been included. The Environmental Coordinator shall ensure compliance during habitat compensation and/or restoration activities. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan and HMMP through receipt of monitoring reports and site inspections. ***MM BIO-7*** *Utility line installation shall be timed so that sensitive habitat areas are not disturbed (e.g., prior to the development and restoration of the new Froom Creek realignment, after removal of riparian areas along the LOVR Ditch due to LOVR widening). In the event a~~All~~ utility line~~s~~ is proposed to be installed across the existing or realigned Froom Creek, or the sensitive riparian areas along the LOVR Ditch, while these features are in their natural or restored conditions, installation ~~from LOVR to the Project site shall be installed~~ via horizontal directional drilling (HDD) to avoid impacts to sensitive habitats. Prior to installation of utility lines, a site-specific geotechnical investigation and frac-out clean-up plan shall be completed in areas proposed for HDD. The geotechnical investigation shall provide recommendations for avoidance of frac-outs and/or other HDD related impacts and to determine appropriate HDD methods (i.e., appropriate drilling mud mixtures for specific types of sediments). The investigation shall include results from at least three borings, a geologic cross-section, a discussion of drilling conditions, and frac-out clean-up plan. The frac-out clean-up plan shall identify methods for minimizing potential for frac-outs and addressing any necessary clean-up or remediation in case of a frac-out. The boring operation would be stopped immediately if a frac-out occurs and steps would be taken to contain and minimize the effects of any spill of drilling mud. The Applicant shall comply with all recommendations of the geotechnical investigation.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Plan Requirements and Timing. Geotechnical investigations shall be conducted, and a report of findings submitted to the City for approval. The findings shall be incorporated into the final Utilities Plan prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review the findings of the geotechnical investigations and final Utilities Plan and confirm compliance through review of grading and improvement plans.	
BIO-4. Project construction and operation would have a substantial adverse impact on the movement of resident or migratory fish or wildlife species or resident and migratory wildlife corridors along Froom Creek, Drainages 1, 2, and 3 and across open grasslands on the Upper Terrace of the Project site.	***MM BIO-1*** *The Applicant shall prepare and implement a Biological Mitigation and Monitoring Plan that identifies both construction and operational related avoidance, reduction, and mitigation measures for impacts to sensitive natural communities. The Biological Mitigation and Monitoring Plan shall include Best Management Practices (BMPs) to avoid or minimize impacts to biological resources, and implementation of on and offsite habitat replacement as follows:* *1) The Biological Mitigation and Monitoring Plan shall include the following construction-related measures and BMPs:* *a) Construction equipment and vehicles shall be stored at least 100 feet away from existing and proposed drainage features and adjacent riparian habitat, and all construction vehicle maintenance shall be performed in a designated offsite vehicle storage and maintenance area approved by the City.* *b) Prior to commencement of construction, Drainages 1, 2, 3, and 4 and all associated springs, seeps, and wetlands shall be protected with construction fencing located a minimum of 25 feet from the edge of the stream channel or top of bank and signed to prohibit entry of construction equipment and personnel unless authorized by the City. Fencing shall be maintained throughout the construction period for each phase of development. Fencing and signage shall be removed following completion of construction.* *c) During any construction activities within 50 feet of the existing Froom Creek channel, realigned Froom Creek channel, LOVR ditch, Drainages 1, 2, 3, or 4, or other existing or proposed drainage features, a City-approved biological monitor shall be present and have the authority to stop or redirect work as needed to protect biological resources.*	Significant and Unavoidable

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	d) All construction materials (e.g., fuels, chemicals, building materials) shall be stored at designated construction staging areas, which shall be located outside of designated sensitive areas. Should spills occur, or if any unanticipated hazardous materials are discovered, materials and/or contaminants shall be cleaned immediately and recycled or disposed of to the satisfaction of the RWQCB, Department of Toxic Substances Control, and/or San Luis Obispo County Public Health Environmental Services, as applicable. *e) All trash and construction debris shall be properly disposed at the end of each day and dumpsters shall be covered either with locking lids or with plastic sheeting at the end of each workday and during storm events. All sheeting shall be carefully secured to withstand weather conditions.* *f) The Applicant shall implement measures designed to minimize construction-related erosion and retain sediment on the Project site, including installation of silt fencing, straw waddles, or other acceptable construction erosion control devices. Such measures shall be installed along the perimeter of disturbed areas and along the top of the bank of the existing and proposed Froom Creek channel and other existing or proposed drainage features and 25 feet from the edge of Drainages 1, 2, 3, and 4. All drainage shall be directed to sediment basins designed to retain all sediment onsite.* *g) Concrete truck and tool washout shall occur in a designated location such that no runoff will reach the creek, onsite drainages, or other sensitive areas.* *h) All open trenches shall be constructed with appropriate exit ramps to allow species that fall into a trench to escape. All open trenches shall be inspected at the beginning of each work day to ensure that no wildlife species is present. Any sensitive wildlife species found during inspections shall be gently encouraged to leave the Project site by a qualified biologist or otherwise trained and City-approved personnel. Trenches will remain open for the shortest period necessary to complete required work.* *i) Existing disturbed areas shall be used for construction staging and storage to the maximum extent possible to minimize disturbance of*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	undeveloped habitats. All construction access roads and staging areas shall be located to avoid known/mapped habitat and minimize habitat fragmentation. **Plan Requirements and Timing.** The Biological Mitigation and Monitoring Plan shall be submitted for review and approval by the City prior to issuance of grading permits and recordation of the final VTM. The plan shall incorporate any additional measures or requirements identified by state and federal agencies, including but not limited to CDFW, RWQCB, NMFS, and USFWS. The Applicant shall prepare a Biological Mitigation Plan that identifies and incorporates all required measures identified in MM BIO-2 through MM BIO-12 below. The plan shall specify all mitigation site locations, timing of surveys and activities, species composition, habitat compensation, species avoidance measures, and other required information, including identification of appropriate onsite construction staging locations. The plan shall demonstrate compliance with all required measures and any required permits shall be obtained from state and federal regulatory agencies prior to the issuance of grading or building permits. A 7-year site mitigation monitoring plan shall also be prepared by the City-approved biologist and incorporated into the Biological Mitigation and Monitoring Plan prior to issuance of grading permits and recordation of the final VTM, with annual reports submitted to the City Natural Resources Manager and Community Development Department. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan to ensure that all BMPs and appropriate mitigation measures have been included. The City shall ensure compliance with requirements of the Biological Mitigation and Monitoring Plan through frequent monitoring and inspection, and receipt of quarterly monitoring reports provided by the Applicant's Environmental Coordinator required per MM BIO-2. The Applicant's Environmental Coordinator shall also ensure compliance during habitat compensation and/or restoration activities through routine monitoring, inspection, and reporting of restoration activities. ***MM BIO-2*** *The Applicant shall retain a qualified Environmental Coordinator/qualified biologist, subject to review and approval by the City to oversee compliance with the Biological Mitigation and Monitoring Plan. The Applicant's Environmental Coordinator shall monitor all construction activities, conduct a biological resources education program for all construction workers prior to the initiation of any clearing or construction*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	activities, and provide quarterly reports to the City regarding construction activities, enforcement issues, and remedial measures. The Applicant's Environmental Coordinator shall be responsible for conducting inspections of the work area each work day to ensure that excavation areas and sensitive or restored habitats do not exhibit construction-related impacts or hazards to wildlife. If any exposure risk is identified, the Environmental Coordinator shall implement measures that could include, but not be limited to, hazing, fencing, and wildlife removals to eliminate the exposure risk. *In addition, the Applicant's Environmental Coordinator shall monitor and regulate all construction occurring within 50 feet of the existing and proposed Froom Creek channel, other existing or proposed drainage features, riparian habitat, Drainages 1, 2, 3, and 4, and seasonal or permanent wetlands. During appropriate flowering, nesting, breeding, migration, and dispersal seasons, the Environmental Coordinator shall also conduct sensitive species surveys immediately prior to construction activities and shall monitor construction activities in the vicinity of habitats to be avoided.* *The work area boundaries and other off-limit areas shall be identified by the biologist and/or Environmental Coordinator on a daily basis. The biologist and/or Environmental Coordinator shall inspect construction and sediment control fencing each work day during construction activities. Any vegetation clearing activities shall be monitored by the biologist and/or Environmental Coordinator.* **Plan Requirements and Timing.** The City shall approve the Applicant's qualified Environmental Coordinator/qualified biologist prior to issuance of grading and building permits for each phase of construction. The Environmental Coordinator shall be present onsite to monitor construction activities pursuant to the approved Biological Mitigation and Monitoring Plan. **Monitoring.** The Environmental Coordinator shall monitor all grading and construction activities occurring within the vicinity of sensitive habitats or known location of sensitive species, shall conduct regular site inspections throughout the entire site, and shall be responsible for compliance of the construction activities and the above BMPs within MM BIO-1 and MM BIO-3 through MM BIO-8. During construction, the Environmental Coordinator shall submit quarterly monitoring reports to the City to ensure compliance with the Biological Mitigation and Monitoring Plan and applicable laws, regulations, and policies. The Environmental Coordinator/qualified biologist	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	shall be onsite during all construction activities which take place within 50 feet of sensitive creek, wetland, and riparian habitat areas. ***MM BIO-4*** *The Biological Mitigation and Monitoring Plan shall require avoidance of sensitive natural communities outside approved development footprints such as the Nassella pulchra Herbaceous Alliance, Central Coast Arroyo Willow Scrub Community, Coastal and Central Valley Freshwater Marsh, and wetland areas to the maximum extent feasible. Mitigation for impacted sensitive natural communities that cannot be avoided shall be achieved through one or more of the following options, subject to City approval:* *a) Onsite restoration, enhancement, or creation of suitable replacement habitat, if feasible onsite restoration opportunities exist and at ratios consistent with those identified in MM BIO-5;* *b) Offsite restoration or creation of suitable habitat for the impacted species at the minimum replacement ratio of 2:1 for sensitive natural communities, native grasslands, and riparian habitat;* *c) Financial contribution to an in-lieu fee program that results in restoration or creation of suitable habitat for the impacted natural communities and/or species; and/or* *d) Purchase of mitigation credits at a USFWS- and/or CDFW-approved mitigation bank.* **Plan Requirements and Timing.** All requirements shall be included in the Biological Mitigation and Monitoring Plan and HMMP to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the BMMP and HMMP to ensure that all BMPs and appropriate mitigation measures have been included. The Applicant's Environmental Coordinator shall ensure compliance during habitat compensation and/or restoration activities through routine monitoring, inspection, and reporting of restoration activities pursuant to the approved Biological Mitigation and Monitoring Plan and HMMP. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan and HMMP through receipt and review of monitoring reports, and site inspections. ***MM BIO-5*** *The Biological Mitigation and Monitoring Plan shall require all temporary and permanent direct and indirect impacts to wetlands, grasslands, and riparian habitat be mitigated, as follows:*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	a) Temporary direct impacts to wetland, native grassland, and riparian habitat ~~impacts~~ shall be mitigated at a minimum 1:1 mitigation ratio (area of restored habitat to impacted habitat). *b) Permanent direct impacts to sensitive natural communities, such as native grasslands, and riparian habitat shall be mitigated at a 2:1 ratio (area of restored and enhanced habitat to impacted habitat).* *c) Permanent direct impacts to wetlands shall be mitigated at a minimum 3:1 ratio unless otherwise directed by state and federal agencies, including but not limited to the CDFW, RWQCB, NMFS, and USFWS (as appropriate).* *h) Potential indirect impacts to the Calle Joaquin wetlands affected by the Froom Creek realignment and changes to site hydrology shall be mitigated as follows. As a part of the HMMP prepared for the Project, the Applicant shall prepare and implement a Long-Term Wetland Monitoring Plan that is designed to quantitatively and qualitatively assess the effectiveness of the HMMP over time to ensure its objectives are achieved. The Long-Term Wetland Monitoring Plan shall be supported by a Baseline Conditions Assessment that identifies the pre-construction condition of the Calle Joaquin wetlands and establishes success criteria for sustained wetland conditions. The Baseline Conditions Assessment shall provide qualitative and quantitative information that will be used in comparing data obtained during subsequent monitoring years to determine if a significant deviance from baseline conditions has occurred at the site. The Long-Term Wetland Monitoring Plan will establish the parameters of a significant deviance from baseline conditions. A significant deviance from baseline may be defined as a "change in wetland area greater than 10%". The Baseline Conditions Assessment shall be updated prior to the start of construction to support agency permitting and guide implementation of the Long-Term Wetland Monitoring Plan. This updated baseline shall be considered in combination with existing and past baseline documentation to provide an expanded baseline reflective of a range of acceptable conditions to compare post Project conditions. The Baseline Conditions Assessment shall include a focused description of the site's hydrologic setting, vegetative cover and composition, quantified wetland areas and classifications, and shall establish the threshold for a significant deviance from wetland area based on the*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	presence of hydrophytic plant species, hydric soil indicators, and wetland hydrology. *At minimum, the condition of the wetland shall be evaluated on an annual basis through completion of a wetland assessment using a regulatory agency approved model (such as, but not limited to, the California Rapid Assessment Method [CRAM]) to document and facilitate long-term monitoring of changes to the wetland. The annual evaluation shall determine and document any degree of change to the wetland as a result of the proposed changes to site hydrology and development throughout build-out under the Specific Plan. Reports documenting the annual wetland assessment shall be provided to the City and relevant regulatory agencies.* *Long-Term Wetland Monitoring for the Calle Joaquin wetlands shall occur continuously for a period of no less than 7 years following Phase I build-out of the Froom Ranch Specific Plan area. After the initial 7-years of minimum annual monitoring, the frequency of long-term evaluations shall be determined in coordination with regulatory agencies and per the requirements of the Long-Term Wetland Monitoring Plan.* *The Long-Term Wetland Monitoring Plan shall include (at minimum) the following requirements. Additional detailed criteria and performance standards will be established in the HMMP prepared for the project and approved by regulatory agencies, but they shall not be any less stringent than the following criteria and performance standards:* *i. Annual monitoring shall evaluate and track the wetland health and biological integrity of the Calle Joaquin wetlands.* *ii. Annual evaluations shall utilize intensive site assessments to provide a more thorough and detailed measure of wetland condition by gathering direct measurements of biological taxa and hydrogeomorphic functions.* *iii. Typical industry standards for the quantitative evaluation of plant cover will be used (e.g., Bonham 1989 and Daubenmire 1968) to evaluate plant composition and structure as well as direct inspections of soil conditions and hydrologic functions.* *iv. Annual or semi-annual evaluations shall observe and document the following, at a minimum:*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	▪ *whether groundwater recharge from Froom Creek to the shallow aquifer is being sustained,* ▪ *whether the onsite artesian well has been discharging to the wetland,* ▪ *evidence of overflows entering the Calle Joaquin wetland from the realigned Froom Creek,* ▪ *excessive ponding, as evidenced by changes in vegetation related to increased duration of ponding,* ▪ *measured depth to groundwater in the onsite artesian well and the relationship of these conditions with conditions in the wetland,* ▪ *specific conductance and temperature in the wetland and other surface sources,* ▪ *the presence or absence of salt efflorescences in the wetland,* ▪ *any persistent green vegetation patches or changes in willow/grass ecotone, and* ▪ *representative photo points.* *v. Monitoring of the realigned creek's hydrology would be required following large storm events during the rain season that are sufficient to initiate flowing water through the site. If after the 3rd year of monitoring, vegetation has successfully established along the creek corridor and sedimentation and erosion are not observed beyond what is determined to be a normal level, then the rainy season monitoring could be scaled back to occur on a quarterly or as-needed basis for the remainder of the monitoring schedule, upon review and approval of the City's Natural Resources Manager and applicable regulatory agencies and consistent with the Long-Term Wetland Monitoring Plan.* *vi. Success criteria to determine whether the Calle Joaquin wetland functions are sustained shall include the following, at a minimum:* ▪ *The constructed bank between the realigned Froom Creek channel and the Calle Joaquin wetlands remains functional and does not recurrently scour or fill to a degree that impairs its operation or impedes circulation through the wetland,* ▪ *Excessive surface water does not pond for periods of long duration,*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	▪ *Salts do not accumulate such that discernible increases in salt efflorescences at the ground surface are not visible,* ▪ *Evidence of deposition by high flows is not found within the wetland (e.g., silt, organics, or other flood deposits).* *vii. If success criteria are not achieved within the 7-year initial monitoring period, a hydrologic assessment will be conducted by a USACE-approved specialist in groundwater supported wetlands to establish whether non-attainment is attributable to onsite conditions or actions beyond the effective control of the Project Applicant. The specialist shall be a registered hydrologist or certified hydrogeologist with statewide expertise, familiarity with groundwater supported wetlands in central coastal California and verifiable experience conducting functional analyses of such wetlands. Recommendations for remedial actions will be submitted by the groundwater specialist to the USACE for review and written approval prior to implementation. If wetland failures are determined to be directly related to the realignment of Froom Creek and development within the Froom Creek Specific Plan area, possible remedial actions would include, at minimum, the following:* ▪ *Engineering controls include biotechnical erosion controls such as the installation of willow wattles and brush mattressing and addition of native cobble to reinforce the low flow berm separating the creek channel from the wetland area to help contain flows into the wetland area.* ▪ *If vegetation establishment is taking longer than expected, remedial measures such as re-seeding bare soils, replanting areas of mortality, and increased maintenance and monitoring may be prescribed.* ▪ *If there is significant evidence of scouring, collapse, or filling of the overflow bank between the realigned low-flow Froom Creek channel and the Calle Joaquin wetlands, a registered professional engineer shall re-evaluate bank type, size, and slope and recommend a solution, such as augmentation or replacement.* ▪ *If there is excessive ponding (spatial or temporal), a registered professional engineer shall assess access to and*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	capacity of existing drainage outlets and recommend a solution, such as augmentation or replacement if necessary. ▪ *If salt efflorescence is observed and specific conductance in the wetland is greater than baseline conditions, a registered professional engineer shall re-evaluate the bank type, slope, size, and conveyance between the realigned Froom Creek low-flow channel and the Calle Joaquin wetlands to increase the frequency of salt flushing, such as altering surface flows to more frequently overflow to the wetland area.* *viii. If through monitoring it is determined that the Project does not adversely impact the Calle Joaquin wetland areas (as defined above), the Applicant shall provide documentation annually (at minimum) to the City, for review and approval by the City's Natural Resources Manager, that no significant signs of hydrological interruption, erosion (including bank failure), or sedimentation have occurred, that the wetland is sustained in biological integrity and health with existing hydrologic inputs, and that channel migration has not adversely affected existing wetland features adjacent to Calle Joaquin.* *ix. If through monitoring it is determined that the Project adversely impacts the Calle Joaquin wetland area, recommendations shall be made for modifications to the Project design in consultation with the City and appropriate regulatory agencies for review and concurrence, as described in subsection viii above. The annual reports would detail the issue or problem area and proposed remedial actions.* *x. If through monitoring it is determined that the Calle Joaquin wetland condition and function cannot be remediated with implementation of all feasible remedial actions and recommendations identified through long-term monitoring and as described in subsection vii above and the Long-Term Wetland Monitoring Plan, then adversely affected wetland areas shall be delineated and mitigated on- or offsite at a minimum 3:1 ratio unless otherwise directed by state and federal agencies, including but not limited to the CDFW, RWQCB, NMFS, and USFWS (as appropriate), consistent with subsection (c) above.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	~~ii.~~*xi. Funding for long-term wetland monitoring, adaptive management, and any recommended contingency measures shall be the responsibility of the Applicant. Payment of a bond by the Applicant would be required to ensure the availability of adequate funds to ensure successful implementation and completion of the Long-Term Wetland Monitoring Plan throughout build-out under the Specific Plan.* ~~*at a minimum 2:1 ratio and require mitigation of at least 10.24 acres. For the purpose of this mitigation, the area of the Calle Joaquin wetlands potentially affected by the Project include those wetlands northwest of Calle Joaquin within the Specific Plan area and southeast of the proposed Froom Creek low flow channel.*~~ *d) Habitat revegetation or creation shall occur in the fall or winter no more than 1 year following habitat disturbance. Revegetation shall be monitored monthly for 7 years with a goal of at least 70-percent survival of container plants and 70-percent relative cover by vegetation type at the end of the 7-year period. Irrigation shall be provided during this period or until otherwise determined necessary by the Applicant's Environmental Coordinator.* *e) Riparian vegetation along Froom Creek shall be maintained in perpetuity to the satisfaction of the City by the Applicant or a City-approved designee. Froom Creek conditions shall be monitored annually following winter storm seasons to assess damage to riparian vegetation and need for maintenance restoration. Monitoring and maintenance of riparian vegetation conditions shall be conducted consistent with the requirements of the Habitat Mitigation and Monitoring Plan outlined in MM BIO-3.* **Plan Requirements and Timing.** All requirements shall be included in the Biological Mitigation and Monitoring Plan to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP (including the Long-Term Wetland Monitoring Plan) to ensure that all BMPs and appropriate mitigation measures have been included. The Environmental Coordinator shall ensure compliance during habitat compensation and/or restoration activities through routine monitoring, inspection, and reporting of restoration activities. The City shall ensure	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	compliance with requirements for the Biological Mitigation and Monitoring Plan and Long-Term Wetland Monitoring Plan through receipt of monitoring reports and site inspections. ***MM BIO-6*** *The Biological Mitigation and Monitoring Plan shall detail timing and implementation of required habitat restoration and shall be submitted to the City's Natural Resources Manager for review and approval, including requirements for consultation with CDFW, NMFS, and USACE as needed. A copy of the final plan shall be submitted to the City for review and approval. The plan shall be implemented by the Project Applicant, under supervision by the City and the Applicant's Environmental Coordinator, and shall:* *a) Describe replacement of sensitive natural community habitats removed, lost, or adversely impacted by the Project, including a list of the soil, plants, and other materials that will be necessary for successful habitat restoration/ replacement, and a description of planting methods, location, spacing, erosion protection, and irrigation measures that will be needed. Restoration and habitat enhancement shall be limited to use of appropriate native species. Habitat restoration or enhancement areas shall be designed to facilitate establishment of appropriate native plants such as willows, cottonwoods, bunchgrass, and rushes.* *b) Habitat restoration or enhancement areas shall be established within the Project boundaries, adjacent to and contiguous with existing habitats to the maximum extent possible.* *c) Habitat restoration or enhancement sites shall be placed within existing or additional necessary deed-restricted area(s) and shall be maintained and monitored for a minimum of 7 years. If sufficient onsite mitigation area is not practicable, an offsite mitigation plan shall be prepared as part of the Biological Mitigation and Monitoring Plan and approved by permitting agencies.* *d) The Biological Mitigation and Monitoring Plan shall identify appropriate restoration and enhancement activities to compensate for impacts to creek, wetland, native bunch grass and riparian habitat, including a detailed planting plan and maintenance plans using locally obtained native species, and shall include habitat enhancement to support native wildlife and plant species.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	e) A weed management plan and weed identification list shall be included in the Biological Mitigation and Monitoring Plan. *f) Habitat restoration or enhancement areas shall be maintained weekly for the first three years after Project completion and quarterly thereafter. Maintenance shall include replacement of unsuccessful planted specimens and eradication of noxious weeds found on California Department of Food and Agriculture (CDFA) Lists A and B. Noxious weeds on CDFA List C may be eradicated or otherwise managed.* *g) Quarterly and annual reports documenting site inspections and site recovery status shall be prepared and sent to the City and appropriate agencies.* **Plan Requirements and Timing.** All requirements shall be included on the Biological Mitigation and Monitoring Plan and HMMP to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP to ensure that all BMPs and appropriate mitigation measures have been included. The Environmental Coordinator shall ensure compliance during habitat compensation and/or restoration activities. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan and HMMP through receipt of monitoring reports and site inspections. ***MM BIO-9*** *Construction and grading of the realigned portion of Froom Creek, including planting of riparian vegetation, watering, and bank stabilization, shall be conducted prior to removal of the existing creek segment to ensure a habitat for special-status species within the creek is maintained through the Project site with no interruption during construction. Project phasing shall be adjusted as needed to accommodate this sequence of construction activities.* **Plan Requirements and Timing.** The Applicant shall demonstrate phasing and creek restoration within the final VTM, and the Biological Mitigation and Monitoring Plan. The Applicant shall submit the plan to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review the Biological Mitigation and Monitoring Plan, and final VTM for compliance. The Applicant's Environmental	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Coordinator shall monitor creek realignment activities to ensure compliance with this mitigation measure. ***MM BIO-11*** *The Biological Mitigation and Monitoring Plan shall address special-status wildlife species management. Grading and construction activities shall avoid the rainy season (typically October 15 to April 15) to the extent practicable, particularly within 50 feet of the existing and proposed Froom Creek channel, and other existing or proposed drainage features, riparian or wetland habitat, and any suitable nesting sites as determined by the City-approved biologist. Injury, mortality to, or significant disturbance of onsite sensitive species, including the California red-legged frog, south-central California coast steelhead, and white-tailed kite, shall be avoided. The plan shall include the following measures: pre-construction surveys; worker awareness; cessation of work in occupied areas if individuals are identified; relocation (if necessary) of frogs and steelhead from the work area by a professional biologist authorized by the USFWS and/or CDFW; and monitoring of construction activities within the vicinity of sensitive habitats by a qualified biologist during construction, consistent with MM BIO-2. Necessary permits shall be obtained from the state (CDFW) and federal (USACE and USFWS) regulatory agencies with jurisdiction and/or permitting authority over a portion of the Project. Any other sensitive species observed during the pre-construction surveys shall be relocated by the qualified biologist into the nearest suitable habitat outside the disturbance area as determined in consultation with the appropriate jurisdictional resource agency.* **Plan Requirements and Timing.** All requirements shall be included on the Biological Mitigation and Monitoring Plan to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP to ensure that all BMPs and appropriate mitigation measures have been included. The City shall ensure compliance with requirements in the Biological Mitigation and Monitoring Plan. The Applicant's Environmental Coordinator shall also ensure compliance during habitat compensation and/or restoration activities. ***MM BIO-12*** *The Biological Mitigation and Monitoring Plan shall address the habitation and movement of special-status wildlife species, as follows:*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	1. Migratory and Nesting/Burrowing Bird Management. Grading and construction activities shall avoid the breeding season (typically from February 15 to August 15) to the extent practicable, particularly within 50 feet of riparian or wetland habitat and mature trees and within onsite grasslands. If Project activities must be conducted during this period and within the vicinity of riparian or wetland habitat, grasslands, and/or mature trees, pre-construction nesting/burrowing bird surveys shall take place no more than one week prior to habitat disturbance associated with each phase; if active nests or burrows are located during these surveys, the following measures shall be implemented: *a. Construction activities within 50 feet of active nests shall be restricted until chicks have fledged, unless the nest belongs to a raptor or burrowing owl, in which case a minimum 500-foot activity restriction buffer shall be observed.* *b. Construction shall be limited to daylight hours (7:00 AM to 7:00 PM or sunset, whichever is sooner).* *c. A pre-construction survey report shall be submitted to the City immediately upon completion of the survey. The report shall detail appropriate fencing or flagging of the buffer zone and make recommendations on additional monitoring requirements. A map of the Project site and nest locations shall be included with the report. If any sensitive species are observed during pre-construction surveys, the Project biologist shall coordinate with appropriate resource agencies to determine appropriate procedure for handling or avoidance of the specimen.* *d. The Project biologist conducting the nesting survey shall have the authority to reduce or increase the recommended buffer depending upon site conditions and the species involved. A report of findings and recommendations for bird protection shall be submitted to the City prior to vegetation removal. If sensitive special-status species are observed during pre-construction surveys, the Project biologist shall coordinate with appropriate resource agencies to determine appropriate procedures for handling or avoidance of the specimen.* *~~d.~~e. If burrowing owls are found onsite and avoidance is not possible, burrow exclusion shall be conducted by City-approved qualified*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	biologists and only during the non-breeding season, before breeding behavior is exhibited and after the burrow is confirmed empty through non-invasive methods, such as surveillance. CDFW recommends replacement of occupied burrows with artificial burrows at a ratio of one burrow collapsed to one artificial burrow constructed (1:1) To avoid recolonization, ongoing surveillance shall be provided by the City-approved Project biologists throughout Project construction at a rate that is sufficient to detect burrowing owls if they return. 2. *Bat Colony Management. Prior to removal of any trees over 20 inches diameter-at-breast-height (DBH) or demolition/relocation of existing onsite structures, a survey shall be conducted by a City and CDFW-approved biologist to determine if any tree or structure proposed for removal, trimming, demolition, or relocation harbors sensitive bat species or maternal bat colonies. Maternal bat colonies shall not be disturbed, and grading and construction activities shall avoid the bat breeding season to the extent feasible. If disturbance of structures must occur during the bat breeding season, buildings must be inspected and deemed clear of bat colonies/roosts within 7 days of demolition and an appropriately trained and approved biologist must conduct a daily site-clearance during demolition. If bats are roosting in a structure or tree in the Project site during the daytime but are not part of an active maternity colony, then exclusion measures shall be utilized and must include one-way valves that allow bats to leave but are designed so that the bats may not re-enter the structure. For each occupied roost removed, one bat box shall be installed in similar habitat as determined by the Project biologist and shall have similar cavities or crevices to those which are removed, including access, ventilation, dimensions, height above ground, and thermal conditions. If a bat colony would be eliminated from the Project site, appropriate alternate bat habitat shall be installed within the Project site. To the extent practicable, alternate bat house installation shall occur near onsite drainages.* **Plan Requirements and Timing.** The Biological Mitigation and Monitoring Plan shall include a management plan for migrating and nesting birds and bat colonies and shall be submitted for review and approval by the City prior to issuance of grading and construction permits and recordation of the final VTM. Construction shall be conducted between August 16 and February 14	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	unless pre-construction surveys are completed. Reports summarizing pre-construction species surveys (i.e., nesting, bat surveys, etc.) shall be submitted to the City within 10 days of survey completion. Construction work shall not commence until after the completion of surveys and City review of corresponding reports. Any required permits shall be obtained from appropriate state and federal agencies prior to issuance of grading and construction permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP to ensure that appropriate requirements have been included to address potential impacts to bird and bat species. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan. The Applicant's Environmental Coordinator shall also ensure compliance during habitat compensation and/or restoration activities. ***MM BIO-13*** *The Applicant shall amend the FRSP to establish a 300-foot development buffer on the centerline of the confluence of Drainage 1, 2, and 3 and the realigned Froom Creek to maintain natural vegetation, ecological, hydrologic, and wildlife connectivity between the Irish Hills Natural Reserve and the Froom Creek corridor. The required buffer shall extend from the point at which the proposed realigned Froom Creek exits the Specific Plan area, upstream along the centerlines of Drainages 1, 2, and 3 for 600 linear feet. The Applicant shall relocate residential uses to areas outside of this buffer and should not exacerbate biological resource impacts in other areas of the site.* **Plan Requirements and Timing.** The above requirements shall be integrated into the Final FRSP and final VTM prior to recordation. City staff shall ensure the above measures are incorporated into building plans prior to issuance. **Monitoring.** The City shall ensure the above measure is incorporated into the Final FRSP prior to Project approval. ***MM BIO-14*** *Proposed roadway/pathway crossings over any drainage shall be designed to ensure adequate passage for wildlife, consistent with the design standards and guidelines of the Federal Highway Administration Wildlife Crossing Structure Handbook.* **Plan Requirements and Timing.** The above requirements shall be integrated into the Final FRSP. City staff shall ensure the above measures are incorporated into the improvement plans prior to approval. **Monitoring.** The City shall ensure the above measure is incorporated into the Final FRSP prior to Project approval.	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
BIO-5. Project construction would result in the potential disturbance, trimming, or removal of up to 75 mature trees.	***MM BIO-15*** *Native Tree Protection. To ensure protection of native protected trees with respect to the tree trunk, canopy, and root zone, the Applicant shall hire a City-approved arborist or qualified biologist to conduct a daily, pre-construction survey of all activities occurring within the protected root zones of protected trees, and shall make recommendations for avoidance, and for any necessary remedial work to ensure the health and safety of trees that are encroached, and any measures necessary to reduce and/or remove potential safety hazards posed by any of these trees. Following construction, the health of affected trees shall be monitored by the arborist or qualified biologist for up to 5 years if necessary and as determined at the discretion of the City.* *Should Project activities result in the compromised health of native trees resulting from encroachment, the Applicant shall submit a native tree replacement planting program, prepared by a qualified biologist, arborist, or other resource specialist, which specifies replacement tree locations, tree or seedling size, planting specifications, and a monitoring program to ensure that the replacement planting program is successful, including performance standards for determining whether replacement trees are healthy and growing normally, and procedures for periodic monitoring and implementation of corrective measures in the event that the health of replacement trees declines. Where the worsened health of a tree results in the loss of protected tree species, mitigation measures in the native tree replacement program shall include the planting of replacement trees on the Project site, if suitable area exists. Riparian trees 4 inches or greater measured at DBH shall be replaced in-kind at a minimum ratio of 3:1 (replaced: removed). Trees 24 inches or greater inches DBH shall be replaced in-kind at a minimum ratio of 10:1. Willows and cottonwoods may be planted from live stakes following guidelines provided in the California Salmonid Stream Habitat Restoration Manual for planting dormant cuttings and container stock (CDFW 2010).* • *Tree replacement shall be conducted in accordance with a Natural Habitat Restoration and Enhancement Plan to be approved by the City's Natural Resources Manager.* • *The Natural Habitat Restoration and Enhancement Plan shall prioritize the planting of replacement trees on-site where feasible, but shall allow that replacement trees may be planted off-site with approval of the City's Natural Resources Manager.* • *Replacement trees may be planted in the fall or winter of the year in which trees were removed. All replacement trees will be planted no*	Less than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	more than 1 year following the date upon which the native trees were removed. *Where onsite mitigation through planting replacement trees is not feasible, mitigation shall be provided by one of the following methods:* • *Off-site mitigation shall be provided by planting no less than 10:1, at a suitable site that is restricted from development or is public parkland. The Applicant shall plant seedlings – less than 1-year old – in an area providing suitable habitat. In the case of oak trees, the seedlings shall be grown from acorns collected in the area; or* • *An in-lieu fee shall be provided for the unavoidable impacts of the loss of native tree habitat. The fee shall be based on the type, size and age of the tree(s) removed.* **Plan Requirements and Timing.** All requirements shall be included on final grading plans. The qualified biologist shall monitor for the health of trees during and following construction activities, for a period of up to 5 years if determined necessary by the City. **Monitoring.** The qualified biologist shall monitor all construction activities, and if necessary, periodically monitor the placement and planting program. City staff shall monitor for the health of affected individuals to determine compliance and potential need for further mitigation.	
3.5 Cultural and Tribal Resources Impacts		
CR-1. Project grading and construction would occur within areas of prehistoric archaeological sensitivity with the potential to impact subsurface cultural or tribal cultural resources.	***MM CR-1*** *A Phase 2 – Subsurface Archaeological Resource Evaluation (SARE) investigation shall be conducted prior to any grading or development proposed within 200 feet of the recorded P-40-000783 and P-40-001195 sites, or the unrecorded site comprising three mapped stone isolates, to evaluate the potential for unknown buried resources within these "archaeologically sensitive" areas, including but not limited to stone, bone, glass, ceramics, fossils, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites, consistent with City Archeological Resource Preservation Program Guidelines. If discovery of unknown buried archaeological resources occurs through the SARE, a City-approved archaeologist shall evaluate the significance of the discovery pursuant to City Archaeological Resource Preservation Program Guidelines and CEQA. If the discovery is found to be a significant cultural resource, Project design shall be modified to avoid modification, disturbance, or destruction of the archeological resource. If the Phase 2 SARE investigations do not discover*	Less than Significant with Mitigation.

