



## INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM

**For Plan No. EID-0437-2022**

**1. Project Title:** General Plan Climate Adaptation and Safety Element (CASE)

**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:**

Teresa McClish, Housing Policy and Programs Manager  
(805) 783-7840

**4. Project Location:**

Citywide, City of San Luis Obispo

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

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

**6. General Plan Designations:**

All land use designations within the City.

**7. Zoning:**

All zones within the City.

**8. Description of the Project:**

The project is the Climate Adaptation and Safety Element (CASE) of the City's General Plan. The CASE updates and replaces the existing Safety Element, which was adopted in 2012. The CASE would serve as the City's Safety Element, which is a required element of a general plan under State law. It also implements State requirements for the Environmental Justice Element in accordance with State Guidelines.

The purpose of the CASE is to reduce the potential short and long-term risk of death, injuries, property damage, and economic and social disruptions resulting from wildfires, floods, droughts, earthquakes, landslides, climate change, and natural and manmade hazards. The increasing severity of impacts of climate change is also a critical consideration in safety elements. State law requires that the safety element include a vulnerability assessment that identifies the risks posed by climate change and a series of adaptation goals, policies, and implementation measures designed to protect the community (Senate Bill [SB] 379, 2015). The CASE also identifies hazards and abatement provisions to guide local decisions related to zoning, subdivisions, and entitlement permits, and includes general hazard and risk reduction strategies complementary to those included in the City's Local Hazard Mitigation Plan (LHMP).

The CASE describes the major hazards present in the city, and where appropriate explains how climate change exacerbates hazards. The types of hazards discussed are: flooding, extreme heat, fire, earthquakes and other geological hazards, hazardous materials, electromagnetic fields, and city operations and emergency services. It then sets forth goals describing a future in which the City's physical, natural, and social systems are resilient to and provide protection from these hazards.

For each hazard, the CASE establishes policies outlining the specific courses of action the City will take to achieve the goals, and programs the City will implement to carry out the policies.

**9. Project Entitlements:**

Adoption of the CASE by the City Council

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

Citywide

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

On August 8, 2022, Native American tribes that have a cultural or traditional affiliation to the area were formally noticed that an Initial Study of Environmental Review was being completed for the CASE. None of the noticed tribes requested consultation pursuant to Public Resources Code Section 21080.3.1.

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

None

**13. Use of this Document**

The CASE is a policy document and does not directly authorize any physical development or improvements. Any future physical improvements would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the State CEQA Guidelines.

The evaluation of environmental impacts in this IS/ND focuses on analysis of policies and programs of the CASE that, when implemented, would have the potential to result in changes to the existing physical environment. Policies and programs that clearly would have no potential to result in physical environmental changes, such policies and programs that direct the City to conduct a study, coordinate with other public agencies, incorporate data or projections into other planning documents, engage with or provide information to residents or businesses, or make reference to existing, ongoing City initiatives, are not discussed in the environmental impact evaluation.

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

## FISH AND WILDLIFE FEES

<input type="checkbox"/>	The California 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).
<input type="checkbox"/>	The project has potential to impact fish and wildlife resources and shall be subject to the payment of Fish and Game fees pursuant to Section 711.4 of the California Fish and Game Code. This initial study has been circulated to the California Department of Fish and Wildlife for review and comment.

## STATE CLEARINGHOUSE

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

On the basis of this initial evaluation:

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

  
Signature

11/9/2022  
Date

Tyler Corey  
Printed Name

For:  
Community Development Director

# EVALUATION OF ENVIRONMENTAL IMPACTS

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

# 1. AESTHETICS

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

## Evaluation

a), b), c), d) The city combines a compact urban form in a rural setting and does not have one character, but several, transitioning from urban in its Downtown Core to more suburban along the edges. The city includes public views of many scenic features, such as The Morros, Santa Lucia Mountains, Irish Hills, Laguna Lake, creeks, and open space and agricultural fields surrounding the city (Land Use and Circulation Element [LUCE] FEIR Table 4.1-2). A total of 20 roadway segments in the city are identified as scenic corridors in the Circulation Element and Conservation and Open Space Element (COSE), as either High or Moderate Value (LUCE FEIR Table 4.1-1). Examples of scenic corridors include segments of U.S. Highway 101, South Higuera Street, Broad Street, Tank Farm Road, and Johnson Avenue.

Implementation of the CASE would result in minor physical changes to the visual aesthetic of the city. For example, CASE Policy 3.1 regarding climate-informed flood management would increase the installation of green infrastructure improvements to manage stormwater runoff, including rain gardens, bioswales, detention basins, permeable parking lots, and permeable pavements. The features would typically be installed in the place of gray infrastructure such as gutters, drains, pipes, and ditches, and therefore would not adversely affect the visual character of affected areas in the city.

