CITY OF SAN LUIS OBISPO

INITIAL STUDY
ENVIRONMENTAL CHECKLIST FORM

For EID-0459-2020

1. Project Title:

Prado Road Bridge Replacement

2. Lead Agency Name and Address:

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

3. Contact Person and Phone Number:

Wyatt Banker Hix, Engineer III
(805) 783-7859

4. Project Location:

The project is located approximately 1,400 feet east of U.S. Highway 101 on the western segment of the signalized intersection of Prado Road and South Higuera Street.

5. Project Sponsor's Name and Address:

City of San Luis Obispo
Wyatt Banker Hix, Engineer III
919 Palm Street
San Luis Obispo, CA 93401
(805) 783-7859

6. General Plan Designations:

Public, Office, Service and Manufacturing, Medium Density Residential

7. Zoning:

Public Right-of-Way

8. Description of the Project:

The City of San Luis Obispo (City) proposes to replace the existing Prado Road Bridge over San Luis Obispo Creek with a wider, single-span bridge structure and construct roadway improvements to Prado Road and the Prado Road/South Higuera Street intersection (project). The project also includes the restoration and enhancement of an approximately 0.753-acre off-site mitigation area located within the Righetti Ranch development area in the vicinity of the Tank Farm Road/Orcutt Road/Union Pacific Railroad (UPRR) corridor to offset unavoidable temporary and permanent project-related impacts to riparian habitat and jurisdictional water features. The project also includes construction of a noise barrier wall to be located along the northeastern corner of the Prado

Road/South Higuera Street intersection to reduce vehicle-related noise impacts to nearby residential uses. The proposed project is described in further detail below.

The City has applied for Highway Bridge Program (HBP) funding for eligible bridge-related construction costs. The HBP is funded by the Federal Highway Administration (FHWA) and administered by the California Department of Transportation (Caltrans). Therefore, the project has been designed and would be required to be implemented in compliance with applicable FHWA and Caltrans standards and regulations.

Purpose and Need

In 2019, a Caltrans Structure Maintenance Routine Inspection Report gave the existing Prado Road Bridge structure a Sufficiency Rating (SR) of 73.5, with a status of "Structurally Deficient" (SD). The existing Prado Road Bridge was also previously deemed functionally obsolete, as the existing two-lane bridge has no bicycle or pedestrian facilities and recent traffic studies indicate that the bridge lacks adequate width to accommodate existing and projected future multimodal (vehicular/bicycle/pedestrian) traffic demands. The City and Caltrans have concurred that bridge replacement is an appropriate action to address these deficiencies.

The primary purpose of the proposed project is to replace the structurally deficient bridge, with secondary consideration for addressing the functional obsolescence of this facility. Additional goals of the project are to provide bicycle and pedestrian facilities across the bridge and to improve multimodal operations at the Prado Road/South Higuera Street intersection. The need of the project is to provide a structurally adequate bridge that safely accommodates expected multimodal traffic.

Bridge Replacement

The existing bridge is a three-span, reinforced concrete, "T" beam bridge built in 1957 spanning San Luis Obispo Creek. The existing bridge is approximately 123 feet long by 26.5 feet wide and currently supports Prado Road, a two-way, east-west arterial roadway with a single vehicle lane in each direction and no bicycle or pedestrian facilities.

The proposed project would replace the existing bridge with a wider, precast, concrete I girder, single-span bridge that spans the creek without the need for supports to be placed in the creek bed. The replacement bridge would have a cross-section that includes four 12-foot-wide through lanes, one 12-foot-wide left-turn lane, one 12-foot-wide right-turn lane, two 5-foot-wide shoulders/bike lanes, and a 2-foot-wide striped median, for a total curb-to-curb width of 84 feet. Consistent with the City's Active Transportation Plan, which identifies future plans for physically separated bicycle facilities on both sides of the Prado Road corridor, the replacement bridge cross section includes a 13-foot-wide raised surface on both sides, accommodating 3-foot-wide stamped concrete buffers, 5-foot directional Class IV bikeways (protected bike lanes), 5.5-foot-wide sidewalks, and 1-foot-wide concrete barriers on each side, resulting in an overall proposed bridge width of 114 feet.

Roadway and Intersection Improvements

Based on traffic forecasts developed for the City's 2035 General Plan Land Use and Circulation Element (LUCE) and several subsequent Environmental Impact Reports (EIRs) for private development projects, in order to maintain acceptable traffic operations through a cumulative horizon year of 2035, the Prado Road corridor requires widening to five lanes, including a center median/turn lane. The cumulative horizon year scenario assumes buildout of the city and the ultimate construction of a full-access interchange at US 101/Prado Road, including both northbound and southbound ramps. In accordance with current City transportation and circulation plans, the Prado Road/South Higuera intersection would remain signal-controlled with widening to provide four vehicular through lanes (two in each direction), a left-turn lane, and a dedicated right-turn lane at the west leg.

A Project Study Report (PSR) was prepared for the US 101/Prado Road Interchange (Prado Interchange PSR, approved April 2018). Using traffic forecasts from the Prado Interchange PSR, a traffic operations analysis was conducted for the Prado Bridge Replacement Project for year 2035 conditions with only a partial-access interchange in place at US 101/Prado Road (northbound ramps only). To maintain acceptable traffic operations this analysis also shows the Prado Road corridor would require widening to five lanes (two through lanes in each direction and a center median/turn lane). Though not a part of the HBP program, intersection traffic analysis shows the Prado

Road/South Higuera Street intersection would operate acceptably with signal control and widening to provide five lanes at the east leg and six lanes at the west, north, and south legs. The resulting lane configuration would include the following:

- West Leg (Prado Road west of South Higuera Street, carries across the replacement Prado Road bridge)
    - Four (4) east–west through lanes (two in each direction)
    - One (1) eastbound to northbound left-turn lane
    - One (1) eastbound to southbound right-turn lane
- East Leg (Prado Road east of South Higuera)
    - Four (4) east-west through lanes (two in each direction)
    - One (1) westbound to southbound left-turn lane
- North Leg (South Higuera Street north of Prado Road)
    - Four (4) north–south through lanes (two in each direction)
    - Two (2) southbound to eastbound left-turn lanes
- South Leg (South Higuera Street south of Prado Road)
    - Four (4) north–south through lanes (two in each direction)
    - Two (2) northbound to westbound left-turn lanes

The proposed replacement bridge reflects a minimum cross section with six vehicular travel lanes. The proposed replacement bridge would not preclude the ultimate plans for seven lanes at each leg of the Prado Road/South Higuera Street intersection with the eventual addition of southbound ramps at the US 101/Prado Interchange, as identified in the LUCE and previous development project EIRs. An additional eastbound left-turn lane (seventh lane) could be accommodated at a future date with striping modifications if warranted, but the proposed project does not propose to widen the bridge to a seven-lane configuration at this time.

Bob Jones Bicycle/Pedestrian Trail Connectivity

The project site is located directly adjacent to the Bob Jones Bike Trail, also known as the Bob Jones City to Sea Trail, a paved Class 1 dedicated bicycle and pedestrian path that includes segments located in the city of San Luis Obispo, the county of San Luis Obispo, and the community of Avila Beach. The segment adjacent to the project site terminates at the southwest corner of the Prado Road/South Higuera Street intersection. The City's Active Transportation Plan identifies the extension of the Bob Jones Bike Trail as a future bicycle and pedestrian project that would play an important role in the future bicycle and pedestrian network. The proposed project includes the construction of protected intersection improvements at the Prado Road/South Higuera Street intersection with separate, channelized bike and pedestrian paths and high-visibility crosswalks. The west leg of the intersection would include a two-way bike crosswalk to facilitate connections between the existing terminus of the Bob Jones Trail and a potential future extension north of Prado Road.

Noise Barrier

The project includes construction of a noise barrier at least 6 feet in height located at the edge of the road shoulder along the northeast corner of the intersection of South Higuera Street and Prado Road (refer to Optional Noise Barrier Location Map, Attachment 5). This barrier would be approximately 400 feet in length and would reduce noise levels from vehicle traffic as perceived from the adjacent residential units by a maximum of 7 decibels (dB). The noise barrier would replace the existing wooden fence currently located along the northeastern corner of the Prado Road/South Higuera Street intersection and would potentially require removal of portions of existing adjacent landscaping.

In accordance with the Caltrans Traffic Noise Analysis Protocol for New Highway Construction and Reconstruction, Retrofit Barrier Projects (Protocol), noise abatement components must be considered for

reasonableness and feasibility as required by 23 Code of Federal Regulations (CFR) 772 and the Protocol. Overall reasonableness of noise abatement measures is determined by the noise reduction design goal and the cost of noise abatement per a Noise Abatement Decision Report (NADR). The NADR prepared for the project found a noise barrier abatement measure was reasonable for residences on the northeast corner of the intersection. Per the Protocol, the next step in determining whether a noise barrier should be constructed was to survey the viewpoints of the benefitted receptors (including property owners and residents of benefitted receptor locations) to determine if those stakeholders wanted the noise barrier to be constructed. The results of the survey concluded that the majority of stakeholders were in favor of the noise barrier being constructed. Therefore, construction of the noise barrier has been incorporated into the project and associated environmental impacts of its construction have been evaluated in this document.

Construction Details

Site Preparation

Trees, bushes, and landscaping in areas needed for construction access and activities would be removed as necessary. Construction activities would be limited to approved project limits of disturbance. The proposed bridge replacement and road improvements would result in the disturbance of approximately 8 acres and would require approximately 7,800 cubic yards of cut material and 480 cubic yards of fill material (net cut of 7,320 cubic yards) and the maximum area disturbed per day would be 0.5 acre.

Based on annual precipitation and timing of construction work, San Luis Obispo Creek could have some water flowing through the channel during construction. In that case, dewatering and a diversion of the water would be required to accommodate construction activities within the creek. Channel flow would be diverted using diversion culverts with coffer dams upstream and downstream of the work area and/or other temporary dewatering measures (e.g., pipes, sandbags, temporary fill). The culverts would intercept the water upstream and release the water downstream of the construction activities, or the water could be pumped from the upstream side of the work to the downstream side of the creek. If groundwater is encountered, it would be pumped to sediment control baffles or basins and then released as clean flow into the downstream area. Excavation of the creek banks at Prado Road would be required to accommodate the new concrete abutments and associated retaining walls. Any excess material would be hauled off-site to an approved disposal facility, as necessary.

Bob Jones Bike Trail Bridge Relocation

The replacement Prado Road Bridge structure is expected to require relocation of the existing Bob Jones Bike Trail bridge and trailhead statue. The eastern abutment of the existing Bob Jones Bike Trail bridge is located approximately 30 feet south of the existing southerly curb of Prado Road and would need to be shifted southward to accommodate the widened Prado Road Bridge. The westerly abutment location does not conflict with the widening and therefore a rotation of the bridge alignment would be centered at that end. Rotation of the easterly end of the bike path bridge is expected to require new cast-in-drilled-hole (CIDH) piling to be placed at the east abutment and would require the widening/modification of the existing abutments. It is anticipated that the existing prefabricated bridge could be lifted by crane, temporarily moved, and then placed onto the realigned abutments once modifications are completed. During this phase of construction, the connection of the Bob Jones Trail to Prado Road west of the creek would remain open for continuity of trail use. Once the bridge is realigned, a temporary trail connection from the east side of the bridge to the sidewalk on South Higuera Street would be constructed to maintain trail use while the roadway and vehicle bridge construction requires the closure of the west bank trail connection to Prado Road.

Pile Installation, Abutment, Retaining Walls

The new bridge abutments would be aligned and constructed behind the existing bridge abutments and would be supported on cast-in-drilled-hole (CIDH) piles. To construct the new bridge abutments, existing abutment excavation and the drilling of holes for the piles would proceed, the reinforcing steel cages would be placed in the holes, and then the holes would be filled with concrete. Once the dewatering culverts and cofferdams are in place, steel piles for creek bank soldier pile retaining walls would also be installed. The steel piles would be placed in drilled holes and filled with concrete to the elevation where the lagging would be placed. The creek soldier pile

walls may be constructed in sections outside the limits of the existing bridge and then finished once the existing bridge is removed.

Once the CIDH piles and soldier piles are in place, the abutments would be formed and reinforcing steel and concrete would be placed. The soldier pile wall would be constructed with timber or concrete lagging and tie backs, if necessary. Concrete facing of the lagging may be provided for aesthetic purposes. Any excess excavated material would be hauled off-site to an approved disposal facility.

Installation of rock slope protection (RSP) is anticipated along the creek banks at the ends of the retaining walls and in between the tiered retaining walls. The toe of the creek bank would be excavated to create a toe for the RSP, filter fabric would be placed in the excavated areas and along a portion of the creek banks, and rocks would be placed in a stacked fashion. Soil would then be placed in the voids of the RSP, and the RSP would be planted with willow cuttings or other vegetation as required and appropriate.

Existing Prado Road Bridge Removal and Utility Relocation

Due to the limited available working room and to expedite construction, Prado Road would be closed at the existing bridge location for the duration of the new bridge construction and a detour plan would be put in place.

Multiple utilities currently exist within the project site, including overhead electrical, telephone, cable television lines, and a City communication conduit, as well as gravity sewer, water, recycled water, and gas lines. The existing Prado Road bridge carries multiple utilities on hangers, including large diameter water, recycled water, and sanitary sewer lines in addition to a gas line and a City communication line. It is anticipated that most of these lines would either be protected in place or relocated to the south and placed on temporary supports for hanging on the new bridge while the existing bridge is being removed. The gravity sewer line may need to be temporarily shut-off for very short durations and during non-peak use, but otherwise would need to remain in operation throughout construction activities. Due to design of the gravity sewer system in a built environment and near the recipient Water Resource Recovery Facility (a few hundred feet to the west), the vertical profile of the sewer line cannot be altered. However, the horizontal location of the sewer line may be altered slightly to be aligned between bridge superstructure support girders. On Prado Road overhead electrical, telephone, and cable television lines could be relocated to either new overhead alignments or conduits placed in the bridge concrete barrier rail. On South Higuera Street, overhead power and communication lines would also need to be relocated.

Once the utilities are supported and/or relocated, the existing bridge deck and girders would be removed followed by the existing piers and abutments. Demolition debris would be collected, kept separate from active water flows, and hauled off-site to an approved disposal facility.

Roadway Improvements

Both Prado Road and South Higuera Street are to be widened to accommodate turning vehicle lanes as well as bicycle and pedestrian improvements for multi-modal transportation. Typical staged construction and traffic handling details would be provided by the contractor to shield work and move traffic through the work area per the City/contractor agreed upon schedule. Bicycle and pedestrian detours would also be provided. In the work zones outside of the bridge closure, the adjacent roadway modifications would be completed while traffic is maintained in or diverted to non-work areas. Shoulder and lane closures would be anticipated as part of the construction activities. Curb, gutter, sidewalk, and storm drainage facilities would be installed. Road sections would be reconstructed with a Class 2 Aggregate Base (AB) and Hot Mix Asphalt (HMA) roadway structural section.

Hydraulics

A hydraulics analysis of San Luis Obispo Creek was completed using the City's updated HEC-RAS model. The existing gravity sewer line currently constricts the flow of water through the bridge and the water backs up against the sewer line before flowing underneath the bridge. The sewer line would be placed in a steel sleeve and realigned between the proposed girders. The girder depths would extend to the bottom of the sewer casing to provide protection of the pipe during high flow events. The project would increase the channel opening under the bridge crossing and lower the water surface elevation for the 50- and 100-year flows compared to the existing conditions

due to the removal of existing supports placed in the creek bed that are a part of the existing bridge. RSP would also be placed in the creek to protect the upstream and downstream ends of these walls.

Right-of-Way

The proposed bridge construction would require temporary construction easements, underground easements, and permanent acquisitions to accommodate the construction of the bridge soldier pile retaining walls, roadway widenings, and the noise barrier. The City owns the parcel south of Prado Road on the east side of the creek (Assessor's Parcel Number [APN] 053-051-072); this parcel and areas of public road right-of-way would be used to accommodate much of the proposed construction activity and staging operations. It is expected that nearby City-owned parcels (west of the project site along Prado Road) could also provide staging areas for construction operations. Some temporary driveway closures are anticipated to be necessary during construction; however, the contractor would be required to coordinate with affected property owners to maintain access to adjacent properties at all times.

Construction Schedule

Construction is expected to take approximately 18 to 24 months to complete. A full closure of the bridge is proposed to reduce construction costs and duration. While specific contractor operations are to be confirmed upon award of the construction contract, project construction would include four primary phases:

- **Phase 1:** Initiate utility coordination and order long lead-time materials. If needed, modify signal head and detection placement to shift South Higuera Street traffic to the west and construct east-side sidewalk, future signal foundation, and noise barrier improvements. If needed, modify signal head and detection placement to shift South Higuera Street traffic to east and construct South Higuera Street widening and business park driveway on west side. Close existing Bob Jones Trail connection on west side of the creek and reconstruct connection, sidewalk, curb, and gutter to be out of future abutment construction area. Conduct clearing and grubbing of top of channel areas to gain access to install cofferdams and stream diversion system. Install stream diversion system and conduct clearing and grubbing of channel areas. Remove the existing Bob Jones Trail bridge. Modify or reconstruct the abutments for the existing Bob Jones Trail bridge. Construct soldier pile walls in creek channel outside of existing bridge limits.
- **Phase 2:** Close the existing Prado Road bridge and construct new abutments with utility openings and temporary supports for utilities in the channel that are to be supported on the new bridge. Relocate utilities onto temporary supports, as appropriate. The existing gravity sewer line would need to be protected in place during the removal of the vehicular bridge.
- **Phase 3:** Remove the existing Prado Road bridge and complete construction of retaining walls. Construct new bridge superstructure and approach slabs. Attach utilities to new bridge structure and finalize construction of west-side curb returns, drainage systems, and remaining signal modifications.
- **Phase 4:** Reopen Prado Road bridge crossing to traffic. Complete regrading of San Luis Obispo Creek, including the placement of RSP. Place the Bob Jones Trail bridge on the reconstructed abutments and install trailhead statue and associated trail connection improvements to the Prado Road/South Higuera Street intersection. Install planting for on-site and off-site mitigation.

The bridge replacement project would require short-term temporary impacts to the terminus of the Bob Jones Trail near the Prado Road/South Higuera Street intersection. However, access to the Bob Jones Trail would be maintained throughout construction. Notice would be provided to surrounding properties/tenants prior to closure of the Prado Road bridge and as needed for specific construction activities.

9. Project Entitlements:

N/A

10. Surrounding Land Uses and Settings:

The Prado Road Bridge is located approximately 1,400 feet east of US 101 in the city of San Luis Obispo. The surrounding area generally consists of service commercial, office, residential, recreation, and public facilities uses.

Surrounding land uses include bank offices, a deli restaurant, an automobile maintenance shop, a glass and mirror shop, a fuel service center, San Luis Obispo Creek, the Bob Jones Bike Trail and trail bridge over San Luis Obispo Creek, and a County of San Luis Obispo probation department office building.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Native American Tribes were notified about the project consistent with City and State regulations including Assembly Bill (AB) 52. Patti Dunton, Tribal Administrator of the Salinan Tribe of San Luis Obispo and Monterey Counties, responded and requested that a Phase I Archaeological Survey be conducted and sent to their tribe for review. Fred Collins, Tribal Administrator of the Northern Chumash Tribal Council, also requested a copy of the Phase I Archaeological Survey prepared for the project for review. City staff provided Patti Dunton and Fred Collins a copy of the Archaeological Survey Report for the Prado Road Bridge Widening Project (source reference 19). A discussion of consultation efforts and conclusions is included in Section 18: TRIBAL CULTURAL RESOURCES of this initial study.

12. Other public agencies whose approval is required:

U.S. Army Corps of Engineers (USACE)
U.S. Fish and Wildlife Service (USFWS)
National Oceanic and Atmospheric Administration National Marine Fisheries Service (NOAA Fisheries)
California Department of Fish and Wildlife (CDFW)
California Department of Transportation (Caltrans)
Regional Water Quality Control Board (RWQCB)
San Luis Obispo County Air Pollution Control District (SLOAPCD), if necessary

The FHWA assigns all federal responsibilities under the National Environmental Policy Act (NEPA) to Caltrans pursuant to 23 U.S.C. 326. Therefore, Caltrans is acting as the federal lead agency for the project. As the federal lead agency, Caltrans would be responsible for consultation with the USFWS and NOAA Fisheries under Section 7 of the Federal Endangered Species Act (FESA) and other federal regulations.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

FISH AND WILDLIFE FEES

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

STATE CLEARINGHOUSE

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

DETERMINATION (To be completed by the Lead Agency):

On the basis of this initial evaluation:

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

Shawna Scott

Signature

July 12, 2022

Date

Shawna Scott

Printed Name

For: Michael Codron,

Community Development Director

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact' is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 19, "Earlier Analysis," as described in (5) below, may be cross-referenced).

5. Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063 (c) (3) (D)). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

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

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

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. the significance criteria or threshold, if any, used to evaluate each question; and

9. the mitigation measure identified, if any, to reduce the impact to less than significance

10. The explanation of each issue should identify:

1. AESTHETICS

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:					
a) Have a substantial adverse effect on a scenic vista?	1, 3	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, open space, and historic buildings within a local or state scenic highway?	1, 3, 4	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	1, 2, 3, 5	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	1, 6	☐	☐	☒	☐

Evaluation

The project is located in a developed area of the city of San Luis Obispo and includes roadway improvements along Prado Road and South Higuera Street extending up to 1,600 feet from the Prado Road/South Higuera Street intersection (Attachment 1, Project Vicinity Map and Attachment 2, Project Location Map). The surrounding visual character of the project area generally includes commercial and office land uses along Prado Road and South Higuera Street; industrial uses south of Prado Road, including the City's Water Resource Recovery Facility; San Luis Obispo Creek; and the Bob Jones Bike Trail, which runs north–south through the project site roughly parallel to South Higuera Street. Existing visual resources in the project vicinity include public views of the San Luis Obispo Creek riparian corridor, a small City-owned open space area located by the southwest corner of the Prado Road and South Higuera Street intersection including a trailhead statue, and the Bob Jones Bike Trail, which extends through the open space area and along San Luis Obispo Creek. Visual quality of the project site is dominated by dense riparian woodland along San Luis Obispo Creek, surrounding commercial and office development, roadway infrastructure, and disturbed road shoulder areas. The existing bridge deck structure is built at-grade and currently serves vehicular traffic but has no sidewalks or shoulders.

Based on Caltrans' California Scenic Highways online mapping tool, the section of the US 101 that runs adjacent to the project site is eligible for state scenic highway designation. The City Conservation and Open Space Element (COSE) identifies this area of the US 101 as having high scenic value and the sections of Prado Road and South Higuera Street within the project site are considered to have moderate scenic value. The COSE also identifies specific goals and policies intended to protect and enhance the city's visual quality and character. Policies in the COSE include, but are not limited to, promoting the creation of "streetscapes" and linear scenic parkways during construction or modification of major roadways, designing new development to be consistent with the surrounding architectural context, and preserving natural and agricultural landscapes.

a) *Less than significant impact.* For California Environmental Quality Act (CEQA) purposes, a scenic vista is generally defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. A substantial adverse effect on a scenic vista would occur if the proposed project would significantly degrade the scenic landscape as viewed from public roads or other public areas.

The project is located in an urbanized area and does not provide views of a highly valued landscape. Although the widened structure would not represent a new land use at this location, the project would substantially increase the amount of transportation infrastructure in the area, resulting in a more urbanized visual character. The project site would be well-screened from US 101 by existing vegetation and, although the project would significantly widen the existing bridge and

Prado Road, the development would not be inconsistent or incompatible with the current extent of urban development and transportation infrastructure in the project vicinity for viewers traveling along Prado Road and South Higuera Street. The noise barrier wall would be located on the northeast corner of the Prado Road/South Higuera Street intersection, between the intersection and adjacent residential uses, and would not block views of any scenic resources or vistas. Therefore, the project would not result a substantial adverse effect on a scenic vista and impacts would be *less than significant.*

b) *Less than significant impact.* Based on the Caltrans California Scenic Highways online mapping tool, the section of US 101 that runs adjacent to the project site is eligible for state scenic highway designation but is not officially designated. The project site is difficult to see from US 101 due to existing trees and vegetation along US 101 and dense riparian vegetation along the San Luis Obispo Creek corridor. During construction, exceedingly tall construction equipment such as cranes would likely be visible to viewers traveling along US 101; however, due to existing dense vegetation on the east side of US 101 and limited views due to the vehicle speed of people traveling along US 101, such equipment would not result in a substantial change in existing views.

The project would include removal of portions of trees, bushes, and landscaping as necessary for construction access and activities but disturbed areas would be restored/revegetated after construction, and the project would not substantially alter the overall character of the existing project site and riparian corridor. The proposed project components, including roadway improvements, relocation of the Bob Jones Bike Trail bridge and trailhead statue, and construction of a minimum 6-foot-tall noise barrier would not be noticeable to viewers traveling along US 101 due to distance, intervening vegetation and topography, travel speed, and general visual consistency of these components with the existing visual character of the project area. The new bridge structure and roadway improvements would be subject to review for consistency with applicable City design standards and views from US 101 would not be substantially altered.

The project also includes the restoration and enhancement of a 0.753-acre off-site mitigation area located within the Righetti Ranch area, which is located approximately 0.6 mile east of California State Route 227 (SR 227). SR 227 is not a designated State Scenic Highway or designated as eligible for listing as a State Scenic Highway. Therefore, the project would not result in substantial damage to scenic resources within a state or local scenic highway and impacts would be *less than significant.*

c) *Less than significant impact.* The project site is located within an urbanized area and has been designed to be consistent with applicable local policies and guidelines for visual quality. COSE Policy 9.1.4 states that the City shall promote the implementation of streetscape design features for major road modifications, including incorporation of pedestrian-oriented features. The project includes the addition of new pedestrian and bicycle facilities to the Prado Road Bridge structure. COSE Policy 9.1.2 states that urban development should reflect its architectural context and Policy 9.2.1 states that the City shall preserve and improve views from public places including scenic roadways. The project would replace the existing bridge structure with a new bridge that would be designed to be compatible with the surrounding area's architectural context and would preserve views of the San Luis Obispo Creek corridor, consistent with City policy. The proposed bridge would generally be compatible in size with the proximate Prado Road/South Higuera Street intersection but would be substantially wider than the existing Prado Road Bridge. Although wider than the existing bridge structure, the proposed replacement bridge would be constructed at grade level and would not block existing views from adjacent locations.

The project would be consistent with the General Design Principles established in the City Community Design Guidelines that call for projects that consider the site character and constraints, accommodating the needs of all users, and appropriate site design given the architectural context of the project. The proposed bridge structure would be built at-grade and would not protrude into the skyline. The final design of the noise barrier wall would be subject to review by the City for visual consistency with the surrounding area. The 6-foot-tall noise barrier wall, would replace an existing 4-foot-tall wooden fence located along the northeastern section of the Prado Road/South Higuera Street intersection. Construction of the 6-foot-tall noise barrier wall would have the potential to result in the disturbance and/or removal of existing landscaped vegetation located between the sidewalk and adjacent residential uses. Vegetation along this area consists mostly of scattered small shrubs and trees along the eastern side of South Higuera Street and fairly dense trees and shrubs along the northern side of Prado Road. Based on the City's Tree Regulations (Municipal Code Chapter 12.24), any tree removal that would result from the project would be subject to the review and recommendations of the City Tree Committee. The project would also be required to comply with the City's criteria for construction-related tree removal, which includes prioritizing preservation of visually prominent trees and native trees and requires compensatory tree planting for each tree removed. Construction activities would be limited in duration and no substantial permanent visual construction impacts

are expected. Therefore, the project would not conflict with applicable zoning or other regulations governing scenic quality and impacts would be *less than significant.*

d) *Less than significant impact.* Temporary lighting during construction activities may be necessary, but the City Municipal Code strictly prohibits construction activities between weekday hours of 7:00 p.m. and 7:00 a.m. or any time on Sundays or holidays, except for emergency public works actions or by specific approval by the Community Development Department. The project would also require modifications to be made to the existing traffic signals located at the Prado Road/South Higuera Street intersection to accommodate the interchange improvements. Signal modifications would include installation of one overhead streetlight at each corner. These signal modifications would be consistent with existing signals and safety lighting, would be shielded, and would not substantially alter existing nighttime lighting conditions in the area. The new bridge structure would include pedestrian-scale path lights, which would have backlight shields to prevent light from spilling over outside of the roadway and proposed sidewalk and bike lanes. All proposed lighting would be designed to be consistent with the City's Night Sky Ordinance. Therefore, impacts associated with creation of a new substantial source of light or glare would be *less than significant.*

Conclusion

Although the project would result in a noticeably larger bridge structure and adjacent roadways, the project would not be incompatible in size with the proximate Prado Road/South Higuera Street intersection and would be designed consistent with City policies and regulations. The project would not substantially conflict with the visual character of the surrounding area. Temporary impacts associated with vegetation removal and disturbance would be minimized through vegetation restoration to further reduce visual impacts. No significant impacts to aesthetic resources would occur; therefore, no mitigation measures are necessary.

2. AGRICULTURE AND FORESTRY RESOURCES

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	1, 7	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	2, 8	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	1, 8	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	1, 8	☐	☐	☐	☒

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	1, 8	☐	☐	☐	☒

Evaluation

The site currently consists of existing roadways and a bridge structure over San Luis Obispo Creek, which supports riparian, landscaped, and ruderal habitats. No portion of the project site or immediately surrounding areas support active agricultural uses. The nearest agricultural uses are located approximately 850 feet northwest of the bridge, adjacent to Sunset Drive-In Theater, and 2,000 feet southeast of the bridge, between Tank Farm Road and Meissner Lane. The project site is not located within or immediately adjacent to land zoned for agricultural uses. Based on Figure 6 in the City's COSE, the project is not located within or immediately adjacent to land under an active Williamson Act Contract.