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	unknown buried archaeological resources but conclude there is a possibility that cultural resources exist within the archaeologically sensitive areas that were evaluated, the Community Development Department Director shall require that the Applicant retain a City-approved archaeologist and local Native American observer to monitor construction activities to identify and protect archaeological resources in accordance with the Archaeological Monitoring Plan described in MM CR-3. **Plan Requirements and Timing.** Any required Phase 2 SARE investigations shall be conducted by a City-approved archaeologist prior to approval of the VTM or Project entitlements. **Monitoring.** The City shall ensure the Phase 2 SARE investigations are completed by a City-approved archaeologist and consistent with City Archeological Resource Preservation Program Guidelines. Any potential modifications to the Project design shall be reviewed and approved by the City prior to approval of any subdivision map or other entitlement. ***MM CR-2*** *If any ground disturbing activities are proposed within 100 feet of the recorded sites P-40-000783, P-40-0011195, or the unrecorded site comprising three mapped stone isolates, on preparation of construction plans, the plans shall delineate a 50-foot buffer surrounding the boundaries of the recorded sites. The area shall be labeled as an "Environmentally Sensitive Area". Highly visible temporary construction fencing shall be installed along the boundary of the 50-foot buffer and shall remain in place until the archaeological monitor recommends removal. If feasible, no ground disturbance, construction worker foot traffic, storage of materials, or storage or use of equipment shall occur within the "Environmentally Sensitive Area". Archaeological monitoring shall occur during all construction activities occurring within 50 feet of the delineated boundary. Upon completion of archaeological monitoring, an archaeological monitoring report shall be prepared and submitted to the City Community Development Department and the Central Coast Information Center at the University of California Santa Barbara.* **Plan Requirements and Timing.** Prior to recordation of the final VTM and issuance of grading permits, plans shall incorporate the delineation of the "Environmentally Sensitive Area" and associated protection measures. **Monitoring.** The City shall verity that required elements are shown on the final VTM and grading permits. Compliance shall be verified pursuant to the approved Archaeological Monitoring Plan.	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	MM CR-3 *Prior to issuance of grading or building permits, and recordation of the final map, an Archaeological Monitoring Plan (AMP) shall be prepared. The AMP should include, but not be limited to, the following:* • *A list of personnel involved in the monitoring activities;* • *Description of Native American involvement;* • *Description of how the monitoring shall occur;* • *Description of location and frequency of monitoring (e.g., full time, part time, spot checking);* • *Description of what resources are expected to be encountered;* • *Description of circumstances that would result in the halting of work at the project site;* • *Description of procedures for halting work on the site and notification procedures;* • *Description of monitoring reporting procedures; and* • *Provide specific, detailed protocols for what to do in the event of the discovery of human remains.* **Plan Requirements and Timing.** The AMP shall be prepared by a City-approved archaeologist prior to issuance of grading or building permits and recordation of the final map. **Monitoring.** The City shall ensure the AMP is prepared by a City-approved archaeologist and consistent with City Archeological Resource Preservation Program Guidelines. ***MM CR-4*** *The Applicant shall retain a City-approved archaeologist and local Native American observer to monitor Project-related ground-disturbing activities that have the potential to encounter previously unidentified archaeological resources, as outlined in the AMP prepared to satisfy MM CR-1. Archaeological and tribal monitoring may cease only if the City-approved archaeologist determines in coordination with the Applicant, Community Development Director, and the Native American monitor that Project activities do not have the potential to encounter and/or disturb unknown resources.* **Plan Requirements and Timing.** The conditions for monitoring and treatment of discoveries shall be printed on all building and grading plans. Prior to issuance of building and grading permits for each phase of the Project, the Applicant shall submit to the City a contract or Letter of Commitment with a qualified archaeologist and Native American monitor. The City shall review	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	and approve the selected archaeologist to ensure they meet appropriate professional qualification standards, consistent with the City's Archeological Resource Preservation Guidelines. **Monitoring.** City permit compliance staff shall confirm monitoring by the archaeologist and tribal representative and City grading inspectors shall spot check fieldwork. The Native American monitor and Project archaeologist shall ensure that actions consistent with this mitigation measure are implemented in the event of any inadvertent discovery. ***MM CR-5*** *In the event of any inadvertent discovery of prehistoric archaeological resources, including but not limited to stone, bone, glass, ceramics, fossils, wood, or shell artifacts, or historic-period archaeological resources, all work within 100 feet of the discovery shall immediately cease (or greater or lesser distance as needed to protect the discovery and determined in the field by the City-approved archaeologist). The Applicant and/or contractor shall immediately notify the City Community Development Department. The City-approved archaeologist shall evaluate the significance of the discovery pursuant to City Archaeological Resource Preservation Program Guidelines prior to resuming any activities that could impact the site/discovery. If the City-approved archaeologist or Native American monitor determine that the find may qualify for listing in the CRHR or as a tribal cultural resource, the site shall be avoided or shall be subject to a Phase II or III mitigation program consistent with City Archeological Resource Preservation Program Guidelines and funded by the Applicant. Work shall not resume until authorization is received from the City.* **Plan Requirements and Timing.** The conditions for monitoring and treatment of discoveries shall be printed on all building and grading plans. Prior to issuance of building and grading permits for each phase of the Project, the Applicant shall submit to the City a contract or Letter of Commitment with identified Project archaeologist and Native American monitor. The City shall review and approve the selected archaeologist to ensure they meet appropriate professional qualification standards, consistent with the Archeological Resource Preservation Program Guidelines. **Monitoring.** City permit compliance staff shall confirm monitoring by the archaeologist and tribal representative and City grading inspectors shall spot check fieldwork. The Native American monitor and Project archaeologist shall ensure that actions consistent with this mitigation measure are implemented in the event of any inadvertent discovery.	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	MM CR-6 *Prior to construction of each phase, workers shall receive education regarding the recognition of possible buried cultural remains and protection of all cultural resources, including prehistoric and historic resources, during construction. Such training shall provide construction personnel with direction regarding the procedures to be followed in the unlikely event that previously unidentified archaeological materials, including Native American burials, are discovered during construction. Training shall also inform construction personnel that unauthorized collection or disturbance of artifacts or other cultural materials is not allowed. The training shall be prepared by a City-approved archaeologist and shall provide a description of the cultural resources that may be encountered in the Project site, specify areas of known sensitivity, outline steps to follow in the event that a discovery is made, and provide contact information for the City-approved archaeologist, Native American monitor, and appropriate City personnel. The training shall be conducted concurrent with other environmental or safety awareness and education programs for the Project, provided that the program elements pertaining to archaeological resources is provided by a qualified instructor meeting applicable professional standards.* **Plan Requirements and Timing.** Prior to ground disturbance for each phase, construction workers shall participate in an educational program that will enable them to recognize and report possible buried cultural remains and protect all cultural resources, including prehistoric and historic resources. The educational program shall be outlined within the Archaeological Monitoring Plan and submitted to the City for approval prior to issuance of grading permits for each phase. **Monitoring.** The City-approved archaeologist shall verify the training has been completed by all construction workers and shall ensure construction workers follow cultural resource discovery protocols. ***MM CR-7*** *If human remains are exposed during construction, the City Community Development Department shall be notified immediately. The Applicant and City shall comply with State Health and Safety Code Section 7050.5, which states that no further disturbance shall occur until the County Coroner has been notified and can make the necessary findings as to origin and disposition of the remains pursuant to PRC Section 5097.98. Construction shall halt around the discovery of human remains, the area shall be protected, and consultation and treatment shall occur as prescribed by law.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Plan Requirements and Timing. The conditions for monitoring and treatment of discoveries shall be printed on all building and grading plans and reflected in the AMP. **Monitoring.** City permit compliance staff shall confirm monitoring by the City-approved archaeologist and tribal representative and City grading inspectors shall spot check fieldwork. The Native American monitor and City-approved archaeologist shall ensure that actions consistent with this mitigation measure are implemented in the event of any inadvertent discovery.	
CR-2. Future resident recreational activities could impact archaeological resources located within proposed open space.	***MM CR-8*** *No designated recreational areas, facilities, pedestrian paths, or roadways shall be located with 50 feet of a known prehistoric or tribal cultural resource site. All archaeological site soils within 100 feet of a known prehistoric or tribal cultural site shall be seeded with shallow rooted native vegetation unless existing natural vegetation (i.e., existing grasslands) can screen the cultural resource from view.* **Plan Requirements and Timing.** The Draft FRSP shall be amended to incorporate these measures as they apply to P-40-000783 or P-40-001195 and the unrecorded site, prior to adoption of the Final FRSP. **Monitoring.** A City-qualified archaeologist shall review and approve the established buffer between Project development and known cultural resource sites and review vegetation seeding covering the archaeological site boundaries prior to issuance of occupancy.	Less than Significant with Mitigation.
CR-3. The Project would result in relocation, demolition, disturbance, and/or removal of historic resources onsite, including individually eligible historic resources and a historic district.	***MM CR-9*** *The Applicant shall retain a qualified professional historic architect meeting the Secretary of the Interior's Professional Qualifications Standards (36 CFR Part 61) to review and comment on design and construction drawings and monitor construction to ensure conformance with the Secretary of the Interior's Standards. The role of the historic architect shall include collaboration on a range of items relating to materials selection, construction methods, design of exterior and interior alterations, and monitoring of construction activities. The historic architect and Applicant shall resolve any unforeseen circumstance in a manner that conforms with the Secretary of the Interior's Standards.* *a) The qualified professional historic architect shall work with the Applicant team to ensure:* *b) Deteriorated historic features would be repaired to the greatest extent feasible. Where features are deteriorated beyond repair, they would be replaced to exactly match the old.* *c) All character-defining features are retained.*	Significant and Unavoidable

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	d) Physical treatments to historic material would use the gentlest means possible and would not damage material. *e) Reconstruction would be clearly identified as a contemporary re-creation.* *f) Interpretative signage would clearly provide information regarding the history of the buildings and their reconstruction.* *Artifacts, features, and other materials recovered through this process shall be described, illustrated, and analyzed fully in a technical report of findings; the analysis shall include comparative research with other sites of similar age. In addition to the technical report, the findings from this research shall be published in an appropriate scientific journal. The Applicant shall fund all technical reporting and subsequent publication.* **Plan Requirements and Timing.** The historic architect shall submit a report documenting conformance with the Secretary of the Interior's Standards to the City for review and approval prior to issuance of any building permits for the Project. Artifacts, features, and other materials recovered through this process shall be described, illustrated, and analyzed fully in a technical report of findings; the analysis shall include comparative research with other sites of similar age. In addition to the technical report, the findings from this research shall be submitted~~published~~ to~~in~~ an appropriate scientific journal. The Applicant shall fund all technical reporting and subsequent publication. The historic architect shall notify the Applicant if any unforeseen circumstance arises during construction that could potentially result in nonconformance with the Secretary of the Interior's Standards. **Monitoring.** The City shall ensure the report is reviewed and approved prior to issuance of grading permits for Phase 3. The historic architect shall participate in a pre-construction meeting with the general contractor and subcontractors and periodically monitor construction to completion of construction. ***MM CR-10*** *The Applicant shall retain a qualified professional photographer to prepare Historic American Building Survey (HABS) Level II documentation and investigate additional applicable surveys (e.g., oral histories, LIDAR, and/or photogrammetry). This documentation shall record the existing appearance of all seven contributing buildings in large and medium format HABS photographs. HABS Level II documentation shall pertain to the entire Froom Ranch Dairy complex so that functional relationships between the buildings can be documented. All documentation components shall be*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	completed in accordance with the Guidelines for Architectural and Engineering Documentation (HABS standards). The photographs shall consist primarily of large format, 4-inch by 5-inch, black and white negatives (one set), contact prints (one set) and 8-inch by 10-inch prints (two sets), archivally processed and printed on fiber-based paper. The set of original negatives shall be made at the time the photographs are taken. The original, archivally-sound negatives and prints shall be and distributed as follows: (1) the Library of Congress in Washington, DC through the National Park Service (one set of negatives and contact prints). **Plan Requirements and Timing.** The draft documentation shall be assembled and submitted to the qualified professional historic architect and the City for review and approval prior to submittal to the repository. The HABS documentation shall be completed prior to the issuance of grading permits for Phase 1. **Monitoring.** A digital copy of the HABS documentation shall be reviewed by the City and approved prior to the issuance of grading permits. ***MM CR-11*** *The Applicant shall work with the City to develop an interpretive project that documents the potential historic district and its cultural and architectural heritage by means of a pamphlet and/or additional means (e.g., signage, interpretive plan, mobile-friendly content), subject to approval by the City. This ~~pamphlet~~interpretive project will highlight the former Froom Ranch Dairy, both primary and secondary contributors, in a social (Froom family) and industrial (dairy industry) context, with an emphasis on how these buildings were used on the dairy farm, and how this property relates to the larger dairy farm context in San Luis Obispo, the Central Coast, and California. Five hundred copies of the pamphlet shall be published. These professionally researched, written and printed materials shall be offered at no cost through the local museums and heritage organizations, and at the trailhead park. After the initial distribution of printed brochures, digital copies shall be available. Throughout the park, interpretive signs that provide information on building history and function (extant and demolished) shall also be incorporated.* **Plan Requirements and Timing.** The Applicant shall prepare and submit draft documentation to the City and Cultural Heritage Committee (CHC) for review and approval prior to the issuance of grading permits for Phase 3. **Monitoring.** The pamphlet and interpretive signage shall be reviewed by the CHC and approved by the Community Development Director. The Parks and	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Recreation Commission shall review any interpretive signage proposed to be located within the park. The City Community Development Department shall ensure park designs incorporate interpretive signage consistent with approved documentation. ***MM CR-12*** *The Applicant shall reuse original material to the greatest extent feasible in the proposed work on the contributing structures to be relocated and/or reconstructed within the proposed public park (main residence, dairy barn, creamery/house, and granary). The Applicant and historic architect shall work with the City to prepare a marketing plan to offer to the public any salvaged historic materials not used during rehabilitation and reconstruction of the primary contributors, and demolition of the secondary contributors. As appropriate, unused or unretained historic materials will be offered to local historical societies and museums, then offered to architectural recycling before being disposed.* **Plan Requirements and Timing.** The Applicant shall prepare and submit draft documentation to the City for review and approval by the Community Development Director prior to the issuance of grading permits for Phase 3. **Monitoring.** The marketing plan shall be reviewed and approved by the Community Development Director. ***MM CR-13*** *The Applicant and historic architect shall prepare design guidelines and a review process for new construction proximate to the main residence. New construction shall be undertaken in such a manner that the essential form and integrity of the main residence and its setting would be unimpaired. The design guidelines and review by City Community Development Director shall ensure new construction is compatible with main residence in material, features, size, scale and proportion, and massing.* **Plan Requirements and Timing.** The Applicant shall prepare and submit draft design guidelines to the City and CHC for review and approval prior to approval of entitlements and the issuance of grading permits for Phase 1. **Monitoring.** The design guidelines shall be reviewed by the CHC and approved by the Community Development Director. ***MM CR-14*** *Prior to commencement of Phase 1 construction, a City-approved qualified structural engineer and historical architect shall survey the existing foundations and other structural aspects of the main residence, creamery, dairy barn, and granary, and develop a preservation plan to protect the historic buildings from potential damage during construction activities.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	The qualified structural engineer shall identify any necessary temporary structural bracing for the historic structures to avoid damage to these resources during the duration of construction. The qualified structural engineer shall prepare a temporary historic structure stabilization plan identifying these techniques as necessary. **Plan Requirements and Timing.** The Applicant shall submit the preservation plan and temporary historic structure stabilization plan to the City for review and approval prior to recordation of the final map and issuance of grading and building permits for Phase 1 of construction. Prior to the issuance of Phase 4 building and grading permits, the Applicant shall submit the final Historic Structures Plan and temporary historic structure stabilization plan, with incorporation of any additional recommendations for repair, to the City for review and approval. **Monitoring.** The City engineer shall review and approve the preservation plan prior to recordation of the final map and issuance of grading permits for Phase 1. The City-approved structural engineer shall periodically monitor vibration during vibration-causing construction activities to ensure excessive vibration does not occur and that temporary historic structure stabilization plan strategies are effective at avoiding vibration damage. The structural engineer shall halt construction activity if he/she deems construction activity may harm historical resources and shall modify or augment the temporary historic structure stabilization plan strategies accordingly.	
3.6 Geology and Soils		
GEO-1. The Project would expose people or structures to adverse effects from earthquakes and seismically induced hazards.	None required	Less than Significant
GEO-2. The Project has the potential to exacerbate potential soils hazards, including expansive soils, differential settlement, and subsidence.	None required	Less than Significant
GEO-3. The Project would potentially cause erosion, landslides, and rockfall.	None required	Less than Significant
GEO-4. The Project would include subterranean parking in Villaggio and may require groundwater dewatering in areas with high groundwater.	None required	Less than Significant

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
GEO-5. Project construction could uncover paleontological resources in geologic deposits during earthwork activities. If improperly handled, such resources could be adversely impacted.	***MM GEO-1*** *Prior to construction of each phase, workers shall receive education regarding the recognition of possible paleontological resources, during grading and excavation. Such training shall provide construction personnel with direction regarding the procedures to be followed in the unlikely event that previously unidentified paleontological materials are discovered during construction. Training shall also inform construction personnel that unauthorized collection or disturbance of paleontological resources is not allowed. The training shall be prepared by a City-approved paleontologist and shall provide a description of paleontological resources that may be encountered in the Project site, outline steps to follow in the event that a discovery is made, and provide contact information for the Project paleontologist and appropriate City personnel. The training shall be conducted concurrent with other environmental or safety awareness and education programs for the Project, provided that the program elements pertaining to paleontological resources is provided by a qualified instructor meeting applicable professional qualifications standards. In order to prevent inadvertent potential significant impacts to paleontological resources that may be encountered during ground disturbance or construction activities, in the event of any inadvertent discovery of paleontological resources during construction, all work within the vicinity of the resource established by the City-approved paleontologist shall temporarily cease. If a paleontological resource is discovered, the City-approved paleontologist shall be notified to assess the significance of the find and provide recommendations as necessary for its proper disposition.* **Plan Requirements and Timing.** Prior to ground disturbance for each phase, construction workers shall participate in an educational program that will enable them to recognize and report possible paleontological resources. The conditions for treatment of discoveries shall be printed on all grading plans. The City shall be notified immediately after the unanticipated discovery of a paleontological resource. Paleontological reports shall be reviewed and approved prior to issuance of occupancy. In the event that any potentially significant paleontological resources are uncovered during ground disturbance or construction activities: a) Temporarily cease grading in the vicinity of the resource established by the City-approved paleontologist and redirect activity elsewhere to ensure the preservation of the resource in which the discovery was made;	Less than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	b) Immediately notify the City of San Luis Obispo Community Development Department regarding the resource and redirected grading activity; c) Obtain the services of a City-approved professional paleontologist who shall assess the significance of the find and provide recommendations as necessary for its proper disposition for review and approval by City of San Luis Obispo Community Development Department. d) Complete all significance assessment and mitigation of impacts to the paleontological resource and verification reviewed and approved by City of San Luis Obispo Community Development Department prior to resuming grading in the area of the find. **Monitoring.** Paleontological reports prepared for the Project site in response to an unanticipated discovery shall be maintained by the City of San Luis Obispo Community Development Department.	
3.7 Hazards, Hazardous Materials, and Wildfire		
HAZ-1. The Project would exacerbate wildfire risks, thereby exposing occupants to wildfire hazards, and impair emergency response, and would require wildfire fuel management in the Irish Hills Natural Reserve.	***MM HAZ-1*** *The Applicant shall prepare and submit a Construction Impact Management Plan to the City of San Luis Obispo Fire Department (SLOFD) prior to the issuance of grading permits. The Plan shall list measures taken during construction to reduce the potential for brush or grass fires from use of heavy equipment, welding, vehicles with catalytic converters, and other potential activities. The Plan shall include SLOFD recommended measures including, but not limited to the following:* • *All equipment with the potential to work off-road shall be equipped with appropriate mufflers and have extinguishers mounted on each vehicle;* • *In coordination with SLOFD, personnel shall be briefed on the dangers of wildfire and be able to respond accordingly should the need arise;* • *Onsite supervisor(s) shall have a cell phone or other means of initiating a 911 response time in a timely manner in the event of a medical emergency and/or fire;* • *All dead and decadent vegetation immediately surrounding the development area shall be removed to a minimum perimeter of 30 feet;* • *Smoking shall only occur in a designated area;* • *A water tender will be available on each construction site during the entire phase of construction; and*	Significant and Unavoidable