CASE Programs 4.4 and 4.5 regarding the city’s urban tree canopy and strategy to mitigate urban heat island effect would increase the number of trees planted and maintained in the city, and also increase the use of building and site design techniques that address urban heat island effect, including reflective roofing and placement of solar carports over surface parking lots. In addition, CASE Policy 4.3, which directs the City to update its building retrofit program to incorporate improvements that increase resilience to extreme heat events and wildfire risk, such as HVAC-systems, air filtration systems, weatherization and energy efficiency improvements, and home hardening against wildfire, would result in physical improvements to the interiors and exteriors of buildings in the city.

Interior building improvements would not affect visual character or the city’s aesthetic, while exterior building and site improvements, such as new trees, HVAC systems, reflective roofing, and solar carports, are often visible from adjacent properties, and depending on their placement, could obstruct line of sight or create glare that changes existing views. Implementation of CASE Policy 5.4 would also result in installation of access roads, where feasible, to ensure adequate access for emergency equipment and civilian evacuation during wildfires. New access roads can change existing visual character of an area, for example by adding an element of developed infrastructure to an otherwise natural or undeveloped area, can add new sources of light to an area, for example from streetlights or vehicle headlights.

However, existing General Plan policies and programs protecting aesthetic resources and visual character would prevent implementation of the CASE from impeding or blocking public views of scenic features, including from scenic corridors;

degrading the existing visual character of any of the city’s many different communities; and adversely affecting day or nighttime views due to creating sources of substantial light or glare. Examples of these policies include but are not limited to 1.7.1 regarding protection of open space and agricultural land from development, Circulation Element Policy 15.1.2 regarding the preservation and improvement of views of scenic resources from roadways, Circulation Element Policy 15.03 regarding placement of public equipment and facilities to avoid harming the visual quality of scenic highways or blocking views from scenic routes with trees, Conservation and Open Space Element Policy 9.1.1 regarding preservation and maintenance of existing natural and agricultural landscapes, Conservation and Open Space Element Policy 9.1.4 regarding creation of scenic parkways along new or significantly modified major roadways, Conservation and Open Space Element Policy 9.2.1 protecting views from public places including scenic roadways, and Conservation and Open Space Element Policy 9.2.3 establishing limits on outdoor lighting. Municipal Code Section 17.76.100.B requires that all exterior mechanical and electrical equipment, such as air conditioners, heaters, and utility meters be screened from view so as not to be visible from the public right-of-way or adjacent residential zones. The CASE does not include any policies or programs that could conflict with zoning or other regulations governing scenic quality in urbanized areas of the city.

In addition, Title 17 of the City’s Municipal Code (Zoning Ordinance), includes standards preventing the creation of new sources of substantial light or glare, including prohibitions on creating glare (for example from reflective roofing) that creates a hazard or a nuisance on another property (Section 17.74.080) and outdoor lighting regulations protecting against degradation of the nighttime visual environment (Section 17.70.100).

**Conclusion**

Less than significant impact.

**2. AGRICULTURE AND FORESTRY RESOURCES**

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	1, 2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	1, 3	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	1, 3	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Evaluation**

a), b), c), d), e) The City of San Luis Obispo (SLO) is in the central portion of the County's agricultural region. The city is, for the most part, urbanized with only a few small areas still engaged in agricultural production limited to areas zoned in the city as Open Space. Two key areas within and adjacent to the city contain prime soils, including the San Luis Ranch property and portions of the Airport Area Specific Plan, notably an area just north of Tank Farm Road designated for Services and Manufacturing, as well as a large area in the center of the Plan Area south of Tank Farm Road designated as Public land (FEIR Figure 4.2-2). SLO City Farm is approximately 25 acres and located off of Highway 101 and Calle Joaquin Road. Properties zoned for agriculture are located near the southern and northwestern limits of the city, and there are no properties within city limits under Williamson Act contracts. No forest or timberland resources are located in the city.

Implementation of the CASE would result in minor physical changes to the city. For example, CASE Policy 3.1 regarding climate-informed flood management would increase the installation of green infrastructure improvements to manage stormwater runoff, including rain gardens, bioswales, detention basins, permeable parking lots, and permeable pavements. The features would typically be installed in the place of gray infrastructure such as gutters, drains, pipes, and ditches to manage runoff volumes generated by urban development. CASE Policies 3.2 and 3.3 regarding the city's urban tree canopy and strategy to mitigate urban heat island effect would increase the number of trees planted and maintained in the city, and also increase the use of building and site design techniques that address urban heat island effect, including reflective roofing and placement of solar carports over surface parking lots. In addition, CASE Policy 3.5, which directs the City to update its building retrofit program to incorporate improvements that increase resilience to extreme heat events and wildfire risk, such as HVAC-systems, air filtration systems, weatherization and energy efficiency improvements, and home hardening against wildfire, would result in physical improvements to the interiors and exteriors of buildings in the city. The aforementioned improvements to building interiors and exteriors, and to sites developed with buildings and other urban uses (e.g., parking lots) would not have potential to adversely affect agricultural or forestry resources because they would not occur in areas where such sensitive resources are present.