The California Department of Conservation (DOC) classifies and maps agricultural lands in the state in the Farmland Mapping and Monitoring Program (FMMP). The FMMP identifies five farmland categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Farmland of Local Potential. The project site is designated as Urban and Built-Up Land by the DOC FMMP (source reference 7). The project site does not support any forest land or timberland.

a) *No impact.* The proposed project site is not located on lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the FMMP. Therefore, the project would not result in the conversion of Farmland to non-agricultural use and *no impacts would occur.*

b) *No impact.* The project site is not located within an agricultural land use or zoning designation, and the project site is not located within or immediately adjacent to land under an active Williamson Act Contract. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract and *no impacts would occur*.

c-d) *No impact.* The project site does not include forest land or timberland or zoning for these uses. Therefore, the project would not conflict with zoning for, result in the loss of, or result in the conversion of forest land, timberland, or timberland zoned Timberland Production and *no impacts would occur.*

e) *No impact.* The project includes replacement and improvements to existing bridge and roadway infrastructure to accommodate recent growth and increased traffic congestion within the city. The project is required to mitigate traffic impacts associated with other large development projects in the city (e.g., San Luis Ranch, Avila Ranch) and is, therefore, responsive to increased growth in the city, consistent with the City's General Plan. Therefore, it would not induce substantial population growth that could convert agricultural uses in the proximity to more urbanized uses. The project would not result in substantial changes in the environment that could result in conversion of nearby agricultural land or forest land and *no impacts would occur*.

Conclusion

No significant impacts to agriculture or forest land were identified; therefore, no mitigation measures are necessary.

3. AIR QUALITY

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	12, 13	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	9, 11, 12, 14, 52	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	1, 12, 14	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	1, 15	☐	☒	☐	☐

Evaluation

The city of San Luis Obispo is located within the South Central Coast Air Basin (SCCAB), which also includes Santa Barbara and Ventura Counties. Air quality within the SCCAB is regulated by several jurisdictions including the U.S. Environmental Protection Agency (USEPA), California Air Resources Board (CARB), and the San Luis Obispo County Air Pollution Control District (SLOAPCD).

San Luis Obispo County is currently designated as "nonattainment" for the state standards for ozone (O_3), partial nonattainment for federal ambient standards for ozone (in eastern portions of the county), and nonattainment for the state standards for particulate matter 10 micrometers or less in diameter (PM_{10}) (source reference 9). The City COSE identifies goals and policies to achieve and maintain air quality that supports health and enjoyment for those who live, work, and visit the city. These goals and policies include meeting federal and state air quality standards, reducing dependency on gasoline- or diesel-powered motor vehicles, and encouraging walking, biking, and public transit use.

The SLOAPCD has developed a CEQA Air Quality Handbook (most recently updated with a November 2017 Clarification Memorandum) to evaluate project-specific impacts and determine if potentially significant impacts could result from a project. To evaluate long-term emissions, cumulative effects, and establish countywide programs to reach acceptable air quality levels, the 2001 San Luis Obispo County Clean Air Plan (CAP) has been adopted by the SLOAPCD.

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. The CARB has identified the following groups who are most likely to be affected by air pollution (i.e., sensitive receptors): children under 14, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. Eastern areas of the project site are located as close as 10 feet from existing single-family mobile homes located at the northeast corner of the Prado Road/South Higuera Street intersection. There is also an existing residence located to the northwest of the existing Prado Road Bridge structure that is directly north of the project site.

Naturally Occurring Asbestos (NOA) has been identified as a toxic air contaminant by the CARB. Any ground disturbance proposed in an area identified as having the potential to contain NOA must comply with the CARB Airborne Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations. The SLOAPCD NOA Map indicates that the project site is located within an area identified as having a potential for NOA to occur (source reference 10).

An Air Quality and Greenhouse Gas Emissions Impact Assessment technical memorandum was prepared for the project to address the Appendix G Environmental Checklist criteria of the CEQA Statute and Guidelines (source reference 11).

a) *Less than significant impact.* In order to be considered consistent with the 2001 CAP, a project must be consistent with the land use planning and transportation control measures and strategies outlined in the CAP. As the project is a transportation improvement project, the land use planning strategies established in the CAP are not applicable to the project. Adopted transportation control measures applicable to the project include, but are not limited to, traffic flow improvements and bicycle and bikeway enhancements. The project would improve traffic flow through the area to accommodate existing and future projected traffic levels as well as provide new pedestrian and bicycle infrastructure. Therefore, the project would be consistent with applicable transportation control measures set forth in the CAP. The project would improve the function of the local transportation system, generally reducing emissions associated with congestion. Therefore, impacts related to a conflict with an air quality plan would be *less than significant.*

b) *Less than significant impact.* The proposed bridge replacement and road improvements would result in the disturbance of approximately 8 acres and the maximum area disturbed per day would be 0.5 acre. This would result in the generation of construction dust as well as short-term construction vehicle emissions, including reactive organic gases (ROG), nitrogen oxide (NO_x), diesel particulate matter (DPM), and particulate matter. Projected construction emissions for each phase of the project were estimated using the Roadway Construction Emissions Model. As shown in Table 1 below, the project's construction emissions would not exceed the SLOAPCD's applicable thresholds for ROG, NO_x, DPM, or PM_{10}.

Table 1. Projected Construction-Related Emissions

	ROG + NO_x			**PM_{10}**	**DPM**		
Project Phase	**Daily (lbs)**	**Quarterly Tier 1 (Tons)[1]**	**Quarterly Tier 2 (Tons)**	**Quarterly Tier 1 (Tons)**	**Daily (lbs)**	**Quarterly Tier 1 (Tons)**	**Quarterly Tier 2 (Tons)**
Demolition and land clearing	13.0	0.92	0.92	0.19	0.49	0.07	0.07
Excavation and grading	25.0	0.92	0.92	0.19	0.91	0.07	0.07
Utilities and foundation	20.9	0.92	0.92	0.19	0.86	0.07	0.07
Paving and landscaping	11.8	0.92	0.92	0.19	0.43	0.07	0.07
Maximum Emissions[2]	25.0	0.92	0.92	0.19	0.91	0.07	0.07
Applicable APCD Threshold	137.00	2.50	6.30	2.50	7.00	0.13	0.32
Exceeds threshold?	No	No	No	No	No	No	No

[1] Average quarterly emissions were conservatively estimated by dividing total emissions for all phases by six quarters to represent the 24-month construction schedule. This methodology results in the same average quarterly emissions for all phases.

[2]Construction phases have been assumed to occur sequentially for air quality modeling. Each phase includes numerous pieces of construction equipment simultaneously at the project site to account for maximum emissions.

Source number 11.

The construction of a noise barrier along the northeastern corner of the Prado Road/South Higuera Street intersection would result in air pollutant emissions in excess of the estimates provided in Table 1 as a result of additional ground disturbance and construction equipment use. However, these additional emissions would be minor and would not result in the exceedance of any emissions threshold based on the relatively small area of disturbance (approximately 0.10 acre) and limited scope of construction activities associated with construction of the wall.

The project also includes the restoration and enhancement of a 0.753-acre off-site mitigation area located within the Righetti Ranch development area, which would include removing and controlling non-native and invasive plant species and replacing them with riparian trees and shrubs. These activities have the potential to result in marginal amounts of additional air pollutants associated with vegetation removal equipment and earthwork. Based on the limited scope and temporary nature of proposed restoration work activities, the additional air pollutant emissions resulting from restoration activities would be minimal and would not result in project emissions exceeding SLOAPCD construction emission thresholds. Therefore, the project would not result in a cumulatively considerable net increase of any criteria air pollutant during the construction phase.

From an operational standpoint, the project would result in a negligible increase in regional vehicle miles travelled and the project would improve overall circulation and traffic flow by reducing vehicle queues and improving bicycle and pedestrian access within the area, which would result in an overall decrease in emissions associated with traffic congestion in the long term through 2035 (see Table 2). Operational emissions were projected using CARB's most recent EMission FACtors (EMFAC) model for on-road emissions inventory of motor vehicles, CT-EMFAC2017, and compared to existing and no-project scenarios, as shown in Table 2 below.

Table 2. Operational Criteria Pollutant Emissions

Scenario	ROG + NO_x		CO
	Daily (lbs)	Annual (Tons)	Daily (lbs)
Existing Condition (2018)	8.6	1.5	4.0
No Project (2035)	33.7	5.9	42.4
Project (2035)	17.2	3.0	21.6
APCD Significance Threshold	25	25	550

Source number 11.

Project operational emissions would be below applicable daily and annual SLOAPCD emissions thresholds and would result in a substantial reduction in operational emissions in the area compared to a "no project" scenario. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment and impacts would be *less than significant*.

c) *Less than significant with mitigation incorporated.* The project site is located within 1,000 feet of several sensitive receptor locations, including single-family residences to the north and east of the project site. Construction activities such as excavation, grading, vegetation removal, staging, and installation of new components would all result in temporary construction vehicle emissions that may adversely affect surrounding sensitive receptors. Mitigation measures AQ-1 and AQ-2 have been identified to reduce exposure of sensitive receptors to adverse construction vehicle emissions and fugitive dust; therefore, impacts would be *less than significant with mitigation incorporated.*

d) *Less than significant with mitigation incorporated.* Construction of the proposed project would generate odors associated with construction smoke and dust and equipment exhaust and fumes. Excavated and demolished materials may also contain objectionable odors within unearthed materials. The proposed construction activities would not differ significantly from those resulting from any other type of construction project. Any effects would be short term in nature and limited to the construction phase of the proposed project.

NOA could have the potential to be released from serpentinite and ultramafic rock within the project site during proposed demolition, grading, and construction activities. A Phase 1 Initial Site Assessment (ISA) was prepared for the project by Earth Systems that evaluated the potential for NOA to be present within the project site. The report concluded that the potential for NOA to occur in the area appeared remote, based on the absence of NOA in all three soil and rock samples collected at the project site. The project would be subject to various regulatory requirements including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (NESHAP) (40 CFR 61, Subpart M – asbestos). These requirements include notification to the SLOAPCD regarding proposed work in an area with potential for NOA, an asbestos survey conducted by a Certified Asbestos Inspector, and implementation of applicable removal and disposal

requirements of identified asbestos-containing materials. Mitigation measures AQ-3 and AQ-4 have been identified to require the City to conduct all project demolition and site disturbance activities in full compliance with applicable federal, state, and local regulations associated with NOA.

The project includes demolition and removal of the existing Prado Road Bridge structure as well as various roadway improvements of the Prado Road/South Higuera Street intersection and temporary relocation of utility pipelines. The existing infrastructure located on-site (e.g., utility lines, pipelines, bridge structure, asphalt roadway, etc.) may have the potential to include asbestos containing materials (ACM), lead-based paint, aerially deposited lead, and/or other hazardous substances and materials. Demolition or temporary disturbance of these facilities may have the potential to result in harmful asbestos, lead, and/or other emissions. Mitigation measures AQ-5 and AQ-6 have been identified to require full compliance with applicable regulatory requirements for removal and disposal of these toxic contaminants if present on-site, including notification of the SLOAPCD prior to disturbance of these project components. For more information on potential impacts associated with aerially deposited lead, see Section 9. Hazards and Hazardous Materials.

Based on compliance with identified mitigation and existing regulations and mitigation measures identified below, potential impacts associated with other emissions would be *less than significant with mitigation incorporated*.

Mitigation Measures

AQ-1 The SLOAPCD recognizes the public health risk reductions that can be realized by idle limitations for both on- and off-road equipment. The following idle restricting measures are required for the construction phase of projects:

a. Idling Restrictions Near Sensitive Receptors for Both On- and Off-Road Equipment.

1. Staging and queuing areas shall be located at the greatest distance feasible from sensitive receptor locations;
2. Diesel idling while equipment is not in use is not permitted;
3. Use of alternative-fueled equipment is recommended whenever possible; and
4. Signs that specify the no-idling requirements must be posted and enforced at the construction site.

b. Idling Restrictions for On-Road Vehicles. Section 2485 of California Code of Regulations Title 13 limits diesel-fueled commercial motor vehicles that operate in the State of California with gross vehicular weight ratings of greater than 10,000 pounds and licensed for operation on highways. It applies to California- and non-California-based vehicles. In general, the regulation specifies that drivers of said vehicles:

1. Shall not idle the vehicle's primary diesel engine while vehicle is not in use, except as noted in Subsection (d) of the regulation; and
2. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 100 feet of a restricted area, except as noted in Subsection (d) of the regulation.

Signs must be posted in the designated queuing areas and job sites to remind drivers of the no-idling requirement. The specific requirements and exceptions in the regulation can be reviewed at the following web site: www.arb.ca.gov/msprog/truck-idling/2485.pdf.

c. Idling Restrictions for off-Road Equipment. Off-road diesel equipment shall comply with the no-idling requirement. Signs shall be posted in the designated queuing areas and job sites to remind off-road equipment operators of the no-idling requirement.

AQ-2 Throughout the construction phase of the project, the project applicant shall implement the following measures to minimize impacts to sensitive receptors and to significantly reduce fugitive dust emissions. These fugitive dust mitigation measures shall be shown on grading and building plans:

a. Reduce the amount of disturbed area where possible;

b. Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency would be required whenever wind speeds exceed 15 miles per hour. Reclaimed (non-potable) water should be used whenever possible;

c. All dirt stockpile areas should be sprayed daily or covered with tarps or other dust barriers, as needed;

d. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil-disturbing activities;

e. Exposed ground areas that are planned to be reworked at dates greater than 1 month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established;

f. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD;

g. 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;

h. Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site;

i. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code Section 23114;

j. Install wheel washers or other devices to control tracking of mud and dirt onto adjacent roadways where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site;

k. 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. Roads shall be pre-wetted prior to sweeping when feasible;

l. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below the SLOAPCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period, and to prevent transport of dust off-site. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Engineering and Compliance Division prior to the start of any grading, earthwork, or demolition.

AQ-3 Prior to initiation of ground-disturbing activities, the applicant shall retain a registered geologist to conduct a geologic evaluation of the property, including sampling and testing for naturally occurring asbestos (NOA) in full compliance with SLOAPCD requirements and the CARB ATCM for Construction, Grading, Quarrying, and Surface Mining Operations (17 CCR 93105). This geologic evaluation shall be submitted to the City Community Development Department upon completion. If the geologic evaluation determines that the project would not have the potential to disturb ACM, the applicant must file an Asbestos ATCM exemption request with the SLOAPCD.

AQ-4 If ACM are determined to be present on-site, proposed earthwork, demolition, and construction activities shall be conducted in full compliance with the various regulatory jurisdictions regarding ACM, including the CARB ATCM for Construction, Grading, Quarrying, and Surface Mining Operations (17 CCR 93105) and requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (NESHAP; 40 Code of Federal Regulations [CFR] Section 61, Subpart M – Asbestos). These requirements include, but are not limited to, the following:

a. Written notification, within at least 10 business days of activities commencing, to the SLOAPCD;

b. Preparation of an asbestos survey conducted by a Certified Asbestos Consultant; and

c. Implementation of applicable removal and disposal protocol and requirements for identified ACM.

AQ-5 All project-related earthwork and demolition of existing structures and/or infrastructure shall be conducted in compliance with applicable regulatory requirements, including the requirements stipulated in the NESHAP (40 CFR 61, Subpart M – asbestos). These requirements include, but are not limited to, notification to the SLOAPCD, an asbestos

survey conducted by a Certified Asbestos Inspector, and applicable removal and disposal requirements of identified asbestos containing materials.

AQ-6 If during construction activities, paint is separated from existing infrastructure (e.g., chemically or physically), the paint waste shall be evaluated independently from the building material by a qualified hazardous materials inspector to determine proper management. All hazardous materials (e.g., lead based paint, etc.) shall be handled and disposed of in accordance with local, state, and federal regulations. If required, all lead work plans shall be submitted to SLOAPCD at least 10 days prior to the start of demolition. The City shall document proof that paint waste has been evaluated by a qualified hazardous waste materials inspector and handled according to their recommendation to the City Community Development Department.

Conclusion

With implementation of standard mitigation measures for construction equipment emissions control, fugitive dust control, NOA, ACM, and lead based paint evaluation and protocol, potential impacts related to air quality would be less than significant.

4. BIOLOGICAL RESOURCES

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	16, 17	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	16, 17, 19	☐	☒	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	16, 17, 18, 19	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	2, 16, 17	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	16	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	16	☐	☐	☐	☒

Evaluation

The following section is primarily based on the Natural Environmental Study (NES), Wetland and Waters Assessment, and Biological Assessment prepared for the project (source references 16 and 17). As a part of the study, a Biological Study Area (BSA) for the project was defined using elements of the proposed project and the expected level and extent of environmental effects. The BSA includes all areas that may be directly, indirectly, temporarily, or permanently impacted by construction, construction-related activities, and vehicles. The BSA also incorporates the proposed mitigation area located within the Righetti Ranch development area.

Biological Setting

The project site is located in an urban area within San Luis Obispo and is bordered to the north and south by the San Luis Obispo Creek corridor, and to the east and west by commercial and low-density development. The U.S. Department of Agriculture Natural Resources Conservation Service (NRCS) Web Soil Survey maps indicate the majority of the BSA is within Salinas silty clay loam, 0 to 2 percent slopes (source reference 18). Vegetation communities observed within the BSA include arroyo willow thicket, ruderal, and landscaped plant communities, as well as developed and other non-vegetated areas.

Special-Status Plant Species

Based on a 5-mile radius query of the California Natural Diversity Database (CNDDB) and official species list from the U.S. Fish and Wildlife Service (USFWS), 39 special-status plant taxa (federally listed, state listed, and/or California Native Plant Society [CNPS] List 1B, 2, or 4) were considered for their potential to occur in the BSA. Upon further analysis and consideration of existing habitat, elevation, and soils within the BSA, and results of surveys conducted for the project or other projects in the vicinity, it was determined that the BSA supports suitable habitat for one of the 39 special-status plant species—black-flowered figwort (*Scrophularia atrata*) (California Rare Plant Rank [CRPR] 1B.2; source reference 16). Botanical surveys were conducted within the BSA during the appropriate flowering period for black-flowered figwort in May 2015, April 2019, and June 2019 and no individuals of this species were identified (source reference 16).

Special-Status Wildlife Species

Based on a 5-mile radius query of the CNDDB and species lists from the USFWS and National Oceanic and Atmospheric Administration National Marine Fisheries Service (NOAA Fisheries), 30 special-status wildlife species were considered for their potential to occur in the BSA. Upon further analysis of existing habitat and past surveys conducted within the project vicinity, it was determined that nesting birds, roosting bats, and 14 special-status wildlife species have the greatest potential to occur within, or directly adjacent to the BSA (Table 3).

Table 3. Special-Status Wildlife with Potential to Occur in BSA

Species	Federal/State/CDFW Status*
Western bumble bee (*Bombus occidentalis*)	--/--/SA
Monarch butterfly (*Danaus plexippus*)	--/--/SA
San Luis Obispo pyrg (*Pyrgulopsis taylori*)	--/--/SA
South-Central California Coast steelhead (*Oncorhynchus mykiss*)	FT,CH/--/ SSC
California red-legged frog (*Rana draytonii*)	FT,CH/--/SSC
Coast Range newt (*Taricha torosa*)	--/--/SSC
Western pond turtle (*Emys marmorata*)	--/--/SSC
Least Bell's vireo (*Vireo bellii pusillus)*	FE,CH,MBTA/ SE/FGC
Loggerhead shrike (*Lanius ludovicianus*)	MBTA/--/ FGC,FP
Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*)	FT,PCH,MBTA/ SE/FGC
White-tailed kite (*Elanus leucurus*)	MBTA/--/ FGC,FP
Southwestern willow flycatcher (*Empidonax traillii extimus*)	FE,CH,MBTA/ SE/FGC

Other nesting birds (Class Aves)	MBTA/--/FGC
Pallid bat (*Antrozous pallidus*)	--/--/SSC
Western mastiff bat *(Eumops perotis californicus*)	--/--/SSC
Other roosting bats (Class Chiroptera)	--/--/--

*Status codes: Federal Endangered (FE), Federal Threatened (FT), Critical Habitat (CH), Proposed Critical Habitat (PCH), Protected under the Federal Migratory Bird Treaty Act (MBTA), State Endangered (SE), Included on CNDDB Special Animals List (SA), California Species of Special Concern (SSC), Protected by California Fish and Game Code Sections 3503 and 3503.5 (FGC), Fully Protected (FP)

Sensitive Habitats/Communities

The CNDDB documents regional habitats and natural communities of concern that are considered sensitive within the 5-mile search area, including federally designated critical habitat. Arroyo willow thicket, mapped within the BSA, may be considered a natural community of concern by the California Department of Fish and Wildlife (CDFW). Federally designated critical habitat for California red-legged frog (CRLF) (*Rana draytonii*) is present approximately 1.5 miles north of the BSA but does not overlay the project site. The project BSA falls within federally designated critical habitat for South-Central California Coast steelhead (*Oncorhynchus mykiss*) Distinct Population Segment (DPS).

Based on the City COSE, the portion of San Luis Obispo Creek within the project site is designated as perennial creek with degraded riparian corridor that can be restored or repaired. This designation applies to most San Luis Obispo Creek segments that are located within city limits.

Jurisdictional Waters

A jurisdictional delineation was conducted for the project and potential federal and state jurisdictional areas were identified within the proposed BSA based on aerial photos and field observations of the Ordinary High-Water Mark (OHWM) and top of bank. "Wetlands" are generally considered to be within U.S. Army Corps of Engineers (USACE) jurisdiction if the three-parameter criteria are satisfied (i.e., hydrophytic vegetation, hydric soils, and wetland hydrology). Based on the assessment, no federal or state wetlands were identified within the survey area. However, "Other waters of the U.S." were identified based on determination of the OHWM, which was determined to be approximately 30 feet wide. The existing riparian corridor of San Luis Obispo Creek extends to the top-of-bank; therefore, CDFW jurisdiction is mapped to include those areas within the outermost extent of riparian vegetation. The Regional Water Quality Control Board (RWQCB) also asserts jurisdiction over "waters of the State" through the Porter-Cologne Water Quality Control Act. The definition of this state jurisdiction is general, and no formal delineation process is in place at this time; therefore, the RWQCB will also commonly utilize the extent of riparian as the extent of their jurisdiction under the Porter-Cologne Act.

Invasive Species

A total of 35 invasive plant species, as identified by the California Invasive Plant Council (Cal-IPC) Inventory, were observed within the BSA. The five non-native plant species with a Cal-IPC category rating of High observed in the BSA include red brome (*Bromus madritensis*), cape ivy (*Delairea odorata*), fennel (*Foeniculum vulgare*), French broom (*Genista monspessulana*), and Himalayan blackberry (*Rubus armeniacus*).

a) *Less than significant with mitigation incorporated.* The project includes the restoration and enhancement of an approximately 0.753-acre off-site mitigation area located within the Righetti Ranch property to offset unavoidable temporary and permanent project impacts to riparian habitat. Restoration activities would be detailed in the final Habitat Mitigation and Revegetation Plan (HMRP) and would include expanding the existing riparian plant community by removing and controlling non-native and invasive plant species and replacing them with native riparian trees and shrubs such as willows, western sycamore (*Platanus racemosa*), elderberry, etc. and understory species such as California blackberry (*Rubus ursinus*), mugwort, and others, as appropriate. These activities would not result in removal or permanent impacts to existing native riparian plant species within the area. Restoration activities may temporarily disturb wildlife in the area through vegetation removal and ground disturbance, but would overall result in the expansion of suitable riparian habitat within the area. Therefore, proposed habitat restoration and enhancement activities would not result in a substantial adverse effect to special-status plant or wildlife species.

The project includes demolition and replacement of the existing Prado Road Bridge, roadway improvements along Prado Road and South Higuera Street, and extension of the Bob Jones Bike Trail. Potential impacts to special-status plant and wildlife species are based on the Biological Assessment prepared for the project (SWCA Environmental Consultants [SWCA] 2019) and are discussed in detail below.

Special-Status Plant Species

Botanical surveys were conducted within the BSA during the appropriate flowering periods in May 2015, April 2019, and June 2019. While potential habitat occurs within the BSA for black-flowered figwort, this species was not observed in the BSA and is not expected to occur.

Special-Status Wildlife Species

Western Bumble Bee

Western bumble bee (*Bombus occidentalis*) has the potential to occur in suitable habitat in the BSA. No formal surveys for invertebrate species were conducted and no western bumble bees were observed with the BSA. The project could result in direct impacts to western bumble bee, if present, through the use and movement of construction equipment along San Luis Obispo Creek. The project could also result in indirect impacts through generation of temporary noise and dust or dewatering. Mitigation measure BR-1 has been identified to require restoration activities to include plantings of native flowering plants in order to provide pollination opportunities for the western bumble bee and other insect species. Upon implementation of this measure, impacts to the western bumble bee would be reduced to *less than significant with mitigation incorporated*.

Monarch Butterfly

No formal surveys for invertebrate species were conducted and no monarch butterflies (*Danaus plexippus*) were observed within the BSA. The nearest recorded occurrence of western butterfly is 0.4 mile north of the BSA. Although there are no known monarch butterfly roosts within the BSA, the trees within the riparian corridor may provide suitable roosting habitat for this species.

The project could result in direct impacts to monarch butterfly, if present, through the use and movement of construction equipment along San Luis Obispo Creek. The project could also result in indirect impacts through generation of temporary noise and dust or dewatering. Mitigation measure BR-2 has been identified to require a survey for monarch butterfly roosts within the project area prior to construction and coordination with appropriate regulatory agencies to establish appropriate buffer zones if roosts are observed. Upon implementation of this measure, impacts to the monarch butterfly would be reduced to *less than significant with mitigation incorporated*.

San Luis Obispo Pyrg

No *Pyrgulopsis* spp. were observed during surveys of San Luis Creek and no proximate occurrences were identified in a CNDDB database search. San Luis Creek appears to support suitable habitat for this species; therefore, there is a potential for presence of San Luis Obispo pyrg (*Pyrgulopsis taylori*) along San Luis Creek. However, this species was not observed in the BSA during seasonally timed surveys and is not expected to occur within the BSA.

Project construction could result in the injury or mortality of San Luis Obispo pyrg (if present) during dewatering to accommodate the bridge improvements. The potential need to capture and relocate this species could subject individual snails to stresses (e.g., temporary removal from aquatic habitat, desiccation, relocation to unfamiliar aquatic habitat) that could result in adverse effects. Injury or mortality could also occur via accidental crushing by worker foot-traffic or construction equipment. The potential for these impacts is anticipated to be low due to no observations of the species within the BSA during surveys. Mitigation measure BR-3 has been identified to require on-site biologists to relocate any *Prygulopsis* ssp. individuals if observed during preconstruction surveys or construction activities. Upon implementation of this measure, impacts to the San Luis Obispo pyrg would be reduced to *less than significant with mitigation incorporated*.

South-Central California Coast Steelhead DPS

Focused surveys for South-Central California Coast steelhead (*Oncorhynchus mykiss*) were not conducted. However, the BSA is within the San Luis Obispo Creek watershed and supports a known steelhead population. Therefore, presence of South-Central California Coast steelhead is inferred. If present within the BSA during project activities, individual steelhead may be directly impacted by the stream diversion activities as well as movement and use of construction equipment within the creek channel. They may be stranded in portions of the creek that must be dewatered, get caught in dewatering pumps, or made vulnerable to predation from foraging birds and mammals. Potential indirect impacts to steelhead from the project may occur and include sediment deposition downstream of the work area, which may adversely impact downstream water quality.

The project has the potential to result in "take" of steelhead; therefore, Caltrans must consult with NOAA Fisheries under Section 7 of the federal Endangered Species Act (FESA) to obtain a Biological Opinion for the project. The Biological Opinion would include several reasonable and prudent measures and terms and conditions to reduce the effects on steelhead and their habitat. In addition to avoidance and minimization measures related to jurisdictional features, which would avoid, minimize, and mitigate for impacts to aquatic habitats, additional measures have been identified to further minimize potential project-related impacts to steelhead, including conducting a worker environmental training program, limiting work to occur within the seasonal minimum creek flow period, and use of fine mesh screening to prevent steelhead and other aquatic species from entering the pump system. These measures are detailed as mitigation measures BR-4 through BR-6. Upon implementation of these measures and compliance with federal and state policies, impacts to South-Central California Coast steelhead would be reduced to *less than significant with mitigation incorporated*.

California Red-legged Frog

According to a query of the CNDDB, there is a record of CRLF (*Rana draytonii*) 0.93 mile southwest of the BSA, adjacent to San Luis Obispo Creek. This August 9, 2006, record (CNDDB Occ. No. 895) was a natural/native occurrence and is presumed extant. The project site is not within a CRLF designated critical habitat unit and no protocol-level surveys were conducted for this project. Due to the proximity of an existing CNDDB occurrence and designated critical habitat, presence of CRLF within the BSA is inferred due to the mobility of this species and it may use the stretch of San Luis Obispo Creek within the BSA as a migration corridor.