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	• *A water tender operator shall be available onsite during all construction and remain onsite a minimum of 30 minutes after all construction has finished for the day.* **Plan Requirements and Timing.** The Applicant shall prepare a Construction Impact Management Plan in coordination with SLOFD, the San Luis Obispo County Fire Department, and the City, and submit the Plan to the SLOFD for approval prior to the issuance of grading permits. Provisions for fire protection shall be restated on all grading and building plans. Fire protection measures shall be implemented throughout construction and draw upon the CALFIRE and San Luis Obispo County Fire Department Strategic Fire Plan. The name and telephone number of an onsite supervisor shall be provided to SLOFD prior to commencement of construction or grading activities. **Monitoring.** The SLOFD shall review the Construction Impact Management Plan and provide recommended measures as necessary. The City permit processing planner shall ensure measures are integrated into the final grading and building plans prior to permit approval. City monitoring staff shall spot check for compliance during construction for each phase of development. ***MM HAZ-2*** *In accordance with PRC Section 4291, the Applicant shall hire a City-qualified team that consists of appropriate specialists (i.e., fire management professionals, biologists) to prepare a Community Fire Protection Plan to design the creation and maintenance of required fire buffers and fuel management zones around developable areas and detail methods for achieving fire safety around new buildings while preserving the integrity and function of affected native plant communities to the maximum extent feasible, and that ensures that consistent fire fuel management practices are applied throughout the City. The Plan shall incorporate management strategies in coordination with adjacent property owners, including Mountainbrook Church and the Irish Hills Natural Reserve. The Plan shall outline the removal and control of invasive, non-native vegetation, and conservation of sensitive habitats and rare species, while developing fire fuel management practices that will discourage or prevent non-native grasses and other non-native invasive species from dominating surrounding areas. Landscaping shall be maintained by the Applicant and periodically inspected by the SLOFD during fire inspections in each of the fuel management zones to avoid the buildup of deadwood and leaf litter, which, if left to accumulate, would reduce the mitigating effect of the Plan. Specifically, the Plan shall include, but not be limited to, the following elements:*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	• *Vegetation coverage and type;* • *Setbacks between structures, sensitive wildlife species, and access routes;* • *Development plan landscaping and planting standards within the setback areas;* • *Native trees and shrubs, such as coast live oak, coastal scrub, and grassland shall be thinned and limbed up but left in place;* • *All allowable weed abatement techniques, qualifications, and requirements for weed abatement contractors, as well as measures and techniques that ensure the required fuel management and vegetation clearance, shall be designed and implemented to provide adequate structure protection and avoid degradation of sensitive biological habitat; and* • *Invasive species shall be removed and controlled.* **Plan Requirements and Timing.** Prior to approval of the final development plan, the Community Fire Protection Plan shall be prepared and submitted to the City Natural Resources Manager and SLOFD for review and approval, with coordination from the San Luis Obispo County Fire Department. The Plan shall be implemented consistent with the approved maintenance schedule. **Monitoring.** The City-qualified biologist shall submit a monitoring report to the City Natural Resources Manager and SLOFD at the end of the first year following Project occupancy documenting the fuel management activities that took place. Conformance with the Community Fire Protection Plan shall be demonstrated through the submittal of annual photo documentation by the Applicant or site visits as necessary at the discretion of the Compliance monitoring staff. ***MM HAZ-3*** *The Froom Ranch Specific Plan (FRSP) shall designate smoking areas, located away from onsite fire hazards areas and within acceptable locations consistent with Chapter 8.16, Smoking Prohibition and Secondhand Smoke Control, of the City Municipal Code. Otherwise, smoking shall be prohibited onsite. The Applicant shall amend the FRSP to include policies to requiring the allowed use of fire resistant landscaping and hardscaping in areas to reduce mulch/gorilla hair, which is the receptive embers, if determined appropriate by SLOFD.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Plan Requirements and Timing. Prior to adoption of the Final FRSP, the Applicant shall amend the Final FRSP to include these policies. The Applicant shall coordinate with SLOFD to identify appropriate locations for designated smoking areas and appropriate fire resistant landscaping and hardscaping features within the Project site. **Monitoring.** The Final FRSP shall be reviewed by the SLOFD and City for inclusion of the above measure. ***MM HAZ-4*** *The Applicant shall prepare and implement an Evacuation Plan, which shall address both Villaggio and Madonna Froom Ranch areas. The Evacuation Plan shall be subject to review by the City and SLOFD, and shall include, but not be limited to:* • *Accommodation for assisted living and special care individuals;* • *Shelter-in-place accommodations;* • *Specified quantity and capacity of vehicles required to accommodate residents and employees of Villaggio, and maintenance of those vehicles;* • *Signage that clearly indicates evacuation routes and meeting areas;* • *Specified egress points for transportation vehicles;* • *A relocation plan from the Project site to a secondary facility, with associated transportation;* • *Contingency plans for changes to the construction schedule or phasing plan that would affect the primary evacuation plan and routes;* • *Periodic updates that would consider potential redevelopment activities or other roadway alterations; and* • *Regular practice drills (e.g., one per year) for implementation of the Evacuation Plan.* **Plan Requirements and Timing.** The above Evacuation Plan shall be prepared in coordination with the SLOFD and the San Luis Obispo County Fire Department and submitted for approval to the City and SLOFD prior to adoption of the Final VTTM. The Applicant shall resubmit the Plan to the City and SLOFD prior to the construction of each phase of development. Prior to occupancy of the first residential unit, the Applicant shall implement measures within the Evacuation Plan. **Monitoring.** The City and SLOFD shall review the Evacuation Plan and ensure all recommendations are incorporated. The City Fire Marshall shall	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	inspect the Project site for compliance prior to the occupancy of the first residential unit for each phase. ***MM HAZ-5*** *The Froom Ranch Specific Plan (FRSP) shall designate fire access routes in at least two locations from the Project site to the Irish Hills Natural Reserve on at least 12-foot wide paths, one extending from Villaggio and one from Madonna Froom Ranch. Fire access routes shall be designed to allow emergency response to wildland area in the Irish Hills to support direct access for firefighting personnel and equipment.* **Plan Requirements and Timing.** Prior to adoption of the Final FRSP, the Applicant shall amend the Final FRSP to include the required accessway, in coordination with SLOFD to identify appropriate locations within the Project site. **Monitoring.** The Final FRSP shall be reviewed by the SLOFD and City for inclusion of the above measure.	
HAZ-2. The Project would potentially expose persons to toxic, hazardous, or otherwise harmful chemicals through accidental conditions involving the release of hazardous materials into the environment.	None Required.	Less than Significant
HAZ-3. The Project site is located within the ALUP Safety Areas and would potentially result in an airport-related safety hazard for people residing or working in the Project site.	None Required.	Less than Significant
3.8 Hydrology and Water Quality		
HYD-1. Project construction activities would result in impacts to water quality due to polluted runoff and increased erosion or siltation.	***MM HYD-1*** *Prior to the issuance of any construction/grading permit and/or the commencement of any clearing, grading, or excavation, the Applicant shall submit a Notice of Intent (NOI) for discharge from the Project site to the California SWRCB Storm Water Permit Unit.* **Plan Requirements and Timing.** The NOI shall be submitted for review and approval to the SWRCB. The City will verify that a Waste Discharge Identification (WDID) number is assigned by the Board prior to the issuance of grading permits for construction activities. The NOI shall address discharge during all phases of development of the site until all disturbed areas are permanently stabilized.	Less than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Monitoring. The City will confirm WDID number assignment prior to approval of the grading permit(s). City monitoring staff will periodically inspect the site during construction to ensure compliance. ***MM HYD-2*** *For each phase of construction, the Applicant shall require the building contractor to prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) to the City 45 days prior to the start of work for approval. The contractor is responsible for understanding the State General Permit and instituting the SWPPP during construction. A SWPPP for site construction shall be developed prior to the initiation of grading and implemented for all construction activity on the Project site in excess of 1 acre, or where the area of disturbance is less than 1 acre but is part of the Project's plan of development that in total disturbs 1 or more acres. The SWPPP shall identify potential pollutant sources that may affect the quality of discharges to stormwater and shall include specific BMPs to control the discharge of material from the site, including, but not limited to:* • *Temporary detention basins, straw bales, sand bagging, mulching, erosion control blankets, silt fencing, and soil stabilizers shall be used.* • *Sufficient physical protection and pollution prevention measures to prevent sedimentation, siltation, and/or debris from entering the Calle Joaquin wetlands.* • *Soil stockpiles and graded slopes shall be covered after 14 days of inactivity and 24 hours prior to and during inclement weather conditions.* • *Fiber rolls shall be placed along the top of exposed slopes and at the toes of graded areas to reduce surface soil movement, as necessary.* • *A routine monitoring plan shall be implemented to ensure success of all onsite erosion and sedimentation control measures.* • *Dust control measures shall be implemented to ensure success of all onsite activities to control fugitive dust.* • *Streets surrounding the Project site shall be cleaned daily or as necessary.* • *BMPs shall be strictly followed to prevent spills and discharges of pollutants onsite (material and container storage, proper trash disposal, construction entrances, etc.).* • *Sandbags, or other equivalent techniques, shall be utilized along graded areas to prevent siltation transport to the surrounding areas.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	• *Additional BMPs shall be implemented for any fuel storage or fuel handling that could occur onsite during construction. The SWPPP must be prepared in accordance with the guidelines adopted by the SWRCB. The SWPPP shall be submitted to the City along with grading/development plans for review and approval. The Applicant shall file a Notice of Completion for construction of the development, identifying that pollution sources were controlled during the construction of the Project and implementing a closure SWPPP for the site.* **Plan Requirements and Timing.** The Applicant shall prepare a SWPPP that includes the above and any additional required BMPs addressing each phase of construction and timing. The SWPPP and notices shall be submitted to the SWRCB under their Stormwater Multi-Application, Reporting, and Tracking System (SMARTS). The SWPPP shall be designed to address erosion and sediment control during all phases of development of the site until all disturbed areas are permanently stabilized. The development plans submitted to the City shall include and reflect the erosion control plan and BMPs submitted to the State. **Monitoring.** City monitoring staff shall periodically inspect the site for compliance with the SWPPP during grading to monitor runoff and after conclusion of grading activities. A Qualified SWPPP Practitioner (QSP) will be retained by the developer for overall management and reporting responsibility regarding the SWPPP and documentation under SMARTS in accordance with their permitting requirement. The Applicant will keep a copy of the SWPPP on the Project site during grading and construction activities. ***MM HYD-3*** *Installation of the stormwater management system shall occur during the dry season (May through October), including realignment and restoration of Froom Creek, installation of hydrological connections for the stormwater detention basin, construction of onsite retention basins, and the installation of the Home Depot and LOVR ditches. Stormwater management system features shall be fully installed and restored to ensure soil stabilization and adequate stormwater conveyance capacity prior to the storm season (October through April).* **Plan Requirements and Timing.** The Applicant shall demonstrate compliance within grading and construction phasing plans subject to City review and approval prior to issuance of grading permits for each Project phase.	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Monitoring. The City shall review grading and construction plans for all phases to ensure compliance. City grading monitors shall spot check for compliance.	
HYD-2. The Project would potentially exacerbate flooding and erosion hazards onsite and in areas downstream, particularly related to the proposed realignment and design of Froom Creek and developed areas of the site.	***MM HYD-4*** *The Applicant shall submit final Froom Creek Realignment plans and supporting technical studies that provide a refined bio-engineering approach to ensure creek bank and channel bottom stability and avoidance or reduction of further erosion. Final creek design plans and a supporting engineering study shall address appropriate boulder sizes and bank protection measures necessary to prevent dislodgement or remobilization of in-channel or toe-slope protection rock. Natural methods (e.g., additional rock) shall be employed as needed to maintain the proposed creek alignment and downslope bank location between the channel and LOVR and the Calle Joaquin wetlands, and to protect mid- to upper-bank areas and top-of-bank from erosion from flood flows and aid in maintenance of riparian vegetation.* **Plan Requirements and Timing.** The Applicant shall submit revised plans and additional supporting technical studies to the City for review and approval prior to recordation of the final VTM. The final VTM shall depict all necessary revisions or improvements identified in the revised Froom Creek Realignment plans and supporting studies. **Monitoring.** City staff shall inspect Froom Creek realignment improvements and ensure compliance throughout all construction phases. Permit compliance monitoring staff shall perform periodic site inspections to verify compliance with planned improvements.	Less than Significant with Mitigation
HYD-3. Operation of the Project would potentially impact water quality of Froom Creek and San Luis Obispo Creek due to polluted urban runoff and sedimentation.	None Required.	Less than Significant
HYD-4. The Project would involve development of new impervious surfaces and potentially interfere with groundwater recharge.	None Required.	Less than Significant
3.9 Land Use		
LU-1. The Project would allow urban development above the 150-foot elevation and would relocate portions of the Froom Ranch Dairy complex, which would potentially conflict with City General Plan	***MM BIO-1*** *The Applicant shall prepare and implement a Biological Mitigation and Monitoring Plan that identifies both construction and operational related avoidance, reduction, and mitigation measures for impacts to sensitive natural communities. The Biological Mitigation and*	Significant and Unavoidable