Implementation of CASE Policy 4.3 would also result in installation of access roads, where feasible, to ensure adequate access for emergency equipment and civilian evacuation during wildfires. Depending on the location, installation of access roads can involve ground disturbing activities such as clearing and grubbing, grading, compacting, and laying of pavement or other impervious or all-weather surfaces. New access roads, if installed, would link existing residential developments in the city to the existing circulation network to facilitate emergency access and evacuation during emergencies. As a result, they would occur in existing developed areas of the city and are not anticipated to convert important farmlands to non-agricultural use or conflict with existing zoning for agricultural use, or result in indirect or edge effects to agricultural resources. Furthermore, Land Use Element Policy 1.7.1 directs the City to protect prime agricultural land, productive agricultural land, and potentially productive agricultural land within the Urban Reserve and city limits for farming, and permanently protect undeveloped prime agricultural land as open space. Therefore, the installation of emergency access roads would not adversely affect agricultural resources.

**Conclusion**

Less than significant impact.



### 3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	1, 4	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	1, 4	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Evaluation

a), b), c), d) The project site is located in the South Central Coast Air Basin (the basin), which includes San Luis Obispo, Santa Barbara, and Ventura Counties. The project site is under the jurisdiction of the San Luis Obispo County Air Pollution Control District (SLOCAPCD), which is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met (“non-attainment”), to develop strategies to meet the standards. Air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-attainment. San Luis Obispo County is designated as non-attainment for State standards for particulate matter (PM10) and ozone, and non-attainment for the federal ozone standard (for Eastern SLO County only) (SLOCAPCD 2019). San Luis Obispo County is designated as attainment or unclassified for all other federal and state standards.

In March 2002, SLOCAPCD adopted the 2001 Clean Air Plan, and in 2015 adopted a Particulate Matter Report with control measures for particulate matter. SLOCAPCD also adopted an Ozone Emergency Episode Plan in 2019, in compliance with the Federal Clean Air Act, in order to provide the basis for taking actions when ambient ozone concentrations reach a level that could endanger public health in San Luis Obispo County.

Implementation of the CASE would result in the construction of smaller-scale physical improvements within the city, which would involve use of vehicles and operation of equipment that would generate criteria air pollutant emissions and toxic air contaminants (TACs) like diesel PM that, depending on the concentration and duration of exposure, are harmful to human health. For example, CASE Programs 4.4 and 4.5 to increase the number of trees planted and maintained in the city would involve minor operation of small pieces of construction equipment (e.g., digging holes, trimming established trees). CASE Programs 4.4 and 3.7 would also involve small-scale construction operations generating minor air pollutant emissions, such as installation of solar carports and green infrastructure improvements like bioswales or permeable pavement. Installation of access routes as called for in CASE Program 3.7 would involve construction activities such as clearing and grubbing, grading, compacting, and laying of pavement or other impervious or all-weather surfaces.

Overall, implementation of the CASE would not result in large-scale construction activities, such as new housing, commercial, or institutional developments, or major infrastructure improvements, which are capable of generating substantial emissions of non-attainment pollutants (i.e., PM10, or ozone precursors ROG and NOx) or exposing people to substantial concentrations of TAC emissions over temporary, short-term periods. It also would not meaningfully increase air pollutant emissions over the long-term, because it would not substantially increase air pollutant emissions from vehicles traveling within, and to and from, the city, or from areawide sources like consumer products, stationary sources like power plants, or sources of TAC emissions like freeways, railyards, gas stations, or distribution centers. Implementation of the CASE would not interfere with implementation of the Clean Air Plan, control measures of the Particulate Matter Report, or Ozone Emergency Episode Plan, because it would not alter the growth projections for the city on which these applicable air quality plans are based.

#### Conclusion

Less than significant impact.

#### 4. BIOLOGICAL RESOURCES

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Evaluation

a), b), c), d), e), f) A variety of natural wetland and upland habitat types and associated plant communities are present within the city limits and support a diverse array of native plants and resident, migratory, and locally nomadic wildlife species, some of which are considered as rare, threatened, or endangered species (FEIR Table 4.4-1). The vast majority of natural and native habitats are located in the City's Sphere of Influence (SOI) and outside of the city limits. San Luis Obispo, Stenner, Prefumo, and Brizzolara Creeks, and numerous tributary channels pass through the city, providing important riparian habitat and migration corridors connecting urbanized areas to less-developed habitats in the SOI surrounding the city limits.