Project construction could result in the injury or mortality of CRLF (if present) during diversion/dewatering of San Luis Obispo Creek. The potential need to capture and relocate CRLF could subject these animals to stresses that could result in adverse effects. Injury or mortality could occur via accidental crushing by worker foot-traffic or construction equipment. Indirect effects of construction activities, including noise and vibration, may cause CRLF to abandon habitat adjacent to work areas. Caltrans anticipates the proposed project would qualify for FESA incidental take coverage under the *Programmatic Biological Opinion for Projects Funded or Approved under the Federal Highway Administration's Federal Aid Program*, which includes a number of measures, including, but not limited to, preconstruction surveys and construction personnel training, relocation of individuals observed, setback distances for refueling and staging of equipment from riparian areas, scheduling work to minimize impacts during breeding season and the wet season, sedimentation control measures, and invasive plant control. These measures are detailed as mitigation measures BR-7 through BR-25. Upon implementation of these measures and compliance with federal and state policies, impacts to CRLF would be reduced to *less than significant with mitigation incorporated*.

Coast Range Newt and Western Pond Turtle

Coast Range newt (*Taricha torosa*) and western pond turtle (*Emys marmorata*) were not observed in the BSA during the reconnaissance surveys. The BSA may provide suitable aquatic habitat and upland/dispersal habitat for Coast Range newt and southwestern pond turtle, and project implementation could result in impacts to these species if they are present within the BSA during construction. Direct impacts to these species could occur if they are present in the construction area during activities such as excavation, grading, grubbing, and vegetation removal from injury, mortality, construction-related noise, and general disturbance. The potential need to capture and relocate these species could subject individuals to stresses that could result in adverse effects. Project implementation has the potential to indirectly affect these species via adverse effects to water quality. Mitigation measure BR-26 has been identified to require a preconstruction survey of the project site and relocation of any Coast Range newts or western pond turtles observed adjacent to suitable habitat up- or downstream of

the project site. Upon implementation of these measures and compliance with federal and state policies, impacts to the Coast Range newt and the western pond turtle would be reduced to *less than significant with mitigation incorporated*.

Least Bell's Vireo, Southwestern Willow Flycatcher, and Western Yellow-Billed Cuckoo

While least Bell's vireo (*Vireo bellii pusillus*), western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), and southwestern willow flycatcher (*Empidonax traillii extimus*) were not observed within the BSA during surveys, riparian habitat within the BSA may provide suitable foraging habitat for these special-status species and other bird species. The width of the corridor and proximity to urban activities may decrease the overall value of the site to provide nesting habitat. While least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo appeared on the official USFWS species list obtained for the proposed project, no protocol surveys (where applicable) were conducted for these species because they are anticipated to have a very low potential for occurrence in or near the BSA. There are no known records for these species along San Luis Obispo Creek, nor are there any nearby occurrences.

The removal of vegetation could directly impact active bird nests and any eggs or young residing in nests. Indirect impacts could also result from noise, dust, and other disturbance associated with construction, which could alter perching, foraging, and/or nesting behaviors. Increased, prolonged, ambient construction-related noise and vibration could adversely affect breeding and nesting behavior and contribute to a decrease in nesting success. While temporary loss of vegetation supporting potential nesting habitat would occur, this would be addressed through proposed habitat restoration. Mitigation measures BR-27 and BR-28 have been identified to limit tree removal to outside the typical nesting bird season if feasible, and if either of these three special-status bird species are observed within 100 feet of project activities, a qualified biologist shall implement an exclusion zone to be avoided until the individuals are greater than 100 feet from project-related disturbance. Upon implementation of these measures, impacts to least Bell's vireo, southwestern flycatcher, and western yellow-billed cuckoo would be reduced to *less than significant with mitigation incorporated*.

Loggerhead Shrike, White-Tailed Kite, and Other Nesting Birds

Common passerine bird species were observed during the site visits and surveys; however, no specific nesting migratory bird surveys have been conducted within the BSA. It is inferred that nesting migratory birds, including loggerhead shrike (*Lanius ludovicianus*) and white-tailed kite (*Elanus leucurus*) could exist within the creek corridor or on the bridge itself.

The removal of vegetation could directly impact active bird nests and any eggs or young residing in nests. Indirect impacts could also result from noise, dust, and other disturbance associated with construction, which could alter perching, foraging, and/or nesting behaviors. Increased, prolonged, ambient construction-related noise and vibration could adversely affect breeding and nesting behavior and contribute to a decrease in nesting success. While temporary loss of vegetation supporting potential nesting habitat would occur, this would be addressed by proposed habitat restoration. Mitigation measures BR-27 through BR-29 have been identified to limit tree removal to outside the typical nesting bird season if feasible, and to require that birds be excluded from the existing bridge structure prior to its demolition. Upon implementation of these measures, impacts to loggerhead shrike, white-tailed kite, and other nesting birds would be reduced to *less than significant with mitigation incorporated*.

Pallid Bat, Western Mastiff Bat, and Other Roosting Bats

While no bats, or evidence of bat activity (e.g., guano, urine staining, etc.), were observed during visual reconnaissance surveys of the BSA, the existing bridge and the riparian corridor may support suitable roosting habitat or structure for bat species, including pallid bat (*Antrozous pallidus*) and western mastiff bat (*Eumops perotis californicus*). If bats utilized the bridge or surrounding trees for seasonal roosting, then direct impacts to bats could result during the proposed construction activities. These direct effects could result in the injury or mortality of bats or harassment that could alter roosting behaviors. Indirect impacts could also result from noise and disturbance associated with construction, which could also alter roosting behaviors. Mitigation measures BR-30 through BR-32 have been identified to avoid and minimize potential impacts to roosting bat species through passive exclusion of the bridge prior to demolition, bat roosting surveys if tree removal is conducted during the bat roosting period, and development of a mitigation plan if determined necessary. Upon implementation of these measures, impacts to pallid bat, western mastiff bat, and other roosting bats would be reduced to *less than significant with mitigation incorporated*.

b) Less than significant with mitigation incorporated.

San Luis Obispo Creek Riparian Corridor and Jurisdictional Water Features

Based on the conditions observed in the field, San Luis Obispo Creek is likely subject to USACE, CDFW, and RWQCB jurisdiction. This is due to the presence of a clearly identifiable OHWM, the evidence of a defined bed and bank, connectivity to permanent waters (San Luis Obispo Creek connects directly to the Pacific Ocean), evidence of wetland hydrology, and presence of riparian vegetation. Jurisdictional areas that would be filled or otherwise replaced with a structure (permanent loss), or permanently altered from the current condition (degradation of current condition), were considered permanent impacts. Temporary impacts are those where vegetation may be removed or disturbed for construction activities or access or for dewatering/diversion operations, if water were present during construction. A summary of permanent and temporary impacts to habitats within the project site is provided in Table 4 below.

Table 4. Estimated Impacts to Habitat and Sensitive Natural Communities

Habitat	Estimated Impacts (Acres)	
	Permanent	**Temporary**
Arroyo Willow Thicket	0.73	0.95
Ruderal	0.22	0.49
Landscaped	0.19	0.02
Developed	0.07	0.25
Streambed[1] (includes Steelhead Critical Habitat)	0.08[1]	0.51[1]
Totals	**1.29**	**2.22**

[1] The stream channel, which includes federal and state jurisdictional areas as well as federally designated Critical Habitat for South Central Coast Steelhead DPS, is underneath the arroyo willow habitat and has been subtracted from the impact acreage for arroyo willow thicket to account for overlap and to avoid duplication of impact acreage.

Mitigation measures BR-33 through BR-44 have been identified to avoid, minimize, or compensate for impacts to riparian and jurisdictional water features within the project area, including, but not limited to, monitoring of ground disturbance and vegetation removal within the San Luis Obispo Creek corridor, installation of high-visibility fencing around designated work areas to avoid unnecessary impacts to adjacent habitats, preparation of a Hazardous Materials Response Plan, and preparation of a Habitat Mitigation and Revegetation Plan (HMRP) that provides proposed mitigation ratios for permanent and temporary impacts to jurisdictional areas. A Conceptual Habitat Mitigation and Monitoring Plan for the Prado Road Bridge Widening Project has been prepared and proposes a 1:1 restoration ratio in-kind for temporary impacts, a 2:1 restoration or enhancement ratio in-kind for permanent impacts resulting in degradation of ecological conditions, and a 3:1 restoration or enhancement ratio in-kind for permanent impacts resulting in permanent loss. An approximately 0.753-acre area of degraded riparian habitat located within the Righetti Ranch property has been identified for restoration and enhancement mitigation measures to be implemented. The HMRP and final mitigation strategy would be subject to the review and would require approval by USACE, RWQCB, USFWS, and CDFW prior to implementation. Upon implementation of these measures, impacts to riparian and jurisdictional water features would be reduced to *less than significant with mitigation incorporated*.

Arroyo Willow Thicket

The arroyo willow thicket associated with San Luis Obispo Creek falls within the Holland (1986) description of central coast riparian scrub and is recognized by the CNDDB (CTT63200CA) as a natural community of special concern. Arroyo willow thickets are classified by the CDFW (2010b) as a natural community of special concern. Within the BSA, the arroyo willow thicket borders San Luis Obispo Creek on both sides. Approximately 2.3 acres of arroyo willow thicket was mapped within the BSA. Approximately 0.73 acre of arroyo willow thicket is estimated to be permanently impacted and approximately 0.95 acre of arroyo willow thicket is estimated to be temporarily impacted. Implementation of measures BR-33 through BR-44 would effectively reduce and compensate for impacts to arroyo willow thicket. Upon implementation of these measures, impacts to arroyo willow thicket would be reduced to *less than significant with mitigation incorporated*.

South-Central California Coast Steelhead DPS Federal Critical Habitat

Approximately 26,136 square feet (0.6 acre) of South-Central California Coast steelhead DPS critical habitat is present within the BSA along San Luis Obispo Creek up to the OHWM. Implementation of the project would result in temporary impacts to the open water habitat in San Luis Obispo Creek as a result of construction activities, including water diversion within the project work area and equipment use within the river channel. Loss of service in steelhead critical habitat, while dewatering, would be an adverse effect to the primary functions of that steelhead critical habitat, but only temporary in duration. The installation of concrete bridge abutments may encroach into the OHWM and permanently impact approximately 3,845 square feet (0.08 acre) of steelhead critical habitat but would not affect stream flows. Approximately 22,216 square feet (0.51 acre) of temporary impacts would occur within the stream channel from dewatering and diversion during project construction. Mitigation measures BR-33 through BR-44 have been identified to avoid or minimize impacts to jurisdictional water features within the project area and would effectively reduce and compensate for impacts to steelhead critical habitat. Upon implementation of these measures, impacts to South-Central California Coast steelhead critical habitat would be reduced to *less than significant with mitigation incorporated*.

c) *Less than significant impact.* A jurisdictional determination was conducted for the project and potential federal and state jurisdictional areas were identified within the proposed BSA based on aerial photos and field observations of the OHWM and top of bank. No federal or state wetlands were identified within the survey area. Therefore, impacts to federally or state-protected wetlands would be *less than significant*.

d) *Less than significant with mitigation incorporated*. The California Essential Habitat Connectivity Project was queried for Essential Habitat Connectivity, which is the best available data describing important areas for maintaining connectivity between large blocks of land for wildlife corridor purposes. These important areas are referred to as Essential Connectivity Areas (ECAs). ECAs are only intended to be a broad-scale representation of areas that provide essential connectivity. The BSA does not fall within an ECA. It is expected that additional linkages would be identified as new data becomes available for various species.

The Conservation and Open Space Element of the City's General Plan includes policies for protection of wildlife corridors in creeks and open space (COSE 7.3.3.D). Figure 3 of the Conservation and Open Space Element identifies a local wildlife corridor traversing the project site, along the San Luis Obispo creek riparian corridor.

For the purposes of this analysis, it is reasonable to assume that the riparian corridor within the project site may be used by wildlife as movement corridors on a local scale. The San Luis Obispo Creek riparian corridor provides habitat for many aquatic and terrestrial species including steelhead, CRLF, southwestern pond turtle, and migratory birds.

Implementation of the project would result in temporary impacts to the open water and riparian habitat of San Luis Obispo Creek and could temporarily impact fish passage and wildlife movement during construction. Diversion and dewatering of San Luis Obispo Creek may temporarily impede fish passage through the project site. These potential temporary impacts on the movement of wildlife through the project site would be minimized to less than significant through implementation of mitigation measures BR-33 through BR-44. Upon completion of the construction phase, the project would result in a permanent beneficial change to existing fish passage characteristics, as the existing piles in the creek channel would be removed. Therefore, while the project would result in a beneficial impact to migratory fish species in operation, temporary impacts would be potentially significant and require mitigation and potential impacts related to the movement of native resident or migratory fish or wildlife would be *less than significant with mitigation incorporated*.

e) *Less than significant with mitigation incorporated.* The City has identified mitigation measures designed to avoid impacts on sensitive habitat areas and biological resources to the extent possible. Disturbed areas would be restored after project construction, potentially improving the quality of habitat in the project area through, for example, invasive species control and trash removal. Mitigation has been identified, including restoring and enhancing existing degraded habitat located within the Righetti Ranch development area to further minimize and compensate for impacts to sensitive species and habitats, consistent with applicable City plans and policies. The project would not interfere with the long-term natural function of project site habitats. Therefore, the project would not be in conflict with any applicable policies protecting biological resources or environmentally sensitive habitats. Impacts would be *less than significant with mitigation incorporated*.

f) *No impact*. The project corridor is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan. Therefore, impacts would not occur.

Mitigation Measures

BR-1 The Habitat Mitigation and Revegetation Plan shall include an assemblage of native flowering plants in order to provide pollination opportunities for western bumble bee and other insect species.

BR-2 Prior to construction, a biologist determined qualified by Caltrans and the CDFW shall survey the BSA for monarch butterfly roosts. If monarch butterfly roosts are observed, the biologist shall coordinate with Caltrans and the CDFW to establish an appropriate buffer zone to avoid direct impacts to roosts until roosting activity has ceased. Observations of monarch butterfly or other special-status species shall be documented on CNDDB forms and submitted to the CDFW upon project completion.

BR-3 During preconstruction surveys and/or during construction, any *Pyrgulopsis* spp. observed by biologists shall be relocated to suitable aquatic habitat outside of the area of impact.

BR-4 Prior to initiation of stream diversion/dewatering, a qualified biologist shall conduct a worker environmental training program, including a description of steelhead, steelhead critical habitat, its legal/protected status, proximity to the project site, avoidance/minimization measures to be implemented during the project, and the implications of violating FESA and permit conditions.

BR-5 In-stream work shall take place between June 15 and October 31 in any given year, when the surface water within San Luis Obispo Creek is likely to be at seasonal minimum. Deviations from this work window shall only be made with permission from the relevant regulatory agencies. During in-stream work, a qualified biologist that has experience in steelhead biology and ecology, aquatic habitats, biological monitoring (including diversion/dewatering), and capturing, handling, and relocating fish species shall be retained. During in-stream work, the biological monitor(s) shall continuously monitor placement and removal of any required stream diversions/dewatering and only the approved biologist shall capture stranded steelhead and other native fish species and relocate them to suitable habitat, as appropriate. The approved biologist(s) shall capture steelhead stranded as a result of diversion/dewatering and relocate steelhead to the nearest suitable in-stream habitat. The approved biologist(s) shall note the number of steelhead observed in the affected area, the number of steelhead relocated, and the date and time of the collection and relocation.

BR-6 During in-stream work, if pumps are incorporated to assist in temporarily dewatering the site, intakes shall be completely screened with no larger than 3/32-inch (2.38-millimeter) wire mesh to prevent steelhead and other sensitive aquatic species from entering the pump system. Pumps shall release the diverted water so that suspended sediment shall not reenter the stream. The form and function of pumps used during the dewatering activities shall be checked daily, at a minimum, by a qualified biological monitor to ensure a dry work environment and minimize adverse effects to aquatic species and habitats.

BR-7 Prior to and during construction activities, only USFWS-approved biologists shall participate in activities associated with the capture and handling of CRLFs.

BR-8 Ground disturbance shall not begin until written approval is received from the USFWS that the biologist(s) is qualified to do conduct the work, unless the individual(s) has/have been approved previously and the USFWS has not revoked that approval. Caltrans shall request approval of the biologist(s) from the USFWS.

BR-9 A USFWS-approved biologist shall survey the project area no more than 48 hours before the onset of work activities. If any life stage of the CRLF is found and these individuals are likely to be killed or injured by work activities, the approved biologist shall be allowed sufficient time to move them from the site before work activities begin. The USFWS-approved biologist shall relocate the CRLFs the shortest distance possible to a location that contains suitable habitat and shall not be affected by the activities associated with the project. The relocation site should be in the same drainage to the extent practicable. Caltrans shall coordinate with USFWS on the relocation site prior to the capture of any CRLFs.

BR-10 Before any activities begin on a project, a USFWS-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of the CRLF and its habitat, the specific measures that are being implemented to conserve the CRLF for the current project, and the boundaries within which the project may be accomplished. Brochures, books, and briefings may be used in the training session, provided that a qualified person is on hand to answer any questions.

BR-11 A USFWS-approved biologist shall be present at the work site until CRLFs have been relocated out of harm's way, workers have been instructed, and disturbance of the habitat has been completed. After this time, the City shall designate a person to monitor on-site compliance with minimization measures. The USFWS-approved biologist shall ensure that this monitor receives the training outlined in the measure above and in the identification of CRLFs. If the monitor or the USFWS-approved biologist recommends that work be stopped because CRLFs would be affected in a manner not anticipated by the USFWS, Caltrans, and the City during the review of the proposed action, they shall notify the resident engineer (the engineer that is directly overseeing and in command of construction activities) immediately. The resident engineer shall either resolve the situation by eliminating the adverse effect immediately or require that actions that are causing these effects be halted. If work is stopped, the USFWS, Caltrans, and the City shall be notified as soon as is reasonably possible.

BR-12 During project activities, trash that may attract predators shall be properly contained, removed from the work site, and disposed of regularly. Following construction, trash and construction debris shall be removed from work areas.

BR-13 All refueling, maintenance, and staging of equipment and vehicles shall occur at least 100 feet from riparian habitat or water bodies and in a location from where a spill would not drain directly toward aquatic habitat (e.g., on a slope that drains away from the water). The monitor shall ensure contamination of habitat does not occur during such operations. Prior to the onset of work, Caltrans and the City shall ensure that a plan is in place for prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.

BR-14 Habitat contours shall be returned to their original configuration at the end of project activities. This measure shall be implemented in all areas disturbed by activities associated with the project, unless the USFWS, Caltrans, and the City determine that it is not feasible or modification or original contours would benefit the CRLF.

BR-15 The number of access routes, size of staging areas, and total area of activity shall be limited to the minimum necessary to achieve the project. Environmentally Sensitive Areas (ESAs) shall be established to confine access routes and construction areas to the minimum area necessary to complete construction, and minimize the impact to CRLF habitat; this goal includes locating access routes and construction areas outside of wetlands and riparian areas to the maximum extent practicable.

BR-16 Caltrans and the City shall attempt to schedule work for times of the year when impacts to CRLF would be minimal. For example, work that would affect large pools that may support breeding would be avoided, to the maximum extent practicable, during the breeding season (November through May). Isolated pools that are important to maintain CRLFs through the driest portions of the year would be avoided, to the maximum degree practicable, during the late summer and early fall. Habitat assessments, surveys, and technical assistance between the USFWS and Caltrans during project planning shall be used to assist in scheduling work activities to avoid sensitive habitats during key times of year.

BR-17 To control sedimentation during and after project implementation, Caltrans and the City shall implement Best Management Practices (BMPs) outlined in any authorizations or permits issued under the authorities of the Clean Water Act that it receives for the specific project. If BMPs are ineffective, Caltrans shall attempt to remedy the situation immediately, in coordination with the USFWS.

BR-18 If a work site is to be temporarily dewatered by pumping, intakes shall be completely screened with wire mesh not larger than 1/5 inch (5.08 millimeters) to prevent CRLFs from entering the pump system. Water shall be released downstream at an appropriate rate to maintain downstream flows during construction. Upon completion of construction activities, any diversions or barriers to flow shall be removed in a manner that would allow flow to resume with the

least disturbance to the substrate. Alteration of the streambed shall be minimized to the maximum extent possible; any imported material shall be removed from the streambed upon completion of the project.

BR-19 Unless approved by the USFWS, water shall not be impounded in a manner that may attract CRLFs.

BR-20 A USFWS-approved biologist shall permanently remove any individuals of exotic species, such as bullfrogs (*Lithobates catesbeiana*), crayfish, and centrarchid fishes, from the project area, to the maximum extent. The USFWS-approved biologist shall be responsible for ensuring their activities are in compliance with the California Fish and Game Code.

BR-21 If Caltrans and the City demonstrate that disturbed areas have been restored to conditions that allow them to function as habitat for CRLF, these areas shall not be included in the amount of total habitat permanently disturbed.

BR-22 To ensure that diseases are not conveyed between work sites by the USFWS-approved biologist, the fieldwork code of practice developed by the Declining Amphibian Task Force shall be followed at all times.

BR-23 Project sites shall be revegetated with an assemblage of native riparian, wetland, and upland vegetation suitable for the area. Locally collected plant materials shall be used to the extent practicable. Invasive, exotic plants shall be controlled to the maximum extent practicable. This measure shall be implemented in all areas disturbed by activities with the project, unless the USFWS, Caltrans, and the City have determined that it is not feasible or practical.

BR-24 Caltrans and the City shall not use herbicides as the primary method to control invasive, exotic plants. However, if Caltrans and the City determine the use of herbicides is the only feasible method for controlling invasive plants at a specific project site, the following additional measures shall be implemented to protect CRLF:

a. Caltrans and the City shall not use herbicides during the breeding season for CRLF.

b. Caltrans and the City shall conduct surveys for CRLF immediately prior to the start of herbicide use. If found, CRLF shall be relocated by a qualified biologist to suitable habitat far enough from the project area that no direct contact with herbicide would occur.

c. Cape ivy and other invasive plants shall be cut and hauled out by hand and painted with glyphosate-based products, such as Aquamaster® or Rodeo®.

d. Licensed and experienced Caltrans staff or a licensed and experienced contractor shall use a hand-held sprayer for foliar application of Aquamaster® or Rodeo® where large monoculture stands occur at an individual project site.

e. All precautions shall be taken to ensure that no herbicide is applied to native vegetation.

f. Foliar applications of herbicide shall not occur when wind speeds are in excess of 3 miles per hour.

g. No herbicides shall be applied within 24 hours of forecasted rain.

h. Application of herbicides shall be done by qualified Caltrans staff, City staff, or contractors to ensure that overspray is minimized, application is made in accordance with the label recommendations, and required and reasonable safety measures are implemented. A safe dye shall be added to the mixture to visually denote treated sites. Application of herbicides shall be consistent with the USEPA Office of Pesticide Programs Endangered Species Protection Program county bulletins.

i. All herbicides, fuels, lubricants, and equipment shall be stored, poured, or refilled at least 100 feet from riparian habitat or water bodies in a location where a spill would not drain directly toward aquatic habitat. Caltrans and the City shall ensure that a plan is in place for a prompt and effective response to accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.

BR-25 Upon completion of the project, Caltrans and the City shall ensure that a Project Completion Report is completed and provided to the USFWS Ventura Field Office. Caltrans and the City shall recommend modifications of the protective measures if alternative measures would facilitate compliance with the provisions of the consultation. In addition,

Caltrans shall reinitiate formal consultation in the event any of the following thresholds are reached as a result of the projects conducted under the provisions of the consultation associated with the Programmatic Biological Opinion:

Caltrans shall reinitiate consultation when, as a result of projects conducted under the provision of the consultation associated with the Programmatic Biological Opinion, any of the following occur:

a. 10 CRLF adults or juveniles have been killed or injured in any given year (for this and all other standards, an egg mass is considered to be a CRLF);

b. 50 CRLFs have been killed or injured in total;

c. 20 acres of critical habitat for the CRLF that include the primary constituent elements of aquatic breeding and non-breeding aquatic habitat and upland and dispersal habitat have been permanently lost in any given year;

d. 100 acres of critical habitat for the CRLF that include the primary constituent elements of aquatic breeding and non-breeding aquatic habitat and upland and dispersal habitat have been permanently lost in total;

e. 100 acres of critical habitat for the CRLF that include the primary constituent elements of aquatic breeding and non-breeding aquatic habitat and upland and dispersal habitat have been temporarily disturbed in any given year; or

f. 500 acres of critical habitat for the CRLF that include the primary constituent elements of aquatic breeding and non-breeding aquatic habitat and upland and dispersal habitat have been temporarily disturbed in total.

BR-26 Prior to construction, a biologist determined qualified by Caltrans and the CDFW shall survey the BSA and, if present, capture and relocate any Coast Range newts and southwestern pond turtles to adjacent suitable habitat upstream or downstream of the BSA. Observations of these or other special-status species shall be documented on CNDDB forms and submitted to CDFW upon project completion. If these species or other CDFW Species of Special Concern aquatic species are observed during construction, they shall likewise be relocated to suitable upstream habitat by a qualified biologist.

BR-27 If feasible and regulatory approvals allow, tree removal shall be scheduled to occur from October 1 to January 31, outside of the typical nesting bird season, to avoid potential impacts to nesting birds. If tree removal or other construction activities are proposed to occur within 100 feet of potential habitat during the nesting season (February 1 to September 1), a nesting bird survey shall be conducted by a biologist determined qualified by Caltrans no more than 3 days prior to construction. If an active nest is found, a qualified biologist shall determine an appropriate buffer and monitoring strategy based on the habits and needs of the species. The buffer area shall be avoided until a qualified biologist has determined that juveniles have fledged.

BR-28 If least Bell's vireo, southwestern willow flycatcher, and/or western yellow-billed cuckoo are observed within 100 feet of construction activities, a qualified biologist shall implement an exclusion zone and work shall be avoided within the exclusion zone until the least Bell's vireo, southwestern willow flycatcher, and/or western yellow-billed cuckoo are located greater than 100 feet from project-related disturbance. If an active least Bell's vireo, southwestern willow flycatcher, and/or western yellow-billed cuckoo nest is observed within 100 feet of the BSA, all project activities shall immediately cease and Caltrans shall contact the USFWS and CDFW within 48 hours. If required, Caltrans shall then initiate FESA Section 7 formal consultation with the USFWS and California Endangered Species Act (CESA) coordination for least Bell's vireo, southwestern willow flycatcher, and/or western yellow-billed cuckoo and implement additional measures as necessary.

BR-29 Prior to demolition of the existing bridge, birds shall be excluded from the existing bridge. Nesting bird exclusion methods may include installation of exclusion netting, removing/knocking down nests before they contain eggs, or other methods approved by the CDFW. Installation of exclusion netting shall occur outside of the typical nesting season (i.e., implement exclusion methods from September 2 to January 31).

BR-30 Prior to demolition of the existing bridge, bats shall be passively excluded from the existing bridge with exclusion netting or other means. Installation of exclusion shall occur outside of the typical maternity roosting season (i.e., implement exclusion from September 2 to February 14).

BR-31 If tree removal is required during the bat maternity roosting season (February 15 to September 1), a bat roost survey shall be conducted by a qualified biologist within 3 days prior to removal. If an active bat roost is found, Caltrans shall coordinate with the CDFW to determine an appropriate buffer based on the habits and needs of the species. Readily visible exclusion zones shall be established in areas where roosts must be avoided using ESA fencing. Work in the buffer area shall be avoided until a qualified biologist has determined that roosting activity has ceased. Active bat maternity roosts shall not be disturbed or destroyed at any time.

BR-32 If it is determined that a substantial impact to pallid bat, western mastiff bat, or a maternity roost shall occur, then the City shall compensate for the impact through the development and implementation of a mitigation plan in coordination with the CDFW.

BR-33 Prior to issuance of construction permits, the City shall prepare a Habitat Mitigation and Revegetation Plan to assist project planners in preparing agency permit applications associated with the permanent and temporary impacts to U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) jurisdictions in San Luis Obispo Creek. The HMRP shall be prepared in compliance with the guidelines provided in the *Final 2015 Regional Compensatory Mitigation and Monitoring Guidelines for South Pacific Division USACE* (USACE 2015), the *Checklist for Compensatory Mitigation Proposals* (USACE 2008a), and the *Final Rule for Compensatory Mitigation for Losses of Aquatic Resources*. The HMRP shall identify the proposed 1:1 restoration ratio in-kind for temporary impacts, a 2:1 restoration or enhancement ratio in-kind for permanent impacts resulting in degradation of ecological conditions, and a 3:1 restoration or enhancement ratio in-kind for permanent impacts resulting in permanent loss. The final mitigation requirements shall be determined through the permitting process and a final Compensatory Mitigation Plan would need to be approved by the USACE, CDFW, and RWQCB.

BR-34 Prior to construction, the City shall obtain a Section 404 Permit from the USACE, a Section 401 Water Quality Certification from the RWQCB, and a Section 1600 Streambed Alteration Agreement from the CDFW for project-related impacts that shall occur in areas under state and federal jurisdiction.

BR-35 Prior to construction, the City shall retain a qualified biological monitor(s) to monitor construction and ensure compliance with the avoidance and minimization efforts outlined within all project environmental documents. At a minimum, monitoring shall occur during initial ground disturbance activities and vegetation removal within the San Luis Obispo Creek corridor. Monitoring may be reduced to part time once initial disturbance and vegetation removal activities are complete. The duration of monitoring should be at least once per week throughout the remaining construction phases, unless specified otherwise by permitting agencies.

BR-36 Prior to construction, all personnel shall participate in an environmental awareness training program conducted by a qualified biologist. The program shall include a description of the sensitive aquatic resources within the BSA and the boundaries within which the project may be accomplished. If appropriate, the biologist may train and designate a representative of the City or other designee to provide training to subcontractors or personnel that shall be on-site for short durations during the project.