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
policies adopted for the purpose of avoiding impacts to visual, biological, and cultural resources and wildfire hazards.	*Monitoring Plan shall include Best Management Practices (BMPs) to avoid or minimize impacts to biological resources, and implementation of on and offsite habitat replacement as follows:* *1) The Biological Mitigation and Monitoring Plan shall include the following construction-related measures and BMPs:* *a) Construction equipment and vehicles shall be stored at least 100 feet away from existing and proposed drainage features and adjacent riparian habitat, and all construction vehicle maintenance shall be performed in a designated offsite vehicle storage and maintenance area approved by the City.* *b) Prior to commencement of construction, Drainages 1, 2, 3, and 4 and all associated springs, seeps, and wetlands shall be protected with construction fencing located a minimum of 25 feet from the edge of the stream channel or top of bank and signed to prohibit entry of construction equipment and personnel unless authorized by the City. Fencing shall be maintained throughout the construction period for each phase of development. Fencing and signage shall be removed following completion of construction.* *c) During any construction activities within 50 feet of the existing Froom Creek channel, realigned Froom Creek channel, LOVR ditch, Drainages 1, 2, 3, or 4, or other existing or proposed drainage features, a City-approved biological monitor shall be present and have the authority to stop or redirect work as needed to protect biological resources.* *d) All construction materials (e.g., fuels, chemicals, building materials) shall be stored at designated construction staging areas, which shall be located outside of designated sensitive areas. Should spills occur, or if any unanticipated hazardous are discovered, materials and/or contaminants shall be cleaned immediately and recycled or disposed of to the satisfaction of the RWQCB, Department of Toxic Substances Control, and/or San Luis Obispo County Public Health Environmental Services, as applicable.* *e) All trash and construction debris shall be properly disposed at the end of each day and dumpsters shall be covered either with locking lids or with plastic sheeting at the end of each workday and during*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	storm events. All sheeting shall be carefully secured to withstand weather conditions. *f) The Applicant shall implement measures designed to minimize construction-related erosion and retain sediment on the Project site, including installation of silt fencing, straw waddles, or other acceptable construction erosion control devices. Such measures shall be installed along the perimeter of disturbed areas and along the top of the bank of the existing and proposed Froom Creek channel and other existing or proposed drainage features and 25 feet from the edge of Drainages 1, 2, 3, and 4. All drainage shall be directed to sediment basins designed to retain all sediment onsite.* *g) Concrete truck and tool washout shall occur in a designated location such that no runoff will reach the creek, onsite drainages, or other sensitive areas.* *h) All open trenches shall be constructed with appropriate exit ramps to allow species that fall into a trench to escape. All open trenches shall be inspected at the beginning of each work day to ensure that no wildlife species is present. Any sensitive wildlife species found during inspections shall be gently encouraged to leave the Project site by a qualified biologist or otherwise trained and City-approved personnel. Trenches will remain open for the shortest period necessary to complete required work.* *i) Existing disturbed areas shall be used for construction staging and storage to the maximum extent possible to minimize disturbance of undeveloped habitats. All construction access roads and staging areas shall be located to avoid known/mapped habitat and minimize habitat fragmentation.* **Plan Requirements and Timing.** The Biological Mitigation and Monitoring Plan shall be submitted for review and approval by the City prior to issuance of grading permits and recordation of the final VTM. The plan shall incorporate any additional measures or requirements identified by state and federal agencies, including but not limited to CDFW, RWQCB, NMFS, and USFWS. The Applicant shall prepare a Biological Mitigation Plan that identifies and incorporates all required measures identified in MM BIO-2 through MM BIO-12 below. The plan shall specify all mitigation site locations, timing of surveys and activities, species composition, habitat	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	compensation, species avoidance measures, and other required information, including identification of appropriate onsite construction staging locations. The plan shall demonstrate compliance with all required measures and any required permits shall be obtained from state and federal regulatory agencies prior to the issuance of grading or building permits. A 7-year site mitigation monitoring plan shall also be prepared by the City-approved biologist and incorporated into the Biological Mitigation and Monitoring Plan prior to issuance of grading permits and recordation of the final VTM, with annual reports submitted to the City Natural Resources Manager and Community Development Department. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan to ensure that all BMPs and appropriate mitigation measures have been included. The City shall ensure compliance with requirements of the Biological Mitigation and Monitoring Plan through frequent monitoring and inspection, and receipt of quarterly monitoring reports provided by the Applicant's Environmental Coordinator required per MM BIO-2. The Applicant's Environmental Coordinator shall also ensure compliance during habitat compensation and/or restoration activities through routine monitoring, inspection, and reporting of restoration activities. ***MM BIO-2*** *The Applicant shall retain a qualified Environmental Coordinator/qualified biologist, subject to review and approval by the City to oversee compliance with the Biological Mitigation and Monitoring Plan. The Applicant's Environmental Coordinator shall monitor all construction activities, conduct a biological resources education program for all construction workers prior to the initiation of any clearing or construction activities, and provide quarterly reports to the City regarding construction activities, enforcement issues, and remedial measures. The Applicant's Environmental Coordinator shall be responsible for conducting inspections of the work area each work day to ensure that excavation areas and sensitive or restored habitats do not exhibit construction-related impacts or hazards to wildlife. If any exposure risk is identified, the Environmental Coordinator shall implement measures that could include, but not be limited to, hazing, fencing, and wildlife removals to eliminate the exposure risk.* *In addition, the Applicant's Environmental Coordinator shall monitor and regulate all construction occurring within 50 feet of the existing and proposed Froom Creek channel, other existing or proposed drainage features, riparian habitat, Drainages 1, 2, 3, and 4, and seasonal or permanent wetlands.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	During appropriate flowering, nesting, breeding, migration, and dispersal seasons, the Environmental Coordinator shall also conduct sensitive species surveys immediately prior to construction activities and shall monitor construction activities in the vicinity of habitats to be avoided. *The work area boundaries and other off-limit areas shall be identified by the biologist and/or Environmental Coordinator on a daily basis. The biologist and/or Environmental Coordinator shall inspect construction and sediment control fencing each work day during construction activities. Any vegetation clearing activities shall be monitored by the biologist and/or Environmental Coordinator.* **Plan Requirements and Timing.** The City shall approve the Applicant's qualified Environmental Coordinator/qualified biologist prior to issuance of grading and building permits for each phase of construction. The Environmental Coordinator shall be present onsite to monitor construction activities pursuant to the approved Biological Mitigation and Monitoring Plan. **Monitoring.** The Environmental Coordinator shall monitor all grading and construction activities occurring within the vicinity of sensitive habitats or known location of sensitive species, shall conduct regular site inspections throughout the entire site, and shall be responsible for compliance of the construction activities and the above BMPs within MM BIO-1 and MM BIO-3 through MM BIO-8. During construction, the Environmental Coordinator shall submit quarterly monitoring reports to the City to ensure compliance with the Biological Mitigation and Monitoring Plan and applicable laws, regulations, and policies. The Environmental Coordinator/qualified biologist shall be onsite during all construction activities which take place within 50 feet of sensitive creek, wetland, and riparian habitat areas. ***MM BIO-3*** *The Biological Mitigation and Monitoring Plan shall include a Habitat Mitigation and Monitoring Plan (HMMP) with details on timing and implementation of required habitat restoration, enhancement, or creation measures. The Biological Mitigation and Monitoring Plan and HMMP shall be prepared under the direction of, and approved by, the City's Natural Resources Manager in conjunction with regulatory agencies with permitting authority over the Project. The HMMP shall contain, at a minimum, the following components (or as otherwise modified by regulatory agency permitting conditions):*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	a) Pre-construction surveys and delineation of vegetation communities, habitat, and wetland features, including clear maps and a summary of onsite habitats to be protected and acreage, design, and locations of required habitat mitigation sites. *b) A description of the location and boundaries of the mitigation site and description of existing site conditions.* *c) A description of measures to be undertaken to enhance the mitigation site for the target species and to protect sensitive resources.* *d) Record necessary replacement of disturbed, altered, and/or lost area of habitat.* *e) A binding long-term agreement with the Applicant to implement and maintain protected and restored sensitive habitats, including native bunch grassland, wetlands, springs, seeps, tributary drainages, and other sensitive or restored native habitats. These measures shall identify typical performance and success criteria deemed acceptable by the City and CDFW based on measurable goals and objectives. Said criteria for restored habitats shall be, at a minimum, at least 70-percent survival of container plants and 70-percent relative cover by vegetation type.* *f) A description of habitat and species restoration and monitoring measures, including specific and objective performance criteria, monitoring methods, data analysis, reporting requirements, and monitoring schedule. (At a minimum, success criteria shall be at least 70-percent survival of container plants and 70-percent relative cover by vegetation type and will include a replacement ratio of 2:1 and determination by a City-approved biologist that the mitigation site provides ecological functions and values for the focal species equal to or exceeding the impacted habitat.)* *g) Plan requirements that ensure mitigation elements that do not meet performance or final success criteria within 5 years are completed through an extension of the plan for an additional 2 years or at the discretion of the City Natural Resources Manager with the goal of completing all mitigation requirements prior to the HMMP end date.* *h) Monitoring of the mitigation and maintenance areas shall occur for the period established in the HMMP, or until success criteria are met; an endowment may be required in some cases as determined by the City. If success criteria cannot be met through the HMMP, the City Natural*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Resources Manager shall specify appropriate commensurate measures (e.g., onsite or offsite restoration, endowment, or bond to the City for completion of necessary mitigation). *i) A binding long-term agreement with the Villaggio Life Plan Community to fund and retain a qualified biologist to train all landscaping crew staff hired over the life of the development on sensitive plant species and habitat within the vicinity of the development, including the identification and avoidance of sensitive plants and habitat. The qualified biologist shall conduct annual monitoring of vegetation surrounding the development and prepare a report summarizing the avoidance or disturbance of sensitive resources from operational activities of the Villaggio development, and identifying necessary replacement or restoration of affected resources. Necessary mitigation shall be subject to the same standards for performance, monitoring, and success identified in subitems b through h, above. The report shall be submitted to the City annually for review and approval.* *j) A plan for fencing and/or signage around the Upper Terrace of the Villaggio development, prohibiting residents, guests, and employees from accessing and disturbing the surrounding sensitive resources.* *k) Requirements for payment of annual fees to the City to fund City review and inspection of the site and Biological Mitigation and Monitoring Plan and HMMP requirements.* **Plan Requirements and Timing.** All requirements shall be included on the Biological Mitigation and Monitoring Plan to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP to ensure that all BMPs and appropriate mitigation measures have been included. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan through frequent monitoring and inspection. The Environmental Coordinator shall also ensure compliance during habitat compensation and/or restoration activities through routine monitoring and inspection of restoration activities. ***MM BIO-4*** *The Biological Mitigation and Monitoring Plan shall require avoidance of sensitive natural communities outside approved development footprints such as the Nassella pulchra Herbaceous Alliance, Central Coast*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Arroyo Willow Scrub Community, Coastal and Central Valley Freshwater Marsh, and wetland areas to the maximum extent feasible. Mitigation for impacted sensitive natural communities that cannot be avoided shall be achieved through one or more of the following options, subject to City approval: *a) Onsite restoration, enhancement, or creation of suitable replacement habitat, if feasible onsite restoration opportunities exist and at ratios consistent with those identified in MM BIO-5;* *b) Offsite restoration or creation of suitable habitat for the impacted species at the minimum replacement ratio of 2:1 for sensitive natural communities, native grasslands, and riparian habitat;* *c) Financial contribution to an in-lieu fee program that results in restoration or creation of suitable habitat for the impacted natural communities and/or species; and/or* *d) Purchase of mitigation credits at a USFWS- and/or CDFW-approved mitigation bank.* **Plan Requirements and Timing.** All requirements shall be included in the Biological Mitigation and Monitoring Plan and HMMP to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the BMMP and HMMP to ensure that all BMPs and appropriate mitigation measures have been included. The Applicant's Environmental Coordinator shall ensure compliance during habitat compensation and/or restoration activities through routine monitoring, inspection, and reporting of restoration activities pursuant to the approved Biological Mitigation and Monitoring Plan and HMMP. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan and HMMP through receipt and review of monitoring reports, and site inspections. ***MM BIO-5*** *The Biological Mitigation and Monitoring Plan shall require all temporary and permanent direct and indirect impacts to wetlands, grasslands, and riparian habitat be mitigated, as follows:* *a) Temporary direct impacts to wetland, native grassland, and riparian habitat ~~impacts~~ shall be mitigated at a minimum 1:1 mitigation ratio (area of restored habitat to impacted habitat).*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	b) Permanent direct impacts to sensitive natural communities, such as native grasslands, and riparian habitat shall be mitigated at a 2:1 ratio (area of restored and enhanced habitat to impacted habitat). *c) Permanent direct impacts to wetlands shall be mitigated at a minimum 3:1 ratio unless otherwise directed by state and federal agencies, including but not limited to the CDFW, RWQCB, NMFS, and USFWS (as appropriate).* *i) Potential indirect impacts to the Calle Joaquin wetlands affected by the Froom Creek realignment and changes to site hydrology shall be mitigated as follows. As a part of the HMMP prepared for the Project, the Applicant shall prepare and implement a Long-Term Wetland Monitoring Plan that is designed to quantitatively and qualitatively assess the effectiveness of the HMMP over time to ensure its objectives are achieved. The Long-Term Wetland Monitoring Plan shall be supported by a Baseline Conditions Assessment that identifies the pre-construction condition of the Calle Joaquin wetlands and establishes success criteria for sustained wetland conditions. The Baseline Conditions Assessment shall provide qualitative and quantitative information that will be used in comparing data obtained during subsequent monitoring years to determine if a significant deviance from baseline conditions has occurred at the site. The Long-Term Wetland Monitoring Plan will establish the parameters of a significant deviance from baseline conditions. A significant deviance from baseline may be defined as a "change in wetland area greater than 10%". The Baseline Conditions Assessment shall be updated prior to the start of construction to support agency permitting and guide implementation of the Long-Term Wetland Monitoring Plan. This updated baseline shall be considered in combination with existing and past baseline documentation to provide an expanded baseline reflective of a range of acceptable conditions to compare post Project conditions. The Baseline Conditions Assessment shall include a focused description of the site's hydrologic setting, vegetative cover and composition, quantified wetland areas and classifications, and shall establish the threshold for a significant deviance from wetland area based on the presence of hydrophytic plant species, hydric soil indicators, and wetland hydrology.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	At minimum, the condition of the wetland shall be evaluated on an annual basis through completion of a wetland assessment using a regulatory agency approved model (such as, but not limited to, the California Rapid Assessment Method [CRAM]) to document and facilitate long-term monitoring of changes to the wetland. The annual evaluation shall determine and document any degree of change to the wetland as a result of the proposed changes to site hydrology and development throughout build-out under the Specific Plan. Reports documenting the annual wetland assessment shall be provided to the City and relevant regulatory agencies. *Long-Term Wetland Monitoring for the Calle Joaquin wetlands shall occur continuously for a period of no less than 7 years following Phase I build-out of the Froom Ranch Specific Plan area. After the initial 7-years of minimum annual monitoring, the frequency of long-term evaluations shall be determined in coordination with regulatory agencies and per the requirements of the Long-Term Wetland Monitoring Plan.* *The Long-Term Wetland Monitoring Plan shall include (at minimum) the following requirements. Additional detailed criteria and performance standards will be established in the HMMP prepared for the project and approved by regulatory agencies, but they shall not be any less stringent than the following criteria and performance standards:* *i. Annual monitoring shall evaluate and track the wetland health and biological integrity of the Calle Joaquin wetlands.* *ii. Annual evaluations shall utilize intensive site assessments to provide a more thorough and detailed measure of wetland condition by gathering direct measurements of biological taxa and hydrogeomorphic functions.* *iii. Typical industry standards for the quantitative evaluation of plant cover will be used (e.g., Bonham 1989 and Daubenmire 1968) to evaluate plant composition and structure as well as direct inspections of soil conditions and hydrologic functions.* *iv. Annual or semi-annual evaluations shall observe and document the following, at a minimum:* ▪ *whether groundwater recharge from Froom Creek to the shallow aquifer is being sustained,*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	▪ *whether the onsite artesian well has been discharging to the wetland,* ▪ *evidence of overflows entering the Calle Joaquin wetland from the realigned Froom Creek,* ▪ *excessive ponding, as evidenced by changes in vegetation related to increased duration of ponding,* ▪ *measured depth to groundwater in the onsite artesian well and the relationship of these conditions with conditions in the wetland,* ▪ *specific conductance and temperature in the wetland and other surface sources,* ▪ *the presence or absence of salt efflorescences in the wetland,* ▪ *any persistent green vegetation patches or changes in willow/grass ecotone, and* ▪ *representative photo points.* *v. Monitoring of the realigned creek's hydrology would be required following large storm events during the rain season that are sufficient to initiate flowing water through the site. If after the 3rd year of monitoring, vegetation has successfully established along the creek corridor and sedimentation and erosion are not observed beyond what is determined to be a normal level, then the rainy season monitoring could be scaled back to occur on a quarterly or as-needed basis for the remainder of the monitoring schedule, upon review and approval of the City's Natural Resources Manager and applicable regulatory agencies and consistent with the Long-Term Wetland Monitoring Plan.* *vi. Success criteria to determine whether the Calle Joaquin wetland functions are sustained shall include the following, at a minimum:* ▪ *The constructed bank between the realigned Froom Creek channel and the Calle Joaquin wetlands remains functional and does not recurrently scour or fill to a degree that impairs its operation or impedes circulation through the wetland,* ▪ *Excessive surface water does not pond for periods of long duration,* ▪ *Salts do not accumulate such that discernible increases in salt efflorescences at the ground surface are not visible,*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	▪ *Evidence of deposition by high flows is not found within the wetland (e.g., silt, organics, or other flood deposits).* vii. *If success criteria are not achieved within the 7-year initial monitoring period, a hydrologic assessment will be conducted by a USACE-approved specialist in groundwater supported wetlands to establish whether non-attainment is attributable to onsite conditions or actions beyond the effective control of the Project Applicant. The specialist shall be a registered hydrologist or certified hydrogeologist with statewide expertise, familiarity with groundwater supported wetlands in central coastal California and verifiable experience conducting functional analyses of such wetlands. Recommendations for remedial actions will be submitted by the groundwater specialist to the USACE for review and written approval prior to implementation. If wetland failures are determined to be directly related to the realignment of Froom Creek and development within the Froom Creek Specific Plan area, possible remedial actions would include, at minimum, the following:* ▪ *Engineering controls include biotechnical erosion controls such as the installation of willow wattles and brush mattressing and addition of native cobble to reinforce the low flow berm separating the creek channel from the wetland area to help contain flows into the wetland area.* ▪ *If vegetation establishment is taking longer than expected, remedial measures such as re-seeding bare soils, replanting areas of mortality, and increased maintenance and monitoring may be prescribed.* ▪ *If there is significant evidence of scouring, collapse, or filling of the overflow bank between the realigned low-flow Froom Creek channel and the Calle Joaquin wetlands, a registered professional engineer shall re-evaluate bank type, size, and slope and recommend a solution, such as augmentation or replacement.* ▪ *If there is excessive ponding (spatial or temporal), a registered professional engineer shall assess access to and capacity of existing drainage outlets and recommend a solution, such as augmentation or replacement if necessary.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	▪ *If salt efflorescence is observed and specific conductance in the wetland is greater than baseline conditions, a registered professional engineer shall re-evaluate the bank type, slope, size, and conveyance between the realigned Froom Creek low-flow channel and the Calle Joaquin wetlands to increase the frequency of salt flushing, such as altering surface flows to more frequently overflow to the wetland area.* *viii.* *If through monitoring it is determined that the Project does not adversely impact the Calle Joaquin wetland areas (as defined above), the Applicant shall provide documentation annually (at minimum) to the City, for review and approval by the City's Natural Resources Manager, that no significant signs of hydrological interruption, erosion (including bank failure), or sedimentation have occurred, that the wetland is sustained in biological integrity and health with existing hydrologic inputs, and that channel migration has not adversely affected existing wetland features adjacent to Calle Joaquin.* *ix.* *If through monitoring it is determined that the Project adversely impacts the Calle Joaquin wetland area, recommendations shall be made for modifications to the Project design in consultation with the City and appropriate regulatory agencies for review and concurrence, as described in subsection viii above. The annual reports would detail the issue or problem area and proposed remedial actions.* *x.* *If through monitoring it is determined that the Calle Joaquin wetland condition and function cannot be remediated with implementation of all feasible remedial actions and recommendations identified through long-term monitoring and as described in subsection vii above and the Long-Term Wetland Monitoring Plan, then adversely affected wetland areas shall be delineated and mitigated on- or offsite at a minimum 3:1 ratio unless otherwise directed by state and federal agencies, including but not limited to the CDFW, RWQCB, NMFS, and USFWS (as appropriate), consistent with subsection (c) above.* ~~iii.~~*xi.* *Funding for long-term wetland monitoring, adaptive management, and any recommended contingency measures shall be the responsibility of the Applicant. Payment of a bond by the*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Applicant would be required to ensure the availability of adequate funds to ensure successful implementation and completion of the Long-Term Wetland Monitoring Plan throughout build-out under the Specific Plan. ~~*at a minimum 2:1 ratio and require mitigation of at least 10.24 acres. For the purpose of this mitigation, the area of the Calle Joaquin wetlands potentially affected by the Project include those wetlands northwest of Calle Joaquin within the Specific Plan area and southeast of the proposed Froom Creek low flow channel.*~~ *d) Habitat revegetation or creation shall occur in the fall or winter no more than 1 year following habitat disturbance. Revegetation shall be monitored monthly for 7 years with a goal of at least 70-percent survival of container plants and 70-percent relative cover by vegetation type at the end of the 7-year period. Irrigation shall be provided during this period or until otherwise determined necessary by the Applicant's Environmental Coordinator.* *e) Riparian vegetation along Froom Creek shall be maintained in perpetuity to the satisfaction of the City by the Applicant or a City-approved designee. Froom Creek conditions shall be monitored annually following winter storm seasons to assess damage to riparian vegetation and need for maintenance restoration. Monitoring and maintenance of riparian vegetation conditions shall be conducted consistent with the requirements of the Habitat Mitigation and Monitoring Plan outlined in MM BIO-3.* **Plan Requirements and Timing.** All requirements shall be included in the Biological Mitigation and Monitoring Plan to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP (including the Long-Term Wetland Monitoring Plan) to ensure that all BMPs and appropriate mitigation measures have been included. The Environmental Coordinator shall ensure compliance during habitat compensation and/or restoration activities through routine monitoring, inspection, and reporting of restoration activities. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan and Long-Term Wetland Monitoring Plan through receipt of monitoring reports and site inspections.	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	MM BIO-6 *The Biological Mitigation and Monitoring Plan shall detail timing and implementation of required habitat restoration and shall be submitted to the City's Natural Resources Manager for review and approval, including requirements for consultation with CDFW, NMFS, and USACE as needed. A copy of the final plan shall be submitted to the City for review and approval. The plan shall be implemented by the Project Applicant, under supervision by the City and the Applicant's Environmental Coordinator, and shall:* *a) Describe replacement of sensitive natural community habitats removed, lost, or adversely impacted by the Project, including a list of the soil, plants, and other materials that will be necessary for successful habitat restoration/ replacement, and a description of planting methods, location, spacing, erosion protection, and irrigation measures that will be needed. Restoration and habitat enhancement shall be limited to use of appropriate native species. Habitat restoration or enhancement areas shall be designed to facilitate establishment of appropriate native plants such as willows, cottonwoods, bunchgrass, and rushes.* *b) Habitat restoration or enhancement areas shall be established within the Project boundaries, adjacent to and contiguous with existing habitats to the maximum extent possible.* *c) Habitat restoration or enhancement sites shall be placed within existing or additional necessary deed-restricted area(s) and shall be maintained and monitored for a minimum of 7 years. If sufficient onsite mitigation area is not practicable, an offsite mitigation plan shall be prepared as part of the Biological Mitigation and Monitoring Plan and approved by permitting agencies.* *d) The Biological Mitigation and Monitoring Plan shall identify appropriate restoration and enhancement activities to compensate for impacts to creek, wetland, native bunch grass and riparian habitat, including a detailed planting plan and maintenance plans using locally obtained native species, and shall include habitat enhancement to support native wildlife and plant species.* *e) A weed management plan and weed identification list shall be included in the Biological Mitigation and Monitoring Plan.* *f) Habitat restoration or enhancement areas shall be maintained weekly for the first three years after Project completion and quarterly*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	thereafter. Maintenance shall include replacement of unsuccessful planted specimens and eradication of noxious weeds found on California Department of Food and Agriculture (CDFA) Lists A and B. Noxious weeds on CDFA List C may be eradicated or otherwise managed. *g) Quarterly and annual reports documenting site inspections and site recovery status shall be prepared and sent to the City and appropriate agencies.* **Plan Requirements and Timing.** All requirements shall be included on the Biological Mitigation and Monitoring Plan and HMMP to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP to ensure that all BMPs and appropriate mitigation measures have been included. The Environmental Coordinator shall ensure compliance during habitat compensation and/or restoration activities. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan and HMMP through receipt of monitoring reports and site inspections. ***MM BIO-9*** *Construction and grading of the realigned portion of Froom Creek, including planting of riparian vegetation, watering, and bank stabilization, shall be conducted prior to removal of the existing creek segment to ensure a habitat for special-status species within the creek is maintained through the Project site with no interruption during construction. Project phasing shall be adjusted as needed to accommodate this sequence of construction activities.* **Plan Requirements and Timing.** The Applicant shall demonstrate phasing and creek restoration within the final VTM, and the Biological Mitigation and Monitoring Plan. The Applicant shall submit the plan to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review the Biological Mitigation and Monitoring Plan, and final VTM for compliance. The Applicant's Environmental Coordinator shall monitor creek realignment activities to ensure compliance with this mitigation measure. ***MM BIO-10*** *Chorro Creek Bog Thistle and Special-Status Plant Management. Prior to issuance of grading and building permits, the*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Applicant shall submit or fund a site survey for special-status plants, including Chorro Creek bog thistle, and: *1. All individual locations of special-status species, including Chorro Creek bog thistle, and suitable habitat areas shall be mapped using GPS coordinates. No construction activities or disturbance shall occur within 50 feet of mapped special-status species, including Chorro Creek bog thistle, or suitable habitat areas. This setback shall be delineated and maintained with construction fencing and clear signage for the duration of grading and construction. If the site survey results identify Chorro Creek bog thistle that may be disturbed or lost from Project construction, the Project shall be redesigned to ensure a minimum 50 foot buffer from mapped Chorro Creek bog thistle occurrences.* *~~2. If the site survey results identify Chorro Creek bog thistle that may be disturbed or lost from Project construction, the Project shall be redesigned to ensure a minimum 50-foot buffer from mapped Chorro Creek bog thistle occurrences.~~* *~~3.~~2. Development adjacent to Drainages 1, 2, and 3 shall be set back a minimum of 50 feet from the top of the bank of these drainages and the edge of delineated associated wetlands.* *3. Drainages 1, 2, and 3 and associated wetlands shall be fenced a minimum of 50 feet from the top of the bank or edge of delineated wetland during construction. The Applicant shall ensure and demonstrate to the City through frequent reporting requirements approved by the City that these areas are managed and maintained in perpetuity to maintain wetland and Chorro Creek bog thistle habitat values to the extent feasible.* *4. If the site survey results identify special-status plant species, including Chorro Creek bog thistle, or suitable habitat that may be disturbed or lost from Project construction, the Project shall be redesigned to ensure a minimum 50-foot buffer from mapped individual occurrences and suitable habitat areas. If buffers cannot be maintained, then consultation with CDFW shall occur to determine appropriate minimization and mitigation measures for impacts to special-status plant species, or in the case of plant species listed pursuant to CESA or the Native Plant Protection Act, to determine if take can be avoided. If take cannot be avoided, take authorization prior to any ground-*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	disturbing activities may be warranted. Take authorization would occur through issuance of an ITP by CDFW, pursuant to Fish and Game Code section 2081(b). **Plan Requirements and Timing.** All requirements shall be included on the Biological Mitigation and Monitoring Plan to be submitted to the City for review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP to ensure that all BMPs and appropriate mitigation measures have been included. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan. The Applicant's Environmental Coordinator shall also ensure compliance during habitat compensation and/or restoration activities. ***MM BIO-11*** *The Biological Mitigation and Monitoring Plan shall address special-status wildlife species management. Grading and construction activities shall avoid the rainy season (typically October 15 to April 15) to the extent practicable, particularly within 50 feet of the existing and proposed Froom Creek channel, and other existing or proposed drainage features, riparian or wetland habitat, and any suitable nesting sites as determined by the City-approved biologist. Injury, mortality to, or significant disturbance of onsite sensitive species, including the California red-legged frog, south-central California coast steelhead, and white-tailed kite, shall be avoided. The plan shall include the following measures: pre-construction surveys; worker awareness; cessation of work in occupied areas if individuals are identified; relocation (if necessary) of frogs and steelhead from the work area by a professional biologist authorized by the USFWS and/or CDFW; and monitoring of construction activities within the vicinity of sensitive habitats by a qualified biologist during construction, consistent with MM BIO-2. Necessary permits shall be obtained from the state (CDFW) and federal (USACE and USFWS) regulatory agencies with jurisdiction and/or permitting authority over a portion of the Project. Any other sensitive species observed during the pre-construction surveys shall be relocated by the qualified biologist into the nearest suitable habitat outside the disturbance area as determined in consultation with the appropriate jurisdictional resource agency.* **Plan Requirements and Timing.** All requirements shall be included on the Biological Mitigation and Monitoring Plan to be submitted to the City for	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	review and approval prior to issuance of grading permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP to ensure that all BMPs and appropriate mitigation measures have been included. The City shall ensure compliance with requirements in the Biological Mitigation and Monitoring Plan. The Applicant's Environmental Coordinator shall also ensure compliance during habitat compensation and/or restoration activities. ***MM BIO-12*** *The Biological Mitigation and Monitoring Plan shall address the habitation and movement of special-status wildlife species, as follows:* 1. *Migratory and Nesting/Burrowing Bird Management. Grading and construction activities shall avoid the breeding season (typically from February 15 to August 15) to the extent practicable, particularly within 50 feet of riparian or wetland habitat and mature trees and within onsite grasslands. If Project activities must be conducted during this period and within the vicinity of riparian or wetland habitat, grasslands, and/or mature trees, pre-construction nesting bird surveys shall take place no more than one week prior to habitat disturbance associated with each phase; if active nests or burrows are located during these surveys, the following measures shall be implemented:* a. *Construction activities within 50 feet of active nests shall be restricted until chicks have fledged, unless the nest belongs to a raptor or burrowing owl, in which case a minimum 500-foot activity restriction buffer shall be observed.* b. *Construction shall be limited to daylight hours (7:00 AM to 7:00 PM or sunset, whichever is sooner).* c. *A pre-construction survey report shall be submitted to the City immediately upon completion of the survey. The report shall detail appropriate fencing or flagging of the buffer zone and make recommendations on additional monitoring requirements. A map of the Project site and nest locations shall be included with the report. If any sensitive species are observed during pre-construction surveys, the Project biologist shall coordinate with appropriate resource agencies to determine appropriate procedure for handling or avoidance of the specimen.* d. *The Project biologist conducting the nesting survey shall have the authority to reduce or increase the recommended buffer*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	depending upon site conditions and the species involved. A report of findings and recommendations for bird protection shall be submitted to the City prior to vegetation removal. If sensitive or special-status species are observed during pre-construction surveys, the Project biologist shall coordinate with appropriate resource agencies to determine appropriate procedures for handling or avoidance of the specimen. *~~d.~~e. If burrowing owls are found onsite and avoidance is not possible, burrow exclusion shall be conducted by City-approved qualified biologists and only during the non-breeding season, before breeding behavior is exhibited and after the burrow is confirmed empty through non-invasive methods, such as surveillance. CDFW recommends replacement of occupied burrows with artificial burrows at a ratio of one burrow collapsed to one artificial burrow constructed (1:1) To avoid recolonization, ongoing surveillance shall be provided by the City-approved Project biologists throughout Project construction at a rate that is sufficient to detect burrowing owls if they return.* 2. *Bat Colony Management. Prior to removal of any trees over 20 inches diameter-at-breast-height (DBH) or demolition/relocation of existing onsite structures, a survey shall be conducted by a City and CDFW-approved biologist to determine if any tree or structure proposed for removal, trimming, demolition, or relocation harbors sensitive bat species or maternal bat colonies. Maternal bat colonies shall not be disturbed, and grading and construction activities shall avoid the bat breeding season to the extent feasible. If disturbance of structures must occur during the bat breeding season, buildings must be inspected and deemed clear of bat colonies/roosts within 7 days of demolition and an appropriately trained and approved biologist must conduct a daily site-clearance during demolition. If bats are roosting in a structure or tree in the Project site during the daytime but are not part of an active maternity colony, then exclusion measures shall be utilized and must include one-way valves that allow bats to leave but are designed so that the bats may not re-enter the structure. For each occupied roost removed, one bat box shall be installed in similar habitat as determined by the Project biologist and shall have similar cavities or crevices to those which are removed, including access, ventilation, dimensions,*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	height above ground, and thermal conditions. If a bat colony would be eliminated from the Project site, appropriate alternate bat habitat shall be installed within the Project site. To the extent practicable, alternate bat house installation shall occur near onsite drainages. **Plan Requirements and Timing.** The Biological Mitigation and Monitoring Plan shall include a management plan for migrating and nesting birds and bat colonies and shall be submitted for review and approval by the City prior to issuance of grading and construction permits and recordation of the final VTM. Construction shall be conducted between August 16 and February 14 unless pre-construction surveys are completed. Reports summarizing pre-construction species surveys (i.e., nesting, bat surveys, etc.) shall be submitted to the City within 10 days of survey completion. Construction work shall not commence until after the completion of surveys and City review of corresponding reports. Any required permits shall be obtained from appropriate state and federal agencies prior to issuance of grading and construction permits and recordation of the final VTM. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan and HMMP to ensure that appropriate requirements have been included to address potential impacts to bird and bat species. The City shall ensure compliance with requirements for the Biological Mitigation and Monitoring Plan. The Applicant's Environmental Coordinator shall also ensure compliance during habitat compensation and/or restoration activities. ***MM CR-9*** *The Applicant shall retain a qualified professional historic architect meeting the Secretary of the Interior's Professional Qualifications Standards (36 CFR Part 61) to review and comment on design and construction drawings and monitor construction to ensure conformance with the Secretary of the Interior's Standards. The role of the historic architect shall include collaboration on a range of items relating to materials selection, construction methods, design of exterior and interior alterations, and monitoring of construction activities. The historic architect and Applicant shall resolve any unforeseen circumstance in a manner that conforms with the Secretary of the Interior's Standards.* *a) The qualified professional historic architect shall work with the Applicant team to ensure:* *b) Deteriorated historic features would be repaired to the greatest extent feasible. Where features are deteriorated beyond repair, they would be replaced to exactly match the old.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	c) All character-defining features are retained. *d) Physical treatments to historic material would use the gentlest means possible and would not damage material.* *e) Reconstruction would be clearly identified as a contemporary re-creation.* *f) Interpretative signage would clearly provide information regarding the history of the buildings and their reconstruction.* *Artifacts, features, and other materials recovered through this process shall be described, illustrated, and analyzed fully in a technical report of findings; the analysis shall include comparative research with other sites of similar age. In addition to the technical report, the findings from this research shall be published in an appropriate scientific journal. The Applicant shall fund all technical reporting and subsequent publication.* **Plan Requirements and Timing.** The historic architect shall submit a report documenting conformance with the Secretary of the Interior's Standards to the City for review and approval prior to issuance of any building permits for the Project. Artifacts, features, and other materials recovered through this process shall be described, illustrated, and analyzed fully in a technical report of findings; the analysis shall include comparative research with other sites of similar age. In addition to the technical report, the findings from this research shall be ~~published~~ submitted to~~in~~ an appropriate scientific journal. The Applicant shall fund all technical reporting and subsequent publication. The historic architect shall notify the Applicant if any unforeseen circumstance arises during construction that could potentially result in nonconformance with the Secretary of the Interior's Standards. **Monitoring.** The City shall ensure the report is reviewed and approved prior to issuance of grading permits for Phase 3. The historic architect shall participate in a pre-construction meeting with the general contractor and subcontractors and periodically monitor construction to completion of construction. ***MM CR-10*** *The Applicant shall retain a qualified professional photographer to prepare Historic American Building Survey (HABS) Level II documentation and investigate additional applicable surveys (e.g., oral histories, LIDAR, and/or photogrammetry). This documentation shall record the existing appearance of all seven contributing buildings in large and medium format HABS photographs. HABS Level II documentation shall pertain to the entire Froom Ranch Dairy complex so that functional relationships between the*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	buildings can be documented. All documentation components shall be completed in accordance with the Guidelines for Architectural and Engineering Documentation (HABS standards). The photographs shall consist primarily of large format, 4-inch by 5-inch, black and white negatives (one set), contact prints (one set) and 8-inch by 10-inch prints (two sets), archivally processed and printed on fiber-based paper. The set of original negatives shall be made at the time the photographs are taken. The original, archivally-sound negatives and prints shall be and distributed as follows: (1) the Library of Congress in Washington, DC through the National Park Service (one set of negatives and contact prints). **Plan Requirements and Timing.** The draft documentation shall be assembled and submitted to the qualified professional historic architect and the City for review and approval prior to submittal to the repository. The HABS documentation shall be completed prior to the issuance of grading permits for Phase 1. **Monitoring.** A digital copy of the HABS documentation shall be reviewed by the City and approved prior to the issuance of grading permits. ***MM CR-11*** *The Applicant shall work with the City to develop an interpretive project that documents the potential historic district and its cultural and architectural heritage by means of a pamphlet and/or additional measures (e.g., signage, interpretive plan, mobile-friendly content), subject to approval by the City. This ~~pamphlet~~ interpretive project will highlight the former Froom Ranch Dairy, both primary and secondary contributors, in a social (Froom family) and industrial (dairy industry) context, with an emphasis on how these buildings were used on the dairy farm, and how this property relates to the larger dairy farm context in San Luis Obispo, the Central Coast, and California. Five hundred copies of the pamphlet shall be published. These professionally researched, written and printed materials shall be offered at no cost through the local museums and heritage organizations, and at the trailhead park. After the initial distribution of printed brochures, digital copies shall be available. Throughout the park, interpretive signs that provide information on building history and function (extant and demolished) shall also be incorporated.* **Plan Requirements and Timing.** The Applicant shall prepare and submit draft documentation to the City and Cultural Heritage Committee (CHC) for review and approval prior to the issuance of grading permits for Phase 3.	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Monitoring. The pamphlet and interpretive signage shall be reviewed by the CHC and approved by the Community Development Director. The Parks and Recreation Commission shall review any interpretive signage proposed to be located within the park. The City Community Development Department shall ensure park designs incorporate interpretive signage consistent with approved documentation. ***MM CR-12*** *The Applicant shall reuse original material to the greatest extent feasible in the proposed work on the contributing structures to be relocated and/or reconstructed within the proposed public park (main residence, dairy barn, creamery/house, and granary). The Applicant and historic architect shall work with the City to prepare a marketing plan to offer to the public any salvaged historic materials not used during rehabilitation and reconstruction of the primary contributors, and demolition of the secondary contributors. As appropriate, unused or unretained historic materials will be offered to local historical societies and museums, then offered to architectural recycling before being disposed.* **Plan Requirements and Timing.** The Applicant shall prepare and submit draft documentation to the City for review and approval by the Community Development Director prior to the issuance of grading permits for Phase 3. **Monitoring.** The marketing plan shall be reviewed and approved by the Community Development Director. ***MM CR-13*** *The Applicant and historic architect shall prepare design guidelines and a review process for new construction proximate to the main residence. New construction shall be undertaken in such a manner that the essential form and integrity of the main residence and its setting would be unimpaired. The design guidelines and review by City Community Development Director shall ensure new construction is compatible with main residence in material, features, size, scale and proportion, and massing.* **Plan Requirements and Timing.** The Applicant shall prepare and submit draft design guidelines to the City and CHC for review and approval prior to approval of entitlements and the issuance of grading permits for Phase 1. **Monitoring.** The design guidelines shall be reviewed by the CHC and approved by the Community Development Director. ***MM CR-14*** *Prior to commencement of Phase 1 construction, a City-approved qualified structural engineer and historical architect shall survey the existing foundations and other structural aspects of the main residence, creamery,*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	dairy barn, and granary, and develop a preservation plan to protect the historic buildings from potential damage during construction activities. *The qualified structural engineer shall identify any necessary temporary structural bracing for the historic structures to avoid damage to these resources during the duration of construction. The qualified structural engineer shall prepare a temporary historic structure stabilization plan identifying these techniques as necessary.* **Plan Requirements and Timing.** The Applicant shall submit the preservation plan and temporary historic structure stabilization plan to the City for review and approval prior to recordation of the final map and issuance of grading and building permits for Phase 1 of construction. Prior to the issuance of Phase 4 building and grading permits, the Applicant shall submit the final Historic Structures Plan and temporary historic structure stabilization plan, with incorporation of any additional recommendations for repair, to the City for review and approval. **Monitoring.** The City engineer shall review and approve the preservation plan prior to recordation of the final map and issuance of grading permits for Phase 1. The City-approved structural engineer shall periodically monitor vibration during vibration-causing construction activities to ensure excessive vibration does not occur and that temporary historic structure stabilization plan strategies are effective at avoiding vibration damage. The structural engineer shall halt construction activity if he/she deems construction activity may harm historical resources and shall modify or augment the temporary historic structure stabilization plan strategies accordingly. ***MM HAZ-2*** *In accordance with PRC Section 4291, the Applicant shall hire a City-qualified team that consists of appropriate specialists (i.e., fire management professionals, biologists) to prepare a Community Fire Protection Plan to design the creation and maintenance of required fire buffers and fuel management zones around developable areas and detail methods for achieving fire safety around new buildings while preserving the integrity and function of affected native plant communities to the maximum extent feasible, and that ensures that consistent fire fuel management practices are applied throughout the City. The Plan shall incorporate management strategies in coordination with adjacent property owners, including Mountainbrook Church and the Irish Hills Natural Reserve. The Plan shall outline the removal and control of invasive, non-native vegetation, and conservation of sensitive habitats and rare species, while developing fire*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	fuel management practices that will discourage or prevent non-native grasses and other non-native invasive species from dominating surrounding areas. Landscaping shall be maintained by the Applicant and periodically inspected by the SLOFD during fire inspections in each of the fuel management zones to avoid the buildup of deadwood and leaf litter, which, if left to accumulate, would reduce the mitigating effect of the Plan. Specifically, the Plan shall include, but not be limited to, the following elements: • *Vegetation coverage and type;* • *Setbacks between structures, sensitive wildlife species, and access routes;* • *Development plan landscaping and planting standards within the setback areas;* • *Native trees and shrubs, such as coast live oak, coastal scrub, and grassland shall be thinned and limbed up but left in place;* • *All allowable weed abatement techniques, qualifications, and requirements for weed abatement contractors, as well as measures and techniques that ensure the required fuel management and vegetation clearance, shall be designed and implemented to provide adequate structure protection and avoid degradation of sensitive biological habitat; and* • *Invasive species shall be removed and controlled.* **Plan Requirements and Timing.** Prior to approval of the final development plan, the Community Fire Protection Plan shall be prepared and submitted to the City Natural Resources Manager and SLOFD for review and approval, with coordination from the San Luis Obispo County Fire Department. The Plan shall be implemented consistent with the approved maintenance schedule. **Monitoring.** The City-qualified biologist shall submit a monitoring report to the City Natural Resources Manager and SLOFD at the end of the first year following Project occupancy documenting the fuel management activities that took place. Conformance with the Community Fire Protection Plan shall be demonstrated through the submittal of annual photo documentation by the Applicant or site visits as necessary at the discretion of the Compliance monitoring staff. ***MM HAZ-3*** *The Froom Ranch Specific Plan (FRSP) shall designate smoking areas, located away from onsite fire hazards areas and within acceptable*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	locations consistent with Chapter 8.16, Smoking Prohibition and Secondhand Smoke Control, of the City Municipal Code. Otherwise, smoking shall be prohibited onsite. The Applicant shall amend the FRSP to include policies to requiring the allowed use of fire resistant landscaping and hardscaping in areas to reduce mulch/gorilla hair, which is the receptive embers, if determined appropriate by SLOFD. **Plan Requirements and Timing.** Prior to adoption of the Final FRSP, the Applicant shall amend the Final FRSP to include these policies. The Applicant shall coordinate with SLOFD to identify appropriate locations for designated smoking areas and appropriate fire resistant landscaping and hardscaping features within the Project site. **Monitoring.** The Final FRSP shall be reviewed by the SLOFD and City for inclusion of the above measure. ***MM HAZ-4*** *The Applicant shall prepare and implement an Evacuation Plan, which shall address both Villaggio and Madonna Froom Ranch areas. The Evacuation Plan shall be subject to review by the City and SLOFD, and shall include, but not be limited to:* • *Accommodation for assisted living and special care individuals;* • *Shelter-in-place accommodations;* • *Specified quantity and capacity of vehicles required to accommodate residents and employees of Villaggio, and maintenance of those vehicles;* • *Signage that clearly indicates evacuation routes and meeting areas;* • *Specified egress points for transportation vehicles;* • *A relocation plan from the Project site to a secondary facility, with associated transportation;* • *Contingency plans for changes to the construction schedule or phasing plan that would affect the primary evacuation plan and routes;* • *Periodic updates that would consider potential redevelopment activities or other roadway alterations; and* • *Regular practice drills (e.g., one per year) for implementation of the Evacuation Plan.* **Plan Requirements and Timing.** The above Evacuation Plan shall be prepared in coordination with the SLOFD and the San Luis Obispo County Fire Department and submitted for approval to the City and SLOFD prior to adoption of the Final VTTM. The Applicant shall resubmit the Plan to the City	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	and SLOFD prior to the construction of each phase of development. Prior to occupancy of the first residential unit, the Applicant shall implement measures within the Evacuation Plan. **Monitoring.** The City and SLOFD shall review the Evacuation Plan and ensure all recommendations are incorporated. The City Fire Marshall shall inspect the Project site for compliance prior to the occupancy of the first residential unit for each phase. ***MM HAZ-5*** *The Froom Ranch Specific Plan (FRSP) shall designate fire access routes in at least two locations from the Project site to the Irish Hills Natural Reserve on at least 12-foot wide paths, one extending from Villaggio and one from Madonna Froom Ranch. Fire access routes shall be designed to allow emergency response to wildland area in the Irish Hills to support direct access for firefighting personnel and equipment.* **Plan Requirements and Timing.** Prior to adoption of the Final FRSP, the Applicant shall amend the Final FRSP to include the required accessway, in coordination with SLOFD to identify appropriate locations within the Project site. **Monitoring.** The Final FRSP shall be reviewed by the SLOFD and City for inclusion of the above measure. ***MM TRANS-19~~21~~*** *The Project shall design and install ~~include~~ a landscaped median along LOVR from the terminus of the existing median at northern Project frontage to Calle Joaquin. ~~Project is responsible for construction of median improvements prior to occupancy of the Lower Area of Villaggio, or fair-share contribution if constructed by others sooner.~~* **Plan Requirements and Timing.** The final FRSP shall be amended to incorporate the above median improvement prior to adoption and submitted to the City for review and approval. Prior to recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a public improvement plan for review and approval by the City. Implementation shall be completed prior to the issuance first certificates of occupancy for development of Villaggio's Lower Area.~~The final FRSP shall be amended to incorporate the above median improvement prior to adoption and submitted to the City for review and approval. The median shall be integrated to the final VTM prior to approval of development plans.~~ **Monitoring.** The City shall ensure the above measure is incorporated into the final FRSP prior to Project approval. The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	plans.~~The City shall ensure the above measure is incorporated into the final FRSP prior to Project approval.~~ ***MM TRANS-2022*** *The Project shall include an emergency access point from Villaggio's Lower Area to the Irish Hills Natural Reserve to provide access to the existing dirt road network to fight fires in Irish Hills, specifically to Neil Havlik Way which connects to the four utility power line structures at the top of the ridgeline. This access point may be gated to ensure site security in consultation with SLOFD.* **Plan Requirements and Timing.** The final FRSP shall be amended to incorporate the above emergency access connection prior to adoption and submitted to the City and SLOFD for review and approval. The above access road shall be integrated to the final VTM prior to approval of development plans. **Monitoring.** The City shall ensure the above measure is incorporated into the final FRSP prior to Project approval. ***MM TRANS-2123*** *The Project shall integrate access to the Project site perimeters for defending the Project site development. Specifically, these measures should address access to the wildland area immediately abutting the western boundary of Villaggio's Lower Area. This measure shall include access from the proposed Local Road "C" to the Irish Hills, which may include use of space between proposed buildings for firefighting vehicle access, ramps up proposed retaining walls, and similar vehicle infrastructure to maintain access to the base of the Irish Hills.* **Plan Requirements and Timing.** The final FRSP shall be amended to incorporate the above emergency access connection along the Irish Hills prior to adoption, and submitted to the City and SLOFD for review and approval. The above access road shall be integrated to the final VTM prior to approval of development plans. **Monitoring.** The City shall ensure the above measure is incorporated into the final FRSP prior to Project approval.	
LU-2. The Project would potentially be inconsistent with existing easements and setback requirements onsite.	None Required.	Less than Significant
3.10 Noise		
NO-1. Project construction, including site grading and heavy truck trips, would generate noise levels	***MM NO-1*** *Except for emergency repair of public service utilities, or where an exception is issued by the Community Development Department, no*	Less than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
that exceed thresholds established in the City's General Plan Noise Element and Noise Guidebook resulting in potentially significant impacts to proximate sensitive receptors.	*operation of tools or equipment used in construction, drilling, repair, alteration, or demolition work shall occur between the hours of 7:00 PM and 7:00 AM, or any time on Sundays, holidays, or after sunset, such that the sound creates a noise disturbance that exceeds 75 dBA for single-family residential uses, 80 dBA for multi-family residential uses, and 85 dBA for mixed residential/commercial land uses, as shown in Table 3.10-9 and Table 3.10-10, across a residential or commercial property line.* **Plan Requirements and Timing.** Plans submitted for grading and building permits shall clearly indicate construction hours and shall be submitted to the City for approval prior to grading and building permit issuance for each Project phase. To ensure response to and resolution of potential public noise nuisance complaints, plans submitted for grading and building permits shall clearly identify the Project's construction manager (or similar) and 24-hour contact information. At the pre-construction meeting required for all phases of grading and development, all construction workers shall be briefed on restricted construction hour limitations. A workday schedule shall be adhered to for the duration of construction for all phases. **Monitoring.** The Applicant's permit compliance monitoring staff shall perform periodic site inspections to verify compliance with activity schedules and respond to complaints. ***MM NO-2*** *For all construction activity at the Project site, noise attenuation techniques shall be employed to ensure that noise levels are maintained within levels allowed by the City of San Luis Obispo Municipal Code, Title 9, Chapter 9.12 (Noise Control). Such techniques shall include:* • *Sound blankets on noise-generating equipment.* • *Stationary construction equipment that generates noise levels above 65 dBA at the Project boundaries shall be shielded with a barrier that meets a sound transmission class (a rating of how well noise barriers attenuate sound) of 25.* • *All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers.* • *Temporary sound barriers shall be constructed between construction sites and affected uses.* **Plan Requirements and Timing.** The Applicant shall designate the proposed area of operation of stationary construction equipment and depict acoustic shielding around these areas on building and grading plans. Equipment and shielding shall be installed prior to construction and remain in the designated	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	location throughout construction activities. Construction plans shall identify Best Management Practices (BMPs) to be implemented during construction. All construction workers shall be briefed at a pre-construction meeting on how, why, and where BMP measures are to be implemented. BMPs shall be identified and described for submittal to the City for review and approval prior to building or grading permit issuance. BMPs shall be adhered to for the duration of the Project. Construction plans shall include truck routes and shall be submitted to the City prior to grading and building permit issuance for each Project phase. **Monitoring.** City staff shall ensure compliance throughout all construction phases. The Applicant's permit compliance monitoring staff shall perform periodic site inspections to verify compliance with activity schedules. ***MM NO-3*** *The Applicant shall inform landowners and business operators at properties within 300 feet of the Project site of proposed construction timelines and noise complaint procedures to minimize potential annoyance or nuisance complaints related to construction noise no less than 10 days prior to initiation of any grading and construction activity for any Phase. The notice shall include the name and contact information of the Project's construction manager and contact information for the City's Community Development Department.* **Plan Requirements and Timing.** The Applicant shall provide and post signs stating these restrictions and the Project's construction manager's name and contact information at construction site entries. Signs shall be posted prior to commencement of construction and maintained throughout construction of any Phase. The construction schedule and mailing list shall be submitted to the City Community Development Department 10 days prior to initiation of any earth movement. **Monitoring.** City staff shall ensure compliance throughout all construction phases. The Applicant's permit compliance monitoring staff shall perform periodic site inspections to verify compliance with activity schedules and respond to complaints.	
NO-2. Project construction activities (e.g., excavation, transportation of heavy equipment) could result in exposure of sensitive receptors and buildings to excessive groundborne vibration.	None Required.	Less than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
NO-3. Long-term operational noise impacts would include higher roadway noise levels from increased vehicle traffic generated by the Project, Project operational noise, and exposure of future residents to high noise levels that could result in the exceedance of thresholds in the City's General Plan Noise Element and Noise Guidelines.	None Required.	Less than Significant
NO-4. Future residents and occupants of the Project could be exposed to periodic high noise levels from nearby commercial uses (e.g., delivery trucks, forklifts, backup alarms) that would exceed City thresholds for residential land uses.	***MM NO-4*** *Prior to approval of park and residential development within the Madonna Froom Ranch area of the Specific Plan, the Applicant shall submit a project-specific noise study that evaluates the potential for noise exposure from adjacent commercial uses and identifies project-specific design measures to attenuate exterior and interior noise consistent with the City's Noise Element and Noise Ordinance. If necessary to reduce noise within acceptable levels, noise reduction measures may include a planted earthen berm, sound wall, or similar noise attenuating feature along the site boundary with Irish Hills Plaza, consistent with Policy 1.8.2 of the Noise Element.* **Plan Requirements and Timing.** The Applicant shall incorporate the above mitigation within the final FRSP prior to adoption. **Monitoring**. City staff shall ensure compliance with required site design and noise reduction measures within the final FRSP prior to adoption and shall confirm any required noise attenuation measures are shown on construction plans prior to issuance of building permits.	Less than Significant with Mitigation
3.11 Population and Housing		
PH-1. Residential and commercial development associated with the Project would induce population growth.	None Required.	Less than Significant
PH-2. The Project would provide additional housing for the City, assisting the jobs-to-housing ratio.	None Required.	Less than Significant
PH-3. The Project would provide additional affordable housing for the City	None Required.	Less than Significant
3.12 Public Services and Recreation		
PS-1. The Project would increase demand on the SLOPD for police protection services.	None Required.	Less than Significant