BR-37 Construction activities within jurisdictional areas shall be conducted during the dry season when stream flows will be at annual lows (June 15 and October 31) in any given year, or as otherwise directed by the regulatory agencies. Deviations from this work window can be made with permission from the relevant regulatory agencies.

BR-38 Prior to initiation of any construction activities, including vegetation clearing or grubbing, sturdy high-visibility fencing shall be installed to protect the jurisdictional areas adjacent to the designated work areas. This fencing shall be placed so that unnecessary adverse impacts to the adjacent habitats are avoided. No construction work (including storage of materials) shall occur outside of the specified project limits. The fencing shall remain in place during the entire construction period, be monitored periodically by a qualified biologist, and be maintained as needed by the contractor.

BR-39 Prior to construction, a Storm Water Pollution Prevention Plan or Water Pollution Control Plan for the project shall be prepared. Provisions of this plan shall be implemented during and after construction as necessary to avoid and minimize erosion and stormwater pollution in and near the work area.

BR-40 Prior to construction, the contractor shall prepare a Hazardous Materials Response Plan to allow for a prompt and effective response to any accidental spills. Workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.

BR-41 During construction, erosion control measures (e.g., silt fencing, fiber rolls, and barriers) shall remain available on-site and shall be utilized as necessary to prevent erosion and sedimentation in jurisdictional areas. No synthetic plastic mesh products shall be used for erosion control and use of these materials on-site is prohibited. Erosion control measures shall be checked to ensure that they are intact and functioning effectively and maintained on a daily basis throughout the duration of construction. The contractor shall also apply adequate dust control techniques, such as site watering, during construction to protect water quality.

BR-42 During construction, the cleaning and refueling of equipment and vehicles shall occur only within a designated staging area and at least 100 feet (30 meters) from wetlands or other aquatic areas. At a minimum, equipment and vehicles shall be checked and maintained on a daily basis to ensure proper operation and avoid potential leaks or spills.

BR-43 During construction, trash shall be contained, removed from the work site, and disposed of regularly. Following construction, trash and construction debris shall be removed from the work areas. Vegetation removed from the construction site shall be taken to a permitted landfill to prevent the spread of invasive species. If soil from weedy areas (such as areas with poison hemlock [*Conium maculatum*] or other invasive exotic plant species) must be removed to an off-site location, the top 6 inches (152 millimeters) containing the seed layer in areas with weedy species shall be disposed of at a permitted landfill.

BR-44 During construction, no pets shall be allowed on the construction site.

Conclusion

With the incorporation of mitigation measures identified above, project impacts to biological resources would be less than significant.

5. CULTURAL RESOURCES

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a) Cause a substantial adverse change in the significance of a historic resource pursuant to §15064.5?	20	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	21	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	2, 21	☐	☒	☐	☐

Evaluation

Historical Resources Evaluation and Methodology

As defined by CEQA, a historical resource includes:

1. A resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR).
2. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant. The architectural, engineering, scientific, economic, agricultural, educational, social, political,

military, or cultural records of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence.

A Historical Resources Evaluation Report was prepared by SWCA to identify historic-period built environment resources (defined as resources constructed in 1970 or earlier) within the project's Area of Potential Effects (APE) and assist the City in meeting requirements under Section 106 of the National Historic Preservation Act (NHPA) and under CEQA, with respect to built environment resources (source reference 20).

A records search was requested from the California Historical Resources Information System (CHRIS) Central Coast Information Center (CCIC) to identify any previously recorded built environment resources and investigations within a 0.5-mile radius of the APE. This search including review of official maps and records on file at CCIC, as well as a search of the National Register of Historic Places (NRHP), CRHR, California Inventory of Historical Resources, California State Historical Landmarks, California Points of Historical Interest, and California Office of Historic Preservation. The results of the searches documented that no historic-period environment resources were previously identified or evaluated.

In addition to the records search, SWCA reviewed online archived Minutes of the San Luis Obispo City Council, City building permits, County recorded maps, County Assessor and County Recorder resources, city directories, and maps and vertical files at the History Center of San Luis Obispo.

Historical Setting

From the nineteenth century through World War II, the Prado Road area was characterized by agricultural use and contained no record of built resources. By the time of the 1952 U.S. Geological Survey (USGS) topographic map, a building was located on the northwest corner of Prado Road and South Higuera Street (the present location of Heritage Bank), and two other buildings were present on the north side of Prado Road west of the creek. Archived Minutes of the City Council meetings document that, in 1956, the City Road Commissioner proposed "to widen and reconstruct the Sewer Farm Road [i.e., Prado Road] between Old State Highway 101 [South Higuera Street] and the Freeway as well as construct a new bridge over San Luis Obispo Creek [the current Prado Road Bridge, built in 1957]" (source reference 20).

Archaeological Records Search and Survey Methodology

An Archaeological Survey Report was prepared by SWCA to identify potential archaeological resources within and adjacent to the APE and assist the City in meeting the project's requirements to comply with NHPA Section 106 and CEQA, with respect to archaeological resources (source reference 21). SWCA also contacted the California Native American Heritage Commission (NAHC) requesting a search of their Sacred Lands File for traditional cultural resources. In addition to the CCIC and NAHC records searches and Native American Consultation efforts, SWCA performed an intensive pedestrian survey of the APE on March 9 and 14, 2018. The survey included all accessible areas of the APE and was accomplished using linear transects spaced no more than 2 meters apart. Within each transect, the ground surface was examined for artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, and features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, postholes, foundations) or historic debris (e.g., metal, glass, ceramics).

Archaeological Setting

The project is located within lands traditionally occupied by the Obispeño Chumash. The first permanent, non-indigenous settlement in the area occurred with the founding of Mission San Luis Obispo de Tolosa in 1771, and soon numerous troop and supply trains passed through Chumash lands on the way from San Diego to more northerly missions and outposts.

a) *No impact.* Two historic-period built environment resources were identified within the project's APE, including Prado Road Bridge and a parcel occupied by a single-family residence and commercial automotive shop, both built prior to 1970. The most recent Caltrans Historic Highway Bridge Inventory for Local Agency bridges identifies the Prado Road Bridge as a Category 5 bridge, that is, a bridge that is not eligible for listing on the NRHP. This Category 5 designation remains appropriate. Lacking both significance and integrity, the single-family residence and commercial automotive shop do not meet the eligibility criteria for listing in the NRHP or CRHR, and there is no evidence that the property otherwise constitutes a historical resource for the purposes of CEQA. In addition, no property within the project site is included in the City's Inventory of Historic Resources. Therefore, no historic properties or historical resources are present within the

APE, and the project would not cause a substantial adverse change in the significance of a historic resource; therefore, *no impacts would occur*.

b) *Less than significant with mitigation incorporated*. No archaeological resources were identified within the APE based on the background research, Native American contact, or field survey. Although the general area is considered to have an elevated sensitivity for the presence of prehistoric resources, given the lack of identified resources in the APE and the extensive level of previous disturbance at and near the existing bridge, sensitivity for unidentified resources in the APE is considered low. If previously unidentified cultural materials are unearthed during construction, mitigation measure CR-1 has been identified to require work be halted in that area until a qualified archaeologist can assess the significance of the find. With implementation of mitigation measure CR-1, potential impacts to archaeological resources would be *less than significant with mitigation incorporated*.

c) *Less than significant with mitigation incorporated*. The project site is partially located within a Burial Sensitivity Area associated with San Luis Obispo Creek identified in "Figure 1: Cultural Resources" of the City COSE. Comments received from three separate Native American contacts contacted during the preparation of the project Archaeological Survey Report expressed concern that the area is sensitive due to the project's proximity to San Luis Obispo Creek. The City also completed formal consultation efforts with one tribe in compliance with Assembly Bill 52 (see Section 18. Tribal Cultural Resources). No human remains are known to exist within the project site; however, the discovery of unknown human remains is a possibility during ground-disturbing activities. Protocol for properly responding to the inadvertent discovery of human remains is identified in State of California Health and Safety Code Section 7050.5 and is detailed in mitigation measure CR-2. With implementation of mitigation measure CR-2, potential impacts to archaeological resources would be *less than significant with mitigation incorporated*.

Mitigation Measures

CR-1 In the event that historical or archaeological remains are discovered during earth-disturbing activities associated with the project, an immediate halt work order shall be issued and the City Community Development Director and City Public Works Director shall be notified. A qualified archaeologist shall conduct an assessment of the resources and formulate proper mitigation measures, if necessary. After the find has been appropriately mitigated, work in the area may resume. A Chumash representative shall monitor any mitigation excavation associated with Native American materials.

CR-2 In the event that human remains are exposed during earth-disturbing activities associated with the project, an immediate halt work order shall be issued and the City Community Development Director and City Public Works Director shall be notified. State Health and Safety Code Section 7050.5 requires that no further disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner shall notify the Native American Heritage Commission within 24 hours.

Conclusion

With implementation of the recommended mitigation measures, the project would have a less-than-significant impact on cultural resources.

6. ENERGY

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	1, 22	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	2, 23	☐	☐	☐	☒

Evaluation

The City's current electricity provider is Central Coast Community Energy (3CE, previously known as Monterey Bay Community Power [MBCP]), which provided 31.7% renewably sourced energy to its customers in 2019 and has committed to providing 100% renewably sourced energy to City government facilities, residences, and private businesses within the city by 2030 (source reference 22).

The City COSE establishes goals and policies to achieve energy conservation and increase use of cleaner, renewable, and locally controlled energy sources. These goals include increasing the use of sustainable energy sources and reducing reliance on non-sustainable energy sources to the extent possible and encouraging the provision for and protection of solar access. Policies identified to achieve these goals include, but are not limited to, use of best available practices in energy conservation, procurement, use, and production; energy-efficiency improvements; pedestrian- and bicycle-friendly facility design; fostering alternative transportation modes; compact, high-density housing; and solar access standards.

The City Climate Action Plan for Community Recovery (2020; source reference 23) also identifies strategies and policies to increase use of cleaner and renewable energy resources in order to achieve the City's GHG emissions reduction target. These strategies include promoting a wide range of renewable energy financing options, incentivizing renewable energy generation in new and existing developments, and increasing community awareness of renewable energy programs.

a) *Less than significant impact.* During construction, fossil fuels, electricity, and natural gas would be used by construction vehicles and equipment. The energy consumed during construction would be short term and would not represent a significant or wasteful demand on available resources. During operation, the project would consist of a replaced bridge structure, improved roadways, and a restored riparian corridor. Signal modifications would include installation of one overhead streetlight at each corner and the new bridge structure would include pedestrian-scale path lights. All permanent lighting would be timed to operate during nighttime hours only and would be sourced by 3CE, which has committed to providing 100% renewably-sourced energy by 2030. The project would improve circulation and reduce congestion and associated vehicle emissions. The project would reduce long-term consumption of energy resources by improving the local transportation network and providing for more efficient vehicular travel, as well as improved bike and pedestrian transportation. Therefore, the project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be *less than significant*.

b) *No impact.* The project does not propose any new buildings or uses that would generate significant long-term operational energy demands. Signal modifications would include installation of one overhead streetlight at each corner and the new bridge structure would include pedestrian-scale path lights which has committed to providing 100% renewably-sourced energy by 2030, consistent with statewide and local energy mix goals. The project would be consistent with the goals and policies in the COSE related to increasing and improving alternative transportation infrastructure and connectivity to incentivize fewer single-user vehicle trips. The project would not conflict with other goals and policies set forth in the COSE or Climate Action Plan associated with renewable energy or energy efficiency; therefore, *no impacts would occur*.

Conclusion

The project's potential impacts related to energy would be less than significant.

7. GEOLOGY AND SOILS

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:					
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	24, 25	☐	☐	☒	☐
ii. Strong seismic ground shaking?	24, 25	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	24, 25	☐	☐	☒	☐
iv. Landslides?	24, 25	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	18, 25	☐	☒	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	24, 25, 27	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 1802.3.2 of the California Building Code (2013), creating substantial direct or indirect risks to life or property?	18, 25,	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	1	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	1, 18	☐	☐	☒	☐

Evaluation

Site Topography

The project area is relatively level, except for the incised channel for San Luis Obispo Creek, which crosses the central portion of the project. Ground surface elevations along Prado Road are approximately 138 feet above sea level; the bottom of the creek channel is 10 to 15 feet below the level of the street. Drainage across the site is by sheet flow to gutters and then to the creek.

Faulting and Seismic Activity

The City Safety Element identifies active, potentially active, and inactive mapped and inferred faults with the potential to affect the city in the event of rupture. The Los Osos Fault, adjacent to the city, is identified under the State of California Alquist-Priolo Fault Hazards Act and is classified as active. The West Huasna, Oceanic, and Edna Faults are considered potentially active and present a moderate fault rupture hazard to developments near them. The San Andreas Fault and the offshore Hosgri Fault, which present the most likely source of ground shaking for San Luis Obispo, have a high probability of producing a major earthquake

within an average lifespan. The highest risk from ground shaking is found on deep soils that were deposited by water, are geologically recent, and have many pore spaces among the soil grains. These are typically in valleys.

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

Seismic-Related Ground Failure

Settlement is defined as the condition in which a portion of the ground supporting part of a structure or facility lowers more than the rest or becomes softer, usually because ground shaking reduces the voids between soil particles, often with groundwater rising in the process. Liquefaction is the sudden loss of the soil's supporting strength due to groundwater filling and lubricating the spaces between soil particles as a result of ground shaking. Soils with high risk for liquefaction are typically sandy and in creek floodplains or close to lakes. In extreme cases of liquefaction, structures can tilt, break apart, or sink into the ground. The likelihood of liquefaction increases with the strength and duration of an earthquake. Based on the Ground Shaking and Landslide Hazards Map in the City Safety Element, the project site is located within an area with high liquefaction potential.

Slope Instability and Landsides

Slope instability can occur as a gradual spreading of soil, a relatively sudden slippage, a rockfall, or in other forms. Causes include steep slopes, inherently weak soils, saturated soils, and earthquakes. Improper grading and manmade drainage can be contributing factors. Much of the development in San Luis Obispo is in valleys, where there is low potential for slope instability. Based on the Ground Shaking and Landslide Hazards Map in the City Safety Element, the project site is located within an area with low landslide potential.

Subsidence

Land subsidence is a gradual settling or sudden sinking of the Earth's surface due to subsurface movement of earth materials. Primary causes are groundwater withdrawal, in which water is removed from pore space as the water table drops, causing the ground surface to settle, tectonic subsidence (where the ground surface is warped or dropped lower due to geologic factors such as faulting or folding), and earthquake-induced shaking that causes sediment liquefaction, which in turn can lead to ground-surface subsidence.

Soil Limiting Factors

The project site is underlain by three soil units, as described below based on the San Luis Obispo County Soil Survey (source reference 18):

- Conception loam (2 to 5 percent slopes). This very deep, moderately well-drained, gently sloping soil has very slow permeability and moderate to high available water capacity. This soil has high shrink-swell potential in the subsoil, surface runoff is slow, and the hazard of water erosion is slight. Building sites and most other engineering practices often require special design considerations because of the high shrink-well potential, low strength, and hardness to pack of the subsoil. Foundations and footings need to be designed to compensate for these soil characteristics. Local road and street design can require that the base material be replaced or covered with a more suitable material in order to reduce maintenance.
- Cropley clay (0 to 2 percent slopes). This very deep, moderately well-drained, nearly level soil has slow permeability and high available water capacity. Surface runoff is low, and the hazard of water erosion is slight. This soil has high shrink-swell potential. Foundations and footings should be designed to compensate for high shrink-swell potential and low strength. Local road and street design can require that the base material be replaced or covered with a more suitable material so that maintenance is minimized.
- Salinas silty clay loam (0 to 2 percent slopes). This very deep, well-drained, nearly level soil has moderately slow permeability and the available water capacity is high or very high. This soil has moderate shrink-swell potential, surface runoff is slow, and the hazard of water erosion is slight. The design of roads, buildings, and other structures needs to consider the low strength and moderate shrink-swell potential of this soil.

a.i-iv) *Less than significant impact.* Figure 3 of the City Safety Element (Earthquake Faults – Local Area) depicts no known fault lines on or within close proximity of the project site. Based on the Ground Shaking and Landslide Hazards Map in the City Safety Element, the project site is located within an area with high liquefaction potential and low landslide potential.

The replacement bridge structure would be designed in compliance with seismic design criteria set out in the California Building Code (CBC) to adequately withstand and minimize the risk associated with seismic ground shaking and seismic-related ground failure, including liquefaction, and soil stability, including landslides. Development of the project would also be required to meet or exceed the most current requirements of the American Association of State Highway and Transportation Officials (AASHTO), which have been developed to establish the minimum requirements necessary for bridge design to safeguard the public health, safety, and general welfare through structural strength, stability, access, and other standards. The bridge would also be designed to meet Caltrans Seismic Design Criteria (SDC). Compliance with AASHTO, Caltrans, and CBC standards would demonstrate that risks related to seismic land failure, seismic ground shaking, seismic-related ground failure, and landslide were properly safeguarded against. Therefore, impacts related to causing substantial adverse effects involving rupture of a known earthquake fault would be *less than significant.*

b) *Less than significant impact with mitigation incorporated.* The proposed bridge replacement and road improvements would require grading, tree and vegetation removal, excavation, and placement of fill materials that could result in temporary soil erosion, sedimentation, and/or stormwater runoff. Proposed restoration of the 0.753-acre mitigation area would also result in vegetation removal that could temporarily increase the potential for soil erosion or loss of topsoil. Based on the NRCS Soil Survey, on-site soils have low erosion potential. No permanent substantial changes in existing topography would occur and all surfaces within the bridge and road improvement areas would be restored to pre-project conditions to the extent feasible upon completion of construction activities. Native riparian vegetation would be planted throughout the 0.753-acre mitigation area. The potential for construction-related erosion, sedimentation, or siltation would be mitigated through compliance with identified mitigation measures BR-17, BR-33 through BR-35, BR-37 through BR-39, and BR-41. With implementation of these measures, potential impacts would be *less than significant with mitigation incorporated.*

c) *Less than significant impact.* Based on the Ground Shaking and Landslide Hazards Map in the City Safety Element, the project site is located within an area with low landslide potential and high liquefaction potential. Based on the USGS Areas of Land Subsidence in California Map, the project is not located in an area of current or historical land subsidence. The project would be required to comply with CBC, AASHTO, and Caltrans seismic design requirements to address and safeguard against potential seismic-related ground failure including lateral spreading, subsidence, liquefaction, or collapse. Therefore, potential impacts related to on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse would be *less than significant.*

d) *Less than significant impact.* Based on the Soil Survey of San Luis Obispo County and Web Soil Survey, the project site is located in an area underlain by soils with moderate to high shrink-swell potential. The project would be designed in compliance with AASHTO, Caltrans, and CBC requirements to compensate for the expansive nature of the soils and properly safeguard public health and safety against potential associated risks. Therefore, potential impacts related to expansive soils would be *less than significant.*

e) *No impact.* The project consists of a bridge replacement, roadway improvements, and extension of a recreational trail. The project does not involve the installation of any septic or other wastewater disposal system. Therefore, *no impacts would occur.*

f) *Less than significant impact.* No known paleontological resources are known to exist in the project area and the project site does not contain any unique geologic features. The project does not include substantial grading or earthwork that would significantly disturb the underlying geologic formation in which paleontological resources may occur. Therefore, potential impacts on paleontological resources would be *less than significant.*

Mitigation Measures

Incorporate measures **BR-17**, **BR-33** through **BR-37**, and **BR-40.**

Conclusion

The project site is not located within a known fault zone, area of high risk of landslide, or area of land subsidence. The project would be required to comply with AASHTO, Caltrans, and CBC requirements, which have been developed to properly safeguard against seismic and geologic hazards. The project would incorporate standard BMPs and mitigation measures to reduce the potential for erosion, sedimentation, and siltation; therefore, with implementation of identified mitigation, potential impacts related to geology and soils would be less than significant.

8. GREENHOUSE GAS EMISSIONS

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	11, 23	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	11, 13, 23	☐	☐	☒	☐

Evaluation

GHGs are any gases that absorb infrared radiation in the atmosphere, and are different from the criteria pollutants discussed in Section 3, Air Quality. The primary GHGs that are emitted into the atmosphere as a result of human activities are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. The City of San Luis Obispo 2005 Community Wide GHG emissions inventory showed that 50% of the city's GHG emissions came from transportation, 22% came from commercial and industrial uses, 21% came from residential uses, and 7% from waste (source reference 23).

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

The City of San Luis Obispo Climate Action Plan for Community Recovery (CAP; 2020) is a long-range plan to reduce GHG emissions from City government operations and community activities. Implementation of the CAP is also intended to help achieve multiple community goals such as lowering energy costs, reducing air pollution, and supporting local economic development. The CAP was prepared with the goal of achieving carbon neutrality by 2035. The CAP includes measures to reduce communitywide GHG emissions by 45 percent below 1990 levels by 2030 and 66 percent below 1990 levels by 2035, which is consistent with California's goal of reducing GHG emissions to 40 percent below 1990 levels by 2030 (source reference 23).

a) *Less than significant impact.* Construction activities would generate GHG emissions through the use of heavy-duty equipment and vehicle trips for workers and construction materials. Annual GHG emissions were projected using emission factors and calculations within the Roadway Construction Emissions Model and compared to existing conditions and no project scenarios, summarized in Table 5 below.

Table 5. Annual GHG Emissions Comparison

Scenario	Greenhouse Gas Emissions (Metric Tons)

Existing Condition (2018)	113
No project (2035)	866
Project[1] (2035)	470

[1] Project emissions include mobile sources and amortized construction sources.

Source Number 11.

As shown in Table 5, the proposed project would eventually result in the generation of more GHG emissions than the Existing/Baseline condition in 2018 due to increased traffic volumes. However, the proposed project would result in less emissions than the no project condition because of improvements in vehicle delay and alternative transportation (bike/pedestrian) facilities. The project also includes restoration and enhancement of a 0.753-acre mitigation area located within the Righetti Ranch development area that would result in overall increased area of native riparian vegetation, resulting in an incremental overall increase in carbon sequestration in that area. Therefore, potential impacts related to generation of GHG emissions would be *less than significant.*

b) *Less than significant impact.* Appendix C of the 2020 CAP includes thresholds and guidance for the preparation of GHG emissions analysis under CEQA for projects within the city. To support progress toward the City's long-term aspirational carbon neutrality goal, plans and projects within the city that undergo CEQA review need to demonstrate consistency with targets in the CAP, a Qualified GHG Emissions Reduction Plan, consistent with CEQA Guidelines Section 15183.5. According to the adopted SLOAPCD guidance, if a project is consistent with a qualified GHG reduction strategy, such as the City's 2020 CAP, the project would not result in a significant impact. Projects that are consistent with 2014 General Plan land use and zoning designations can utilize the City's CEQA GHG Emissions Analysis Compliance Checklist to demonstrate consistency with the CAP's GHG emissions reduction strategy. Based on the analysis provided in Table 6 below, the project would be consistent with the City's GHG Emissions Analysis Checklist.

Table 6. Project Consistency with the City's Climate Action Plan

Climate Action Plan Measures	Project Consistency
Clean Energy Systems	
Does the Project include an operational commitment to participate in Central Coast Community Energy?	**Consistent**. The project's operational energy demand associated with pedestrian-level lighting along the bridge structure and street lighting at the South Higuera Street/Prado Road intersection would be served by Central Coast Community Energy.
Green Buildings	

Does the Project exclusively include "All-electric buildings"? For the purpose of this checklist, the following definitions and exemptions apply: *All-electric building.* A new building that has no natural gas plumbing installed within the building and that uses electricity as the source of energy for all space heating, water heating, cooking appliances, and clothes drying appliances. An All-Electric Building may be plumbed for the use of natural gas as fuel for appliances in a commercial kitchen. Specific exemptions to the requirements for all - electric buildings include: . Commercial kitchens a. The extension of natural gas infrastructure into an industrial building for the purpose of supporting manufacturing processes (i.e. not including space conditioning). b. Accessory Dwelling Units that are attached to an existing single-family home. Essential Service Buildings including, but not limited to, public facilities, hospitals, medical centers and emergency operations centers. c. Temporary buildings. d. Gas line connections used exclusively for emergency generators. e. Any buildings or building components exempt from the California Energy Code. f. Residential subdivisions in process of permitting or constructing initial public improvements for any phase of a final map recorded prior to January 1, 2020, unless compliance is required by an existing Development Agreement. If the proposed project falls into an above exemption category, what measures are applicants taking to reduce onside fossil fuel consumption to the maximum extent feasible? If not applicable (N/A), explain why this action is not relevant.	**Consistent/Not Applicable**. The project would include replacement of an existing bridge structure and various roadway, pedestrian, and bicycle facility improvements. No new habitable structures would be constructed as part of the project.
Climate Action Plan Measures	**Project Consistency**
Connected Community	
Does the Project comply with requirements in the City's Municipal Code with no exceptions, including bicycle parking, bikeway design, and EV charging stations?	**Consistent**. The project has been designed to comply with the requirements in the City's Municipal Code and would be required to demonstrate compliance with applicable City Municipal Code requirements related to bicycle parking, bikeway design, and pedestrian infrastructure design.
Is the estimated Project-generated Vehicle Miles Traveled (VMT) within the City's adopted thresholds, as confirmed by the City's Transportation Division?	**Consistent**. The City's Transportation Impact Study Guidelines states that no standardized thresholds have been defined for induced travel impacts and recommends a case-by-case evaluation. Based on the
If "No", does the Project/Plan include VMT mitigation	

strategies and/or a Transportation Demand Management (TDM) Plan approved by the City's Transportation Division?	traffic analysis prepared for this project, the project would not result in a significant increase in regional VMT (source reference 53, see Section 17 Transportation for further discussion).
Does the Project demonstrate consistency with the City's adopted Active Transportation Plan?	**Consistent.** Consistent with the City's Active Transportation Plan, which identifies future plans for physically separated bicycle facilities on both sides of the Prado Road corridor, the replacement bridge would include a 13-foot-wide raised surface for Class IV bikeways (protected bike lanes). The proposed project would also construct protected bicycle intersection improvements at the Prado Road/South Higuera Street intersection with high-visibility crossing markings for pedestrians and cyclists, which would provide an improved crossing opportunity for pedestrians and bicyclists.
Circular Economy	
Will the Project subscribe all units and/or buildings to organic waste pick up and provide the appropriate on-site enclosures consistent with the provisions of the City of San Luis Obispo Development Standards for Solid Waste Services? Please provide a letter from San Luis Garbage company verifying that the project complies with their standards and requirements for organic waste pick up.	**Consistent/Not Applicable**. The project does not include the construction of new habitable structures.
Natural Solutions	
Does the Project comply with Municipal Code requirements for trees?	**Consistent**. The project would be subject to all tree removal and replacement planting regulations cited within the City Municipal Code.

Construction of the project would be required to be conducted in accordance with the 2019 California Green Building Standards Code (CALGreen) and other applicable policies for equipment use, energy sources, and construction waste diversion. As discussed in threshold a above, the project would provide new pedestrian and bicycle infrastructure, which would be consistent with the City's Climate Action Plan goals for investing in bicycle infrastructure and development of complete streets. The project would not conflict with SB 32, SLOCOG's 2019 Regional Transportation Plan, or other statewide, regional, or local plans or policies intended to reduce GHG emissions. The project would be consistent with the City's 2020 CAP, a qualified GHG reduction strategy pursuant to CEQA Guidelines Section 15183.5; therefore, impacts would be *less than significant.*

Conclusion

The project would not generate significant GHG emissions above existing levels and would not exceed any applicable GHG thresholds, contribute considerably to cumulatively significant GHG emissions, or conflict with plans adopted to reduce GHG emissions. Therefore, potential impacts related to GHG emissions would be less than significant and no mitigation measures are necessary.

9. HAZARDS AND HAZARDOUS MATERIALS

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	1	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	1, 25. 27	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	1	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	27, 28, 29, 30	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	31, 32	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	33	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	1	☐	☐	☒	☐

Evaluation

Based on a review of the State Water Resources Control Board (SWRCB) Geotracker database, California Department of Toxic Substance Control (DTSC) EnviroStor database, and California Environmental Protection Agency (CalEPA) Cortese list website, there are no active hazardous waste cleanup sites within the project site or immediately surrounding areas. The closest cleanup sites are located approximately 230 feet south of the project site, 150 feet north of the project site, and 450 feet south of the project site, and each of these cleanup sites have been closed and remediated to the satisfaction of regulatory agency staff.

Earth Systems Pacific prepared a Phase 1 ISA for the proposed project in 2015 in order to evaluate the potential for the presence of soil or groundwater contamination that may be present within the project site or property, and the potential effect on the project (source reference 27). This assessment identified several potential environmental concerns and Recognized Environmental Conditions (RECs) that could affect the proposed project, including aerially deposited lead, former/existing service stations, and road striping.