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
PS-2. The Project would increase the demand on SLOFD and CALFIRE for fire protection services and create potential declines in firefighter-to-population ratios; however, the Project would be located within the accepted response time performance area. Development of senior residential uses, which are associated with higher than average calls for emergency medical service, would increase emergency calls for service	None Required.	Less than Significant
PS-3. The Project would generate increases in enrollment at public schools (especially C.L. Elementary and Laguna Middle Schools).	None Required.	Less than Significant
PS-4. The Project would increase the demand for public parkland and neighborhood parks from increased residential population.	***MM PS-1*** *Public Parkland Requirements for Villaggio. Mitigation shall be calculated based on actual buildout populations within Madonna Froom Ranch. At the discretion of the Community Development Department and City of San Luis Obispo Parks and Recreation Department, and to ensure that parkland would satisfy the needs of the proposed population of Villaggio, the Applicant shall either:* *a) Identify, purchase, and develop up to 7.32 acres of parkland, including 2.79 acres of neighborhood park (in addition to the 2.9 acres of public parkland proposed by the Project), within the City's Sphere of Influence, consistent with City General Plan PRE Policies 3.13.1, 3.15.1, 5.0.1, and 5.0.2. If feasible, land for development of neighborhood park space should be identified within interior areas of the City Sphere of Influence to maximize use and access; or* *b) Provide a contribution of fees in-lieu of dedication of parkland, restricted solely for parkland acquisition and improvement.* **Plan Requirements and Timing.** The development of parkland and/or dedication of fees shall be completed by the Applicant prior to issuance of building permits. While coordinating with the City Parks and Recreation Department, the Applicant shall modify the FRSP to demonstrate the provision of recreational facilities to meet the demand of Villaggio residents if an onsite option is selected. **Monitoring.** The City shall ensure compliance with General Plan PRE Policies 3.13.1, 3.15.1, 5.0.1, and 5.0.2, and shall ensure the above measure is implemented prior issuance of building permits.	Less than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	MM PS-2 *Public Parkland Requirements for Madonna Froom Ranch. The Applicant shall identify, designate, dedicate, and/or develop up to 1.16 acres of public parkland into the Froom Ranch Specific Plan to be operational at the time of buildout of the Project, in addition to parkland provided under MM PS-1. Mitigation shall be calculated based on actual buildout populations within Madonna Froom Ranch and may be implemented using one of the following options, at the discretion of the Community Development Department and City Parks and Recreation Department:* *a) The Applicant shall designate an additional area of up to 1.16 acres of public facilities land use with the intention of providing parkland, within the Specific Plan area, consistent with City General Plan PRE Policies 3.13.1, 3.15.1, 5.0.1, and 5.0.2, or* *b) The Applicant shall identify and purchase or dedicate up to 1.16 acres of parkland within the City's Sphere of Influence, or* *c) The Applicant shall provide a contribution of fees in-lieu of dedication of up to 1.16 acres of parkland, restricted solely for parkland acquisition and improvement.* **Plan Requirements and Timing.** The development of parkland and/or dedication of fees shall be completed by the Applicant prior to issuance of building permits. While coordinating with the City Parks and Recreation Department, the Applicant shall modify the FRSP to demonstrate the provision of recreational facilities to meet the demand of Madonna Froom Ranch residents if an onsite option is selected. **Monitoring.** The City shall ensure compliance with General Plan PRE Policies 3.13.1, 3.13.1, 5.0.1, and 5.0.2, and shall ensure the above measure is implemented prior to issuance of building permits.	
3.13 Transportation and Traffic		
TRANS-1. Project construction activities would potentially create traffic impacts due to congestion from construction vehicles (e.g., construction trucks, construction worker vehicles, equipment, etc.) as well as temporary traffic lane and sidewalk closures.	***MM TRANS-1*** *The Applicant shall prepare a Construction Transportation Management Plan for all phases of the Project for review and approval by the City prior to issuance of grading or building permits to address and manage traffic during construction. The Applicant shall coordinate with SLO Regional Rideshare for the development of the Plan. The Plan shall be designed to:* • *Prevent traffic impacts on the surrounding roadway network;* • *Restrict construction staging to within the Project site;*	Less than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	• *Minimize parking impacts both to public parking and access to private parking to the greatest extent practicable;* • *Ensure safety for both those construction vehicles and works and the surrounding community; ~~and~~* • *Prevent substantial truck traffic through residential neighborhoods; and* • *Provide strategies to reduce single-occupancy vehicle trips made by resident and employees.~~* *The Construction Transportation Management Plan shall be subject to review and approval by the Public Works Director to ensure that the Plan has been designed in accordance with this mitigation measure. The Applicant shall identify a point of contact to coordinate Plan implementation. This review shall occur prior to issuance of grading or building permits. It shall, at a minimum, include the following:* • *Ongoing Requirements throughout the Duration of Construction:* • *A detailed Construction Transportation Management Plan for work zones shall be maintained. At a minimum, this shall include parking and travel lane configurations; warning, regulatory, guide, and directional signage; and area sidewalks, bicycle lanes, and parking lanes. The Plan shall include specific information regarding the Project's construction activities that may disrupt normal pedestrian and traffic flow and the measures to address these disruptions. Such Plan shall be reviewed and approved by the Community Development Department and implemented in accordance with this approval.* • *Heavy haul construction vehicles and cement trucks shall not pass through Villaggio's Lower Area access roads once any of the Lower Area residences become occupied, and must utilize access from Calle Joaquin to access the Upper Terrace after that time.* • *Work within the public right-of-way shall be reviewed and approved by the City on a case-by-case basis based on the magnitude and type of construction activity. Work shall generally be performed between 8:30 AM and 4:00 PM. This work includes dirt hauling and construction material delivery. Work within the public right-of-way outside of these hours shall only be allowed after the issuance of an after-hours*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	construction permit administered by the Building and Safety Division. Additional restrictions may be put in place by Public Works Department depending on particular construction activities and conditions. • *Streets and equipment shall be cleaned in accordance with established Public Works requirements.* • *Trucks shall only travel on a City-approved construction route. Limited queuing may occur on the construction site itself.* • *Materials and equipment shall be minimally visible to the public; the preferred location for materials is to be onsite, with a minimum amount of materials within a work area in the public right-of-way, subject to a current Use of Public Property Permit.* • *Provision of off-street parking for construction workers, which may include the use of a remote location with shuttle transport to the site, if determined necessary by the City.* • *Where construction activities require closure of bike lanes or sidewalks along LOVR, temporary bicycle and pedestrian pathways shall be provided where feasible with physical separation provided between users and adjacent vehicle traffic consistent with Public Works requirements.* *Project Coordination Elements That Shall Be Implemented Prior to Commencement of Construction:* • *The traveling public shall be advised of impending construction activities that may substantially affect key roadways or other facilities (e.g., information signs, portable message signs, media listing/notification, and implementation of an approved Construction Impact Mitigation Plan).* • *A Use of Public Property Permit, Excavation Permit, Sewer Permit, or Oversize Load Permit, as well as any Caltrans permits required for any construction work requiring encroachment into public rights-of-way, detours, or any other work within the public right-of-way shall be obtained.* • *Timely notification of construction schedules shall be provided to all affected agencies (e.g., Police Department, Fire Department, Public*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Works Department, and Community Development Department) and to all owners and residential and commercial tenants of property within a radius of 0.25 mile. • *Construction work shall be coordinated with affected agencies in advance of start of work. Approvals may take up to two weeks per each submittal.* • *Public Works Department approval of any haul routes for construction materials and equipment deliveries shall be obtained.* • *Construction traffic plans, routes, and schedules shall be shared with the City Active Transportation Committee, County Public Works Department (for distribution to the County Bicycle Advisory Committee), the Los Verdes Park 1 and 2 Homeowners Associations, and local bicycle advocacy groups, such as Bike SLO County and the SLO Bicycle Club.* **Plan Requirements and Timing.** The Applicant shall submit the Construction Transportation Management Plan to the City for review and approval prior to issuance of grading or building permits. The Construction Transportation Management Plan shall be updated as needed to reflect changing conditions over the Project's five-year construction schedule. The Applicant shall conduct necessary construction employee training prior to the commencement of construction. The City Public Works Department, Community Development Department, Police Department, and Fire Department, and nearby residences and businesses shall be notified of the construction schedule prior to initiation of construction. The Applicant shall submit individual traffic control plans and part of encroachment permits for work within the public right-of-way. **Monitoring.** The City shall ensure compliance with the Construction Transportation Management Plan with periodic inspections of the Project site during construction. Complaints related to construction traffic at the site shall be directed to the City Public Works Department.	
TRANS-2. Under Existing plus Project conditions, the addition of Project traffic would exacerbate existing queuing and peak hour traffic for automobiles, and poor levels of service for pedestrians and bicycle modes of transportation,	***MM AQ-6*** *The Applicant shall revise the FRSP to include measures necessary to reduce the Project's operational, mobile-source emissions, and VMT to the maximum extent feasible, including, but not limited to the following:* • *Rideshare and Employee Ridership Programs: The FRSP shall be amended to include measures for encouraging and incentivizing*	Significant and Unavoidable

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
causing transportation deficiencies in the Project vicinity.	*residents and employees of the proposed development participate in the San Luis Obispo Regional Rideshare program.* • *Senior Shuttle Service: Villaggio shall provide clean fuel shuttle services and shall provide sufficient onsite electric vehicle charging infrastructure to support the services. Electric vehicle charging infrastructure included to meet requirements for personal vehicles may not be used to fulfill this requirement~~or coordinate with existing shuttle services such as Dial-A-Ride and the Senior Go! Shuttle to provide curb-to-curb shuttle service for residents of the Villaggio Life Community Plan~~.* • *All Electric Small Vehicles: The FRSP shall require all personal small vehicles (e.g., golf carts) be 100 percent electric powered.* • *~~Car Share: Provide car-sharing opportunities within the Villaggio Life Community Plan and Madonna Froom Ranch areas.~~* • *Promote Carpools, Vanpools, and Electric Vehicle (EV) Vehicles: Provide dedicated parking for carpools, vanpools, and high-efficiency vehicles in exceedance of Cal Green Tier 2 standards.* • *~~Offsite EV Improvements: Work with SLO County APCD to expand or fund the expansion of EV charging stations throughout the City.~~* **Requirements and Timing.** The Applicant shall include all feasible Best Management Strategies as part of the final FRSP~~ and final VTM~~. For the selected Best Management Strategies, the Applicant shall work with City and SLO County APCD staff to calculate estimated mobile-source emissions to ensure emissions are reduced to the maximum extent feasible as vehicles are the largest source of operational emissions, noting that vehicle emissions are regulated on a state and federal level. City and SLO County APCD staff shall ensure the above measures are incorporated into the FRSP ~~and final VTM~~ prior to recordation. **Monitoring.** City staff shall ensure measures are listed on the final ~~VTM~~ FRSP submitted for review and approval by the City. City and SLO County APCD staff shall work with the Applicant to ensure that these strategies are implemented. The City shall verify compliance in consultation with the SLO County APCD. ***MM TRANS-2*** *The Project Applicant shall design and construct the extension of the southbound right-turn pocket at the LOVR/U.S. 101 southbound ramps intersection to provide a storage length of at least 150 feet. In coordination with the Applicant, the City and Caltrans shall also implement traffic signal*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	coordination between the LOVR/Calle Joaquin intersection and adjacent U.S. 101 northbound and southbound ramps and optimize traffic signal timings at these three intersections. In addition, the Applicant shall also pay a fair share mitigation fee towards the improvements that are required to be constructed by the San Luis Ranch development at this intersection, which include extension of the southbound off-ramp through/left-turn pocket to provide a storage length of at least 320 feet.~~The Project Applicant shall design and construct the extension of the westbound left-turn pocket at the LOVR/U.S. 101 southbound ramps intersection to provide a storage length of 320 feet, and design and construct the extension of the southbound right-turn pocket at the LOVR/U.S. 101 southbound ramps intersection to provide a storage length of 140 feet. In coordination with the Applicant, the City and Caltrans shall also optimize traffic signal timings and coordination between LOVR/Calle Joaquin and LOVR/U.S. 101 southbound ramps. If improvements are constructed sooner by others, the Applicant may be responsible for a fair share contribution towards improvement costs.~~ This mitigation measure requires Caltrans approval and coordination. **Plan Requirements and Timing.** Prior to ~~grading and~~ recordation of the final VTM for subdivision of the ~~development of~~ Madonna Froom Ranch development phase, the Applicant shall submit a Public Street Improvement Plan for roadway improvements at the southbound right-turn pocket and a Traffic Engineering Study ~~for~~with signal timing recommendations for review and ~~approval~~ implementation by the City and Caltrans. Payment of fair share mitigation fees shall be provided prior to first building permit issuance for Madonna Froom Ranch development, while construction of applicable improvements shall be completed prior to the issuance of first certificate of occupancy for Madonna Froom Ranch development.~~Implementation of improvements shall be completed prior to the issuance of a certificate of occupancy or building permits for the Madonna Froom Ranch development. If improvements are completed sooner by others, the Applicant shall make a fair share contribution prior to issuance of building permits for the Madonna Froom Ranch development.~~ **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City. ***MM TRANS-3*** *The Project Applicant pay a fair share mitigation fee towards the improvements to be constructed by the Avila Ranch development project,*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	which include the following: ~~shall design and install measures to restrict~~ left turn~~s~~ at the South Higuera Street/Vachell Lane intersection, ~~extend~~ extension of Buckley Road from Vachell Lane to South Higuera Street, and install~~ation of~~ a traffic signal at Buckley Road/South Higuera Street intersection. *If the Buckley Road Extension has not been completed prior to the Madonna Froom Ranch development phase, the Applicant shall be responsible for design and installation of alternate measures to mitigate the Project's proportional share of intersection impacts to the satisfaction of the Public Works Director. Alternative measures may include installation of a center refuge on S. Higuera to allow two-stage left turns from Vachell, installation of left-turn restrictions at South Higuera/Vachell if the planned Earthwood Lane street connection between Vachell and Suburban has been completed, or signalization of the S. Higuera/Vachell intersection. Mitigation may require County coordination. ~~If improvements are constructed sooner by others, the Applicant may be responsible for a fair share contribution towards improvement costs. This mitigation measure requires County approval and coordination.~~* **Plan Requirements and Timing.** Prior to issuance of building permits for each development phase, the Applicant shall provide a prorated fair share contribution towards the South Higuera/Vachell and Buckley Road improvements per the terms established in the Avila Ranch Private Reimbursement Agreement. If the Buckley Road Extension has not been completed by others prior to issuance of first building permits for the Madonna Froom Ranch development phase, the Applicant shall design and construct alternate mitigation measures to the satisfaction of the Public Works Director prior to issuance of first certificate of occupancy for Madonna Froom Ranch.~~Prior to grading and recordation of the final VTM for development of Madonna Froom Ranch, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of a certificate of occupancy or building permits for the Madonna Froom Ranch development. If improvements are completed sooner by others, the Applicant shall make a fair share contribution prior to issuance of building permits for the Madonna Froom Ranch development.~~ **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City.	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	MM TRANS-4 *The Project Applicant shall ~~design and install the~~pay a fair share mitigation fee towards improvements to be constructed by the Avila Ranch development, which include restriping of the westbound approach of the South Higuera Street/Suburban Road intersection to extend the left- and right-turn pocket storage to 250 feet. If planned improvements have not yet been completed prior to issuance of building permits for the Madonna Froom Ranch development, the Applicant shall be responsible for installation of the striping improvements. ~~improvements are constructed sooner by others, the Applicant may be responsible for a fair share contribution towards improvement costs.~~* **Plan Requirements and Timing.** Prior to ~~grading and recordation of the final VTM for development of Madonna Froom Ranch, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to~~ the issuance of ~~a certificate of occupancy or~~ building permits for Madonna Froom Ranch development, the Applicant~~. If improvements are completed sooner by others, the Applicant may be responsible for making~~ shall provide a fair share contribution towards the intersection striping improvements. If the planned improvements have not yet been completed by others prior to issuance of building permits for Madonna Froom Ranch development, the applicant shall be responsible for installation of the intersection striping improvements prior to issuance of first certificates of occupancy for ~~prior to issuance of building permits for~~ the Madonna Froom Ranch development. **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City. ***MM TRANS-5*** *The Project Applicant shall pay a fair share mitigation fee towards bicycle improvements at South Higuera/Tank Farm to be constructed by the Avila Ranch development, which include extending the westbound bike lane on Tank Farm Road to the South Higuera Street/Tank Farm Road intersection and installation of a bike box (with loop detection) to facilitate bicycle left-turn movements. Fair share contribution is satisfied through participation in the Citywide Transportation Impact Fee program.* *If the planned bicycle improvements have not yet been completed prior to development of the Villaggio Lower Area, the Applicant shall be responsible for design and installation of the bicycle improvements.~~The Project Applicant~~*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	~~*shall extend the westbound bike lane on Tank Farm Road approaching the South Higuera Street/Tank Farm Road intersection to the intersection and install a bike box to facilitate bicycle left-turn movements. If improvements are constructed sooner by others, the Applicant may be responsible for a fair share contribution towards improvement costs.*~~ **Plan Requirements and Timing.** Prior to the issuance of building permits for each development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements through payment of Citywide Transportation Impact Fees. If the planned improvements have not yet been completed by others prior to issuance of first building permits for Villaggio's Lower Area development, the Applicant shall be responsible for design and installation of the bicycle improvements prior to first occupancy permits for the Villaggio Lower Area development.~~Prior to grading and recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of a certificate of occupancy or building permits for Villaggio's Lower Area development. If improvements are completed sooner by others, the Applicant may be responsible for a fair share contribution prior to issuance of building permits for Villaggio's Lower Area development.~~ **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City. ***MM TRANS-6a*** *The Project Applicant shall pay fair share mitigation fees towards intersection improvements to be constructed by the Avila Ranch development, which include installation of a second southbound left-turn lane at the South Higuera Street/Tank Farm Road intersection. Fair share contributions are satisfied through participation in the Citywide Transportation Impact Fee program.* *If installation of dual southbound left-turn lanes has not been completed prior to Madonna Froom Ranch development phase, the Applicant shall coordinate with the City to retime the traffic signal at South Higuera/Tank Farm to mitigate the Project's proportional contribution to queueing impacts.*~~*The Project Applicant shall design and install a second southbound left-turn lane at the South Higuera Street/Tank Farm Road intersection. The Project Applicant shall also pay fair share costs for construction of the Prado Road*~~	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	~~*Overpass/Interchange project. If intersection improvements are constructed sooner by others, the Applicant will be responsible for a fair share contribution towards improvement costs through participation in the Citywide Transportation Impact Fee program.*~~ **Plan Requirements and Timing.** Prior to the issuance of building permits for each development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements through payment of Citywide Transportation Impact Fees. If the planned South Higuera/Tank Farm intersection improvements have not yet been completed by others prior to issuance of first building permits for Madonna Froom Ranch development, the Applicant shall submit a Traffic Engineering Study with signal timing recommendations for review and implementation by the City prior to issuance of first certificates of occupancy for Madonna Froom Ranch development.~~Prior to grading and recordation of the final VTM for development of Madonna Froom Ranch, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City for the South Higuera/Tank Farm intersection improvements. Implementation of intersection improvements shall be completed prior to the issuance of a certificate of occupancy or building permits for the Madonna Froom Ranch development. Intersection improvement costs exceeding the Project's proportional share may be eligible for fee credits or reimbursements. Participation in the Citywide Transportation Impact Fee program will fulfill the Project's fair share financial obligation towards the Prado Road Overpass/Interchange project and the South Higuera/Tank Farm Road intersection improvements, if constructed sooner by others. Payment of City Transportation Impact Fees shall be required prior to issuance of building permits for each development phase.~~ **Monitoring.** The City shall verify that the Applicant pays fair share costs in accordance to the approved phase and design plans. ***MM TRANS-6b*** *The Project Applicant shall pay fair share costs for construction of the Prado Road Overpass/Interchange project. Fair share contributions are satisfied through participation in the Citywide Transportation Impact Fee program.* **Plan Requirements and Timing.** Prior to the issuance of building permits for each development phase, the Applicant shall provide a fair share	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	contribution towards the mitigation improvements through payment of Citywide Transportation Impact Fees **Monitoring.** The City shall verify that the Applicant pays fair share costs in accordance to the approved phase and design plans. ***MM TRANS-7*** *The Project Applicant shall pay a fair share mitigation fee towards the intersection improvements to be constructed by the City at the South Higuera/Prado intersection, which includes installation of a second northbound left-turn lane, a second southbound left-turn lane, a second eastbound through lane, bicycle protected intersection features, traffic signal modifications, and widening of the adjacent Prado Road Creek Bridge west of South Higuera. Fair share contributions for both improvements are satisfied through participation in the Citywide Transportation Impact Fee program.*~~*The Project Applicant shall design and install a second northbound left-turn lane at the South Higuera Street/Prado Road intersection, which requires the replacement of the Prado Road Bridge just west of South Higuera. Project is responsible for implementation prior to development of Madonna Froom Ranch, or fair share contribution through participation in the Citywide Transportation Impact Fee program if improvements are constructed sooner by others.*~~ **Plan Requirements and Timing**. Prior to the issuance of building permits for each development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements through payment of Citywide Transportation Impact Fees.~~Prior to grading and recordation of the final VTM for development of Madonna Froom Ranch, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of a certificate of occupancy or building permits for the Madonna Froom Ranch development. Improvement costs exceeding the Project's proportional share may be eligible for fee credits or reimbursements. If improvements are completed sooner by others, the Applicant shall make a fair share contribution through participation in the Citywide Transportation Impact Fee program prior to issuance of building permits for the Madonna Froom Ranch development.~~ **Monitoring.** The City shall verify that the Applicant pays fair share costs in accordance to the approved phase and design plans.~~The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City.~~	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	MM TRANS-8 *The Project Applicant shall design and install Class IV bikeways (protected bike lanes) along LOVR to provide a physical buffer between the sidewalk and vehicular traffic lanes. Improvement extents shall occur in the northbound direction between Laguna Lane and Diablo Drive, and in the southbound direction between Diablo Drive and Madonna Road. Some gaps in physical separation may remain due to right-of-way limitations or other design constraints.~~Project is responsible for fair-share contribution towards improvement costs.~~* **Plan Requirements and Timing.** Prior to ~~grading and~~ recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of ~~a~~ first certificates of occupancy ~~or building permits~~ for Villaggio's Lower Area development. Improvement costs exceeding the Project's proportional share may be eligible for ~~fee credits or reimbursements~~private reimbursement. **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans ~~or contributes an appropriate fair share as approved by the City~~. ***MM TRANS-9*** *The Project Applicant shall design and install ADA-compliant curb, gutter and sidewalk along the west side of LOVR to complete the sidewalk connection between the Irish Hills Plaza and Calle Joaquin. The Project Applicant shall also design and install Class IV bikeways (protected bike lanes) along LOVR to provide a physical buffer between the sidewalk and vehicular traffic lanes in the northbound and southbound directions between Madonna Road and South Higuera Street. This mitigation measure requires Caltrans approval and coordination for improvements near the LOVR/U.S. 101 interchange. If Class IV bikeways are not approved for segments within Caltrans right-of-way, or are deemed infeasible for short segments due to other geometric constraints, alternative treatments to improve pedestrian levels of service may be approved to the satisfaction of the Public Works Director. Potential alternative treatments include installation of striped bike lane buffers, street trees or other features that further buffer pedestrians from street traffic.~~The Project is responsible for all costs related to construction of sidewalks, curb and gutter, and a fair share contribution towards Class IV bikeway improvements. This mitigation measure requires Caltrans approval and coordination for improvements near LOVR/U.S. 101 interchange.~~*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Plan Requirements and Timing. Prior to ~~grading and~~ recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of ~~a~~first certificates of occupancy ~~or building permits~~ for Villaggio's Lower Area development. Applicable construction costs for improvements along LOVR between Calle Joaquin and Froom Ranch Way consistent with the planned Bob Jones Trail (Calle Joaquin to Oceanaire) Connection Project may be eligible for credits or reimbursement through the City's Transportation Impact Fee program. Costs exceeding the Project's proportional share for improvements along other segments may be eligible for private reimbursement only.~~Bikeway improvement costs exceeding the Project's proportional share may be eligible for fee credits or reimbursements.~~ **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans~~ or contributes an appropriate fair share as approved by the City~~. ***MM TRANS-10*** *The Project Applicant shall pay fair share mitigation fees towards Madonna Road improvements to be constructed by the San Luis Ranch development, which include installation of a Class I Multi-Use Path parallel to Madonna Road between Oceanaire Drive and the U.S. 101 southbound ramps intersection. This project is in construction currently. Fair share contributions are satisfied through participation in the Citywide Transportation Impact Fee program.*~~*The Project Applicant shall design and install a Class I Multi-Use Path parallel to Madonna Road between Oceanaire Drive and the U.S. 101 southbound ramps intersection. The Project is responsible for a fair share contribution towards improvements through payment of City Traffic Impact Fees.*~~ **Plan Requirements and Timing.** Prior to the issuance of building permits for each development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements through payment of Citywide Transportation Impact Fees.~~Prior to grading and recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of a certificate of occupancy or building permits for Villaggio's Lower Area development. Improvement costs exceeding the Project's proportional share may be eligible for fee credits or reimbursements. If improvements are completed sooner by~~	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	~~others, the Applicant shall make a fair share contribution through participation in the Citywide Transportation Impact Fee program prior to issuance of building permits for Villaggio's Lower Area development.~~ **Monitoring.** The City shall verify that the Applicant pays fair share costs in accordance to the approved phase and design plans.~~The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City.~~ ***MM TRANS-11*** *The Project is responsible for incorporating traffic calming measures (e.g., speed humps, bulb-outs, chicanes, etc.) into the design of Local Road "A" prior to development of Villaggio's Lower Area. Traffic calming measures shall be designed to the satisfaction of the City Public Works and Fire Departments.* **Plan Requirements and Timing.** Prior to ~~grading and~~ recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of ~~a~~first certificates of occupancy ~~or building permits~~ for development of Villaggio's Lower Area. **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans.	
TRANS-3. Under Near-Term plus Project (Scenario 2) conditions, the addition of Project traffic would exacerbate existing queuing and peak hour traffic for automobiles and poor levels of service for pedestrians and bike modes of transportation, causing transportation deficiencies in the Project vicinity.	***MM TRANS-2*** *The Project Applicant shall design and construct the extension of the southbound right-turn pocket at the LOVR/U.S. 101 southbound ramps intersection to provide a storage length of at least 150 feet. In coordination with the Applicant, the City and Caltrans shall also implement traffic signal coordination between the LOVR/Calle Joaquin intersection and adjacent U.S. 101 northbound and southbound ramps and optimize traffic signal timings at these three intersections. In addition, the Applicant shall also pay a fair share mitigation fee towards the improvements that are required to be constructed by the San Luis Ranch development at this intersection, which include extension of the southbound off-ramp through/left-turn pocket to provide a storage length of at least 320 feet.*~~*The Project Applicant shall design and construct the extension of the westbound left-turn pocket at the LOVR/U.S. 101 southbound ramps intersection to provide a storage length of 320 feet, and design and construct the extension of the southbound right-turn pocket at the LOVR/U.S. 101 southbound ramps intersection to provide a storage length of 140 feet. In coordination with the Applicant, the City and Caltrans shall also optimize traffic signal timings and coordination between LOVR/Calle*~~	Significant and Unavoidable

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	~~*Joaquin and LOVR/U.S. 101 southbound ramps. If improvements are constructed sooner by others, the Applicant may be responsible for a fair share contribution towards improvement costs. This mitigation measure requires Caltrans approval and coordination.*~~ **Plan Requirements and Timing.** Prior to ~~grading and~~ recordation of the final VTM for subdivision of the ~~development of~~ Madonna Froom Ranch development phase, the Applicant shall submit a Public Street Improvement Plan for roadway improvements at the southbound right-turn pocket and a Traffic Engineering Study ~~for~~with signal timing recommendations for review and ~~approval~~ implementation by the City and Caltrans. Payment of fair share mitigation fees shall be provided prior to first building permit issuance for Madonna Froom Ranch development, while construction of applicable improvements shall be completed prior to the issuance of first certificate of occupancy for Madonna Froom Ranch development.~~Implementation of improvements shall be completed prior to the issuance of a certificate of occupancy or building permits for the Madonna Froom Ranch development. If improvements are completed sooner by others, the Applicant shall make a fair share contribution prior to issuance of building permits for the Madonna Froom Ranch development.~~ **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City. ***MM TRANS-5*** *The Project Applicant shall pay a fair share mitigation fee towards bicycle improvements at South Higuera/Tank Farm to be constructed by the Avila Ranch development, which include extending the westbound bike lane on Tank Farm Road to the South Higuera Street/Tank Farm Road intersection and installation of a bike box (with loop detection) to facilitate bicycle left-turn movements. Fair share contribution is satisfied through participation in the Citywide Transportation Impact Fee program.* *If the planned bicycle improvements have not yet been completed prior to development of the Villaggio Lower Area, the Applicant shall be responsible for design and installation of the bicycle improvements.*~~*The Project Applicant shall extend the westbound bike lane on Tank Farm Road approaching the South Higuera Street/Tank Farm Road intersection to the intersection and install a bike box to facilitate bicycle left turn movements. If improvements*~~	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	~~*are constructed sooner by others, the Applicant may be responsible for a fair share contribution towards improvement costs.*~~ **Plan Requirements and Timing.** Prior to the issuance of building permits for each development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements through payment of Citywide Transportation Impact Fees. If the planned improvements have not yet been completed by others prior to issuance of first building permits for Villaggio's Lower Area development, the Applicant shall be responsible for design and installation of the bicycle improvements prior to first occupancy permits for the Villaggio Lower Area development.~~Prior to grading and recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of a certificate of occupancy or building permits for Villaggio's Lower Area development. If improvements are completed sooner by others, the Applicant may be responsible for a fair share contribution prior to issuance of building permits for Villaggio's Lower Area development.~~ **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City. ***MM TRANS-6a*** *The Project Applicant shall pay fair share mitigation fees towards intersection improvements to be constructed by the Avila Ranch development, which include installation of a second southbound left-turn lane at the South Higuera Street/Tank Farm Road intersection. Fair share contributions are satisfied through participation in the Citywide Transportation Impact Fee program.* *If installation of dual southbound left-turn lanes has not been completed prior to Madonna Froom Ranch development phase, the Applicant shall coordinate with the City to retime the traffic signal at South Higuera/Tank Farm to mitigate the Project's proportional contribution to queueing impacts.*~~*The Project Applicant shall design and install a second southbound left-turn lane at the South Higuera Street/Tank Farm Road intersection. The Project Applicant shall also pay fair share costs for construction of the Prado Road Overpass/Interchange project. If intersection improvements are constructed sooner by others, the Applicant will be responsible for a fair share*~~	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	~~*contribution towards improvement costs through participation in the Citywide Transportation Impact Fee program.*~~ **Plan Requirements and Timing.** Prior to the issuance of building permits for each development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements through payment of Citywide Transportation Impact Fees. If the planned South Higuera/Tank Farm intersection improvements have not yet been completed by others prior to issuance of first building permits for Madonna Froom Ranch development, the Applicant shall submit a Traffic Engineering Study with signal timing recommendations for review and implementation by the City prior to issuance of first certificates of occupancy for Madonna Froom Ranch development.~~Prior to grading and recordation of the final VTM for development of Madonna Froom Ranch, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City for the South Higuera/Tank Farm intersection improvements. Implementation of intersection improvements shall be completed prior to the issuance of a certificate of occupancy or building permits for the Madonna Froom Ranch development. Intersection improvement costs exceeding the Project's proportional share may be eligible for fee credits or reimbursements. Participation in the Citywide Transportation Impact Fee program will fulfill the Project's fair share financial obligation towards the Prado Road Overpass/Interchange project and the South Higuera/Tank Farm Road intersection improvements, if constructed sooner by others. Payment of City Transportation Impact Fees shall be required prior to issuance of building permits for each development phase.~~ **Monitoring.** The City shall verify that the Applicant pays fair share costs in accordance to the approved phase and design plans. ***MM TRANS-6b*** *The Project Applicant shall pay fair share costs for construction of the Prado Road Overpass/Interchange project. Fair share contributions are satisfied through participation in the Citywide Transportation Impact Fee program.* **Plan Requirements and Timing.** Prior to the issuance of building permits for each development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements through payment of Citywide Transportation Impact Fees	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Monitoring. The City shall verify that the Applicant pays fair share costs in accordance to the approved phase and design plans. ***MM TRANS-7*** *The Project Applicant shall pay a fair share mitigation fee towards the intersection improvements to be constructed by the City at the South Higuera/Prado intersection, which includes installation of a second northbound left-turn lane, a second southbound left-turn lane, a second eastbound through lane, bicycle protected intersection features, traffic signal modifications, and widening of the adjacent Prado Road Creek Bridge west of South Higuera. Fair share contributions for both improvements are satisfied through participation in the Citywide Transportation Impact Fee program.* **Plan Requirements and Timing**. Prior to the issuance of building permits for each development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements through payment of Citywide Transportation Impact Fees. **Monitoring.** The City shall verify that the Applicant pays fair share costs in accordance to the approved phase and design plans. ***MM TRANS-8*** *The Project Applicant shall design and install Class IV bikeways (protected bike lanes) along LOVR to provide a physical buffer between the sidewalk and vehicular traffic lanes. Improvement extents shall occur in the northbound direction between Laguna Lane and Diablo Drive, and in the southbound direction between Diablo Drive and Madonna Road. Some gaps in physical separation may remain due to right-of-way limitations or other design constraints.~~Project is responsible for fair share contribution towards improvement costs.~~* **Plan Requirements and Timing.** Prior to ~~grading and~~ recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of ~~a~~first certificates of occupancy ~~or building permits~~ for Villaggio's Lower Area development. Improvement costs exceeding the Project's proportional share may be eligible for ~~fee credits or reimbursements~~private reimbursement. **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City. ***MM TRANS-9*** *The Project Applicant shall design and install ADA-compliant curb, gutter and sidewalk along the west side of LOVR to complete the*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	sidewalk connection between the Irish Hills Plaza and Calle Joaquin. The Project Applicant shall also design and install Class IV bikeways (protected bike lanes) along LOVR to provide a physical buffer between the sidewalk and vehicular traffic lanes in the northbound and southbound directions between Madonna Road and South Higuera Street. This mitigation measure requires Caltrans approval and coordination for improvements near the LOVR/U.S. 101 interchange. If Class IV bikeways are not approved for segments within Caltrans right-of-way, or are deemed infeasible for short segments due to other geometric constraints, alternative treatments to improve pedestrian levels of service may be approved to the satisfaction of the Public Works Director. Potential alternative treatments include installation of striped bike lane buffers, street trees or other features that further buffer pedestrians from street traffic.~~The Project is responsible for all costs related to construction of sidewalks, curb and gutter, and a fair share contribution towards Class IV bikeway improvements. This mitigation measure requires Caltrans approval and coordination for improvements near LOVR/U.S. 101 interchange.~~ **Plan Requirements and Timing.** Prior to ~~grading and~~ recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of ~~a~~first certificates of occupancy ~~or building permits~~ for Villaggio's Lower Area development. Applicable construction costs for improvements along LOVR between Calle Joaquin and Froom Ranch Way consistent with the planned Bob Jones Trail (Calle Joaquin to Oceanaire) Connection Project may be eligible for credits or reimbursement through the City's Transportation Impact Fee program. Costs exceeding the Project's proportional share for improvements along other segments may be eligible for private reimbursement only.~~Bikeway improvement costs exceeding the Project's proportional share may be eligible for fee credits or reimbursements.~~ **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans~~ or contributes an appropriate fair share as approved by the City~~. ***MM TRANS-12*** *In coordination with the County, the Project Applicant shall pay a fair share mitigation fee for costs to construct the following future improvements at the LOVR/Foothill Boulevard intersection: widen northbound approach to provide one left-turn, two through, and one right-turn lane; widen westbound approach to provide one left-turn lane, one*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	shared through/right-turn lane, and one right-turn lane. Additional improvements include roadway striping and traffic signal modifications needed to accommodate new lane configurations. This mitigation measure requires County approval and coordination.~~In coordination with the County, the Project Applicant shall coordinate and fund any costs required to optimize the traffic signal timing at the County intersection of LOVR/Foothill Boulevard to reduce queues for the southbound left-turn movement. This mitigation measure requires County approval and coordination.~~ **Plan Requirements and Timing.** Prior to recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit preliminary intersection improvement plans for review and approval by the County, with plans developed to a level of detail sufficient to provide an engineer's estimate of probable construction costs, including right-of-way acquisition (if needed). Fair share mitigation fees for these improvements shall be paid to the County prior to issuance of first certificates of occupancy development of Villaggio's Lower Area.~~Prior to grading and recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Traffic Engineering Study identifying recommended signal timing modifications for review and approval by the County. Signal optimization shall be completed to the satisfaction of the County prior to City issuance of a certificate of occupancy or building permits for development of Villaggio's Lower Area.~~ **Monitoring.** The City shall verify that the Applicant has provided applicable design plans and contributes an appropriate fair share mitigation fee to the satisfaction of the County.~~The City shall verify that the Applicant implements the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share to the satisfaction of the County.~~ ***MM TRANS-13*** *In coordination with the Applicant, the City shall retime the traffic signal at LOVR/Madonna to implement Lead Pedestrian Intervals for each pedestrian crossing phase.~~In coordination with the City, the Project Applicant shall fund any costs required to implement Lead Pedestrian Intervals for each pedestrian crossing phase at the LOVR/Madonna Road intersection.~~* **Plan Requirements and Timing.** Prior to the issuance of first building permits for the Villaggio Lower Area development phase, the City shall implement the signal timing modifications.~~Prior to grading and recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall~~	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	~~submit a Traffic Engineering Study identifying recommended signal timing modifications for review and approval by the City. The proposed Lead Pedestrian Intervals shall be installed prior to the issuance of a certificate of occupancy or building permits for Villaggio's Lower Area development.~~ **Monitoring.** The City shall verify that the signal timing modifications are implemented in accordance to the approved project phase.~~The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City.~~ ~~***MM TRANS-14*** *~~The Project Applicant shall pay fair share costs for construction of the Prado Road Overpass/Interchange project and northbound U.S. 101 ramps through participation in the Citywide Transportation Impact Fee program.~~* ~~**Plan Requirements and Timing.** Participation in the Citywide Transportation Impact Fee program will fulfill the Project's fair share financial obligation towards the Prado Road Overpass/Interchange project. Payment of City Transportation Impact Fees shall be required prior to issuance of building permits for each development phase.~~ ~~**Monitoring.** The City shall verify that the Applicant contributes an appropriate fair share as approved by the City.~~ ***MM TRANS-14~~15~~*** *In coordination with the City, the Project Applicant shall fund any costs required to implement Lead Pedestrian Intervals for each pedestrian crossing phase at the South Higuera Street/Tank Farm Road intersection.* **Plan Requirements and Timing.** Prior to grading and recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Traffic Engineering Study identifying recommended signal timing modifications for review and approval by the City. The proposed Lead Pedestrian Intervals shall be installed prior to the issuance of an occupancy or building permit for Villaggio's Lower Area development. **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City. ***MM TRANS-15~~16~~*** *The Project Applicant shall pay fair share mitigation fees towards extension of the northbound right-turn pocket storage at the South Higuera/Tank Farm Road intersection to 230 feet. Improvements are to be constructed by the San Luis Ranch Development or as a City-led capital*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	improvement project. Fair share contributions are satisfied through participation in the Citywide Transportation Impact Fee program. ~~*The Project Applicant shall design and install improvements to extend the northbound right turn pocket storage at the South Higuera Street/Tank Farm Road intersection to 230 feet. If improvements are constructed sooner by others, the Applicant may be responsible for a fair share contribution towards improvement costs.*~~ **Plan Requirements and Timing.** Prior to the issuance of building permits for each development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements through payment of Citywide Transportation Impact Fees.~~Prior to grading and recordation of the final VTM for development of Madonna Froom Ranch, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. The proposed improvements shall be completed prior to the issuance of an occupancy or building permit for Madonna Froom Ranch development. Improvement costs exceeding the Project's proportional share may be eligible for fee credits or reimbursements. If constructed sooner by others, participation in the Citywide Transportation Impact Fee program will fulfill the Project's fair share financial obligation. Payment of City Transportation Impact Fees shall be required prior to issuance of building permits for each development phase.~~ **Monitoring.** The City shall verify that the Applicant pays its fair share fees.~~The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City.~~ ~~***MM TRANS-17*** *The Project Applicant shall design and install restriping modifications at the South Higuera Street/Prado Road intersection to accommodate a second southbound left-turn lane and second eastbound through lane. This requires striping modifications, potential street parking removal on the eastern leg of the intersection, and potential traffic signal modifications to accommodate the modified intersection configuration. If intersection improvements are constructed sooner by others, the Applicant will be responsible for a fair share contribution towards improvement costs.*~~ ~~**Plan Requirements and Timing.** Prior to grading and recordation of the final VTM for development of Madonna Froom Ranch, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of an occupancy or~~	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	~~building permit for the Madonna Froom Ranch development. Improvement costs exceeding the Project's proportional share may be eligible for fee credits or reimbursements. If constructed sooner by others, participation in the Citywide Transportation Impact Fee program will fulfill the Project's fair share financial obligation. Payment of City Transportation Impact Fees shall be required prior to issuance of building permits for each development phase.~~ **~~Monitoring.~~** ~~The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City.~~ ***MM TRANS-16~~18~~*** *In coordination with the City and Caltrans, the Project Applicant shall fund costs required to optimize traffic signal timings along the LOVR corridor between Descanso Street and the South Higuera to improve traffic coordination and operations along this roadway segment. These intersections include LOVR/Descanso, LOVR/Royal, LOVR/Laguna, LOVR/Madonna, LOVR/Froom Ranch, LOVR/Auto Park, LOVR/Calle Joaquin, LOVR/U.S. 101 southbound ramps, LOVR/U.S. 101 northbound ramps and LOVR/S. Higuera. This requires coordination with Caltrans.~~*In coordination with the City and Caltrans, the Project Applicant shall fund any costs required to optimize traffic signal timings at three intersections along LOVR between Calle Joaquin and the U.S. 101 northbound ramps to improve traffic coordination and operations along this roadway segment. These intersections include LOVR/Calle Joaquin, LOVR/U.S. 101 southbound ramps, and LOVR/U.S. 101 northbound ramps. This requires coordination with Caltrans.*~~ **Plan Requirements and Timing.** Prior to issuance of first building permits for development of Villaggio Lower Area, the Applicant shall submit a Traffic Engineering Study identifying recommended signal timing modifications for review and approval by the City and Caltrans. Signal timing implementation shall be completed by the City and Caltrans.~~Prior to grading and recordation of the final VTM for development of Madonna Froom Ranch, the Applicant shall submit a Traffic Engineering Study identifying recommended signal timing modifications for review and approval by the City and Caltrans. Signal optimization shall be completed to the satisfaction of the City and Caltrans prior to City issuance of a certificate of occupancy or building permits for Madonna Froom Ranch development.~~ **Monitoring.** The City shall verify that the Applicant submits the required Traffic Engineering Study~~The City shall verify that the Applicant installs the~~	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	~~improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City~~. ***MM TRANS-17~~19~~*** *The Project Applicant shall pay a fair share mitigation fee to fund restriping modifications at the LOVR/Madonna Road intersection to increase southbound turn pocket storage to 365 feet.~~The Project Applicant shall design and install restriping modifications at the LOVR/Madonna Road intersection to increase turn pocket storage to 365 feet and optimize signal timings to improve operations and reduce queuing at the SB left-turn lane. If intersection improvements are constructed sooner by others, the Applicant will be responsible for a fair share contribution towards improvement costs.~~* **Plan Requirements and Timing.** Prior to the issuance of first building permits for the Villaggio Lower Area development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements. Improvements to be installed by the City as part of regular signing and striping improvements.~~Prior to grading and recordation of the final VTM for development of Madonna Froom Ranch, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of an occupancy or building permit for the Madonna Froom Ranch development. Improvement costs exceeding the Project's proportional share may be eligible for fee credits or reimbursements. If constructed sooner by others, participation in the Citywide Transportation Impact Fee program will fulfill the Project's fair share financial obligation. Payment of City Transportation Impact Fees shall be required prior to issuance of building permits for each development phase.~~ **Monitoring.** The City shall verify that the Applicant pays its fair share fees and that adequate funding is collected to implement these improvements.~~The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City.~~ ***MM TRANS-18~~20~~*** *The Project Applicant shall pay a fair share mitigation fee to fund modifications to the traffic signal at the Madonna Road/Dalidio Drive intersection to provide an eastbound right-turn overlap phase concurrent with the northbound left-turn phase. ~~The Project Applicant shall modify the traffic signal at the Madonna Road/Dalidio Drive intersection to provide EB right-turn overlap phase concurrent with NB left turn phase. If intersection improvements are constructed sooner by others, the Applicant will be responsible for a fair share contribution towards improvement costs.~~*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Plan Requirements and Timing. Prior to the issuance of first building permits for the Madonna Froom Ranch development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements. Improvements to be implemented by the City as part of its ongoing traffic operations improvement program or installed in conjunction with other intersection modifications to be constructed by the San Luis Ranch development project.~~Prior to grading and recordation of the final VTM for development of Madonna Froom Ranch, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of an occupancy or building permit for the Madonna Froom Ranch development. Improvement costs exceeding the Project's proportional share may be eligible for fee credits or reimbursements. If constructed sooner by others, participation in the Citywide Transportation Impact Fee program will fulfill the Project's fair share financial obligation. Payment of City Transportation Impact Fees shall be required prior to issuance of building permits for each development phase.~~ **Monitoring.** The City shall verify that the Applicant pays its fair share fees and that adequate funding is collected to implement these improvements.~~The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City.~~	
TRANS-4. The Project would result in traffic safety impacts and inadequate emergency access and evacuation options, resulting in potential for structural damage, injuries, or loss of life due to wildland fires or other emergency situations.	***MM HAZ-4*** *The Applicant shall prepare and implement an Evacuation Plan, which shall address both Villaggio and Madonna Froom Ranch areas. The Evacuation Plan shall be subject to review by the City and SLOFD, and shall include, but not be limited to:* • *Accommodation for assisted living and special care individuals;* • *Shelter-in-place accommodations;* • *Specified quantity and capacity of vehicles required to accommodate residents and employees of Villaggio, and maintenance of those vehicles;* • *Signage that clearly indicates evacuation routes and meeting areas;* • *Specified egress points for transportation vehicles;* • *A relocation plan from the Project site to a secondary facility, with associated transportation;* • *Contingency plans for changes to the construction schedule or phasing plan that would affect the primary evacuation plan and routes;*	Less than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	• *Periodic updates that would consider potential redevelopment activities or other roadway alterations; and* • *Regular practice drills (e.g., one per year) for implementation of the Evacuation Plan.* **Plan Requirements and Timing.** The above Evacuation Plan shall be prepared in coordination with the SLOFD and the San Luis Obispo County Fire Department and submitted for approval to the City and SLOFD prior to adoption of the Final VTTM. The Applicant shall resubmit the Plan to the City and SLOFD prior to the construction of each phase of development. Prior to occupancy of the first residential unit, the Applicant shall implement measures within the Evacuation Plan. **Monitoring.** The City and SLOFD shall review the Evacuation Plan and ensure all recommendations are incorporated. The City Fire Marshall shall inspect the Project site for compliance prior to the occupancy of the first residential unit for each phase. ***MM TRANS-19~~21~~*** *The Project shall design and install~~include~~ a landscaped median along LOVR from the terminus of the existing median at northern Project frontage to Calle Joaquin. ~~Project is responsible for construction of median improvements prior to occupancy of the Lower Area of Villaggio, or fair share contribution if constructed by others sooner.~~* **Plan Requirements and Timing.** The final FRSP shall be amended to incorporate the above median improvement prior to adoption and submitted to the City for review and approval. Prior to recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a public improvement plan for review and approval by the City. Implementation shall be completed prior to the issuance first certificates of occupancy for development of Villaggio's Lower Area.~~The final FRSP shall be amended to incorporate the above median improvement prior to adoption and submitted to the City for review and approval. The median shall be integrated to the final VTM prior to approval of development plans.~~ **Monitoring.** The City shall ensure the above measure is incorporated into the final FRSP prior to Project approval. The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans.~~The City shall ensure the above measure is incorporated into the final FRSP prior to Project approval.~~ ***MM TRANS-20~~22~~*** *The Project shall include an emergency access point from Villaggio's Lower Area to the Irish Hills Natural Reserve to provide access*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	to the existing dirt road network to fight fires in Irish Hills, specifically to Neil Havlik Way which connects to the four utility power line structures at the top of the ridgeline. This access point may be gated to ensure site security in consultation with SLOFD. **Plan Requirements and Timing.** The final FRSP shall be amended to incorporate the above emergency access connection prior to adoption and submitted to the City and SLOFD for review and approval. The above access road shall be integrated to the final VTM prior to approval of development plans. **Monitoring.** The City shall ensure the above measure is incorporated into the final FRSP prior to Project approval. ***MM TRANS-21~~23~~*** *The Project shall integrate access to the Project site perimeters for defending the Project site development. Specifically, these measures should address access to the wildland area immediately abutting the western boundary of Villaggio's Lower Area. This measure shall include access from the proposed Local Road "C" to the Irish Hills, which may include use of space between proposed buildings for firefighting vehicle access, ramps up proposed retaining walls, and similar vehicle infrastructure to maintain access to the base of the Irish Hills.* **Plan Requirements and Timing.** The final FRSP shall be amended to incorporate the above emergency access connection along the Irish Hills prior to adoption, and submitted to the City and SLOFD for review and approval. The above access road shall be integrated to the final VTM prior to approval of development plans. **Monitoring.** The City shall ensure the above measure is incorporated into the final FRSP prior to Project approval.	
TRANS-5. Onsite circulation would result in safety impacts to pedestrian and bicycle access.	***MM TRANS-22~~24~~*** *To address pedestrian and bicycle circulation safety issues, the Project Applicant shall incorporate the following ~~following modifications to the preliminary Project concept designs throughout the Project site are recommended~~ elements into public improvements plans based on design guidance published by National Association of City Transportation Officials and the Federal Highway Administration:* • *Install pedestrian refuges within center medians at north and south legs of the LOVR/Auto Park Way intersection;*	Less than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	• *Install a single northbound left-turn lane at the LOVR/Auto Park Way intersection in lieu of dual left-turn lanes, as currently proposed, to shorten pedestrian crossing distance at the south leg of the intersection.* • *Minimize the amount of roadway widening required along LOVR to the extent practicable by reducing turn pocket lengths at the LOVR/Auto Park intersection to the minimum extent required per applicable traffic engineering standards;* • *Install a bulb-out at the southwest corner of the intersection to shorten pedestrian crossing distance at the south leg of the LOVR/Auto Park Way intersection;* • *Install Lead Pedestrian Intervals at all pedestrian crossings at the LOVR/Auto Park Way intersection;* • *Install protected bicycle intersection features as part of signalization and intersection improvements at the LOVR/Auto Park Way intersection, conceptually consistent with planned improvements at the nearby LOVR/Froom Ranch Way and Madonna Road/Dalidio Drive intersections, and as illustrated in the Bob Jones Trail (Calle Joaquin to Oceanaire) Project Study Report;* • *Provide physically protected bicycle lanes (Class IV bikeway) along LOVR approaching/departing the Auto Park Way intersection and along Commercial Collector "A". The Class IV bikeways shall be installed on-street with a physical barrier between cyclists and vehicular traffic or by constructing raised bicycle facilities at the sidewalk level adjacent to pedestrian sidewalks;* • *Sidewalks shall be provided within the Madonna Froom Ranch development area of the Project site as per City standards; and* • *Sidewalk design shall meet ADA requirements for a comfortable walking environment.* **Plan Requirements and Timing.** The final FRSP shall be amended to incorporate the above improvements prior to adoption and submitted to the City and SLOFD for review and approval. Prior to recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a public improvement plan for review and approval by the City. Implementation shall be completed prior issuance of first certificates of	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	occupancy for development of Villaggio's Lower Area.~~The above improvements shall be integrated to the final VTM prior to approval of development plans.~~ **Monitoring.** The City shall ensure the above measure is incorporated into the final FRSP prior to Project approval. The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans.	
TRANS-6. Under long-term Cumulative plus Project conditions, Project-generated traffic would result in a cumulatively considerable contribution to traffic for automobiles and poor levels of service for pedestrians and bike modes of transportation, causing transportation deficiencies in the Project vicinity.	***MM TRANS-2*** *The Project Applicant shall design and construct the extension of the southbound right-turn pocket at the LOVR/U.S. 101 southbound ramps intersection to provide a storage length of at least 150 feet. In coordination with the Applicant, the City and Caltrans shall also implement traffic signal coordination between the LOVR/Calle Joaquin intersection and adjacent U.S. 101 northbound and southbound ramps and optimize traffic signal timings at these three intersections. In addition, the Applicant shall also pay a fair share mitigation fee towards the improvements that are required to be constructed by the San Luis Ranch development at this intersection, which include extension of the southbound off-ramp through/left-turn pocket to provide a storage length of at least 320 feet.* **Plan Requirements and Timing.** Prior to recordation of the final VTM for subdivision of the Madonna Froom Ranch development phase, the Applicant shall submit a Public Street Improvement Plan for roadway improvements at the southbound right-turn pocket and a Traffic Engineering Study with signal timing recommendations for review and implementation by the City and Caltrans. Payment of fair share mitigation fees shall be provided prior to first building permit issuance for Madonna Froom Ranch development, while construction of applicable improvements shall be completed prior to the issuance of first certificate of occupancy for Madonna Froom Ranch development. **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City. ***MM TRANS-5*** *The Project Applicant shall pay a fair share mitigation fee towards bicycle improvements at South Higuera/Tank Farm to be constructed by the Avila Ranch development, which include extending the westbound bike lane on Tank Farm Road to the South Higuera Street/Tank Farm Road intersection and installation of a bike box (with loop detection) to facilitate*	Less than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	bicycle left-turn movements. Fair share contribution is satisfied through participation in the Citywide Transportation Impact Fee program. *If the planned bicycle improvements have not yet been completed prior to development of the Villaggio Lower Area, the Applicant shall be responsible for design and installation of the bicycle improvements.~~The Project Applicant shall extend the westbound bike lane on Tank Farm Road approaching the South Higuera Street/Tank Farm Road intersection to the intersection and install a bike box to facilitate bicycle left turn movements. If improvements are constructed sooner by others, the Applicant may be responsible for a fair share contribution towards improvement costs.~~* **Plan Requirements and Timing.** Prior to the issuance of building permits for each development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements through payment of Citywide Transportation Impact Fees. If the planned improvements have not yet been completed by others prior to issuance of first building permits for Villaggio's Lower Area development, the Applicant shall be responsible for design and installation of the bicycle improvements prior to first occupancy permits for the Villaggio Lower Area development.~~Prior to grading and recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of a certificate of occupancy or building permits for Villaggio's Lower Area development. If improvements are completed sooner by others, the Applicant may be responsible for a fair share contribution prior to issuance of building permits for Villaggio's Lower Area development.~~ **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City. ***MM TRANS-6a*** *The Project Applicant shall pay fair share mitigation fees towards intersection improvements to be constructed by the Avila Ranch development, which include installation of a second southbound left-turn lane at the South Higuera Street/Tank Farm Road intersection. Fair share contributions are satisfied through participation in the Citywide Transportation Impact Fee program.* *If installation of dual southbound left-turn lanes has not been completed prior to Madonna Froom Ranch development phase, the Applicant shall coordinate*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	with the City to retime the traffic signal at South Higuera/Tank Farm to mitigate the Project's proportional contribution to queueing impacts. ~~*The Project Applicant shall design and install a second southbound left-turn lane at the South Higuera Street/Tank Farm Road intersection. The Project Applicant shall also pay fair share costs for construction of the Prado Road Overpass/Interchange project. If intersection improvements are constructed sooner by others, the Applicant will be responsible for a fair share contribution towards improvement costs through participation in the Citywide Transportation Impact Fee program.*~~ **Plan Requirements and Timing.** Prior to the issuance of building permits for each development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements through payment of Citywide Transportation Impact Fees. If the planned South Higuera/Tank Farm intersection improvements have not yet been completed by others prior to issuance of first building permits for Madonna Froom Ranch development, the Applicant shall submit a Traffic Engineering Study with signal timing recommendations for review and implementation by the City prior to issuance of first certificates of occupancy for Madonna Froom Ranch development.~~Prior to grading and recordation of the final VTM for development of Madonna Froom Ranch, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City for the South Higuera/Tank Farm intersection improvements. Implementation of intersection improvements shall be completed prior to the issuance of a certificate of occupancy or building permits for the Madonna Froom Ranch development. Intersection improvement costs exceeding the Project's proportional share may be eligible for fee credits or reimbursements. Participation in the Citywide Transportation Impact Fee program will fulfill the Project's fair share financial obligation towards the Prado Road Overpass/Interchange project and the South Higuera/Tank Farm Road intersection improvements, if constructed sooner by others. Payment of City Transportation Impact Fees shall be required prior to issuance of building permits for each development phase.~~ **Monitoring.** The City shall verify that the Applicant pays fair share costs in accordance to the approved phase and design plans. ***MM TRANS-6b*** *The Project Applicant shall pay fair share costs for construction of the Prado Road Overpass/Interchange project. Fair share*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	contributions are satisfied through participation in the Citywide Transportation Impact Fee program. **Plan Requirements and Timing.** Prior to the issuance of building permits for each development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements through payment of Citywide Transportation Impact Fees **Monitoring.** The City shall verify that the Applicant pays fair share costs in accordance to the approved phase and design plans. ***MM TRANS-7*** *The Project Applicant shall pay a fair share mitigation fee towards the intersection improvements to be constructed by the City at the South Higuera/Prado intersection, which includes installation of a second northbound left-turn lane, a second southbound left-turn lane, a second eastbound through lane, bicycle protected intersection features, traffic signal modifications, and widening of the adjacent Prado Road Creek Bridge west of South Higuera. Fair share contributions for both improvements are satisfied through participation in the Citywide Transportation Impact Fee program.* **Plan Requirements and Timing**. Prior to the issuance of building permits for each development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements through payment of Citywide Transportation Impact Fees. **Monitoring.** The City shall verify that the Applicant pays fair share costs in accordance to the approved phase and design plans. ***MM TRANS-8*** *The Project Applicant shall design and install Class IV bikeways (protected bike lanes) along LOVR to provide a physical buffer between the sidewalk and vehicular traffic lanes. Improvement extents shall occur in the northbound direction between Laguna Lane and Diablo Drive, and in the southbound direction between Diablo Drive and Madonna Road. Some gaps in physical separation may remain due to right-of-way limitations or other design constraints.~~Project is responsible for fair share contribution towards improvement costs.~~* **Plan Requirements and Timing.** Prior to ~~grading and~~ recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of ~~a~~first certificates of occupancy ~~or building permits~~ for Villaggio's Lower Area development.	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Improvement costs exceeding the Project's proportional share may be eligible for ~~fee credits or reimbursements~~private reimbursement. **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City. ***MM TRANS-9*** *The Project Applicant shall design and install ADA-compliant curb, gutter and sidewalk along the west side of LOVR to complete the sidewalk connection between the Irish Hills Plaza and Calle Joaquin. The Project Applicant shall also design and install Class IV bikeways (protected bike lanes) along LOVR to provide a physical buffer between the sidewalk and vehicular traffic lanes in the northbound and southbound directions between Madonna Road and South Higuera Street. This mitigation measure requires Caltrans approval and coordination for improvements near the LOVR/U.S. 101 interchange. If Class IV bikeways are not approved for segments within Caltrans right-of-way, or are deemed infeasible for short segments due to other geometric constraints, alternative treatments to improve pedestrian levels of service may be approved to the satisfaction of the Public Works Director. Potential alternative treatments include installation of striped bike lane buffers, street trees or other features that further buffer pedestrians from street traffic.~~The Project is responsible for all costs related to construction of sidewalks, curb and gutter, and a fair share contribution towards Class IV bikeway improvements. This mitigation measure requires Caltrans approval and coordination for improvements near LOVR/U.S. 101 interchange.~~* **Plan Requirements and Timing.** Prior to ~~grading and~~ recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. Implementation shall be completed prior to the issuance of ~~a~~first certificates of occupancy ~~or building permits~~ for Villaggio's Lower Area development. Applicable construction costs for improvements along LOVR between Calle Joaquin and Froom Ranch Way consistent with the planned Bob Jones Trail (Calle Joaquin to Oceanaire) Connection Project may be eligible for credits or reimbursement through the City's Transportation Impact Fee program. Costs exceeding the Project's proportional share for improvements along other segments may be eligible for private reimbursement only.~~Bikeway improvement costs exceeding the Project's proportional share may be eligible for fee credits or reimbursements.~~	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Monitoring. The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans ~~or contributes an appropriate fair share as approved by the City~~. ***MM TRANS-12*** *In coordination with the County, the Project Applicant shall pay a fair share mitigation fee for costs to construct the following future improvements at the LOVR/Foothill Boulevard intersection: widen northbound approach to provide one left-turn, two through, and one right-turn lane; widen westbound approach to provide one left-turn lane, one shared through/right-turn lane, and one right-turn lane. Additional improvements include roadway striping and traffic signal modifications needed to accommodate new lane configurations. This mitigation measure requires County approval and coordination.* **Plan Requirements and Timing.** Prior to recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit preliminary intersection improvement plans for review and approval by the County, with plans developed to a level of detail sufficient to provide an engineer's estimate of probable construction costs, including right-of-way acquisition (if needed). Fair share mitigation fees for these improvements shall be paid to the County prior to issuance of first certificates of occupancy development of Villaggio's Lower Area. **Monitoring.** The City shall verify that the Applicant has provided applicable design plans and contributes an appropriate fair share mitigation fee to the satisfaction of the County. ***MM TRANS-13*** *In coordination with the Applicant, the City shall retime the traffic signal at LOVR/Madonna to implement Lead Pedestrian Intervals for each pedestrian crossing phase.~~In coordination with the City, the Project Applicant shall fund any costs required to implement Lead Pedestrian Intervals for each pedestrian crossing phase at the LOVR/Madonna Road intersection.~~* **Plan Requirements and Timing.** Prior to the issuance of first building permits for the Villaggio Lower Area development phase, the City shall implement the signal timing modifications.~~Prior to grading and recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Traffic Engineering Study identifying recommended signal timing modifications for review and approval by the City. The proposed Lead Pedestrian Intervals shall be installed prior to the issuance of a certificate of occupancy or building permits for Villaggio's Lower Area development.~~	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Monitoring. The City shall verify that the signal timing modifications are implemented in accordance to the approved project phase.~~The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City.~~ ***MM TRANS-14*** *In coordination with the City, the Project Applicant shall fund any costs required to implement Lead Pedestrian Intervals for each pedestrian crossing phase at the South Higuera Street/Tank Farm Road intersection.* **Plan Requirements and Timing.** Prior to grading and recordation of the final VTM for development of Villaggio's Lower Area, the Applicant shall submit a Traffic Engineering Study identifying recommended signal timing modifications for review and approval by the City. The proposed Lead Pedestrian Intervals shall be installed prior to the issuance of an occupancy or building permit for Villaggio's Lower Area development. **Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City. ***MM TRANS-16*** *In coordination with the City and Caltrans, the Project Applicant shall fund costs required to optimize traffic signal timings along the LOVR corridor between Descanso Street and the South Higuera to improve traffic coordination and operations along this roadway segment. These intersections include LOVR/Descanso, LOVR/Royal, LOVR/Laguna, LOVR/Madonna, LOVR/Froom Ranch, LOVR/Auto Park, LOVR/Calle Joaquin, LOVR/U.S. 101 southbound ramps, LOVR/U.S. 101 northbound ramps and LOVR/S. Higuera. This requires coordination with Caltrans.* **Plan Requirements and Timing.** Prior to issuance of first building permits for development of Villaggio Lower Area, the Applicant shall submit a Traffic Engineering Study identifying recommended signal timing modifications for review and approval by the City and Caltrans. Signal timing implementation shall be completed by the City and Caltrans. **Monitoring.** The City shall verify that the Applicant submits the required Traffic Engineering Study. ***MM TRANS-18*** *The Project Applicant shall pay a fair share mitigation fee to fund modifications to the traffic signal at the Madonna Road/Dalidio Drive intersection to provide an eastbound right-turn overlap phase concurrent with the northbound left-turn phase. The Project Applicant shall modify the traffic*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	signal at the Madonna Road/Dalidio Drive intersection to provide EB right-turn overlap phase concurrent with NB left-turn phase. If intersection improvements are constructed sooner by others, the Applicant will be responsible for a fair share contribution towards improvement costs. **Plan Requirements and Timing.** Prior to the issuance of first building permits for the Madonna Froom Ranch development phase, the Applicant shall provide a fair share contribution towards the mitigation improvements. Improvements to be implemented by the City as part of its ongoing traffic operations improvement program or installed in conjunction with other intersection modifications to be constructed by the San Luis Ranch development project. **Monitoring.** The City shall verify that the Applicant pays its fair share fees and that adequate funding is collected to implement these improvements. ~~***MM TRANS-25** In coordination with the County, the Project Applicant shall pay its fair share fees to fund modifications to the northbound approach at the LOVR/Foothill Boulevard intersection to provide one left-turn, two through, and one right-turn lane, or similar operational improvements to the satisfaction of the County Public Works Director. Additional minor traffic signal, striping, and signage modifications may be required for implementation of these improvements. This mitigation measure requires County approval and coordination.*~~ ~~**Plan Requirements and Timing.** Prior to grading and recordation of the final VTM for development of Madonna Froom Ranch, the Applicant shall submit a Public Street Improvement Plan and Engineer's Estimate of Probable Cost for review and approval by the County. The Applicant shall pay its fair share fees to the County prior to the issuance of an occupancy or building permit for Madonna Froom Ranch development to fund implementation of the future intersection improvements.~~ ~~**Monitoring.** The City shall verify that the Applicant provides the required design plans and contributes an appropriate fair share as approved by the County in accordance to the approved development phase.~~ ***MM TRANS-2326*** *The Project Applicant shall pay a fair share mitigation fee to fund striping modifications to extend the northbound left-turn pocket at the LOVR/Royal Way intersection to 150 feet. This mitigation measure requires Caltrans approval and coordination.*~~*The Project Applicant shall pay its fair share fees to fund striping modifications to extend the northbound left-turn pocket at the LOVR/Royal Way intersection to 150 feet, and to optimize the*~~	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	~~*traffic signal timings along the LOVR corridor between Descanso Street and South Higuera Street. This mitigation measure requires Caltrans approval and coordination.*~~ **Plan Requirements and Timing.** Prior to issuance of first building permits~~an occupancy or building permit~~ for Madonna Froom Ranch, the Applicant shall pay its fair share fees to the City. **Monitoring.** The City shall verify that the Applicant contributes an appropriate fair share as approved by the City and that adequate funding is collected to implement these improvements. ***MM TRANS-24~~27~~*** *In coordination with the Applicant, the City shall retime the traffic signal at LOVR/Calle Joaquin to implement Lead Pedestrian Intervals for each pedestrian crossing phase. Requires Caltrans coordination.~~In coordination with the City, the Project Applicant shall pay its fair share fees to fund the implementation of Lead Pedestrian Intervals for each pedestrian crossing phase at the LOVR/Calle Joaquin intersection.~~* **Plan Requirements and Timing.** Prior to the issuance of first building permits for the Villaggio Lower Area development phase, the City shall implement the signal timing modifications.~~Prior to issuance of an occupancy or building permit for Madonna Froom Ranch, the Applicant shall pay its fair share fees to the City.~~ **Monitoring.** The City shall verify that the signal timing modifications are implemented in accordance to the approved project phase.~~The City shall verify that the Applicant contributes an appropriate fair share as approved by the City and that adequate funding is collected to implement these improvements.~~ ***MM TRANS-25~~28~~*** *The Project Applicant shall pay its fair share mitigation fees to fund intersection striping improvements to extend~~the extension of~~ the southbound left-turn pocket storage at the South Higuera Street/Tank Farm Road intersection to 300 feet.* **Plan Requirements and Timing.** Prior to issuance of ~~an occupancy or~~first building permits for Madonna Froom Ranch, the Applicant shall pay its fair share fees to the City. **Monitoring.** The City shall verify that the Applicant contributes an appropriate fair share as approved by the City and that adequate funding is collected to implement these improvements. ~~***MM TRANS-29*** *The Project Applicant shall pay its fair share fee to the City to fund the extension of the westbound right-turn pocket storage at the~~	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	~~*Madonna Road/Oceanaire Drive intersection to 200 feet. This may require replacement of the existing culvert on Madonna Road east of Oceanaire Drive.*~~ ~~**Plan Requirements and Timing.** Prior to issuance of an occupancy or building permit for Madonna Froom Ranch, the Applicant shall pay its fair share fees to the City.~~ ~~**Monitoring.** The City shall verify that the Applicant contributes an appropriate fair share as approved by the City and that adequate funding is collected to implement these improvements.~~ ~~***MM TRANS-30** The Project Applicant shall coordinate and fund the City to modify the traffic signal phasing and timing plans at the Madonna Road/Dalidio Drive intersection to provide an eastbound right turn overlap phase concurrent with the northbound left-turn phase. The Applicant shall be responsible for implementation prior to development of Madonna Froom Ranch or fair share contribution if constructed sooner by others.*~~ ~~**Plan Requirements and Timing.** Prior to grading and recordation of the final VTM for development of Madonna Froom Ranch, the Applicant shall submit a Public Street Improvement Plan for review and approval by the City. The proposed improvements shall be completed prior to the issuance of an occupancy permit for Madonna Froom Ranch development.~~ ~~**Monitoring.** The City shall verify that the Applicant installs the improvements in accordance to the approved phase and design plans or contributes an appropriate fair share as approved by the City.~~	
3.14 Utilities and Energy Conservation		
UT-1. The Project would require the expansion of utility infrastructure to serve new development, including water, sewer, natural gas, and electricity into the site; the construction of which could cause environmental effects.	***MM AQ-1** A Construction Activity Management Plan (CAMP) shall be included as part of Project grading and building plans and shall be submitted to SLO County APCD and to the City for review and approval prior to the start of construction. The plan shall include but not be limited to the following elements:* *1. A Dust Control Management Plan that encompasses the following dust control measures:* • *Reduce the amount of disturbed area where possible;* • *Water trucks or sprinkler trucks shall be used during construction to keep all areas of vehicle movement damp enough to prevent dust from leaving the site and from exceeding the APCD's limit of 20 percent opacity for greater than 3 minutes in any 60-minute*	Less than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	period. At a minimum, this would require twice-daily applications. Increased watering frequency would be required when wind speeds exceed 15 miles per hour (mph). Reclaimed water or the onsite water well (non-potable) shall be used when possible. The contractor or builder shall consider the use of a SLO County APCD-approved dust suppressant where feasible to reduce the amount of water used for dust control; • *All dirt stock-pile areas shall be sprayed daily as needed;* • *Permanent dust control measures identified in the approved Project revegetation and landscape plans of any development within the Specific Plan area should be implemented as soon as possible following completion of any soil disturbing activities;* • *Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating native grass seed and watered until vegetation is established;* • *All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by SLO County APCD;* • *All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used;* • *Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;* • *All trucks hauling dirt, sand, soil, or other loose materials are to be covered or shall maintain at least 2 feet of freeboard in accordance with California Vehicle Code Section 23114;* • *Designate access points and require all employees, subconsultants, and others to use them. Install and operate a "track-out prevention device" where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can be any device or combination of devices that are effective at preventing track-out, located at the point of intersection of any unpaved area and a paved road. If utilized, rumble strips or steel plate devices shall be cleaned periodically. If paved roadways*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	accumulate tracked-out soils, the track-out prevention device shall be modified or replaced to prevent track-out; • *Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where feasible;* • *All of these fugitive dust mitigation measures shall be shown on grading and building plans; and* • *The contractor or builder shall designate a person or persons to monitor the fugitive dust control emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20 percent opacity, and to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to SLO County APCD Compliance Division prior to the start of any grading, earthwork or demolition.* 2. *Implementation of the following BACT for diesel-fueled construction equipment. The BACT measures shall include:* • *Use of at least Tier 3 off-road equipment and 2010 on-road compliant engines;* • *Repowering equipment with the cleanest engines available; and* • *Installing California Verified Diesel Emission Control Strategies.* 3. *Implementation of the following standard air quality measures to minimize diesel emissions:* • *Maintain all construction equipment in proper tune according to manufacturer's specifications;* • *Fuel all off-road and portable diesel-powered equipment with CARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road).* • *Use on-road heavy-duty trucks that meet the CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines and comply with the State On-Road Regulation;* • *Construction or trucking companies with fleets that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g. captive or NO_x exempt area fleets) may be eligible by proving alternative compliance;*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	• *On- and off-road diesel equipment shall not be allowed to idle for more than five minutes. Signs shall be posted in the designated queuing areas to remind drivers and operators of the five-minute idling limit;* • *Diesel idling within 1,000 feet of sensitive receptors is not permitted;* • *Staging and queing areas shall not be loated within 1,000 feet of sensitive receptors;* • *Electrify equipment when feasible;* • *Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and,* • *Use alternatively fueled construction equipment onsite where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.* 4. *Tabulation of on- and off-road construction equipment (age, horse-power, and miles and/or hours of operation);* 5. *Schedule construction truck trips during non-peak hours (as determined by the Public Works Director) to reduce peak hour emissions; and* 6. *Limit the length of the construction work-day period to 8 hours max.* **Plan Requirements and Timing.** The CAMP shall be submitted to SLO County APCD and to the City for review and City approval prior to issuance of grading and construction permits and recordation of the final VTM. All required fugitive dust and emissions control measures shall be noted on all grading and building plans and all construction activities shall adhere to measures throughout all grading, hauling, and construction activities. The contractor or builder shall provide the City Community Development Director and SLO County APCD with the name and contact information for an assigned onsite dust and emissions control monitor(s) who has the responsibility to: a) assure all dust control requirements are complied with including those covering weekends and holidays, b) order increased watering as necessary to prevent transport of dust offsite, and c) attend the pre-construction meeting. The dust monitor shall be designated prior to grading permit issuance for each Project phase. The dust control components apply from the beginning of any grading or construction throughout all development activities until occupancy is issued and landscaping is successfully installed.	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Monitoring. City staff shall ensure measures are depicted on the CAMP and all submitted grading and construction plans for each Project phase. The Applicant shall be responsible for compliance during construction activities, including holidays or weekends when work may not be in progress. City grading and building inspectors shall spot check and ensure compliance onsite. ***MM BIO-1*** *The Applicant shall prepare and implement a Biological Mitigation and Monitoring Plan that identifies both construction and operational related avoidance, reduction, and mitigation measures for impacts to sensitive natural communities. The Biological Mitigation and Monitoring Plan shall include Best Management Practices (BMPs) to avoid or minimize impacts to biological resources, and implementation of on and offsite habitat replacement as follows:* *1) The Biological Mitigation and Monitoring Plan shall include the following construction-related measures and BMPs:* *a) Construction equipment and vehicles shall be stored at least 100 feet away from existing and proposed drainage features and adjacent riparian habitat, and all construction vehicle maintenance shall be performed in a designated offsite vehicle storage and maintenance area approved by the City.* *b) Prior to commencement of construction, Drainages 1, 2, 3, and 4 and all associated springs, seeps, and wetlands shall be protected with construction fencing located a minimum of 25 feet from the edge of the stream channel or top of bank and signed to prohibit entry of construction equipment and personnel unless authorized by the City. Fencing shall be maintained throughout the construction period for each phase of development. Fencing and signage shall be removed following completion of construction.* *c) During any construction activities within 50 feet of the existing Froom Creek channel, realigned Froom Creek channel, LOVR ditch, Drainages 1, 2, 3, or 4, or other existing or proposed drainage features, a City-approved biological monitor shall be present and have the authority to stop or redirect work as needed to protect biological resources.* *d) All construction materials (e.g., fuels, chemicals, building materials) shall be stored at designated construction staging areas, which shall be located outside of designated sensitive areas.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Should spills occur, or if any unanticipated hazardous materials are discovered, materials and/or contaminants shall be cleaned immediately and recycled or disposed of to the satisfaction of the RWQCB Department of Toxic Substances Control, and/or San Luis Obispo County Public Health Environmental Services, as applicable. *e) All trash and construction debris shall be properly disposed at the end of each day and dumpsters shall be covered either with locking lids or with plastic sheeting at the end of each workday and during storm events. All sheeting shall be carefully secured to withstand weather conditions.* *f) The Applicant shall implement measures designed to minimize construction-related erosion and retain sediment on the Project site, including installation of silt fencing, straw waddles, or other acceptable construction erosion control devices. Such measures shall be installed along the perimeter of disturbed areas and along the top of the bank of the existing and proposed Froom Creek channel and other existing or proposed drainage features and 25 feet from the edge of Drainages 1, 2, 3, and 4. All drainage shall be directed to sediment basins designed to retain all sediment onsite.* *g) Concrete truck and tool washout shall occur in a designated location such that no runoff will reach the creek, onsite drainages, or other sensitive areas.* *h) All open trenches shall be constructed with appropriate exit ramps to allow species that fall into a trench to escape. All open trenches shall be inspected at the beginning of each work day to ensure that no wildlife species is present. Any sensitive wildlife species found during inspections shall be gently encouraged to leave the Project site by a qualified biologist or otherwise trained and City-approved personnel. Trenches will remain open for the shortest period necessary to complete required work.* *i) Existing disturbed areas shall be used for construction staging and storage to the maximum extent possible to minimize disturbance of undeveloped habitats. All construction access roads and staging areas shall be located to avoid known/mapped habitat and minimize habitat fragmentation.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Plan Requirements and Timing. The Biological Mitigation and Monitoring Plan shall be submitted for review and approval by the City prior to issuance of grading permits and recordation of the final VTM. The plan shall incorporate any additional measures or requirements identified by state and federal agencies, including but not limited to CDFW, RWQCB, NMFS, and USFWS. The Applicant shall prepare a Biological Mitigation Plan that identifies and incorporates all required measures identified in MM BIO-2 through MM BIO-12 below. The plan shall specify all mitigation site locations, timing of surveys and activities, species composition, habitat compensation, species avoidance measures, and other required information, including identification of appropriate onsite construction staging locations. The plan shall demonstrate compliance with all required measures and any required permits shall be obtained from state and federal regulatory agencies prior to the issuance of grading or building permits. A 7-year site mitigation monitoring plan shall also be prepared by the City-approved biologist and incorporated into the Biological Mitigation and Monitoring Plan prior to issuance of grading permits and recordation of the final VTM, with annual reports submitted to the City Natural Resources Manager and Community Development Department. **Monitoring.** The City shall review and approve the Biological Mitigation and Monitoring Plan to ensure that all BMPs and appropriate mitigation measures have been included. The City shall ensure compliance with requirements of the Biological Mitigation and Monitoring Plan through frequent monitoring and inspection, and receipt of quarterly monitoring reports provided by the Applicant's Environmental Coordinator required per MM BIO-2. The Applicant's Environmental Coordinator shall also ensure compliance during habitat compensation and/or restoration activities through routine monitoring, inspection, and reporting of restoration activities. ***MM CR-3*** *Prior to issuance of grading or building permits, and recordation of the final map, an Archaeological Monitoring Plan (AMP) shall be prepared. The AMP should include, but not be limited to, the following:* • *A list of personnel involved in the monitoring activities;* • *Description of Native American involvement;* • *Description of how the monitoring shall occur;* • *Description of location and frequency of monitoring (e.g., full time, part time, spot checking);* • *Description of what resources are expected to be encountered;*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	• *Description of circumstances that would result in the halting of work at the project site;* • *Description of procedures for halting work on the site and notification procedures;* • *Description of monitoring reporting procedures; and* • *Provide specific, detailed protocols for what to do in the event of the discovery of human remains.* **Plan Requirements and Timing.** The AMP shall be prepared by a City-approved archaeologist prior to issuance of grading or building permits and recordation of the final map. **Monitoring.** The City shall ensure the AMP is prepared by a City-approved archaeologist and consistent with City Archeological Resource Preservation Program Guidelines. ***MM CR-4*** *The Applicant shall retain a City-approved archaeologist and local Native American observer to monitor Project-related ground-disturbing activities that have the potential to encounter previously unidentified archaeological resources, as outlined in the AMP prepared to satisfy MM CR-1. Archaeological and tribal monitoring may cease only if the City-approved archaeologist determines in coordination with the Applicant, Community Development Director, and the Native American monitor that Project activities do not have the potential to encounter and/or disturb unknown resources.* **Plan Requirements and Timing.** The conditions for monitoring and treatment of discoveries shall be printed on all building and grading plans. Prior to issuance of building and grading permits for each phase of the Project, the Applicant shall submit to the City a contract or Letter of Commitment with a qualified archaeologist and Native American monitor. The City shall review and approve the selected archaeologist to ensure they meet appropriate professional qualification standards, consistent with the City's Archeological Resource Preservation Guidelines. **Monitoring.** City permit compliance staff shall confirm monitoring by the archaeologist and tribal representative and City grading inspectors shall spot check fieldwork. The Native American monitor and Project archaeologist shall ensure that actions consistent with this mitigation measure are implemented in the event of any inadvertent discovery. ***MM CR-5*** *In the event of any inadvertent discovery of prehistoric archaeological resources, including but not limited to stone, bone, glass,*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	ceramics, fossils, wood, or shell artifacts, or historic-period archaeological resources, all work within 100 feet of the discovery shall immediately cease (or greater or lesser distance as needed to protect the discovery and determined in the field by the City-approved archaeologist). The Applicant and/or contractor shall immediately notify the City Community Development Department. The City-approved archaeologist shall evaluate the significance of the discovery pursuant to City Archaeological Resource Preservation Program Guidelines prior to resuming any activities that could impact the site/discovery. If the City-approved archaeologist or Native American monitor determine that the find may qualify for listing in the CRHR or as a tribal cultural resource, the site shall be avoided or shall be subject to a Phase II or III mitigation program consistent with City Archeological Resource Preservation Program Guidelines and funded by the Applicant. Work shall not resume until authorization is received from the City. **Plan Requirements and Timing.** The conditions for monitoring and treatment of discoveries shall be printed on all building and grading plans. Prior to issuance of building and grading permits for each phase of the Project, the Applicant shall submit to the City a contract or Letter of Commitment with identified Project archaeologist and Native American monitor. The City shall review and approve the selected archaeologist to ensure they meet appropriate professional qualification standards, consistent with the Archeological Resource Preservation Program Guidelines. **Monitoring.** City permit compliance staff shall confirm monitoring by the archaeologist and tribal representative and City grading inspectors shall spot check fieldwork. The Native American monitor and Project archaeologist shall ensure that actions consistent with this mitigation measure are implemented in the event of any inadvertent discovery. ***MM HAZ-1*** *The Applicant shall prepare and submit a Construction Impact Management Plan to the City of San Luis Obispo Fire Department (SLOFD) prior to the issuance of grading permits. The Plan shall list measures taken during construction to reduce the potential for brush or grass fires from use of heavy equipment, welding, vehicles with catalytic converters, and other potential activities. The Plan shall include SLOFD recommended measures including, but not limited to the following:* • *All equipment with the potential to work off-road shall be equipped with appropriate mufflers and have extinguishers mounted on each vehicle;*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	• *In coordination with SLOFD, personnel shall be briefed on the dangers of wildfire and be able to respond accordingly should the need arise;* • *Onsite supervisor(s) shall have a cell phone or other means of initiating a 911 response time in a timely manner in the event of a medical emergency and/or fire;* • *All dead and decadent vegetation immediately surrounding the development area shall be removed to a minimum perimeter of 30 feet;* • *Smoking shall only occur in a designated area;* • *A water tender will be available on each construction site during the entire phase of construction; and* • *A water tender operator shall be available onsite during all construction and remain onsite a minimum of 30 minutes after all construction has finished for the day.* **Plan Requirements and Timing.** The Applicant shall prepare a Construction Impact Management Plan in coordination with SLOFD, the San Luis Obispo County Fire Department, and the City, and submit the Plan to the SLOFD for approval prior to the issuance of grading permits. Provisions for fire protection shall be restated on all grading and building plans. Fire protection measures shall be implemented throughout construction and draw upon the CALFIRE and San Luis Obispo County Fire Department Strategic Fire Plan. The name and telephone number of an onsite supervisor shall be provided to SLOFD prior to commencement of construction or grading activities. ***Monitoring.*** *The SLOFD shall review the Construction Impact Management Plan and provide recommended measures as necessary. The City permit processing planner shall ensure measures are integrated into the final grading and building plans prior to permit approval. City monitoring staff shall spot check for compliance during construction for each phase of development.* ***MM HYD-1*** *Prior to the issuance of any construction/grading permit and/or the commencement of any clearing, grading, or excavation, the Applicant shall submit a Notice of Intent (NOI) for discharge from the Project site to the California SWRCB Storm Water Permit Unit.* **Plan Requirements and Timing.** The NOI shall be submitted for review and approval to the SWRCB. The City will verify that a Waste Discharge Identification (WDID) number is assigned by the Board prior to the issuance of grading permits for construction activities. The NOI shall address discharge	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	during all phases of development of the site until all disturbed areas are permanently stabilized. **Monitoring.** The City will confirm WDID number assignment prior to approval of the grading permit(s). City monitoring staff will periodically inspect the site during construction to ensure compliance. ***MM HYD-2*** *For each phase of construction, the Applicant shall require the building contractor to prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) to the City 45 days prior to the start of work for approval. The contractor is responsible for understanding the State General Permit and instituting the SWPPP during construction. A SWPPP for site construction shall be developed prior to the initiation of grading and implemented for all construction activity on the Project site in excess of 1 acre, or where the area of disturbance is less than 1 acre but is part of the Project's plan of development that in total disturbs 1 or more acres. The SWPPP shall identify potential pollutant sources that may affect the quality of discharges to stormwater and shall include specific BMPs to control the discharge of material from the site, including, but not limited to:* • *Temporary detention basins, straw bales, sand bagging, mulching, erosion control blankets, silt fencing, and soil stabilizers shall be used.* • *Sufficient physical protection and pollution prevention measures to prevent sedimentation, siltation, and/or debris from entering the Calle Joaquin wetlands.* • *Soil stockpiles and graded slopes shall be covered after 14 days of inactivity and 24 hours prior to and during inclement weather conditions.* • *Fiber rolls shall be placed along the top of exposed slopes and at the toes of graded areas to reduce surface soil movement, as necessary.* • *A routine monitoring plan shall be implemented to ensure success of all onsite erosion and sedimentation control measures.* • *Dust control measures shall be implemented to ensure success of all onsite activities to control fugitive dust.* • *Streets surrounding the Project site shall be cleaned daily or as necessary.* • *BMPs shall be strictly followed to prevent spills and discharges of pollutants onsite (material and container storage, proper trash disposal, construction entrances, etc.).*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	• *Sandbags, or other equivalent techniques, shall be utilized along graded areas to prevent siltation transport to the surrounding areas.* • *Additional BMPs shall be implemented for any fuel storage or fuel handling that could occur onsite during construction. The SWPPP must be prepared in accordance with the guidelines adopted by the SWRCB. The SWPPP shall be submitted to the City along with grading/development plans for review and approval. The Applicant shall file a Notice of Completion for construction of the development, identifying that pollution sources were controlled during the construction of the Project and implementing a closure SWPPP for the site.* **Plan Requirements and Timing.** The Applicant shall prepare a SWPPP that includes the above and any additional required BMPs addressing each phase of construction and timing. The SWPPP and notices shall be submitted to the SWRCB under their Stormwater Multi-Application, Reporting, and Tracking System (SMARTS). The SWPPP shall be designed to address erosion and sediment control during all phases of development of the site until all disturbed areas are permanently stabilized. The development plans submitted to the City shall include and reflect the erosion control plan and BMPs submitted to the State. ***Monitoring.*** *City monitoring staff shall periodically inspect the site for compliance with the SWPPP during grading to monitor runoff and after conclusion of grading activities. A Qualified SWPPP Practitioner (QSP) will be retained by the developer for overall management and reporting responsibility regarding the SWPPP and documentation under SMARTS in accordance with their permitting requirement. The Applicant will keep a copy of the SWPPP on the Project site during grading and construction activities.* ***MM NO-1*** *Except for emergency repair of public service utilities, or where an exception is issued by the Community Development Department, no operation of tools or equipment used in construction, drilling, repair, alteration, or demolition work shall occur between the hours of 7:00 PM and 7:00 AM, or any time on Sundays, holidays, or after sunset, such that the sound creates a noise disturbance that exceeds 75 dBA for single-family residential uses, 80 dBA for multi-family residential uses, and 85 dBA for mixed residential/commercial land uses, as shown in Table 3.10-9 and Table 3.10-10, across a residential or commercial property line.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	Plan Requirements and Timing. Plans submitted for grading and building permits shall clearly indicate construction hours and shall be submitted to the City for approval prior to grading and building permit issuance for each Project phase. To ensure response to and resolution of potential public noise nuisance complaints, plans submitted for grading and building permits shall clearly identify the Project's construction manager (or similar) and 24-hour contact information. At the pre-construction meeting required for all phases of grading and development, all construction workers shall be briefed on restricted construction hour limitations. A workday schedule shall be adhered to for the duration of construction for all phases. **Monitoring.** The Applicant's permit compliance monitoring staff shall perform periodic site inspections to verify compliance with activity schedules and respond to complaints. ***MM NO-2*** *For all construction activity at the Project site, noise attenuation techniques shall be employed to ensure that noise levels are maintained within levels allowed by the City of San Luis Obispo Municipal Code, Title 9, Chapter 9.12 (Noise Control). Such techniques shall include:* • *Sound blankets on noise-generating equipment.* • *Stationary construction equipment that generates noise levels above 65 dBA at the Project boundaries shall be shielded with a barrier that meets a sound transmission class (a rating of how well noise barriers attenuate sound) of 25.* • *All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers.* • *Temporary sound barriers shall be constructed between construction sites and affected uses.* **Plan Requirements and Timing.** The Applicant shall designate the proposed area of operation of stationary construction equipment and depict acoustic shielding around these areas on building and grading plans. Equipment and shielding shall be installed prior to construction and remain in the designated location throughout construction activities. Construction plans shall identify Best Management Practices (BMPs) to be implemented during construction. All construction workers shall be briefed at a pre-construction meeting on how, why, and where BMP measures are to be implemented. BMPs shall be identified and described for submittal to the City for review and approval prior to building or grading permit issuance. BMPs shall be adhered to for the duration of the Project. Construction plans shall include truck routes and shall	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	be submitted to the City prior to grading and building permit issuance for each Project phase. **Monitoring.** City staff shall ensure compliance throughout all construction phases. The Applicant's permit compliance monitoring staff shall perform periodic site inspections to verify compliance with activity schedules. ***MM NO-3*** *The Applicant shall inform landowners and business operators at properties within 300 feet of the Project site of proposed construction timelines and noise complaint procedures to minimize potential annoyance or nuisance complaints related to construction noise no less than 10 days prior to initiation of any grading and construction activity for any Phase. The notice shall include the name and contact information of the Project's construction manager and contact information for the City's Community Development Department.* **Plan Requirements and Timing.** The Applicant shall provide and post signs stating these restrictions and the Project's construction manager's name and contact information at construction site entries. Signs shall be posted prior to commencement of construction and maintained throughout construction of any Phase. The construction schedule and mailing list shall be submitted to the City Community Development Department 10 days prior to initiation of any earth movement. ***Monitoring.*** *City staff shall ensure compliance throughout all construction phases. The Applicant's permit compliance monitoring staff shall perform periodic site inspections to verify compliance with activity schedules and respond to complaints.* ***MM NO-4*** *Prior to approval of park and residential development within the Madonna Froom Ranch area of the Specific Plan, the Applicant shall submit a project-specific noise study that evaluates the potential for noise exposure from adjacent commercial uses and identifies project-specific design measures to attenuate exterior and interior noise consistent with the City's Noise Element and Noise Ordinance. If necessary to reduce noise within acceptable levels, noise reduction measures may include a planted earthen berm, sound wall, or similar noise attenuating feature along the site boundary with Irish Hills Plaza, consistent with Policy 1.8.2 of the Noise Element.* **Plan Requirements and Timing.** The Applicant shall incorporate the above mitigation within the final FRSP prior to adoption. **Monitoring**. City staff shall ensure compliance with required site design and noise reduction measures within the final FRSP prior to adoption and shall	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	confirm any required noise attenuation measures are shown on construction plans prior to issuance of building permits. ***MM TRANS-1*** *The Applicant shall prepare a Construction Transportation Management Plan for all phases of the Project for review and approval by the City prior to issuance of grading or building permits to address and manage traffic during construction. The Applicant shall coordinate with SLO Regional Rideshare for the development of the Plan. The Plan shall be designed to:* • *Prevent traffic impacts on the surrounding roadway network;* • *Restrict construction staging to within the Project site;* • *Minimize parking impacts both to public parking and access to private parking to the greatest extent practicable;* • *Ensure safety for both those construction vehicles and works and the surrounding community;* • *Prevent substantial truck traffic through residential neighborhoods; and* • *Provide strategies to reduce single-occupancy vehicle trips made by resident and employees.* *The Construction Transportation Management Plan shall be subject to review and approval by the Public Works Director to ensure that the Plan has been designed in accordance with this mitigation measure. The Applicant shall identify a point of contact to coordinate Plan implementation. This review shall occur prior to issuance of grading or building permits. It shall, at a minimum, include the following:* • *Ongoing Requirements throughout the Duration of Construction:* • *A detailed Construction Transportation Management Plan for work zones shall be maintained. At a minimum, this shall include parking and travel lane configurations; warning, regulatory, guide, and directional signage; and area sidewalks, bicycle lanes, and parking lanes. The Plan shall include specific information regarding the Project's construction activities that may disrupt normal pedestrian and traffic flow and the measures to address these disruptions. Such Plan shall be reviewed and approved by the Community Development Department and implemented in accordance with this approval.*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	• *Heavy haul construction vehicles and cement trucks shall not pass through Villaggio's Lower Area access roads once any of the Lower Area residences become occupied, and must utilize access from Calle Joaquin to access the Upper Terrace after that time.* • *Work within the public right-of-way shall be reviewed and approved by the City on a case-by-case basis based on the magnitude and type of construction activity. Work shall generally be performed between 8:30 AM and 4:00 PM. This work includes dirt hauling and construction material delivery. Work within the public right-of-way outside of these hours shall only be allowed after the issuance of an after-hours construction permit administered by the Building and Safety Division. Additional restrictions may be put in place by Public Works Department depending on particular construction activities and conditions.* • *Streets and equipment shall be cleaned in accordance with established Public Works requirements.* • *Trucks shall only travel on a City-approved construction route. Limited queuing may occur on the construction site itself.* • *Materials and equipment shall be minimally visible to the public; the preferred location for materials is to be onsite, with a minimum amount of materials within a work area in the public right-of-way, subject to a current Use of Public Property Permit.* • *Provision of off-street parking for construction workers, which may include the use of a remote location with shuttle transport to the site, if determined necessary by the City.* • *Where construction activities require closure of bike lanes or sidewalks along LOVR, temporary bicycle and pedestrian pathways shall be provided where feasible with physical separation provided between users and adjacent vehicle traffic consistent with Public Works requirements.* *Project Coordination Elements That Shall Be Implemented Prior to Commencement of Construction:* • *The traveling public shall be advised of impending construction activities that may substantially affect key roadways or other facilities*	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	(e.g., information signs, portable message signs, media listing/notification, and implementation of an approved Construction Impact Mitigation Plan). • *A Use of Public Property Permit, Excavation Permit, Sewer Permit, or Oversize Load Permit, as well as any Caltrans permits required for any construction work requiring encroachment into public rights-of-way, detours, or any other work within the public right-of-way shall be obtained.* • *Timely notification of construction schedules shall be provided to all affected agencies (e.g., Police Department, Fire Department, Public Works Department, and Community Development Department) and to all owners and residential and commercial tenants of property within a radius of 0.25 mile.* • *Construction work shall be coordinated with affected agencies in advance of start of work. Approvals may take up to two weeks per each submittal.* • *Public Works Department approval of any haul routes for construction materials and equipment deliveries shall be obtained.* • *Construction traffic plans, routes, and schedules shall be shared with the City Active Transportation Committee, County Public Works Department (for distribution to the County Bicycle Advisory Committee), the Los Verdes Park 1 and 2 Homeowners Associations, and local bicycle advocacy groups, such as Bike SLO County and the SLO Bicycle Club.* **Plan Requirements and Timing.** The Applicant shall submit the Construction Transportation Management Plan to the City for review and approval prior to issuance of grading or building permits. The Construction Transportation Management Plan shall be updated as needed to reflect changing conditions over the Project's five-year construction schedule. The Applicant shall conduct necessary construction employee training prior to the commencement of construction. The City Public Works Department, Community Development Department, Police Department, and Fire Department, and nearby residences and businesses shall be notified of the construction schedule prior to initiation of construction. The Applicant shall	