The project site is located within the San Luis Obispo Regional Airport Land Use Plan (ALUP). Based on the ALUP, the project is located within both the projected 50-dB and 55-dB airport noise contours and within the 75-a-weighted decibel (dBA) single-event noise at ground-level contour (source reference 31).

a) *Less than significant impact.* The project site, US 101, and local roadways within the project area (e.g., South Higuera Street, Tank Farm Road) are currently used for the routine vehicle transport of potentially hazardous materials. While vehicles transporting hazardous materials may utilize the new Prado Road Bridge, the project would not increase, encourage, or otherwise facilitate this use above existing levels in the area. No long-term operational impacts related to the routine transport, handling, or disposal of hazardous materials would result from the proposed project; therefore, potential impacts would be *less than significant*.

b) *Less than significant with mitigation incorporated.* Oils, gasoline, lubricants, fuels, and other potentially hazardous substances would be used and stored temporarily on-site during construction activities associated with the bridge replacement and road improvements. Fuel for vegetation removal equipment may be used during restoration activities at the 0.753-acre mitigation area located within the Righetti Ranch development area. There is the potential for leaks or spills of these substances to occur during construction, which could result in adverse effects to the public or the environment within certain areas of project vicinity, such as San Luis Obispo Creek or the Bob Jones Bike Trail. Use of these substances would be temporary and limited to the 18- to 24-month construction period. Storage and use of potentially hazardous materials would be subject to standard CBC and Uniform Fire Code requirements for the handling of hazardous materials. Mitigation measures BR-40, BR-42, and HAZ-1 have been identified to require the preparation of a Hazardous Materials Response Plan, identify the proper procedures to promptly and effectively respond to any leak or spill events, and restrict cleaning and refueling of vehicles to a specific staging area throughout the construction period.

The Phase 1 ISA prepared for the project identified several RECs related to the current or past use of hazardous materials or petroleum products on or near the project site that the project may have the potential to disturb and potentially result in an accidental release of hazardous materials. These RECs included identification of the potential for aerially deposited lead to be present within soils located along the road shoulders of the project site, the potential for hydrocarbon-contaminated soil to be present within the area proposed for new right-of-way, and the potential for existing road striping to contain elevated levels of potentially hazardous metals. Mitigation measures HAZ-2 and HAZ-3 have been identified to require soil testing of the area proposed for new right-of-way and testing of the existing yellow traffic striping and similar pavement marking materials for analytes to confirm presence or absence of existing hazardous materials and remove them according to Caltrans requirements.

The existing structure located on-site was constructed in 1957 and may have the potential to include asbestos-containing materials, lead-based paint, creosote, and deposited oils, lubricants, and other heavy metals. Demolition of this structure may have the potential to result in harmful emissions of these hazardous materials into the environment. Mitigation measure AQ-3 has been identified to ensure compliance with applicable regulatory requirements for removal and disposal of these toxic contaminants if present on-site, including notification of the SLOAPCD prior to demolition of the existing structure. Therefore, potential impacts related to release of hazardous materials into the environment through reasonably foreseeable upset and accident conditions would be *less than significant with mitigation incorporated.*

c) *No impact.* The project site is not located within 0.25 mile of an existing or proposed school facility. The nearest school facility is Pacific Beach High School, located approximately 0.7 mile to the southwest of the project site. Therefore, *no impacts would occur*.

d) *Less than significant.* Based on a search of the SWRCB Geotracker database, DTSC EnviroStar database, and CalEPA Cortese List website, there are no active hazardous waste cleanup sites within the project site. Therefore, potential impacts would be less than significant.

e) *Less than significant impact.* The project site is located within the 50- and 55-dB airport noise contour areas designated in the San Luis Obispo Regional Airport Land Use Plan (ALUP) and within the 75-dB single-event noise at ground-level contour. Based on the Center for Disease Control and Prevention (CDC) National Institute for Occupational Safety and Health (NIOSH), noise levels above 85 dB are considered hazardous for worker health and safety. Maximum noise levels from airplanes taking off and landing at the airport would not exceed 75 dB at ground level and would be periodic in nature. Therefore, project construction employees would not be exposed to excessive noise from the nearby airport that would result in a health or safety hazard. The project would not result in a change to existing uses and would not create a hazard to employee safety due to proximity to the regional airport. Therefore, impacts related to safety hazards or excessive noise due to proximity to an airport would be *less than significant*.

f) *Less than significant impact.* The project bridge replacement activities would be located on a portion of Prado Road that is in proximity to the northbound US 101 on- and off-ramps. Based on the Diablo Canyon Emergency Planning Zone (EPZ) Map, US 101 is a designated evacuation route. The project would result in the full closure of the bridge during the 18- to 24-month construction period, which would have the potential to physically interfere with emergency evacuation in the area in the event of an emergency. However, evacuees would maintain access to an alternative route to access the US 101 northbound on-ramp located approximately 0.65 mile north of the project site using Elks Lane, and two other US 101 northbound on-ramps are located within 1 mile of the project site. In addition, the project would include temporary improvements to surrounding intersections such as signal timing optimization, temporary restriping, installation of a temporary traffic signal at the Higuera Street/Elks Lane intersection, and installation of detour and other message signs in order to reduce congestion resulting from bridge closure (see Section 17. Transportation for more information). Therefore, due to the temporary nature of proposed road closures and availability of alternative evacuation routes within close proximity of the project site, impacts related to implementation of or interference with an emergency response or evacuation plan would be *less than significant*.

g) *Less than significant.* The project is located within an urbanized area of the city with dense riparian vegetation located along the San Luis Obispo Creek corridor. During construction, use of flammable materials on-site may result in the temporary increase of fire risk. However, the construction site would be equipped with proper fire prevention equipment and mitigation measures BR-40 and HAZ-1 have been identified to require the preparation of a Hazardous Materials Response Plan to allow for a prompt and effective response to any accidental spills. During operation, the new bridge structure and other roadway improvements would not result in an exacerbation of fire risk within the project vicinity. The project is not located in an urban-wildland interface area and impacts related to exposure of people or structures to significant risks involving wildland fires would be *less than significant*.

Mitigation Measures

Implement mitigation measure **AQ-3**, **BR-40**, and **BR-42**

HAZ-1 All project-related spills or leaks of hazardous materials shall be cleaned up immediately. Spill prevention and clean-up materials shall be located on-site at all times during construction.

HAZ-2 Prior to issuance of construction permits, soil sampling shall be conducted in areas of the South Higuera Street right-of-way where soil disturbance or excavation is proposed for the presence of hazardous materials, including aerially deposited lead (ADL) and hydrocarbons. Soil sampling shall be conducted by a licensed geologist or other qualified professional as approved by the City. ADL sampling shall focus on unpaved areas and formerly unpaved areas within the right-of-way and shall be conducted in accordance with current Caltrans guidance documents. Analytes to be targeted should include gasoline-, diesel-, and oil-range hydrocarbons; volatile organic compounds; and fuel oxygenates. If contaminated soil is present, the appropriate abatement actions shall be implemented in accordance with applicable Caltrans Standard Special Provisions and other applicable standards.

HAZ-3 A Soil Management Plan and Health and Safety Plan shall be developed for the project to ensure contaminated soils excavated during project construction are handled, stockpiled, and disposed of in accordance with federal, state, and local regulations. Special handling, treatment, or disposal of ADL in soils during construction activities shall be consistent with the DTSC and Caltrans Soil Management Agreement for Aerially Deposited Lead-Contaminated soils (effective July 1, 2016).

HAZ-4 Prior to issuance of construction permits, yellow traffic striping and similar pavement parking materials shall be tested for presence of elevated levels of metals that would require removal and special disposal measures during construction per Caltrans Standard Special Provisions and other applicable standards.

Conclusion

The project does not propose the routine transport, use, handling, or disposal of hazardous substances during operation. The project site is not located within proximity to any active hazardous waste cleanup sites and mitigation has been identified to reduce potential impacts related to accidental spill or leak of hazardous substances during construction and proper testing and removal of potentially hazardous substances that may be present within the project site. Upon implementation of mitigation

measures AQ-3, BR-40, BR-42 and HAZ-1 through HAZ-4, impacts associated with hazards and hazardous materials would be less than significant.

10. HYDROLOGY AND WATER QUALITY

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	1, 16	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	1, 34, 35	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
i. Result in substantial erosion or siltation on or off site;	1, 16, 36	☐	☒	☐	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	1, 16, 36	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	1, 35, 36	☐	☐	☒	☐
iv. Impede or redirect flood flows?	1, 2, 16, 36	☐	☒	☐	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	1, 37, 38	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	2, 16, 34, 39, 40	☐	☒	☐	☐

Evaluation

The San Luis Obispo Creek watershed is an approximately 53,271-acre coastal basin in southern San Luis Obispo County, which rises to an elevation of about 2,500 feet above sea level in the Santa Lucia Range. San Luis Obispo Creek flows to the Pacific Ocean and has six major tributary basins: Stenner Creek, Prefumo Creek, Laguna Lake, East Branch San Luis Obispo Creek, Davenport Creek, and See Canyon. The creek flows through the city and empties into the Pacific Ocean just west of Avila Beach (source reference 16).

USACE regulatory jurisdiction under Section 404 of the Clean Water Act (CWA) extends to work in, over, and under waters of the United States that results in a discharge of dredged or fill materials within USACE jurisdiction. San Luis Obispo Creek is considered jurisdictional waters of the United States by the USACE. Section 401 of the CWA functions to ensure that federally permitted activities comply with the federal CWA and other state-mandated water quality laws. Section 401 is implemented through a review process that is conducted by the RWQCB and is typically triggered by the Section 404 permitting process. The RWQCB issues a Water Quality Certification via the Section 401 process that ensures a proposed project complies with

applicable effluent limitations, water quality standards, and other conditions of state law. Evaluating the effects of the project on both water quality and quantity (runoff) falls under the jurisdiction of the RWQCB.

Under the Porter-Cologne Act, "waters of the State" fall under the jurisdiction of the SWRCB and RWQCBs. The RWQCBs must prepare and periodically update water quality control basin plans. Each basin plan sets forth water quality standards for surface water and groundwater, as well as actions to control non-point and point sources of pollution to achieve and maintain these standards. In most cases, the RWQCBs seek to protect these beneficial uses by requiring the integration of water quality control measures into projects that would result in discharge into waters of the State.

The San Luis Obispo Creek Watershed Enhancement Plan was prepared to guide local restoration partners and provide recommendations for continued enhancement projects within the San Luis Obispo Creek watershed. This plan also identifies critical issues facing the watershed such as degradation of steelhead trout instream habitat and prevalence of migration barriers, low-quality riparian vegetation buffers, and surface water quality, and identifies recommendations to address them. Lastly, the plan identifies specific restoration and enhancement projects based on the critical issues identified (source reference 37).

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

Based on the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer (NFHL) Viewer, a portion of the project site is within a 100-year flood zone. The FEMA 100-year flood zone identifies areas that would be subject to inundation in a 100-year storm event, or a storm with a 1% chance of occurring in any given year.

In 2015, the state legislature approved the Sustainable Groundwater Management Act (SGMA). SGMA requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans (source reference 34). The project is located within the San Luis Obispo Valley Groundwater Basin, which has been designated by the California Department of Water Resources (DWR) as a high-priority basin. The County and City formed Groundwater Sustainability Agencies (GSAs) within their respective jurisdictions to ensure full compliance with SGMA throughout the entire San Luis Obispo Valley Groundwater Basin.

a) *Less than significant with mitigation incorporated.* During construction, water quality of San Luis Obispo Creek could be impacted by the use of hazardous substances within the creek channel and increased potential for erosion, sedimentation, and stormwater runoff. The largest percentage of construction pollutants would be sediment, construction debris from demolished structures, and dust generated during excavation, grading, hauling, demolition, and various other activities. These impacts would be limited in nature by the scope and length of the construction activities and further minimized by implementation of standard construction pollution prevention standards and BMPs required by the Central Coast RWQCB. As the project would disturb more than 1 acre of soil, the project would be required to obtain a Construction Storm Water General Permit and prepare a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would be required to identify all potential pollutants and their sources, including sediment associated with construction, and site-effective BMPs to reduce or eliminate pollutant discharges from construction activities and after construction is completed.

   Once operational, the replacement bridge could impact the water quality of San Luis Obispo Creek through the residual release of pollutants from vehicles such as oil, grease, sediments, or heavy metals. The proposed project would manage and treat contaminated storm flows consistent with current regulations, which would reduce the potential for contamination over existing conditions. Potential impacts would be minimized by post-construction pollution prevention standards to control potential discharges of pollutants. Mitigation measures BR-13, BR-17, BR-23, BR-24, BR-35 BR-37 through BR-44, and HAZ-1 through HAZ-3 would further reduce potential impacts to surface and groundwater quality by requiring measures including, but not limited to, equipment fueling and staging setbacks from aquatic habitats, implementation of erosion and sedimentation BMPs, preparation of a Hazardous Materials Response Plan and a SWPPP, and immediate disposal of construction trash and debris. Through implementation of construction and project design-level BMPs, a SWPPP, and mitigation measures BR-13, BR-17, BR-23, BR-24, BR-35, BR-37 through BR-44, and HAZ-1 through

HAZ-3, potential impacts associated with degradation of surface or groundwater quality would be reduced to *less than significant with mitigation incorporated*.

b) *Less than significant impact.* The project would result in an overall increase of the impervious surface area within the project site by replacing the existing bridge with a wider structure, implementing roadway improvements, and modifying the Bob Jones Bike Trail. This would result in an increase in the volume and rate of runoff and, if not managed properly, a slight reduction in groundwater recharge within the project site compared to existing conditions. The project would be required to comply with the Central Coast RWQCB's Post Construction Stormwater Management requirements, which would include implementation of measures for runoff retention on-site.

The proposed project would not use groundwater at the site during operation. The proposed project would utilize minimal amounts of water during construction activities for dust management and other incidental uses, but would not otherwise generate any long-term demand in water supply. There is a construction water well adjacent to the City's wastewater treatment facility in the immediate vicinity of the project, and the City can coordinate with the Utilities Department to secure additional City water supplies to serve project demands. Therefore, there is existing City water available, both recycled and potable, in the project limits to support construction activities, as necessary. Therefore, the project would not substantially affect groundwater supplies or interfere substantially with groundwater recharge and impacts would be *less than significant.*

c.i) *Less than significant with mitigation incorporated.* San Luis Obispo Creek is likely to have some water flowing through the channel during the 18- to 24-month construction schedule. Therefore, it is likely that a diversion of the water would be required to allow construction workers and equipment access to do the necessary work. A temporary culvert, consisting of approximately two 36-inch pipes, would be used to divert summer flows away from the work area and downstream. The pipes would be approximately 525 feet long and installed through the upstream and downstream berms running parallel to the direction of flow. The overall length of the diversion system may be shorter depending on the construction staging over two seasons of construction. The pipes would have 6 × 6-inch holes cut into the top every 50 feet to be used as inspection ports to verify proper flow of water, identify blockages, and verify fish and wildlife passage through the system.

A geo-textile bag filter may be used at the discharge point of the sump pump to prevent erosion/scour and to ensure proper sediment filtration. A qualified biologist would monitor the pump intake and outfall during dewatering to log visible water characteristics including soil erosion, sedimentation, and turbidity. As the project would disturb more than 1 acre of soil, the project would be required to prepare a SWPPP and site-effective BMPs to reduce or eliminate pollutant discharges both from construction activities and after construction is completed including sedimentation and erosion control measures. Mitigation measures BR-17, BR-23, BR-36, BR-38, and BR-40 would further reduce potential impacts associated with sedimentation and erosion control from work within the creek by requiring work to be conducted within the dry season, implementation of BMPs, and revegetation of disturbed areas.

Proposed restoration and enhancement of the 0.753-acre mitigation area may also have the potential to result in temporary soil erosion, but would overall increase the area of vegetation along the creek corridor. Implementation of measures BR-17, BR-23, BR-36, BR-38, and BR-40 would effectively reduce temporary impacts associated with erosion at this location during restoration activities. Therefore, impacts associated with alteration of drainage patterns and/or streams resulting in sedimentation or erosion would be *less than significant with mitigation incorporated*.

c.ii) *Less than significant impact.* As discussed in threshold c.i above, during construction, the project would result in the diversion of surface water within San Luis Obispo Creek through a temporary culvert. Compliance with applicable design standards and Caltrans requirements indicates that potential risks to people and structures, including those related to on- or off-site flooding, were properly safeguarded against during the project design phase. The project would increase the channel opening under the bridge crossing and lower the water surface elevation for the 50- and 100-year flows compared to the existing conditions due to the removal of existing supports placed in the creek bed that are a part of the existing bridge structure. Therefore, the project would improve flood capacity and would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, and impacts would be *less than significant.*

c.iii) *Less than significant impact.* The project would result in an overall increase of the impervious surface area of the project site, which would result in an overall increase in the rate and volume of stormwater runoff within the area. The project

would be required to comply with the Central Coast RWQCB's Post Construction Stormwater Management requirements, which would include implementation of measures for runoff retention on-site. The project site provides limited opportunities for many typical retention and infiltration devices due to limited landscaped area in the right of way and/or at low elevation points, congestion of underground utilities, low infiltrating clay soils, and proximity to the top of the existing creek bank. Therefore, the project proposes to collect stormwater and provide water quality treatment before the water is discharged into San Luis Creek. The proposed stormwater management design includes bioretention areas and a stormwater quality treatment unit. Therefore, the project would not result in the creation or contribution of runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Through compliance with existing regulations, potential impacts would be *less than significant*.

c.iv) *Less than significant with mitigation incorporated.* As discussed in threshold c.i above, the project would result in the diversion of San Luis Obispo Creek water flow through a temporary culvert. This has the potential to redirect flood flows if in place during a large precipitation event. Mitigation measure BR-37 has been identified to require construction activities within jurisdictional areas to be conducted during the dry season when stream flows would be at annual lows (June 15 through October 31) in any given year, or as otherwise directed by applicable regulatory agencies. This would preclude stream diversion activities from occurring during the wet season during which flood flows may occur. Diversion pipes would be removed during the winter when construction activities would not be occurring within the creek channel. Therefore, impacts associated with alteration of a stream and redirection of flood flows would be *less than significant with mitigation incorporated.*

d) *Less than significant.* Based on the FEMA NFHL Viewer, a portion of the project site is within a 100-year flood zone. The new bridge structure and other project components within the flood zone would be designed according to ASSHTO and Caltrans standards to accommodate 100-year storm conditions. San Luis Obispo Creek would be diverted and dewatered during project construction; however, flows would be restored to their natural contour upon completion of construction. Diversion would occur during the dry season and would not substantially affect flooding potential in surrounding areas.

The project is not located in close proximity to any standing body of water that could be subject to seiches. The project is not located in an area that could be inundated by a tsunami event. Therefore, impacts related to release of pollutants due to flooding or inundation would be *less than significant.*

e) *Less than significant with mitigation incorporated.* As discussed in threshold b, above, the project would not result in a substantial increase of impervious surface area or groundwater pumping that would impede groundwater recharge. The proposed project would not use groundwater at the site and would only use water for dust management and other incidental uses. Therefore, the project would not conflict with SGMA.

During construction, water quality of San Luis Obispo Creek could be impacted by the use of hazardous substances within the creek channel and increased potential for erosion, sedimentation, and stormwater runoff. Potential impacts would be minimized by post-construction pollution prevention standards to control potential discharges of pollutants and mitigation measures BR-13, BR-17, BR-23, BR-24, BR-35, BR-37 through BR-44, and HAZ-1 through HAZ-3 would further reduce potential impacts to surface and groundwater quality by requiring measures including, but not limited to, equipment fueling and staging setbacks from aquatic habitats, implementation of erosion and sedimentation BMPs, preparation of a Hazardous Materials Response Plan and a SWPPP, and immediate disposal of construction trash and debris. Implementation of these measures would be consistent with protecting San Luis Obispo Creek's beneficial uses and maintaining the creek's water quality objectives outlined in the Central Coast Basin Plan. Mitigation measures to facilitate fish migration through the project site during construction, minimize water quality impacts, and restore riparian habitat on- and off-site would be generally consistent with the recommendations identified in the San Luis Obispo Creek Watershed Enhancement Plan as well as watershed management and water quality goals and policies identified in the City COSE. Therefore, with implementation of mitigation measures, the project would not result in a conflict with of a water quality control plan or sustainable groundwater management plan and impacts would be *less than significant with mitigation incorporated*.

Mitigation Measures

Implement mitigation measures **BR-13**, **BR-17**, **BR-23**, **BR-24**, **BR-35**, **BR-37** through **BR-44**, and **HAZ-1** through **HAZ-3**.

Conclusion

With the incorporation of these measures, residual impacts related to hydrology and water quality would be less than significant.

11. LAND USE AND PLANNING

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a) Physically divide an established community?	1, 8	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	1, 8	☐	☐	☐	☒

Evaluation

The project site is primarily located within public right-of-way along Prado Road and South Higuera Street and is surrounded by uses zoned as Public Facility (PF), Office (O), Service Commercial (C-S), and Medium Density Residential (R-2).

a-b) *No impact.* The project includes the replacement of an existing structurally deficient bridge and various roadway improvements to sufficiently accommodate multimodal transportation and current and future traffic flows. The project would not physically divide an established community. The project has been and would be designed, constructed, and operated in compliance with the policies of the City's General Plan and with the standards and limitations of the City's Zoning Regulations. The project would not divide an established community or conflict with land use plans or policies; therefore, *no impacts would occur*.

Conclusion

The project does not have the potential to physically divide an established community or cause a significant environmental impact due to a conflict with any land use plan or policy; therefore, no mitigation measures are necessary.

12. MINERAL RESOURCES

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	2	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	2	☐	☐	☐	☒

Evaluation

Based on the City COSE, mineral extraction is prohibited within city limits.

a-b) *No impact.* No known mineral resources are present within the project site and future extraction of mineral resources is very unlikely due to the urbanized nature of the area; therefore, *no impacts would occur*.

Conclusion

No impacts to mineral resources were identified; therefore, no mitigation measures are necessary.

13. NOISE

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	6, 42, 43, 44, 45	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	42, 45, 46, 47	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	31, 32,45	☐	☐	☒	☐

Evaluation

The project site's ambient noise environment is generally dominated by vehicles travelling along South Higuera Street and Prado Road as well as vehicle queues that form at the intersection of these two roadways. Based on the City Land Use Circulation Element Program EIR, the community noise equivalent level (CNEL) at 50 feet from the roadway centerline of Prado Road within the project site is 65 decibels (dB) (source reference 41). Existing CNEL 50 feet from the roadway centerline of South Higuera Street within the project site is 70 dB (source reference 41). The City Noise Element establishes standards for maximum

acceptable noise levels associated with stationary and transportation sources in proximity to noise-sensitive uses. New noise-sensitive development shall be located and designed to meet the maximum outdoor and indoor exposure levels detailed in Table 7.

Table 7. Maximum Noise Exposure for Noise-Sensitive Uses due to Transportation Noise Sources

Noise-Sensitive Use	Outdoor Activity Areas[1]	Indoor Spaces		
	L_{dn} or CNEL in dB	L_{dn} or CNEL in dB	L_{eq} in dB[2]	L_{max} in dB[3]
Residences, hotels, motels, hospitals, nursing homes	60	45	--	60
Theaters, auditoriums, music halls	--	--	35	60
Churches, meeting halls, office building, mortuaries	60	--	45	--
Schools, libraries, museums	--	--	45	60
Neighborhood parks	65	--	--	--
Playgrounds	70	--	--	--

Notes: L_{dn} = day-night average sound level, CNEL = Community Noise Equivalent Level, L_{eq} = equivalent continuous sound level, L_{max} = maximum sound level

[1] If the location of outdoor activity areas is not shown, the outdoor noise standard shall apply at the property line of the receiving land use.

[2] As determined for a typical worst-case hour during periods of use.

[3] L_{max} indoor standard applies only to railroad noise at locations south of Orcutt Road.

The City Noise Element also identifies Policy 1.4 regarding noise created by new transportation sources, including road, railroad, and airport expansion projects, which states noise from these sources shall be mitigated to not exceed the levels specified in Table 7 for outdoor activity areas and indoor spaces of noise-sensitive land uses, which were established before the new transportation noise source.

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

Because the project would be partially funded through the FHWA HBP, the project would also be subject to 23 CFR 772, which provides procedures for preparing operational and construction noise studies and evaluating noise abatement considered for federal and federal-aid highway projects. According to 23 CFR 772, all highway projects that are developed in conformance with this regulation are deemed to be in conformance with FHWA noise standards.

In accordance with Caltrans Traffic Noise Analysis Protocol for New Highway Construction and Reconstruction, Retrofit Barrier Projects (Protocol), noise abatement components must be considered for reasonableness and feasibility as required by 23 CFR 772 and the Protocol. Overall reasonableness of noise abatement measures is determined by the noise reduction design goal and the cost of noise abatement per a Noise Abatement Decision Report (NADR). The NADR prepared for the project found a noise barrier abatement measure was reasonable for residences on the northeast corner of the intersection. The next step was to survey the viewpoints of the benefitted receptors (including property owners and residents of benefitted receptors) to determine if those stakeholders wanted the noise barrier to be constructed. Survey results concluded that a majority of the stakeholders were in

favor of the construction of a noise barrier; therefore, this document includes evaluation of environmental impacts of the project including construction of the noise barrier.

The project would also be subject to Caltrans construction noise and groundborne vibration standards. Caltrans Standard Specifications Section 7-1.01I, "Sound Control Requirements," states that noise levels generated during construction shall comply with applicable federal, state, and local regulations, and that all equipment shall be fitted with adequate mufflers according to the manufacturers' specifications. The Caltrans Transportation and Construction Vibration Guidance Manual (2013) identifies transportation- and construction-related sources of vibration and their relative amplitudes, identifies appropriate vibration thresholds, and outlines methods of reducing vibration and procedures for addressing vibration issues. The project would be required to adhere to Caltrans Standard Specification Section 14-8.02, "Noise Control," which prohibits the exceedance of 86 dBA maximum sound level (L_{max}) at 50 feet from the job site activities from 9:00 p.m. to 6:00 a.m. and requires all construction equipment to be equipped with an internal combustion engine with the manufacturer-recommended muffler.

The project site is located within the ALUP. Based on the ALUP the project is located within both the projected 50-dB and 55-dB airport noise contours and within the 75-dBA single-event noise at ground-level contour.

A Noise Study Report was prepared for the project to evaluate noise impacts and abatement consistent with the Code of Federal Regulations "Procedures for Abatement of Highway Traffic Noise" (source reference 40). Preparation of the report included a field investigation to identify land uses within the project area that could be subject to traffic and construction noise impacts from the proposed project. Identified land uses and their relative location are shown in Table 8.

Table 8. Surrounding Land Uses

Area	Location	Uses
A	West side of Prado Road Bridge	Industrial, single-family residence
B	South side of Prado Road Bridge west of S. Higuera Street	Bob Jones Bike Trail
C	West side of Higuera Street south of Prado Road	Commercial retail and music school
D	West side of Higuera Street south of Prado Road, south of Area C	Commercial and retail uses
E	East side of Higuera Street south of Prado Road	Commercial and retail uses
F	East side of Higuera Street south of Prado Road, north of area E	Commercial and civic uses
G	East side of Higuera Street north of Prado Road	Residential uses
H	East side of Higuera Street north of Prado Road, north of area G	Residential uses
I	East side of Higuera Street north of Prado Road, north of area G and west of area H	Commercial and retail uses
J	West side of Higuera Street north of Prado Road	Commercial and civic uses

Existing noise levels from surrounding uses were measured for short intervals of 15 minutes and ranged from 57.1 equivalent sound level (Leq) at the Bob Jones Bike Trail (Area B) to 70.1 Leq at the existing music school located near the south end of the project site at 3440 South Higuera Street (Area C).

a) *Less than significant with mitigation incorporated*.

Construction

Proposed restoration and enhancement of the 0.753-acre mitigation area located within the Righetti Ranch development area would be located proximate to existing residential uses along Tank Farm and Orcutt Road; however, proposed restoration activities would not result in use of any heavy equipment with the potential to exceed local noise regulations . During the construction phase of the bridge replacement and road improvements, noise from demolition, site disturbance, equipment, and other construction activities may intermittently dominate the noise environment in the immediate area. Typical noise levels produced by construction equipment commonly used on roadway construction projects are shown in Table 9.

Table 9. Typical Noise Levels for Construction Equipment

Equipment Type	Typical Noise Level (dBA) 50 Feet from Source
Backhoe	80
Concrete Mixer	85
Concrete Pump	82
Crane, Mobile	83
Dozer	85
Heavy Truck	84
Jack Hammer	88
Paver	85
Pneumatic Tool	85
Scraper	85

Source reference 45

The worst-case combined construction noise level would likely occur during the grading and site preparation phases, which would generate a combined noise level of 89 dBA Leq at 50 feet. There is one single-family residence located less than 100 feet from the existing bridge, where the most intensive construction activities would occur. Noise produced by construction equipment would be short term, intermittent, and required to comply with Caltrans Standard Specifications, which require all construction equipment be fitted with adequate mufflers according to the manufacturers' specifications. Construction activities would also be required to comply with the City's Municipal Code regulations regarding days and timeframes during which construction activities can occur; however, an exception to identified standard construction times can be obtained through approval of the community development department (Municipal Code 9.12.050.B.6). In addition, mitigation measures N-1 and N-2 have been identified to require implementation of standard noise BMPs, such as use of electric or hydraulically powered impact tools wherever feasible, and requirements for signs and briefing of construction employees regarding all noise control measures to be implemented throughout the construction phase. Upon implementation of these measures, project construction activities would not result in generation of a substantial increase in ambient noise levels in exceedance of applicable regulatory thresholds. Therefore, impacts would be *less than significant with mitigation incorporated*.

Operation

Upon completion of the construction phase, the project would increase the capacity for vehicle traffic along Prado Road to accommodate current and future traffic demands. Traffic noise levels in the project vicinity following project implementation were predicted using the FHWA Traffic Noise Model Version 2.5 (TNM 2.5). Traffic noise was evaluated under existing conditions, design-year (2035) no-project conditions, and design-year conditions with the project alternative.