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
	submit individual traffic control plans and part of encroachment permits for work within the public right-of-way. **Monitoring.** The City shall ensure compliance with the Construction Transportation Management Plan with periodic inspections of the Project site during construction. Complaints related to construction traffic at the site shall be directed to the City Public Works Department. ***MM UT-1*** *The Applicant shall amend the FRSP to require that the size, location, and alignment of all on- and offsite water supply, recycled water, wastewater, and energy infrastructure shall be subject to review and approval by the City's Public Works and Utilities Departments. The Applicant shall be responsible for constructing all required onsite and offsite utility improvements, as well as for repaving of damaged roadways.* **Plan Requirements and Timing.** The Applicant is required to implement the above standard mitigation measures prior to approval of grading and the final VTM. City staff shall ensure the above measures are incorporated into the Final FRSP and building plans prior grading and recordation of the final VTM. **Monitoring.** City staff shall ensure measures are on all Project plans. City staff shall work with the Applicant to ensure that these requirements are implemented.	
UT-2. Project-related increases in water use would increase demand for the City's potable water supply.	None Required.	Less than Significant
UT-3. Project-generated wastewater would contribute to demand for wastewater collection facilities and remaining available and planned capacity of the City's WRRF.	***MM UT-2*** *The Applicant shall pay fair share costs for replacement of the Laguna lift station or construction of capacity improvements through negotiation of a private reimbursement agreement with the City.* **Plan Requirements and Timing.** Negotiation of a private reimbursement agreement with the City will fulfil the Project's fair share financial obligation towards construction of necessary capacity improvements or replacement of the Laguna lift station. Appropriate fees shall be negotiated with the City. Payment of fees shall be required prior to issuance of building permits for each development phase. **Monitoring.** The City shall approve the private reimbursement agreement and verify that the Applicant contributes appropriate fair share fees as approved by the City.	Less than Significant with Mitigation