Evaluation of existing conditions noise levels revealed that approximately 10 of the existing mobile home residences located in Area G (represented by noise monitoring stations #7 through #12; Attachment 4) currently experience noise

levels in exceedance of the 60 dBA noise level threshold identified in the City Noise Element for outdoor areas of residential uses. Noise levels in 2035 at these areas would increase slightly under no-project conditions approximately 1 to 2 dB. This would result in the number of residential locations with noise level exceedances of 60 dBA to increase from 10 to 16 in Area G and from 0 to 6 in Area H, for a total of 22 residences without the project (Table 10).

Table 10. Number of Residence Locations in Exceedance of NE 60 dBA Threshold Comparison

Conditions	Number of Residence Locations Exposed to Noise Levels in Exceedance of 60 dBA NE Threshold
Existing Conditions	10
Design Year No Project Conditions	22
Design Year with Project (Including Noise Barrier)	13

With implementation of the proposed project, noise levels at surrounding uses in 2035 would experience a maximum increase of 1 dBA above no-project conditions. Typically, a 3 dBA increase is the minimum increase required for the increased noise to be perceptible by the human ear. In some locations noise levels would not change between no-project conditions and project conditions, and in other locations noise levels would decrease approximately 1 dBA under project conditions from no-project conditions (Table 11). Implementation of the project, including construction of the 6-foot-tall noise barrier, would reduce the number of residence locations exposed to noise levels in exceedance of 60 dBA from 22 to 13 in 2035. Based on this analysis, the project would not result in a substantial increase in the ambient noise levels in the project vicinity above no-project conditions.

Table 11. Predicted Future Noise and Barrier Analysis of Selected Noise Monitoring Receptors

Noise Monitoring Receptor	Area	Land Use	Existing Noise Level (Leq(h), dBA)	Design Year Noise Level without Project (Leq(h), dBA)	Noise Level Prediction with Project including 6-foot Barrier (Leq(h), dBA)
1	A	Residence	61	64	64
3	B	Bob Jones Bike Trail	58	60	61
5	C	The TeVelde Conservatory of Music	67	68	69
7	C	Music Motive	67	68	69
8	G	Residence	69	70	63
10	G	Residence	69	71	64
11	G	Residence	68	70	65
16	G	Pool	59	61	58
37	H	Residence	59	61	60
38	H	Residence	58	60	59

Source reference 45

Under 23 CFR 772, noise abatement must be considered if the project is predicted to result in a traffic noise impact, which is defined as when the predicted noise level in an area in the design-year approaches for exceeds the noise abatement criteria (NAC) corresponding with the land use in that area. The exterior NAC for residential land uses and recreational land uses is 67 Leq(h). Attachment 4 identifies the location of each of the noise monitoring stations placed within the project vicinity to collect traffic noise data and which of the monitoring station locations that would be predicted to approach or exceed the FHWA NAC based on the land uses at each location.

Under design year no-project conditions, noise monitoring locations #8 through #11 would still experience noise levels approaching or exceeding the NAC threshold of 67 $L_{eq(g)}$ (see Table 11). The project would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Mitigation measures N-1 and N-2 have been identified to reduce the project's impacts associated with substantial temporary increases in noise levels during project construction to *less than significant.*

b) *Less than significant*. The project does not propose pile driving or other high impact activities that would generate substantial groundborne noise or groundborne vibration during construction. Use of heavy equipment would generate groundborne noise and vibration, but these activities would be periodic, limited in duration, and consistent with other standard construction activities. With regard to human perception, vibration levels would begin to be perceptible at levels of 0.04 inches per second peak particle velocity (in/sec ppv) for continuous events and 0.25 in/sec ppv for transient events. Groundborne vibration levels associated with representative construction equipment are summarized in Table 12.

Table 12. Representative Vibration Source Levels for Construction Equipment

Equipment	Peak Particle Velocity at 25 feet (in/sec)
Large bulldozer	0.089
Caisson drilling	0.089
Loaded trucks	0.076
Jackhammer	0.035
Small Bulldozers	0.0003

Source references 43 and 44.

While some construction activities may result in perceptible vibration, the project-generated vibration levels would be well below the thresholds identified as having the potential to be perceptible to humans. Therefore, potential impacts associated with groundborne noise and vibration would be *less than significant.*

c) *Less than significant.* The project site is located within the 50-dB and 55-dB airport noise contour areas designated in the ALUP and within the 75-dB single-event noise at ground-level contour. Based on the NIOSH, noise levels above 85 dB are considered hazardous for worker health and safety. Therefore, project construction employees would not be exposed to excessive noise that would result in a health or safety hazard. Therefore, impacts related to excessive noise due to proximity to an airport would be *less than significant.*

Mitigation Measures

N-1 For the entire duration of the construction phase of the project, the following BMPs shall be adhered to:

a. Stationary construction equipment that generates noise that exceeds 60 dBA at the project boundaries shall be shielded with the most modern noise control devises (i.e. mufflers, lagging, and/or motor enclosures).

b. Impact tools (e.g., jack hammers, pavement breakers, rock drills, etc.) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed-air exhaust from pneumatically powered tools.

c. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed-air exhaust shall be used.

d. All construction equipment shall have the manufacturers' recommended noise abatement methods installed, such as mufflers, engine enclosures, and engine vibration insulators, intact and operational.

e. All construction equipment shall undergo inspection at periodic intervals to ensure proper maintenance and presence of noise control devices (e.g., mufflers, shrouding, etc.).

f. Plan noisier operations and activities during times least sensitive to nearby receptors.

g. Maintain good public relations with surrounding community members and provide frequent activity updates of all construction activities. Let all surrounding community members know that all noise-related complaints shall be directed to the City Public Works Department.

N-2 Construction plans shall note construction hours, truck routes, and all construction noise BMPs, and shall be reviewed and approved by the City Community Development Department prior to issuance of grading/building permits. The City shall provide and post signs stating these restrictions at construction entry sites prior to commencement of construction and maintained throughout the construction phase of the project. All construction workers shall be briefed at a preconstruction meeting on construction hour limitations and how, why, and where BMP measures are to be implemented. Noise-related complaints shall be directed to the City Public Works Department.

Conclusion

With implementation of the recommended mitigation measures, project impacts associated with noise would be less than significant.

14. POPULATION AND HOUSING

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	1, 48	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	1, 48	☐	☐	☒	☐

Evaluation

The population of San Luis Obispo has grown from 45,119 in 2010 to approximately 47,446 in 2018 according to the U.S. Census Bureau and is the largest city in terms of population in San Luis Obispo County. The City's housing tenure is approximately 38% owner-occupied and 62% renter-occupied, which is strongly influenced by California Polytechnic State University, San Luis Obispo (Cal Poly) and Cuesta College enrollment. Many segments of the city's population have difficulty finding affordable housing within the city due to their economic, physical, or sociological circumstances. San Luis Obispo contains the largest concentration of jobs in the county, and during workdays, the city's population increases to an estimated 55,733 persons (source reference 48).

The City Housing Element identifies various goals, policies, and programs based on an assessment of the city's housing needs, opportunities, and constraints. The City's overarching goals for housing include safety, affordability, conservation of existing housing, accommodation for mixed-income neighborhoods, providing housing variety and tenure, planning for new housing,

maintaining neighborhood quality, providing special needs housing, encouraging sustainable housing and neighborhood design, maximizing affordable housing opportunities for those who live or work in the City, and developing housing on suitable sites.

a) *Less than significant impact.* The proposed project does not include development of residential housing and would not induce unplanned growth within the city. The City's Circulation Element identifies future transportation capital projects to accommodate planned future growth demands within the city. The level of planned growth in the city would substantially increase travel demand through the Prado Road/South Higuera Street intersection and adjacent bridge on Prado Road. Cumulative condition forecasts within the City Circulation Element and Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) reflect the increased traffic demand expected from the planned future development of land uses in the area. The project would improve local circulation and increase the capacity for vehicle traffic along Prado Road to accommodate current and future traffic demands of surrounding planned development, consistent with currently adopted land use and transportation plans, including the City's Land Use and Circulation Element and SLOCOG's Regional RTP/SCS. The project includes replacement and improvements to an existing bridge structure and surrounding roadways to accommodate existing and future planned traffic demands and offsite riparian restoration and would not create new access to undeveloped land that could experience new unplanned development as a result of the project. Therefore, impacts related to inducing substantial unplanned within an area would be *less than significant*.

b) *Less than significant impact.* The project would not result in the removal of existing housing structures or displacement of people. Therefore, impacts related to the displacement of substantial numbers of people or housing would be *less than significant*.

Conclusion

No significant impacts to population or housing resources were identified; therefore, no mitigation measures are necessary.

15. PUBLIC SERVICES

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

Evaluation

The project site is located within the existing service area of the City of San Luis Obispo Fire Department (SLOFD) and the nearest fire station is City Fire Station #4. Station #4 is staffed with a three-person paramedic engine company with a Type 1 pumper/fire engine and an unstaffed Type III fire apparatus. The City also has a mutual aid agreement with the California Department of Forestry and Fire Protection (CAL FIRE), which allows for additional fire or emergency services when needed.

The City of San Luis Obispo Police Department (SLOPD) provides public safety services for the city, which consists of 85.5 employees, 59 of which are sworn police officers. The SLOPD operates out of one main police station located at 1042 Walnut Street at the intersection of Santa Rosa Street (State Route 1) and US 101.The project is located within the San Luis Coastal Unified School District and public parks and recreation trails within the city are managed and maintained by the City of San Luis Obispo Department of Parks and Recreation and Department of Public Works.

a) *Less than significant impact.*

Fire Protection: The project would replace an existing structurally deficient bridge with a new, wider bridge that would accommodate additional lanes of vehicle traffic and increased bicycle and pedestrian facilities. The project would remove the existing deficient bridge structure, which currently serves as a potential safety hazard due to structural instability. The project would improve traffic flow through the immediate area and could potentially improve emergency response times for fire department personnel. Restoration and enhancement of the 0.753-acre mitigation area within the Righetti Ranch development area would not result in the need for additional fire protection services. The project would not result in a need for additional or altered fire service facilities; therefore, impacts would be *less than significant*.

Police Protection: The project would replace an existing structurally deficient bridge with a new, wider bridge that would accommodate additional lanes of vehicle traffic and improved bicycle and pedestrian facilities. The project would not result in the need for additional police services or additional or altered police facilities. Restoration and enhancement of the 0.753-acre mitigation area within the Righetti Ranch development area would not result in the need for additional police protection services. Therefore, impacts related to provision or need of new or altered government facilities for police protection would be *less than significant*.

Schools: The project would replace an existing structurally deficient bridge with a new, wider bridge that would accommodate additional lanes of vehicle traffic and improved bicycle and pedestrian facilities. No new land uses or habitable structures would be developed and therefore the project would not result in the need for new or expanded school facilities within the area. Restoration and enhancement of the 0.753-acre mitigation area within the Righetti Ranch development area would not result in the need for new or expanded educational facilities. Impacts related to provision or need of new or altered school facilities would be *less than significant.*

Parks: The project would replace an existing structurally deficient bridge with a new, wider bridge that would accommodate additional lanes of vehicle traffic and improved bicycle and pedestrian facilities. No new land uses or habitable structures are proposed. Restoration and enhancement of the 0.753-acre mitigation area within the Righetti Ranch development area would not result in the need for new or expanded parks or recreational facilities. The project would not result in an increased demand for park or recreation facilities; therefore, impacts would be *less than significant*.

Other Public Facilities: The project would replace an existing structurally deficient bridge with a new, wider bridge that would accommodate additional lanes of vehicle traffic and improved bicycle and pedestrian facilities. No new land uses or habitable structures are proposed. Restoration and enhancement of the 0.753-acre mitigation area within the Righetti Ranch development area would not result in the need for new or expanded public services. The project would not result in an increased demand for other public facilities such as libraries or post offices; therefore, impacts would be *less than significant.*

Conclusion

The project would not result in significant impacts to public services; therefore, no mitigation measures are necessary.

16. RECREATION

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	1	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	1, 16	☐	☒	☐	☐

Evaluation

Existing City recreation facilities consist of eight community parks, 10 neighborhood parks, eight mini parks, joint-use sites (such as school playgrounds), non-joint-use sites, and six recreation centers/special facilities, as well as open space areas and recreational trails. The City Recreation Element identifies goals, policies, and programs to help plan, develop, and maintain community parks and recreation facilities. The City's statement of overall department goals is for the City Parks and Recreation facilities and programs to enable all citizens to participate in fun, healthful, or enriching activities that enhance the quality of life in the community. As demand for recreation facilities and activities grow and change, the City intends to focus its efforts in the following areas: continued development of athletic fields and support facilities, providing parks in underserved neighborhoods, providing a multi-use community center and therapy pool, expanding paths and trails for recreational use, linking recreation facilities, and meeting the special needs of disabled persons, at-risk youth, and senior citizens.

The project site is located directly adjacent to the Bob Jones Bike Trail, a paved Class 1 dedicated bicycle and pedestrian path that includes segments located in the city of San Luis Obispo, the county of San Luis Obispo, and the community of Avila Beach. The segment within the city currently terminates at the southwest corner of the Prado Road/South Higuera Street intersection. The City of San Luis Obispo Active Transportation Plan identifies the extension of the Bob Jones Bike Trail northward and southward from the existing path within the city to connect the Laguna Lake Park area and the west end of Marsh Street to the southern city limit at South Higuera Street as a first-priority project.

a) *Less than significant impact.* The replacement Prado Road Bridge structure is expected to require relocation of the existing Bob Jones Bike Trail bridge and trailhead statue. The eastern abutment of the existing Bob Jones Bike Trail bridge is located approximately 30 feet south of the existing southerly curb of Prado Road and would need to be shifted southward to accommodate the Prado Road widening. The westerly abutment location does not conflict with the widening and therefore the project proposes rotation of the bridge alignment centered (pivoting) at that end. Rotation of the easterly end of the bike path bridge is expected to require new cast-in-drilled-hole (CIDH) piling to be placed at the east abutment and would require the widening/modification of the existing abutments. It is anticipated that the existing prefabricated bridge could be lifted by crane, temporarily moved out of the construction area, and then placed onto the realigned abutments once modifications are completed. During this phase of construction, the connection of the Bob Jones Trail to Prado Road west of the creek would remain open for continuity of trail use. Once the bridge is realigned, a temporary trail connection from the east side of the bridge to the sidewalk on South Higuera Street would be constructed to maintain trail use while the roadway and vehicle bridge construction requires the closure of the west bank trail connection to Prado Road. Access to the Bob Jones Bike Trail would be maintained through project construction.

While the project would not result in an increase in residents in the area, upon completion of construction activities, the project would result in new protected bike lanes and sidewalks along Prado Road where no pedestrian or bicycle facilities currently exist. These additional amenities would improve connectivity between surrounding pedestrian and bicycle infrastructure and may result in a moderate increase in bicycle and pedestrian traffic on the Bob Jones Bike Trail and similar proximate facilities. These additional bicycle amenities are identified in the City's Active Transportation Plan and the additional pedestrian infrastructure would be consistent with the City's Circulation Element policies for improved pedestrian access. The project would have an overall beneficial impact on recreational bicycle and pedestrian facilities by adding new infrastructure through the project area and any marginal increase in usership would not result in an increase in bicycle and

pedestrian traffic that would result in the substantial acceleration of the physical deterioration of the Bob Jones Bike Trail or other related facilities. Restoration and enhancement of the approximately 0.753-acre mitigation area within the Righetti Ranch property would not be accessible to the public and would not result in the increase of demand on existing park or recreational facilities. The project would not result in the increase of use of existing parks or recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; therefore, impacts would be *less than significant*.

b) *Less than significant impact with mitigation incorporated.* The project includes the relocation of the eastern abutment of the existing Bob Jones Bike Trail bridge and relocation of the trailhead statue south of its current position within the same City-owned parcel. These project components are included in the proposed project description and have been evaluated throughout this document. These activities would result in potentially significant adverse physical effects on the environment, including, but not limited to, grading, vegetation removal, soil compaction, and creation of new impervious surfaces within environmentally sensitive areas. With implementation of mitigation measures BR-1 through BR-44, CR-1 and CR-2, HAZ-1 and HAZ-2, and N-1 and N-2, potential impacts related to relocation and expansion of recreation facilities would be reduced to *less than significant with mitigation incorporated*.

Mitigation Measures

Implement mitigation measures **BR-1** through **BR-44**, **CR-1** and **CR-2**, **HAZ-1** and **HAZ-2**, and **N-1** and **N-2**.

Conclusion

The project would not result in result in the substantial increase in use of existing recreational facilities. Potential environmental effects associated with the proposed relocation of the Bob Jones Bike Trail bridge would be less than significant upon implementation of identified mitigation measures.

17. TRANSPORTATION

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	49, 50, 51, 52, 53, 54	☐	☒	☐	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	11, 53	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	1, 53, 54	☐	☐	☒	☐
d) Result in inadequate emergency access?	1, 54	☐	☒	☐	☐

Evaluation

Prado Road is a two-way east–west arterial roadway that extends from US 101 eastward to Canto Parkway. Prado Road is a critical component of the City's Circulation Element, shown as an arterial route west of US 101 and as a highway/regional route east of US 101. The Prado Road Bridge over San Luis Obispo Creek was built in 1957 and is located approximately 1,400 feet east of US 101 on the western segment of the signalized intersection of Prado Road and South Higuera Street. This bridge is a significant constriction point along Prado Road as it is 26 feet wide and the corridor is over 60 feet wide both east and west of the bridge. The bridge has been classified as structurally deficient and deemed functionally obsolete, as the existing two-lane

bridge lacks any pedestrian or bicycle facilities and has insufficient width to accommodate existing and future multimodal traffic demands. Five existing public transit stops are located directly along the outside of the project site:

- Prado at Elks – SLO Transit route 2A
- Higuera at Prado (east side of South Higuera Street) – SLO Transit route 2A and Regional Transit Authority (RTA) route 10N
- Higuera at Prado (west side of South Higuera Street) – SLO Transit route 2B and RTA route 10S
- Higuera at Margarita (DMV) (east side of South Higuera Street) – SLO Transit route 2B and RTA route 10N
- Higuera at Margarita (DMV) (west side of South Higuera Street) – RTA route 10S

The City Circulation Element identifies current traffic levels and delays of public roadways and identifies transportation goals and policies to guide development and express the community's preferences for current and future conditions. Goals included in the plan include, but are not limited to, maintaining accessibility and protecting the environment throughout San Luis Obispo while reducing dependence on single-occupant use of motor vehicles, reducing use of cars by supporting and promoting alternatives such as walking, riding buses and bicycles, using car pools, promoting the safe operation of all modes of transportation, and widening and extending streets only when there is a demonstrated need and when the projects would cause no significant, long-term environmental problems. The future extension of Prado Road to the east to connect to Broad Street and the extension of Prado Road to the west as an overcrossing or new interchange with US 101 have been identified as future projects to improve circulation and traffic flow within the city. Planning for the westward extension is currently underway.

The segment of Prado Road between US 101 and South Higuera Street had an average daily traffic volume of 7,400 and Level of Service (LOS) C in 2018. The Prado Road/South Higuera Street intersection currently operates at a worst-case peak hour level of service of LOS C and an average delay of 25.8 seconds/vehicle during the PM peak hour (2018). The City Circulation Element establishes a minimum LOS D for signalized intersections outside of the downtown area. City traffic operations standards also establish vehicle queuing thresholds for intersections and include policies to ensure spill back from turn pockets or block upstream driveways are avoided (source reference 49).

The City Active Transportation Plan outlines the City's official policies and goals for the design and development of bikeways and other active transportation infrastructure within the city (and in adjoining territory under County jurisdiction but within the city's Urban Reserve Line) and includes specific objectives for reducing vehicle use and promoting active transportation modes. This plan identifies proposed protected bicycle lanes on both sides of Prado Road within the vicinity of the project and a bicycle pedestrian intersection at the South Higuera Street/Prado Road intersection. A Protected Bike Line is defined as a bikeway for the exclusive use of bicycles and includes a separation beyond striping required between the separated bikeway and the through vehicular traffic. A bicycle protected intersection design provides separate, channelized bike and pedestrian paths, high-visibility bicycle and pedestrian crosswalk markings to improve improving the crossing experience and reduce conflicts between turning motor vehicles and people walking or cycling.

In 2013, SB 743 was signed into law with the intent to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions" and required the Governor's Office of Planning and Research (OPR) to identify new metrics for identifying and mitigating transportation impacts within CEQA. As a result, in December 2018, the California Natural Resources Agency certified and adopted updates to the State CEQA Guidelines. The revisions included new requirements related to the implementation of SB 743 and identified vehicle miles traveled (VMT) per capita, VMT per employee, and net VMT as new metrics for transportation analysis under CEQA (as detailed in Section 15064.3 [b]). Beginning July 1, 2020, the newly adopted VMT criteria for determining significance of transportation impacts must be implemented statewide. In June 2020, the City formally adopted the transition from LOS to VMT for the purposes of CEQA evaluation and also established local VMT thresholds of significance.

a) *Less than significant with mitigation incorporated.* The proposed project includes the replacement of the existing Prado Road Bridge with a wider bridge structure including bicycle and pedestrian infrastructure and various roadway and intersection improvements along Prado Road and at the Prado Road/S. Higuera Street intersection. The project would require closure of the existing bridge during much of construction, which would extend for approximately 18 to 24 months. For the purposes of assessing construction traffic impacts, this analysis conservatively assumes full closure of the bridge for 24 months. The City would endeavor to open the bridge in one or both directions to vehicular traffic whenever feasible,

but for the purposes of this analysis the bridge is assumed to be closed to automobiles for up to two years. Pedestrian and bicycle connectivity across the creek between Higuera Street and Prado Road would generally be retained throughout the construction process.

While LOS is no longer considered an environmental impact under CEQA, actions associated with addressing LOS may result in a physical effect on the environment that could result in potentially significant impacts under CEQA. A Construction Traffic Analysis was prepared for the project (source reference 53). Peak hour traffic forecasts were developed for 2025 conditions using the City's Travel Demand Model. With the closure of the Prado Road bridge during construction, five surrounding intersections were projected to operate at unacceptable LOS levels during the a.m. and/or p.m. peak hour per City policies. Improvements identified to address short-term construction-related traffic LOS impacts include signal timing optimization, temporary restriping, installation of a temporary traffic signal at the Higuera Street/Elks Lane intersection, and installation of detour and other message signs. Temporary signal timing optimization and restriping would result in negligible physical changes to the environment. Installation of a temporary traffic signal at the Higuera Street/Elks Lane intersection and installation of new traffic notification/detour message signage would result in temporary air pollutant, greenhouse gas, and noise emissions associated with installation and removal but would not result in potentially significant impacts due to the limited scope of construction activities and distance from proximate sensitive receptor locations. The new temporary traffic signal would be located within City right-of-way and would not require substantial grading, therefore, potential impacts to agricultural, biological, cultural, or geologic resources would be less than significant. Consistent with the City's Active Transportation Plan, which recommends a future pedestrian/bicycle crossing at the intersection of S. Higuera Street/Elks Lane, the temporary traffic signal would be designed to allow efficient conversion to a Pedestrian Hybrid Beacon crossing following completion of the project construction activities.

With implementation of signal timing optimization, restriping, and installation of a temporary traffic signal as described above, temporary LOS of surrounding intersections would be improved to acceptable levels at all but one location. Even with the implementation of signal optimization at the South Higuera Street/Los Osos Valley Road intersection, the intersection would operate at an unacceptable LOS while the Prado Road Bridge is closed. The Construction Traffic Analysis prepared for the project (source reference 54) recommended construction of additional turn and receiving lanes at this location would be necessary to address temporary LOS impacts. Due to the cost of implementing such improvements, including potentially right-of-way acquisition, and the temporary nature of the impact, these recommended improvements were determined to be infeasible. Based on the State CEQA Guidelines Section 15064.3, a project's effect on automobile delay, such as the short-term construction-related LOS delays at the South Higuera Street/Los Osos Valley Road intersection, are not considered an environmental impact under CEQA. Therefore, if any of the measures identified to address temporary LOS impacts are found to be infeasible and implemented as part of the project, any resulting LOS impacts would not be considered an impact under CEQA. All feasible measures to address temporary construction-related LOS impacts would be incorporated into the project Plan, Specification, and Estimate (PS&E) required for the FHWA grant funding application for the project.

Road closures along Prado Road would affect the Prado at Elks transit stop serviced by SLO Transit route 2A during the 18- to 24-month project construction period. Mitigation measure TR-1 has been identified to require notification of SLO Transit prior to scheduled road closure along Prado Road, so that the 2A route may be appropriately modified during the construction period and SLO Transit could provide proper notice to affected riders prior to the modification of the route. Transit stops located along South Higuera Street would maintain full access during the construction phase of the project. Based on the proximity of other transit stops, the temporary nature of the transit stop closure, and mitigation requiring adequate notification to SLO Transit and transit users, impacts to transit facilities would be less than significant with mitigation.

The project would be consistent with the City Circulation Element's long-term goals and policies related to promotion of alternative forms of transportation, design of safe and convenient access for all mode users, and maintaining adequate LOS on roadways and intersections. Consistent with the City's Active Transportation Plan, which identifies future plans for protected pedestrian/bicycle paths on both sides of the Prado Road corridor, the replacement bridge cross-section includes a 13-foot-wide raised surface on both sides, accommodating 3-foot-wide stamped concrete buffers, 5-foot directional Class IV bikeways (protected bike lanes), 5.5-foot-wide sidewalks, and 1-foot-wide Class I paths (including buffer/shoulder width) and 2-foot-wide concrete barriers rails on each side. With implementation of TR-1, the project would avoid conflicts with current transit programs during construction and impacts would be *less than significant with mitigation incorporated*.

b) *Less than significant impact.* The City's Travel Demand Model (TDM) was used to estimate VMT with and without the project, in compliance with the City's 2020 Transportation Impact Study Guidelines (TISG). The TISG describes thresholds and approaches to evaluate a variety of project types, including transportation projects such as the proposed project.

Induced demand can occur when a new roadway capacity induces additional vehicular travel. Guidance from the State Office of Planning and Research (OPR) notes that "if a project would likely lead to a measurable and substantial increase in vehicle travel, the lead agency should conduct an analysis assessing the amount of vehicle travel the project will induce."

In its guidance document, OPR has identified a variety of transportation projects that would not likely lead to a substantial or measurable increase in vehicle travel, including bridge repair projects and addition of capacity on collector streets provided the project also substantially improves conditions for pedestrians and cyclists. The City's TISG also notes that no standardized thresholds have been defined for induced travel impacts and recommends a case-by-case evaluation.

The TDM was run under baseline conditions with and without the proposed bridge widening and intersection improvements. The total regional VMT with and without the project is summarized in Table 13, below.

Table 13. Regional VMT Summary

Scenario	Total Regional VMT
Baseline	8,486,293
Baseline Plus Project	8,486,370
Change from Baseline (VMT)	77
Change from Baseline (percent)	0.0009%

The project would result in the overall increase in regional VMT by 0.0009 percent; therefore, the project would not result in a substantial increase in VMT. The project would also substantially improve conditions for pedestrians and cyclists within the project area. Therefore, impacts would be *less than significant.*

c) *Less than significant with mitigation incorporated.* During the construction phase, the project would result in the full closure of Prado Road west of the South Higuera Street/Prado Road intersection. Proposed lane closures and use and transport of construction vehicles and equipment within an area that experiences a considerable amount of vehicle, pedestrian, and bicycle traffic would have the potential to result in safety hazards. Mitigation measure T-2 has been identified to require the preparation and approval of a Construction Traffic Management Plan to require the implementation of temporary traffic control measures, notification procedures, and other measures to significantly reduce the safety risks in and around the project site during construction activities.

Existing traffic volumes currently exceed the capacity of the single northbound to westbound left-turn lane at the Prado Road/South Higuera Street intersection, which causes vehicle queues to spill back into the adjacent through lane, creating safety concerns with higher propensity for rear-end collisions. Installation of a second northbound to westbound left-turn lane is warranted at this location, and this improvement is required mitigation for several approved development projects in the city. The project includes intersection improvements to accommodate the second northbound to westbound left-turn lane and improve pedestrian/bicycle safety crossing the intersection. Implementation of the project would safely accommodate existing and expected multimodal traffic demands. Therefore, impacts related to increases in hazards and incompatible uses would be *less than significant.*

d) *Less than significant with mitigation incorporated.* As discussed in threshold a above, where feasible, construction activities would be conducted to maintain one lane of traffic in each direction (for a total of two lanes of traffic) during peak travel times and on weekends. However, Prado Road may be periodically closed to facilitate work performed at abutments, placement of the precast girders, relocation of utilities, and moving traffic during various stages of work.

Temporary road closures may impede or delay responses from local emergency service providers to emergencies in the immediate area if they are unaware of the closures. Mitigation measure TR-1 would require the City to notify local emergency service providers prior to any scheduled road closures. Therefore, impacts related to inadequate emergency access would be *less than significant with mitigation incorporated.*

Mitigation Measures

TR-1 At least 8 weeks prior to scheduled road closure, the City shall notify SLO Transit and local emergency service providers (including the SLOFD, SLOPD, and San Luis Ambulance Services) of road closures along Prado Road. The notice shall include dates and estimated duration of the closure, identify alternative access routes to properties made inaccessible by the closure (as applicable), and contact information available if there are issues or complaints. Complaints shall be directed to the City Public Works Department.