Table ES-1. Project Impacts, Mitigation Measures and Residual Impacts (Continued)

Impacts	Mitigation Measures	Residual Significance
UT-4. The Project would generate additional solid waste for disposal at the Cold Canyon Landfill.	None Required.	Less than Significant
UT-5. The Project would result in an increase of energy consumption and requirement for additional energy resources.	None Required.	Less than Significant
3.15 Mineral Resources		
MN-1. Project implementation would result in the loss of the existing onsite red rock quarry (Froom Ranch Pit).	None Required.	Less than Significant

ES-6 SUMMARY OF PROJECT ALTERNATIVES

The CEQA Guidelines state that an "EIR shall describe a range of reasonable alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project, and evaluate the comparative merits of the alternatives" (Section 15126.6). Several alternatives to the proposed Project, including the No Project Alternative and Minimum LUE-Compliant Project Alternative, were considered. Each alternative considers the ability of a particular alternative to substantially reduce or eliminate the Project's significant environmental impacts, while still meeting basic Project objectives.

This EIR discusses alternatives to the proposed Project, including the No Project Alternative, Alternative 1 – Clustered Development Below the 150-foot Elevation Alternative (the Actionable Alternative), Alternative 2 – Residential Development Project Alternative, Alternative 3 – Minimum LUE-Compliant Project Alternative, and alternatives that were considered and discarded. Each of these considers the ability of a particular alternative to substantially reduce or eliminate the Project's significant environmental impacts, while still meeting basic Project objectives. Consistent with CEQA Guidelines Section 15126.6(c), a range of alternatives that do not provide any environmental advantages compared to the proposed Project, meet key Project objectives, nor achieve overall agency policy goals were eliminated from further consideration, including retention of agricultural uses on site, increasing housing development, majorly reducing the Project, and developing a business park.

The alternatives analyzed in the EIR include:

No Project Alternative:

Under the No Project Alternative, no development or annexation of the site to the City would occur, and the site would remain designated for agricultural and commercial uses by the County. The site would continue to be designated as SP-3 of the City General Plan and remain within the City's Sphere of Influence, and all General Plan LUE requirements for SP-3 for potential future development would remain applicable. No new development or construction would occur under this alternative and the site would continue to be used as grazing land and as a staging and operations site for the existing construction company. Froom Creek would not be realigned or enhanced and no changes to existing stormwater conveyance and management systems would occur. The existing wetlands and onsite stormwater

detention basin would remain. All structures associated with the Froom Ranch Dairy complex would remain in place, would not be rebuilt or restored, and would continue to be utilized for construction business operations (offices, equipment storage, etc.). Daily vehicle trips would remain low/negligible associated with limited employee trips from the existing construction business onsite.

Alternative 1 – Clustered Development Below the 150-foot Elevation Line (the Actionable Alterative):

Alternative 1 would include a major reconfiguration of the proposed land use plan and redesign of key Project elements specifically to cluster proposed land uses into a smaller development footprint, thereby reducing environmental impacts identified in the EIR. Alternative 1 represents an alternative largely designed by the Project Applicant (see Appendix C for a conceptual design plan that informed this alternative analysis) with three key changes to respond to the EIR's impact analysis for the Project, as discussed further below. This alternative is analyzed at a high level of detail to allow City adoption of this alternative (if selected). Alternative 1 would include three primary features that differ from the Project to substantially reduce identified Project impacts: 1) consistency with the 2014 General Plan LUE policies for restricting urban development below the 150-foot elevation line; 2) clustered development within the Lower Area of Villaggio and Madonna Froom Ranch with increases in building density and height; and 3) increased emergency access.

Alternative 2 – Residential Development Project Alternative:

Alternative 2 would include a major reconfiguration of the proposed land use plan and redesign of key Project elements similar to Alternative 1, including substantially increased clustering of development within Madonna Froom Ranch and the Lower Area of Villaggio to reduce environmental impacts identified in the EIR. This alternative would continue to provide a Life Plan Community and new multi-family neighborhood; however, unlike the Project and Alternative 1, Alternative 2 would eliminate commercial uses on site. Instead, Alternative 2 would support 178 multi-family residential units (four more than proposed under the Project or Alternative 1), 404 senior independent living units, 51 beds in residential health care facilities, and 3.3 acres of public parkland. Four primary features of this alternative are intended to substantially reduce identified Project impacts: 1) no commercial development within Madonna Froom Ranch; 2) consistency with the

2014 General Plan LUE policies for restricting urban development below the 150-foot elevation line; 3) clustered development within the Lower Area of Villaggio and Madonna Froom Ranch with increases in building density and height; and 4) increased emergency access.

Alternative 3 – Minimum LUE-Compliant Project Alternative:

Alternative 3 would be a low-build alternative with the most restricted area for development and a major redesign of key Project elements. Alternative 3 would substantially reduce the development capacity of the Project site to the minimum development allowed by the General Plan LUE. This alternative would be most closely aligned with the existing General Plan LUE performance standards and minimum development policy framework for the Project site with regard to the land use mix and allowable development levels. Alternative 3 would support 200 multiple family residential units, 50,000 sf of commercial uses and 3.0 acres of public facilities, but would not support development of a Life Plan Community. This development would be clustered in already-disturbed areas of the Project site on the northern side and below the 150-foot elevation line, which would avoid or minimize a range of environmental impacts identified in this EIR. Alternative 3 would reduce or change Project impacts through: 1) reducing residential development to 200 units consistent with the minimum development performance standards of the LUE SP-3, Madonna on LOVR Specific Plan Area; 2) reducing commercial development to 50,000 sf consistent with the minimum development performance standards of the LUE SP-3; 3) no development of the Villaggio Life Plan Community; 4) retention of the existing Froom Creek channel; 5) consistency with the 2014 General Plan LUE policies for restricting urban development below the 150-foot elevation line; and 6) increased emergency access.

Impacts associated with each of these alternatives is summarized in Table ES-2.

Table ES-2. Impact Comparison of Alternatives to the Proposed Project

Issue Area	No Project	Alternative 1 – Clustered Development Below the 150-Foot Elevation Alternative (Actionable Alternative)	Alternative 2 – Residential Development Project Alternative	Alternative 3 – Minimum LUE-Compliant Project Alternative
Aesthetics and Visual Resources	Less	Less	Less	Less
Agricultural Resources	Less	Similar	Similar	Less
Air Quality and GHG Emissions	Less	Similar	Similar	Less
Biological Resources	Less	Less	Less	Less
Cultural and Tribal Resources	Greater	Less	Less	Less
Geology and Soils	Less	Similar	Similar	Similar
Hazards, Hazardous Materials, and Wildfires	Less	Less	Less	Less
Hydrology and Water Quality	Less	Similar	Similar	Less
Land Use and Planning	Less	Less	Less	Less
Noise	Less	Less	Less	Less
Population and Housing	Greater	Similar	Similar	Less
Public Services	Less	Similar	Similar	Less
Transportation and Traffic	Less	Similar	Similar	Less
Utilities and Energy Conservation	Less	Similar	Similar	Less
Mineral Resources	Less	Similar	Similar	Similar
Project Objectives Met?	No	Yes	Partially	Partially

ES-7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table ES-2 summarizes the environmental impacts associated with the proposed Project and the analyzed alternatives. The *No Project Alternative* would involve no development on site and, as a result, would have the fewest impacts and would be environmentally superior to the Project. However, the No Project Alternative would not achieve the Project objectives. Further, CEQA Guidelines Section 15126.6 states that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

Alternative 1 is considered to be the environmentally superior alternative since impacts would be reduced for many issue areas and all Project objectives would be met, as described below. Alternative 1 would substantially reduce impacts as compared to the Project in the following resource areas: aesthetics and visual resources; biological resources; cultural and tribal cultural resources; hazards, hazardous materials, and wildfires; and land use and planning. For instance, avoidance of development within the Upper Terrace area of Villaggio would greatly eliminate impacts to biological resources, including serpentine native bunchgrass grassland habitats, and would minimize impacts to springs, seeps, and wetland habitats along Drainages 1, 2, and 3, as well as associated impacts to 12 special status plant species. Despite substantial reductions to many impacts under Alternative 1 as compared to the Project, Alternative 1 would continue to result in significant and unavoidable impacts to air quality and greenhouse gases; biological resources; historic resources; hazards, hazardous materials, and wildfires; land use and planning; noise; and transportation and traffic.