TR-2 Construction Traffic Management Plan. Prior to the issuance of construction permits, the construction contractor shall meet with the City Public Works Department to determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion, impacts to bicyclists and pedestrians, impacts to public transit services, and impacts to emergency service providers during construction of the project. The construction contractor shall develop a construction management plan for review and approval by the Public Works Department. The plan shall include, at minimum, the following items and requirements:

- A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic and pedestrian hours, detour signs if required, lane closure procedures, sidewalk closure procedures, signs, designated construction access routes, and temporary traffic control measures for automobile, bicycle, and pedestrian traffic.
- Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur.
- Location of construction staging areas for materials, equipment, and vehicles.
- Identification of haul routes for movement of construction vehicles that would minimize impacts on vehicular and pedestrian traffic, circulation and safety.
- Temporary construction fencing to contain debris and material and to secure the site.
- Provisions for removal of trash generated by project construction activity.
- A process for responding to and tracking complaints pertaining to construction activity. Complaints shall be directed to the City Public Works Department.
- Provisions for monitoring surface streets used for haul and truck routes so that any damage and debris attributable to construction-related trips can be identified and corrected, including regular street sweeping within the project vicinity.
- Location and signage of bicycle and pedestrian detours. Safe access for pedestrians and bicyclists shall be maintained to the greatest extent possible throughout the duration of construction activities.
- In the event the Prado Road Bridge Replacement Project is under construction at the same time as the US 101/Prado Road Interchange Project during any portion of the construction schedule, at least one connection from US 101 to the City street network shall be maintained at all times (e.g., via the Prado Road/South Higuera intersection or Elks Lane/South Higuera intersection). The Construction Traffic Management Plan shall include measures that identify the necessary steps that would be taken by the construction contractor and the City to ensure this connection is maintained.

The plan shall also incorporate, at minimum and to the extent feasible, the following recommendations of the Construction Traffic Analysis (CCTC 2021) prepared for the project:

- Signal timing modification and/or optimization at surrounding intersections;
- Restriping at surrounding intersections to improve traffic flow; and
- Installation of temporary signalization at the Higuera Street/Elks Lane intersection prior to the closure of the Prado Road Bridge.

It is anticipated that the recommendations of the Construction Traffic Management Plan for temporary signing, striping, and signalization of the South Higuera intersection, and other construction traffic control measures would be incorporated into the project Plan, Specification, and Estimate (PS&E) and developed in the context of the City Municipal Code Construction and Fire Prevention Regulations and the City of San Luis Obispo 2013 Construction & Fire Codes, which address other issues such as hours of construction onsite, limitations on noise and dust emissions, and other applicable items.

Conclusion

With the incorporation of mitigation measures TR-1 and TR-2 identified above, residual impacts associated with transportation would be less than significant.

18. TRIBAL CULTURAL RESOURCES

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	55	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	55	☐	☒	☐	☐

Evaluation

Approved in 2014, AB 52 added tribal cultural resources to the categories of resources that must be evaluated under CEQA. Tribal cultural resources are defined as either of the following:

1. Sites, features, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    a. Included or determined to be eligible for inclusion in the CRHR; or

b. Included in a local register of historical resources as defined in subdivision (k) of California Public Resources Code Section 5020.1.

2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of California Public Resources Code Section 5024.1. In applying these criteria for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American Tribe.

During preparation of the project Archaeological Survey Report, SWCA contacted the NAHC on January 29, 2018, requesting a search of their Sacred Lands File for traditional cultural resources. The NAHC responded on February 13, 2018, indicating the results of the Sacred Lands File search were negative. The NAHC also provided a consultation list of 10 Native American groups with traditional lands or cultural places located within the area. SWCA conducted informal tribal consultation and mailed letters to each of these contacts on March 21, 2018, and follow-up calls and emails were made on April 23 and 24, 2018. SWCA has received the following responses:

- Fred Collins, Chairman of the Northern Chumash Council, responded via email on April 25, 2018, and requested the following statement be included in the report: "In the event that buried or otherwise unknown cultural resources are discovered during construction work in the area of the find, work shall be suspended and the City of San Luis Obispo should be contacted immediately, and appropriate mitigations measures shall be developed by qualified archeologist or historian if necessary, at the developers expense. If the coroner determines the remains are Native American, the Native American Heritage Commission (NAHC) would be contacted and the remains would be left in situ and protected until a decision is made on their final disposition." Mr. Collins had no further comments on the project.
- Patti Dunton, Tribal Administrator for the Salinan Tribe of Monterey and San Luis Obispo Counties, responded via email on April 21, 2018, and stated she was not aware of any cultural resources in the project area. Ms. Dunton expressed concerns regarding the proximity to San Luis Obispo Creek and requested she be informed of the survey results. SWCA followed up with Ms. Dunton via telephone the same day and reiterated the survey was negative, as described in the outreach letter. Ms. Dunton had no further comments on the project.
- Mona Tucker, Chair of the yak titᵛu titᵛu yak tiłhini Northern Chumash Tribe of San Luis Obispo County and Region, contacted SWCA via email on April 5, 2018. She did not have any specific information regarding cultural resources in the project site but expressed concerns that, due to the level of proposed ground disturbance in and near San Luis Obispo Creek, archaeological and Native American monitoring should occur during construction.

In November 2020, Native American Tribes were notified about the project consistent with City and State regulations including Assembly Bill (AB) 52. Fred Collins, Tribal Administrator of the Northern Chumash Tribal Council, also requested a copy of the Phase I Archaeological Survey prepared for the project for review. Patti Dunton, Tribal Administrator of the Salinan Tribe of San Luis Obispo and Monterey Counties, responded and stated that they are aware of cultural resources in the area and would like to see all ground disturbing activities be monitored by a cultural resource specialist and Native American monitor. She also requested that a Phase I Archaeological Survey be conducted and sent to their tribe for review (source reference 55). City staff provided Patti Dunton and Fred Collins a copy of the Archaeological Survey Report for the Prado Road Bridge Widening Project (source reference 21) and no further requests for consultation or comments were received.

a) *Less than significant with mitigation incorporated.* Based on consultation with local tribes, the project site may have the potential to contain tribal cultural resources that could be eligible for listing in the CRHR or local register. Mitigation measure TCR-1 has been identified to require presence of a qualified archaeologist and Native American monitor during all project related construction activities that result in disturbance of native soil. If previously unidentified tribal cultural materials are unearthed during construction, mitigation measure CR-1 has been identified to require work be halted in that area until a qualified archaeologist can assess the significance of the find. Therefore, potential impacts to tribal cultural resources would be *less than significant with mitigation incorporated*.

b) *Less than significant with mitigation incorporated.* Based on consultation with local tribes, the project site may have the potential to contain resources considered significant by a California Native American tribe. Mitigation measure TCR-1 has been identified to require presence of a qualified archaeologist and Native American monitor during all project related construction activities that result in disturbance of native soil. Therefore, with incorporation of mitigation measures TCR-1, CR-1, and CR-2, impacts would be *less than significant with mitigation incorporated*.

Mitigation Measures

Implement mitigation measures **CR-1** and **CR-2**.

TCR-1 A qualified archaeologist and Native American monitor shall be present during all project related construction activities that result in disturbance of native soil that may contain tribal cultural resources. Monitoring activities shall be conducted in accordance with a Monitoring Plan as approved by the City Community Development Department. The plan shall include provisions such as:

a. List of personnel involved in the monitoring activities including a Native American monitor;

b. Description of how the monitoring shall occur;

c. Description of monitoring frequency;

d. Description of circumstances that would result in the "work diversion," in the case of discovery, at the project site;

e. Description of procedures for diverting work on the site and notification procedures;

f. Description of monitoring reporting procedures; and

g. Description of the procedures for reburial of artifacts and/or human remains within identified areas on the project site or other suitable location.

Conclusion

With the implementation of the recommended mitigation measures, the project would have a less-than-significant impact to tribal cultural resources.

19. UTILITIES AND SERVICE SYSTEMS

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	1	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	1	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	1	☐	☐	☐	☒

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	1, 56	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	1, 56	☐	☐	☒	☐

Evaluation

Multiple utilities currently cross the project site, including overhead electrical, telephone, and cable television lines, as well as gravity sewer, water, recycled water, and gas lines that are supported by the bridge deck. The gravity sewer line may need to be temporarily shut-off for very short durations and during non-peak use, but otherwise would remain in operation throughout construction activities. Due to design of the gravity sewer system in a built environment and near the recipient Water Resource Recovery Facility (WRRF; a few hundred feet to the west), the vertical profile of the sewer line cannot be altered. However, the horizontal location of the sewer line may be altered slightly to be aligned between bridge superstructure support girders. The existing water, recycled water, and gas lines could be relocated to the new bridge location with supports. Overhead electrical, telephone and cable television lines could be relocated to either new overhead alignments or conduits placed in the bridge concrete barrier rail. The WRRF is currently being upgraded to improve its ability to recover resources traditionally classified as waste. The upgrade would improve the plant's efficiency while reducing dependency on reservoir and groundwater supplies and would not affect current treatment services or otherwise affect the project.

The City of San Luis Obispo Utilities Department is the sole water provider within the city, which provides potable and recycled water to the community, and is responsible for water supply, treatment, distribution, and resource planning. The City WRRF treats all of the wastewater from the city, Cal Poly, and the County airport. The facility treats 4.5 million gallons of wastewater daily, 365 days a year. The most recent upgrade to the WRRF was completed to improve the quality of water discharged into San Luis Obispo Creek (located downstream of the project site). The WRRF has very stringent discharge requirements and now produces a high-quality effluent that surpasses drinking water standards for many constituents. Plans to utilize a portion of this effluent to irrigate parks, median strips, landscaping, and other appropriate uses are being implemented under the City's Water Reuse Program.

Project demolition and other construction solid waste materials would likely be disposed of at the Cold Canyon Landfill. The Cold Canyon Landfill has approximately 14,500,000 cubic yards of remaining capacity as of January of 2015 and is expected to reach capacity in 2040 (source reference 56).

a) *Less than significant impact.* The project would result in the relocation of multiple utilities from the existing bridge structure to the new bridge structure. The new structure would be in the same general location as the old structure and alignment of existing utilities within the bridge structure would not change substantially. Overhead electrical, telephone, and cable television lines may be relocated to either new overhead alignments or conduits placed in the bridge concrete barrier rail. Relocation of these utilities would be subject to the review and approval of the City Utilities Department and all affected utility providers and would not result in significant environmental effects; therefore, impacts related to relocation of utility facilities would be *less than significant.*

b) *Less than significant impact.* The project would require water supplies during construction activities for dust suppression, vehicle washing, and other ancillary activities, but would not otherwise generate any long-term demand in water supply. The City has adequate water supply for project construction and no long-term increase in water supply demand would occur. Therefore, impacts related to sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years would be *less than significant.*

c) *No impact.* The proposed project does not propose use or development of any on-site wastewater disposal systems or connection to any community wastewater system. The project would not include any use that would require wastewater

discharge, except for short-term construction activities that would be serviced by on-site portable restroom and hand-washing facilities and/or existing facilities within the project site. Therefore, *no impacts would occur*.

d) *Less than significant impact.* Construction activities would result in the generation of solid waste materials, including cut volumes and demolition of existing infrastructure. Demolition debris would be collected, kept separate from active water flows, and hauled off-site to an approved disposal facility, most likely Cold Canyon Landfill, which has adequate capacity. Upon completion, operation and use of the new bridge and improved roadways would not generate any solid waste. Therefore, impacts would be *less than significant.*

Conclusion

No significant impacts to utilities and service systems would occur; therefore, no mitigation measures are necessary.

20. WILDFIRE

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	1, 24, 33	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	1, 24	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	1, 24	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	1, 24	☐	☐	☒	☐

Evaluation

The project is located in an urban area within the city of San Luis Obispo. Urban fire hazards result from the materials, size, and spacing of buildings, and from the materials, equipment, and activities they contain. Additional factors are access, available water volume and pressure, and response time for fire fighters. Based on the City Local Hazard Mitigation Plan, the risk of wildland fires is greatest near the city limits where development meets rural areas of combustible vegetation. Most of the community is within 1 mile of a designated High or Very High Fire Hazard Severity Zone, which indicates significant risk to wildland fire.

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

a) *Less than significant impact.* The project bridge replacement activities would be located on a portion of Prado Road that is directly adjacent to a northbound US 101 on-ramp. Based on the Diablo Canyon EPZ Map, US 101 is a designated evacuation route. The project would result in the full closure of the bridge during the 18- to 24-month construction period,

which would have the potential to physically interfere with emergency evacuation in the area in the event of an emergency. However, evacuees would maintain access to an alternative route to access the US 101 northbound on-ramp located approximately 0.65 mile north of the project site using Elks Lane, and two other US 101 northbound on-ramps are located within 1 mile of the project site. Therefore, due to the temporary nature of proposed road closures and availability of alternative evacuation routes within close proximity of the project site, impacts related to impairing an emergency response or evacuation plan would be *less than significant*. The project would benefit emergency access and evacuation routes in the long-term.

b) *No impact*. The project site is located in an urban area and includes a portion of San Luis Obispo Creek and its associated riparian vegetation corridor. The project would include the replacement of an existing bridge structure and improvements to existing roadways, as well as extension of an existing bike path. The project would not substantially change existing slopes on-site or result in the removal of a natural or built wind barrier. Furthermore, the project does not include the construction of any new structures for human occupancy. The project would not result in the exacerbation of fire risks due to slope, prevailing winds, or other factors that would expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, no *impacts would occur*.

c) *Less than significant impact.* The project is located within an urbanized area of the city with dense riparian vegetation located along the San Luis Obispo Creek corridor. Construction-related activities, including the relocation of existing power lines on-site, may result in the temporary minor increase of fire risk. However, this work would be carried out in compliance with applicable California Public Utilities Commission (CPUC) procedures and protocol, only a relatively short distance of power lines would need to be relocated (approximately 350 feet), and required fire safety equipment would be available on-site in the event of a fire. During operation, the new bridge structure and other roadway improvements would not result in an exacerbation of fire risk within the project vicinity. Therefore, impacts related to exposure of people or structures to significant risks involving wildfires would be *less than significant*.

d) *Less than significant impact.* The project site is generally flat and would not be located near a hillslope or in an area subject to downstream flooding or landslides. The project site is not in a designated high or very high wildfire risk area and does not include any design elements that would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be *less than significant*.

Conclusion

The project would not expose people or structures to new or exacerbated wildfire risks and would not require the development of new or expanded infrastructure or maintenance to reduce wildfire risks. Therefore, potential impacts associated with wildfire would be less than significant and no mitigation measures are necessary.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	N/A	☐	☒	☐	☐

The project may result in impacts to special-status wildlife, nesting birds, riparian habitat, designated critical habitat, and jurisdictional water features. However, mitigation measures have been identified to reduce potential impacts to a less-than-

significant level, including but not limited to, preconstruction surveys, worker environmental training program, limiting work to occur within the seasonal minimum creek flow period, and restoration and enhancement of riparian habitat off-site. The project may result in impacts to cultural or paleontological resources. Mitigation measures have been identified to reduce potential impacts to a less-than-significant level, including awareness training and incidental discovery protocol. Implementation of identified mitigation measures would reduce potential impacts on the environment, fish and wildlife species, and California historic and prehistoric resources to *less than significant with mitigation incorporated*.					
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	N/A	☐	☒	☐	☐
When project impacts are considered along with, or in combination with, other reasonably foreseeable impacts, the project's potential cumulative impacts may be significant. Mitigation measures have been incorporated into the project to reduce project-related impacts to a less-than-significant level. Based on implementation of identified project-specific mitigation measures and the relatively limited number and extent of potential impacts, the cumulative effects of the proposed project would not be cumulatively considerable and would be *less than significant with mitigation incorporated*.					
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	N/A	☐	☒	☐	☐
The project may result in noise impacts to surrounding sensitive land uses. Mitigation measures have been identified to reduce the potential of this impact to less than significant, including noticing and implementation of appropriate noise-reducing construction methods. With incorporation of mitigation identified in this Initial Study, potential environmental effects of the project would not directly or indirectly result in any substantial adverse effects on human beings and this impact would be *less than significant with mitigation incorporated*.					

22. EARLIER ANALYSES

Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or Negative Declaration. Section 15063 (c) (3) (D). In this case a discussion should identify the following items:
a) **Earlier analysis used.** Identify earlier analyses and state where they are available for review.
Not applicable.
b) **Impacts adequately addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
Not applicable.
c) **Mitigation measures.** For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions of the project.
Not applicable.

23. SOURCE REFERENCES

1.	Project Plans, August 2017
2.	City of San Luis Obispo Conservation & Open Space Element, 2006.
3.	Prado Road Bridge Widening Project Visual Assessment Impact Assessment, April 2019
4.	California Scenic Highways, February 2017
5.	City of San Luis Obispo Community Design Guidelines, June 2010
6.	City of San Luis Obispo Municipal Code, May 2019
7.	California Department of Conservation Farmland Mapping and Monitoring Program, 2016
8.	City of San Luis Obispo Interactive Parcel Viewer, January 2015
9.	California Air Resources Board Area Designation Maps / State and National, December 2018
10.	San Luis Obispo County Air Pollution Control Board Naturally Occurring Asbestos Mapping Tool, 2017
11.	Prado Road Bridge Replacement Project - Air Quality and Greenhouse Gas Emissions Impact Assessment in accordance with the California Environmental Quality Act, March 2021
12.	San Luis Obispo County Air Pollution Control District CEQA Air Quality Handbook, April 2012
13.	San Luis Obispo County Clean Air Plan, December 2001
14.	Clarification Memorandum for the San Luis Obispo County Air Pollution Control District's 2012 CEQA Air Quality Handbook, November 2017

15.	Initial Site Assessment Prado Road Bridge Replacement Project, July 2015
16.	Prado Road Bridge Widening Project Natural Environment Study, July 2019
17.	Prado Road Bridge Widening Project Biological Assessment, March 2020
18.	U.S. Department of Agriculture Natural Resources Conservation Service Web Soil Survey, Accessed August 2019
19.	Conceptual Habitat Mitigation and Monitoring Plan for the Prado Road Bridge Widening Project, September 2019
20.	Historical Resources Evaluation Report for the Prado Road Bridge Widening Project, July 2019
21.	Archaeological Survey Report for the Prado Road Bridge Widening Project, July 2019
22.	Central Coast Community Energy Webpage – Understanding Clean Energy. Available at: https://3cenergy.org/understanding-clean-energy/.
23.	City of San Luis Obispo Climate Action Plan for Community Recovery, July 2020
24.	City of San Luis Obispo General Plan Safety Element, July 2000.
25.	California Building Code, 2019
26.	Areas of Land Subsidence in California, USGS, Accessed September 2019
27.	Initial Site Assessment Prado Road Bridge Replacement Project Prado Road at San Luis Obispo Creek, July 2015
28.	California Department of Toxic Substances Control, Envirostor Accessed August 21, 2019
29.	State Water Resources Control Board, Geotracker Accessed August 21, 2019
30.	California Environmental Protection Agency, Cortese List Data Resources Accessed August 21, 2019
31.	County of San Luis Obispo Airport Land Use Plan, May 2005
32.	Center for Disease Control and Prevention (CDC), Understanding Noise Exposure Limits: Occupational vs. General Environment Noise, February 2016, Accessed September 4, 2019
33.	Diablo Canyon Emergency Planning Zone Map [n.d.]
34.	SGMA Groundwater Management, Department of Water Resources 2019
35.	Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region, California Regional Water Quality Control Board, July 2013
36.	Diversion/Dewatering Plan for the Prado Road Bridge Replacement Project, August 2019
37.	Federal Emergency Management Agency National Flood Hazard Layer Viewer, accessed September 3, 2019
38.	California Department of Conservation Tsunami Inundation Map for Emergency Planning Port San Luis Quadrangle, 2009

39.	San Luis Obispo Creek Watershed Enhancement Plan, January 2002
40.	Water Quality Control Plan for the Central Coastal Basin, June 2019
41.	City of San Luis Obispo Land Use & Circulation Update Final Program EIR – Volume 1, Draft Environmental Impact Report, September 2014, Available at:
42.	City of San Luis Obispo Noise Element, 1996
43.	Highway Traffic Noise Analysis and Abatement Policy and Guidance – Noise Fundamentals, Federal Highway Administration 2017
44.	Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration, September 2018
45.	Prado Road Bridge Replacement Project Noise Study Report, October 2019
46.	Transit Noise and Vibration Impact Assessment Manual. United States Department of Transportation, Federal Transit Administration (FTA), September 2018
47.	Transportation and Construction-Induced Vibration Guidance Manual. California Department of Transportation (Caltrans), September 2013
48.	City of San Luis Obispo Housing Element, November 2020
49.	City of San Luis Obispo Circulation Element, 2017
50.	City of San Luis Obispo Active Transportation Plan, February 2021
51.	San Luis Obispo Transit 2019-2020 User Guide, June 2019
52.	Regional Transit Authority Route 10 Informational PDF, December 2017
53.	Prado Road Creek Bridge Widening – Traffic Operations and VMT Analysis Memorandum, November 2020, Central Coast Transportation Consulting
54.	Prado Road Creek Bridge Widening – Construction Traffic Analysis Memorandum, February 2021, Central Coast Transportation Consulting
55.	City staff email correspondence, November 2020
56.	SWIS Facility Detail Cold Canyon Landfill, Inc., California Department of Resources Recycling and Recovery, Accessed September 16th, 2019

Attachments

1. Project Vicinity Map
2. Project Location Map
3. Noise Monitoring Positions and NAC Criteria Exceedance Map
4. Noise Barrier Location Map
5. Proposed Project Plan

REQUIRED MITIGATION AND MONITORING PROGRAMS

Air Quality

AQ-1 The SLOAPCD recognizes the public health risk reductions that can be realized by idle limitations for both on- and off-road equipment. The following idle restricting measures are required for the construction phase of projects:

a. Idling Restrictions Near Sensitive Receptors for Both On- and Off-Road Equipment.

1. Staging and queuing areas shall be located at the greatest distance from sensitive receptor locations;
2. Diesel idling when equipment is not in use is not permitted;
3. Use of alternative-fueled equipment is recommended whenever possible; and
4. Signs that specify the no-idling requirements must be posted and enforced at the construction site.

b. Idling Restrictions for On-Road Vehicles. Section 2485 of California Code of Regulations Title 13 limits diesel-fueled commercial motor vehicles that operate in the State of California with gross vehicular weight ratings of greater than 10,000 pounds and licensed for operation on highways. It applies to California- and non-California-based vehicles. In general, the regulation specifies that drivers of said vehicles:

1. Shall not idle the vehicle's primary diesel engine while vehicle is not in use, except as noted in Subsection (d) of the regulation; and
2. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 100 feet of a restricted area, except as noted in Subsection (d) of the regulation.

Signs must be posted in the designated queuing areas and job sites to remind drivers of the no-idling requirement. The specific requirements and exceptions in the regulation can be reviewed at the following web site: www.arb.ca.gov/msprog/truck-idling/2485.pdf.

c. Idling Restrictions for off-Road Equipment. Off-road diesel equipment shall comply with the no-idling requirement. Signs shall be posted in the designated queuing areas and job sites to remind off-road equipment operators of the no-idling requirement.

AQ-2 Throughout the construction phase of the project, the project applicant shall implement the following measures to minimize impacts to sensitive receptors and to significantly reduce fugitive dust emissions. These fugitive dust mitigation measures shall be shown on grading and building plans:

a. Reduce the amount of disturbed area where possible;

b. Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency would be required whenever wind speeds exceed 15 miles per hour. Reclaimed (non-potable) water should be used whenever possible;

c. All dirt stockpile areas should be sprayed daily or covered with tarps or other dust barriers, as needed;

d. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil-disturbing activities;

e. Exposed ground areas that are planned to be reworked at dates greater than 1 month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established;

f. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD;

g. 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;

h. Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site;

i. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code Section 23114;

j. Install wheel washers or other devices to control tracking of mud and dirt onto adjacent roadways where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site;

k. 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. Roads shall be pre-wetted prior to sweeping when feasible;

l. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below the SLOAPCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period, and to prevent transport of dust off-site. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Engineering and Compliance Division prior to the start of any grading, earthwork, or demolition.

AQ-3 Prior to initiation of ground-disturbing activities, the applicant shall retain a registered geologist to conduct a geologic evaluation of the property, including sampling and testing for naturally occurring asbestos (NOA) in full compliance with SLOAPCD requirements and the CARB ATCM for Construction, Grading, Quarrying, and Surface Mining Operations (17 CCR 93105). This geologic evaluation shall be submitted to the City Community Development Department upon completion. If the geologic evaluation determines that the project would not have the potential to disturb ACM, the applicant must file an Asbestos ATCM exemption request with the SLOAPCD.

AQ-4 If ACM are determined to be present on-site, proposed earthwork, demolition, and construction activities shall be conducted in full compliance with the various regulatory jurisdictions regarding ACM, including the CARB ATCM for Construction, Grading, Quarrying, and Surface Mining Operations (17 CCR 93105) and requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (NESHAP; 40 Code of Federal Regulations [CFR] Section 61, Subpart M – Asbestos). These requirements include, but are not limited to, the following:

a. Written notification, within at least 10 business days of activities commencing, to the SLOAPCD;

b. Preparation of an asbestos survey conducted by a Certified Asbestos Consultant; and

c. Implementation of applicable removal and disposal protocol and requirements for identified ACM.

AQ-5 All project-related earthwork and demolition of existing structures and/or infrastructure shall be conducted in compliance with applicable regulatory requirements, including the requirements stipulated in the NESHAP (40 CFR 61, Subpart M – asbestos). These requirements include, but are not limited to, notification to the SLOAPCD, an asbestos survey conducted by a Certified Asbestos Inspector, and applicable removal and disposal requirements of identified asbestos containing materials.

AQ-6 If during construction activities, paint is separated from existing infrastructure (e.g., chemically or physically), the paint waste shall be evaluated independently from the building material by a qualified hazardous materials inspector to determine proper management. All hazardous materials (e.g., lead based paint, etc.) shall be handled and disposed of in accordance with local, state, and federal regulations. If required, all lead work plans shall be submitted to SLOAPCD at least 10 days prior to the start of demolition. The applicant shall submit proof that paint waste has been evaluated by a qualified hazardous waste materials inspector and handled according to their recommendation to the City Community Development Department.

Monitoring Program: These measures shall be incorporated into project grading and building plans for review and approval by the City Community Development Department. Compliance shall be verified by the City during regular inspections, in coordination with the SLOAPCD, as necessary.

Biological Resources

BR-1 The Habitat Mitigation and Revegetation Plan shall include an assemblage of native flowering plants in order to provide pollination opportunities for western bumble bee and other insect species.

BR-2 Prior to construction, a biologist determined qualified by Caltrans and the CDFW shall survey the BSA for monarch butterfly roosts. If monarch butterfly roosts are observed, the biologist shall coordinate with Caltrans and the CDFW to establish an appropriate buffer zone to avoid direct impacts to roosts until roosting activity has ceased. Observations of monarch butterfly or other special-status species shall be documented on CNDDB forms and submitted to the CDFW upon project completion.

BR-3 During preconstruction surveys and/or during construction, any *Pyrgulopsis* spp. observed by biologists shall be relocated to suitable aquatic habitat outside of the area of impact.

BR-4 Prior to initiation of stream diversion/dewatering, a qualified biologist shall conduct a worker environmental training program, including a description of steelhead, steelhead critical habitat, its legal/protected status, proximity to the project site, avoidance/minimization measures to be implemented during the project, and the implications of violating FESA and permit conditions.

BR-5 In-stream work shall take place between June 15 and October 31 in any given year, when the surface water within San Luis Obispo Creek is likely to be at seasonal minimum. Deviations from this work window shall only be made with permission from the relevant regulatory agencies. During in-stream work, a qualified biologist that has experience in steelhead biology and ecology, aquatic habitats, biological monitoring (including diversion/dewatering), and capturing, handling, and relocating fish species shall be retained. During in-stream work, the biological monitor(s) shall continuously monitor placement and removal of any required stream diversions/dewatering and only the approved biologist shall capture stranded steelhead and other native fish species and relocate them to suitable habitat, as appropriate. The approved biologist(s) shall capture steelhead stranded as a result of diversion/dewatering and relocate steelhead to the nearest suitable in-stream habitat. The approved biologist(s) shall note the number of steelhead observed in the affected area, the number of steelhead relocated, and the date and time of the collection and relocation.

BR-6 During in-stream work, if pumps are incorporated to assist in temporarily dewatering the site, intakes shall be completely screened with no larger than 3/32-inch (2.38-millimeter) wire mesh to prevent steelhead and other sensitive aquatic species from entering the pump system. Pumps shall release the diverted water so that suspended sediment shall not reenter the stream. The form and function of pumps used during the dewatering activities shall be checked daily, at a minimum, by a qualified biological monitor to ensure a dry work environment and minimize adverse effects to aquatic species and habitats.

BR-7 Prior to and during construction activities, only USFWS-approved biologists shall participate in activities associated with the capture and handling of CRLFs.

BR-8 Ground disturbance shall not begin until written approval is received from the USFWS that the biologist(s) is qualified to do conduct the work, unless the individual(s) has/have been approved previously and the USFWS has not revoked that approval. Caltrans shall request approval of the biologist(s) from the USFWS.

BR-9 A USFWS-approved biologist shall survey the project area no more than 48 hours before the onset of work activities. If any life stage of the CRLF is found and these individuals are likely to be killed or injured by work activities, the approved biologist shall be allowed sufficient time to move them from the site before work activities begin. The USFWS-approved biologist shall relocate the CRLFs the shortest distance possible to a location that contains suitable habitat and shall not be affected by the activities associated with the project. The relocation site should be in the same

drainage to the extent practicable. Caltrans shall coordinate with USFWS on the relocation site prior to the capture of any CRLFs.

BR-10 Before any activities begin on a project, a USFWS-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of the CRLF and its habitat, the specific measures that are being implemented to conserve the CRLF for the current project, and the boundaries within which the project may be accomplished. Brochures, books, and briefings may be used in the training session, provided that a qualified person is on hand to answer any questions.

BR-11 A USFWS-approved biologist shall be present at the work site until CRLFs have been relocated out of harm's way, workers have been instructed, and disturbance of the habitat has been completed. After this time, the City shall designate a person to monitor on-site compliance with minimization measures. The USFWS-approved biologist shall ensure that this monitor receives the training outlined in the measure above and in the identification of CRLFs. If the monitor or the USFWS-approved biologist recommends that work be stopped because CRLFs would be affected in a manner not anticipated by the USFWS, Caltrans, and the City during the review of the proposed action, they shall notify the resident engineer (the engineer that is directly overseeing and in command of construction activities) immediately. The resident engineer shall either resolve the situation by eliminating the adverse effect immediately or require that actions that are causing these effects be halted. If work is stopped, the USFWS, Caltrans, and the City shall be notified as soon as is reasonably possible.

BR-12 During project activities, trash that may attract predators shall be properly contained, removed from the work site, and disposed of regularly. Following construction, trash and construction debris shall be removed from work areas.

BR-13 All refueling, maintenance, and staging of equipment and vehicles shall occur at least 100 feet from riparian habitat or water bodies and in a location from where a spill would not drain directly toward aquatic habitat (e.g., on a slope that drains away from the water). The monitor shall ensure contamination of habitat does not occur during such operations. Prior to the onset of work, Caltrans and the City shall ensure that a plan is in place for prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.

BR-14 Habitat contours shall be returned to their original configuration at the end of project activities. This measure shall be implemented in all areas disturbed by activities associated with the project, unless the USFWS, Caltrans, and the City determine that it is not feasible or modification or original contours would benefit the CRLF.

BR-15 The number of access routes, size of staging areas, and total area of activity shall be limited to the minimum necessary to achieve the project. Environmentally Sensitive Areas (ESAs) shall be established to confine access routes and construction areas to the minimum area necessary to complete construction, and minimize the impact to CRLF habitat; this goal includes locating access routes and construction areas outside of wetlands and riparian areas to the maximum extent practicable.

BR-16 Caltrans and the City shall attempt to schedule work for times of the year when impacts to CRLF would be minimal. For example, work that would affect large pools that may support breeding would be avoided, to the maximum extent practicable, during the breeding season (November through May). Isolated pools that are important to maintain CRLFs through the driest portions of the year would be avoided, to the maximum degree practicable, during the late summer and early fall. Habitat assessments, surveys, and technical assistance between the USFWS and Caltrans during project planning shall be used to assist in scheduling work activities to avoid sensitive habitats during key times of year.

BR-17 To control sedimentation during and after project implementation, Caltrans and the City shall implement Best Management Practices (BMPs) outlined in any authorizations or permits issued under the authorities of the Clean Water Act that it receives for the specific project. If BMPs are ineffective, Caltrans shall attempt to remedy the situation immediately, in coordination with the USFWS.

BR-18 If a work site is to be temporarily dewatered by pumping, intakes shall be completely screened with wire mesh not larger than 1/5 inch (5.08 millimeters) to prevent CRLFs from entering the pump system. Water shall be released downstream at an appropriate rate to maintain downstream flows during construction. Upon completion of

construction activities, any diversions or barriers to flow shall be removed in a manner that would allow flow to resume with the least disturbance to the substrate. Alteration of the streambed shall be minimized to the maximum extent possible; any imported material shall be removed from the streambed upon completion of the project.

BR-19 Unless approved by the USFWS, water shall not be impounded in a manner that may attract CRLFs.

BR-20 A USFWS-approved biologist shall permanently remove any individuals of exotic species, such as bullfrogs (*Lithobates catesbeiana*), crayfish, and centrarchid fishes, from the project area, to the maximum extent. The USFWS-approved biologist shall be responsible for ensuring their activities are in compliance with the California Fish and Game Code.

BR-21 If Caltrans and the City demonstrate that disturbed areas have been restored to conditions that allow them to function as habitat for CRLF, these areas shall not be included in the amount of total habitat permanently disturbed.

BR-22 To ensure that diseases are not conveyed between work sites by the USFWS-approved biologist, the fieldwork code of practice developed by the Declining Amphibian Task Force shall be followed at all times.

BR-23 Project sites shall be revegetated with an assemblage of native riparian, wetland, and upland vegetation suitable for the area. Locally collected plant materials shall be used to the extent practicable. Invasive, exotic plants shall be controlled to the maximum extent practicable. This measure shall be implemented in all areas disturbed by activities with the project, unless the USFWS, Caltrans, and the City have determined that it is not feasible or practical.

BR-24 Caltrans and the City shall not use herbicides as the primary method to control invasive, exotic plants. However, if Caltrans and the City determine the use of herbicides is the only feasible method for controlling invasive plants at a specific project site, the following additional measures shall be implemented to protect CRLF:

a. Caltrans and the City shall not use herbicides during the breeding season for CRLF.

b. Caltrans and the City shall conduct surveys for CRLF immediately prior to the start of herbicide use. If found, CRLF shall be relocated by a qualified biologist to suitable habitat far enough from the project area that no direct contact with herbicide would occur.

c. Cape ivy and other invasive plants shall be cut and hauled out by hand and painted with glyphosate-based products, such as Aquamaster® or Rodeo®.

d. Licensed and experienced Caltrans staff or a licensed and experienced contractor shall use a hand-held sprayer for foliar application of Aquamaster® or Rodeo® where large monoculture stands occur at an individual project site.

e. All precautions shall be taken to ensure that no herbicide is applied to native vegetation.

f. Foliar applications of herbicide shall not occur when wind speeds are in excess of 3 miles per hour.

g. No herbicides shall be applied within 24 hours of forecasted rain.

h. Application of herbicides shall be done by qualified Caltrans staff, City staff, or contractors to ensure that overspray is minimized, application is made in accordance with the label recommendations, and required and reasonable safety measures are implemented. A safe dye shall be added to the mixture to visually denote treated sites. Application of herbicides shall be consistent with the USEPA Office of Pesticide Programs Endangered Species Protection Program county bulletins.

i. All herbicides, fuels, lubricants, and equipment shall be stored, poured, or refilled at least 100 feet from riparian habitat or water bodies in a location where a spill would not drain directly toward aquatic habitat. Caltrans and the City shall ensure that a plan is in place for a prompt and effective response to accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.

BR-25 Upon completion of the project, Caltrans and the City shall ensure that a Project Completion Report is completed and provided to the USFWS Ventura Field Office. Caltrans and the City shall recommended modifications of the protective measures if alternative measures would facilitate compliance with the provisions of the consultation. In addition,

Caltrans shall reinitiate formal consultation in the event any of the following thresholds are reached as a result of the projects conducted under the provisions of the consultation associated with the Programmatic Biological Opinion:

Caltrans shall reinitiate consultation when, as a result of projects conducted under the provision of the consultation associated with the Programmatic Biological Opinion, any of the following occur:

a. 10 CRLF adults or juveniles have been killed or injured in any given year (for this and all other standards, an egg mass is considered to be a CRLF);

b. 50 CRLFs have been killed or injured in total;

c. 20 acres of critical habitat for the CRLF that include the primary constituent elements of aquatic breeding and non-breeding aquatic habitat and upland and dispersal habitat have been permanently lost in any given year;

d. 100 acres of critical habitat for the CRLF that include the primary constituent elements of aquatic breeding and non-breeding aquatic habitat and upland and dispersal habitat have been permanently lost in total;

e. 100 acres of critical habitat for the CRLF that include the primary constituent elements of aquatic breeding and non-breeding aquatic habitat and upland and dispersal habitat have been temporarily disturbed in any given year; or

f. 500 acres of critical habitat for the CRLF that include the primary constituent elements of aquatic breeding and non-breeding aquatic habitat and upland and dispersal habitat have been temporarily disturbed in total.

BR-26 Prior to construction, a biologist determined qualified by Caltrans and the CDFW shall survey the BSA and, if present, capture and relocate any Coast Range newts and southwestern pond turtles to adjacent suitable habitat upstream or downstream of the BSA. Observations of these or other special-status species shall be documented on CNDDB forms and submitted to CDFW upon project completion. If these species or other CDFW Species of Special Concern aquatic species are observed during construction, they shall likewise be relocated to suitable upstream habitat by a qualified biologist.

BR-27 If feasible and regulatory approvals allow, tree removal shall be scheduled to occur from October 1 to January 31, outside of the typical nesting bird season, to avoid potential impacts to nesting birds. If tree removal or other construction activities are proposed to occur within 100 feet of potential habitat during the nesting season (February 1 to September 1), a nesting bird survey shall be conducted by a biologist determined qualified by Caltrans no more than 3 days prior to construction. If an active nest is found, a qualified biologist shall determine an appropriate buffer and monitoring strategy based on the habits and needs of the species. The buffer area shall be avoided until a qualified biologist has determined that juveniles have fledged.

BR-28 If least Bell's vireo, southwestern willow flycatcher, and/or western yellow-billed cuckoo are observed within 100 feet of construction activities, a qualified biologist shall implement an exclusion zone and work shall be avoided within the exclusion zone until the least Bell's vireo, southwestern willow flycatcher, and/or western yellow-billed cuckoo are located greater than 100 feet from project-related disturbance. If an active least Bell's vireo, southwestern willow flycatcher, and/or western yellow-billed cuckoo nest is observed within 100 feet of the BSA, all project activities shall immediately cease and Caltrans shall contact the USFWS and CDFW within 48 hours. If required, Caltrans shall then initiate FESA Section 7 formal consultation with the USFWS and California Endangered Species Act (CESA) coordination for least Bell's vireo, southwestern willow flycatcher, and/or western yellow-billed cuckoo and implement additional measures as necessary.

BR-29 Prior to demolition of the existing bridge, birds shall be excluded from the existing bridge. Nesting bird exclusion methods may include installation of exclusion netting, removing/knocking down nests before they contain eggs, or other methods approved by the CDFW. Installation of exclusion netting shall occur outside of the typical nesting season (i.e., implement exclusion methods from September 2 to January 31).

BR-30 Prior to demolition of the existing bridge, bats shall be passively excluded from the existing bridge with exclusion netting or other means. Installation of exclusion shall occur outside of the typical maternity roosting season (i.e., implement exclusion from September 2 to February 14).

BR-31 If tree removal is required during the bat maternity roosting season (February 15 to September 1), a bat roost survey shall be conducted by a qualified biologist within 3 days prior to removal. If an active bat roost is found, Caltrans shall coordinate with the CDFW to determine an appropriate buffer based on the habits and needs of the species. Readily visible exclusion zones shall be established in areas where roosts must be avoided using ESA fencing. Work in the buffer area shall be avoided until a qualified biologist has determined that roosting activity has ceased. Active bat maternity roosts shall not be disturbed or destroyed at any time.

BR-32 If it is determined that a substantial impact to pallid bat, western mastiff bat, or a maternity roost shall occur, then the City shall compensate for the impact through the development and implementation of a mitigation plan in coordination with the CDFW.

BR-33 Prior to issuance of construction permits, the City shall prepare a Habitat Mitigation and Revegetation Plan to assist project planners in preparing agency permit applications associated with the permanent and temporary impacts to U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) jurisdictions in San Luis Obispo Creek. The HMRP shall be prepared in compliance with the guidelines provided in the *Final 2015 Regional Compensatory Mitigation and Monitoring Guidelines for South Pacific Division USACE* (USACE 2015), the *Checklist for Compensatory Mitigation Proposals* (USACE 2008a), and the *Final Rule for Compensatory Mitigation for Losses of Aquatic Resources*. The HMRP shall identify proposed mitigation ratios to compensate for permanent and temporary impacts to jurisdictional areas expected from the project. The HMRP shall identify the proposed 1:1 restoration ratio in-kind for temporary impacts, a 2:1 restoration or enhancement ratio in-kind for permanent impacts resulting in degradation of ecological conditions, and a 3:1 restoration or enhancement ratio in-kind for permanent impacts resulting in permanent loss. The final mitigation requirements shall be determined through the permitting process and a final Compensatory Mitigation Plan will need to be approved by the USACE, CDFW, and RWQCB.

BR-34 Prior to construction, the City shall obtain a Section 404 Permit from the USACE, a Section 401 Water Quality Certification from the RWQCB, and a Section 1600 Streambed Alteration Agreement from the CDFW for project-related impacts that shall occur in areas under state and federal jurisdiction.

BR-35 Prior to construction, the City shall retain a qualified biological monitor(s) to monitor construction and ensure compliance with the avoidance and minimization efforts outlined within all project environmental documents. At a minimum, monitoring shall occur during initial ground disturbance activities and vegetation removal within the San Luis Obispo Creek corridor. Monitoring may be reduced to part time once initial disturbance and vegetation removal activities are complete. The duration of monitoring should be at least once per week throughout the remaining construction phases, unless specified otherwise by permitting agencies.

BR-36 Prior to construction, all personnel shall participate in an environmental awareness training program conducted by a qualified biologist. The program shall include a description of the sensitive aquatic resources within the BSA and the boundaries within which the project may be accomplished. If appropriate, the biologist may train and designate a representative of the City or other designee to provide training to subcontractors or personnel that shall be on-site for short durations during the project.

BR-37 Construction activities within jurisdictional areas shall be conducted during the dry season when stream flows will be at annual lows (June 15 and October 31) in any given year, or as otherwise directed by the regulatory agencies. Deviations from this work window can be made with permission from the relevant regulatory agencies.

BR-38 Prior to initiation of any construction activities, including vegetation clearing or grubbing, sturdy high-visibility fencing shall be installed to protect the jurisdictional areas adjacent to the designated work areas. This fencing shall be placed so that unnecessary adverse impacts to the adjacent habitats are avoided. No construction work (including storage of materials) shall occur outside of the specified project limits. The fencing shall remain in place during the entire construction period, be monitored periodically by a qualified biologist, and be maintained as needed by the contractor.

BR-39 Prior to construction, a Storm Water Pollution Prevention Plan or Water Pollution Control Plan for the project shall be prepared. Provisions of this plan shall be implemented during and after construction as necessary to avoid and minimize erosion and stormwater pollution in and near the work area.

BR-40 Prior to construction, the contractor shall prepare a Hazardous Materials Response Plan to allow for a prompt and effective response to any accidental spills. Workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.

BR-41 During construction, erosion control measures (e.g., silt fencing, fiber rolls, and barriers) shall remain available on-site and shall be utilized as necessary to prevent erosion and sedimentation in jurisdictional areas. No synthetic plastic mesh products shall be used for erosion control and use of these materials on-site is prohibited. Erosion control measures shall be checked to ensure that they are intact and functioning effectively and maintained on a daily basis throughout the duration of construction. The contractor shall also apply adequate dust control techniques, such as site watering, during construction to protect water quality.

BR-42 During construction, the cleaning and refueling of equipment and vehicles shall occur only within a designated staging area and at least 100 feet (30 meters) from wetlands or other aquatic areas. At a minimum, equipment and vehicles shall be checked and maintained on a daily basis to ensure proper operation and avoid potential leaks or spills.

BR-43 During construction, trash shall be contained, removed from the work site, and disposed of regularly. Following construction, trash and construction debris shall be removed from the work areas. Vegetation removed from the construction site shall be taken to a permitted landfill to prevent the spread of invasive species. If soil from weedy areas (such as areas with poison hemlock [*Conium maculatum*] or other invasive exotic plant species) must be removed to an off-site location, the top 6 inches (152 millimeters) containing the seed layer in areas with weedy species shall be disposed of at a permitted landfill.

BR-44 During construction, no pets shall be allowed on the construction site.

Monitoring Program: These conditions and measures shall be noted on all grading and construction plans. The City Community Development Department and Natural Resources Manager shall verify compliance.

Cultural Resources

CR-1 In the event that historical or archaeological remains are discovered during earth-disturbing activities associated with the project, an immediate halt work order shall be issued and the City Community Development Director and City Public Works Director shall be notified. A qualified archaeologist shall conduct an assessment of the resources and formulate proper mitigation measures, if necessary. After the find has been appropriately mitigated, work in the area may resume. A Chumash representative shall monitor any mitigation excavation associated with Native American materials.

CR-2 In the event that human remains are exposed during earth-disturbing activities associated with the project, an immediate halt work order shall be issued and the City Community Development Director and City Public Works Director shall be notified. State Health and Safety Code Section 7050.5 requires that no further disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner shall notify the Native American Heritage Commission within 24 hours.

Monitoring Program: These conditions shall be noted on all grading and construction plans. The City Community Development Department shall verify compliance.

Hazards & Hazardous Materials

HAZ-1 All project-related spills or leaks of hazardous materials shall be cleaned up immediately. Spill prevention and clean-up materials shall be located on-site at all times during construction.

HAZ-2 Prior to issuance of construction permits, soil sampling shall be conducted in areas of the South Higuera Street right-of-way where soil disturbance or excavation is proposed for the presence of hazardous materials, including aerially deposited lead (ADL) and hydrocarbons. Soil sampling shall be conducted by a licensed geologist or other qualified

professional as approved by the City. ADL sampling shall focus on unpaved areas and formerly unpaved areas within the right-of-way and shall be conducted in accordance with current Caltrans guidance documents. Analytes to be targeted should include gasoline-, diesel-, and oil-range hydrocarbons; volatile organic compounds; and fuel oxygenates. If contaminated soil is present, the appropriate abatement actions shall be implemented in accordance with applicable Caltrans Standard Special Provisions and other applicable standards.

HAZ-3 A Soil Management Plan and Health and Safety Plan shall be developed for the project to ensure contaminated soils excavated during project construction are handled, stockpiled, and disposed of in accordance with federal, state, and local regulations. Special handling, treatment, or disposal of ADL in soils during construction activities shall be consistent with the DTSC and Caltrans Soil Management Agreement for Aerially Deposited Lead-Contaminated soils (effective July 1, 2016).

HAZ-4 Prior to issuance of construction permits, yellow traffic striping and similar pavement parking materials shall be tested for presence of elevated levels of metals that would require removal and special disposal measures during construction per Caltrans Standard Special Provisions and other applicable standards.

Monitoring Program: These measures shall be incorporated into project grading and building plans for review and approval by the City Community Development, SLOFD, and City Public Works Departments. Compliance shall be verified by the City during regular inspections.

Noise

N-1 For the entire duration of the construction phase of the project, the following BMPs shall be adhered to:

a. Stationary construction equipment that generates noise that exceeds 60 dBA at the project boundaries shall be shielded with the most modern noise control devises (i.e. mufflers, lagging, and/or motor enclosures).

b. Impact tools (e.g., jack hammers, pavement breakers, rock drills, etc.) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed-air exhaust from pneumatically powered tools.

c. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed-air exhaust shall be used.

d. All construction equipment shall have the manufacturers' recommended noise abatement methods installed, such as mufflers, engine enclosures, and engine vibration insulators, intact and operational.

e. All construction equipment shall undergo inspection at periodic intervals to ensure proper maintenance and presence of noise control devices (e.g., mufflers, shrouding, etc.).

f. Plan noisier operations and activities during times least sensitive to nearby receptors.

g. Maintain good public relations with surrounding community members and provide frequent activity updates of all construction activities. Let all surrounding community members know that all noise-related complaints shall be directed to the City Public Works Department.

N-2 Construction plans shall note construction hours, truck routes, and all construction noise BMPs, and shall be reviewed and approved by the City Community Development and Public Works Departments prior to issuance of grading/building permits. The City shall provide and post signs stating these restrictions at construction entry sites prior to commencement of construction and maintained throughout the construction phase of the project. All construction workers shall be briefed at a preconstruction meeting on construction hour limitations and how, why, and where BMP measures are to be implemented. Noise-related complaints shall be directed to the City Public Works Department.

Monitoring Program: These measures shall be incorporated into project grading and building plans for review and approval by the City Community Development Department. Compliance shall be verified by the City during regular inspections.

Transportation

TR-1 At least 8 weeks prior to scheduled road closure, the City shall notify SLO Transit and local emergency service providers (including the SLOFD, SLOPD, and San Luis Ambulance Services) of road closure along Prado Road. The notice shall include dates and estimated duration of the closure, identify alternative access routes to properties made inaccessible by the closure (as applicable), and contact information available if there are issues or complaints. Complaints shall be directed to the City Public Works Department.

TR-2 Construction Traffic Management Plan. Prior to the issuance of each building permit, the construction contractor shall meet with the City Public Works department to determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion, impacts to bicyclists and pedestrians, impacts to public transit services, and impacts to emergency service providers during construction of the project. The construction contractor will develop a construction management plan for review and approval by the Public Works department. The plan shall include at least the following items and requirements:

- A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic and pedestrian hours, detour signs if required, lane closure procedures, sidewalk closure procedures, signs, designated construction access routes, and temporary traffic control measures for automobile, bicycle, and pedestrian traffic.

- Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur.

- Location of construction staging areas for materials, equipment, and vehicles.

- Identification of haul routes for movement of construction vehicles that would minimize impacts on vehicular and pedestrian traffic, circulation and safety; and provision for monitoring surface streets used for haul routes so that any damage and debris attributable to the haul trucks can be identified and corrected by the project applicant.

- Temporary construction fences to contain debris and material and to secure the site.

- Provisions for removal of trash generated by project construction activity.

- A process for responding to and tracking complaints pertaining to construction activity. Complaints shall be directed to the City Public Works Department.

- Provisions for monitoring surface streets used for truck routes so that any damage and debris attributable to the trucks can be identified and corrected, including regular street sweeping within the project vicinity.

- Location and signage of bicycle and pedestrian detours. Safe access for pedestrians and bicyclists shall be maintained to the greatest extent possible throughout the duration of construction activities.

- In the event the Prado Road Bridge Replacement Project is under construction at the same time as the US 101/Prado Road Interchange Project during any portion of the construction schedule, at least one connection from US 101 to the City street network shall be maintained at all times (e.g., via the Prado Road/South Higuera intersection or Elks Lane/South Higuera intersection). The Construction Traffic Management Plan shall include measures that identify the necessary steps that would be taken by the construction contractor and the City to ensure this connection is maintained.

The plan may also include, but is not limited to, the following measures:

- Signal timing modification and/or optimization at surrounding intersections;

- Restriping at surrounding intersections to improve traffic flow; and

- Installation of temporary signalization at the Higuera Street/Elks Lane intersection prior to closure of the Prado Road Bridge.

It is anticipated that recommendations of the Construction Traffic Management Plan for temporary signing, striping, signalization of the S. Higuera/Elks Lane intersection, and other construction traffic control would be incorporated into the project Plan, Specification, and Estimate (PS&E) and developed in the context of the City Municipal Code Construction and Fire Prevention Regulations and the City of San Luis Obispo 2013 Construction & Fire Codes, which address other issues such as hours of construction onsite, limitations on noise and dust emissions, and other applicable items.

Monitoring Program: These measures shall be incorporated into project grading and building plans for review and approval by the City Community Development and City Public Works Departments. Compliance shall be verified by the City during regular inspections.

Tribal Cultural Resources

TCR-1 A qualified archaeologist and Native American monitor shall be present during all project related construction activities that result in disturbance of native soil that may contain tribal cultural resources. Monitoring activities shall be conducted in accordance with a Monitoring Plan as approved by the City Community Development Department. The plan shall include provisions such as:

a. List of personnel involved in the monitoring activities including a Native American monitor;

b. Description of how the monitoring shall occur;

c. Description of monitoring frequency;

d. Description of circumstances that would result in the "work diversion," in the case of discovery, at the project site;

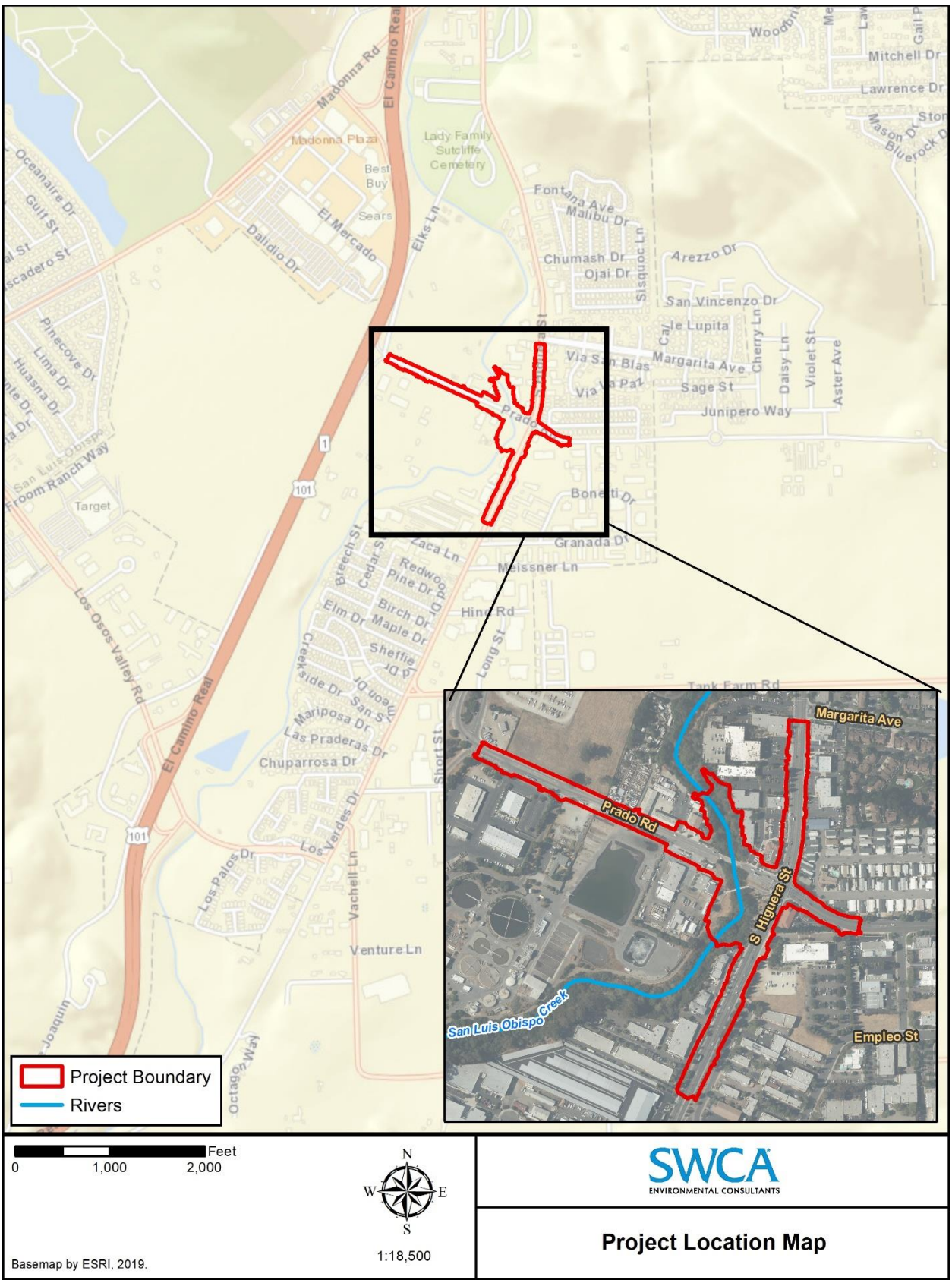
e. Description of procedures for diverting work on the site and notification procedures;

f. Description of monitoring reporting procedures; and

g. Description of the procedures for reburial of artifacts and/or human remains within identified areas on the project site or other suitable location.

Monitoring Program: This measure shall be noted on all project grading and building plans for review and approval by the City Community Development and City Public Works Departments. Compliance shall be verified by the City during regular inspections.


California
Salinas
Fresno
Visalia
San Luis Obispo
Bakersfield
Project Location
Santa Maria
Lompoc
Santa Barbara
Oxnard
Camp San Luis Obispo
Cabrillo Hwy
N Santa Rosa St
Los Osos Valley Rd
W Foothill Blvd
E Foothill Blvd
El Camino Real
San Luis Obispo
Higuera St
Broad St
Restoration Mitigation Area
Project Location
Tank Farm Rd
Buckley Rd
Edna Rd
Price Canyon Rd
Carpenter Canyon Rd
Noyes Rd
Avila Beach
Pismo Beach
Arroyo Grande
Miles
0
2
4
N
W
E
S
1:150,000
Basemap by ESRI, 2019.
SWCA
ENVIRONMENTAL CONSULTANTS
Project Vicinity Map



SWCA ENVIRONMENTAL CONSULTANTS

Project Location Map


MARGARITA AVE
Area J
ST-1
Area I
Area H
35
39
36
40
37
41
38
42
ST-4
1
Area A
12
14
20
25
27
8
13
15
21
26
28
9
PRADO RD
Area G
10
16
17
22
29
32
11
2
3
ST-5
18
23
30
33
19
4
Area B
24
31
34
HIGUERA ST
ST-2
5
6
ST-3
7
Area C
Area F
Area D
Legend
Analysis Areas
Noise Monitoring Locations
Impact
Approach/Exceed Noise Abatement Criteria
None
0
175
350
Feet
N
Area E


Prado Rd
S Higuera St
Via Ensenada
Prado Rd
Project Boundary
Optional Noise Barrier
Feet
0
100
200
N
W
E
S
1:1,700
Aerial Imagery by County of San Luis Obispo, 2014.
SWCA
ENVIRONMENTAL CONSULTANTS
Optional Noise Barrier Location Map

ATTACHMENT 5

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CITY OF SAN LUIS OBISPO

PRADO ROAD BRIDGE WIDENING
OVERALL ILLUSTRATIVE LAYOUT PLAN
May 19, 2022

PRELIMINARY
NOT FOR CONSTRUCTION

WALLACE GROUP®