Several special status habitat types, and special-status plant and wildlife species are known to occur in the City's SOI, including recorded occurrences of 30 special status plant species, 20 special status wildlife species, and four natural communities of special concern (FEIR Tables 4.4-2 and 4.4-3). The City has adopted several open space conservation plans to protect areas of the city containing habitat for special status plant and wildfire species, including Bishop Peak, Cerro San Luis, South Hills, Johnson Ranch, Laguna Lake, Stenner Springs, Mioosi Open Space, Irish Hills, Terrace Hill, Reservoir Canyon, and the Agricultural Master Plan for Calle Joaquin Reserve. The City's Tree Regulations (Municipal Code Chapter 12.24) address the installation, maintenance, and preservation of trees within the city. The City discourages the removal of healthy trees that present no threat to people or property and, with certain exceptions, does not permit tree removals unless a tree removal permit has been issued (Municipal Code Section 12.24.090). The Municipal Code also sets forth setback requirements for all creeks defined in the General Plan Conservation and Open Space Element, which generally prohibit development and related improvements within 20 to 50 feet of creeks (Section 17.70.030).

Implementation of the CASE would result in minor physical changes to the city. For example, CASE Policy 3.1 regarding climate-informed flood management would increase the installation of green infrastructure improvements to manage stormwater runoff, including rain gardens, bioswales, detention basins, permeable parking lots, and permeable pavements. The features would typically be installed in the place of gray infrastructure such as gutters, drains, pipes, and ditches to manage runoff volumes generated by urban development.

CASE Policies 4.4 and 4.5 regarding the city’s urban tree canopy and strategy to mitigate urban heat island effect would increase the number of trees planted and maintained in the city, and also increase the use of building and site design techniques that address urban heat island effect, including reflective roofing and placement of solar carports over surface parking lots. In addition, CASE Policy 4.3, which directs the City to update its building retrofit program to incorporate improvements that increase resilience to extreme heat events and wildfire risk, such as HVAC-systems, air filtration systems, weatherization and energy efficiency improvements, and home hardening against wildfire, would result in physical improvements to the interiors and exteriors of buildings in the city. The aforementioned improvements to building interiors and exteriors, and to sites developed with buildings and other urban or suburban uses (e.g., parking lots) would not have potential to adversely affect biological resources because they would be limited to developed, disturbed areas that do not contain sensitive species or habitats or other biological resources.

Implementation of CASE Policy 5.4 would also result in installation of access roads, where feasible, to ensure adequate access for emergency equipment and civilian evacuation during wildfires. Depending on the location, installation of access roads can involve ground disturbing activities such as clearing and grubbing, grading, compacting, and laying of pavement or other impervious or all-weather surfaces. New access roads, if installed, would link existing residential developments in the city to the existing circulation network to facilitate emergency access and evacuation during emergencies. As a result, they would occur in existing developed areas of the city and are not anticipated to result in the loss of habitat for sensitive plant or animal species, including creeks and habitat protected by an adopted open space conservation plan. Further, existing policies of the General Plan Conservation and Open Space Element, including Policies 7.3.1, 7.3.2, 7.3.3, 7.5.4, 7.7.1, 7.7.4, 7.7.8, and 8.3.2, and City’s creek setback regulations, require that the City protect sensitive plant and wildlife species, wetland and upland habitat types, wildlife and habitat corridors and creeks from development and human activities, including the location, design, and maintenance of City roads, including emergency access roads. Conservation and Open Space Element Policy 7.5.1 requires that significant trees making substantial contributions to natural habitat or to the urban landscape shall be protected and any removal will be subject to specific criteria and mitigation requirements. For these reasons, the implementation of CASE policies and programs also would not damage or result in loss of trees protected by the Tree Ordinance, or habitats protected by adopted open space conservation plans.

**Conclusion**

Less than significant impact.

**5. CULTURAL RESOURCES**

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historic resource pursuant to §15064.5?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## **Evaluation**

a), b), c) Archaeological evidence demonstrates that Native American groups (including the Chumash) have occupied the Central Coast for at least 10,000 years, and that Native American use of the central coast region may have begun during the late Pleistocene, as early as 9000 B.C., demonstrating that historical resources began their accumulation on the central coast during the prehistoric era. The City is located within the area historically occupied by the Obispeño Chumash, the northernmost of the Chumash people of California. The City contains numerous historic resources, including five historic districts, several historic properties, as well as potentially significant historic and prehistoric sites. Burial points and burial sensitivity areas are also located in the city.

Implementation of the CASE would result in minor physical changes to the city. For example, CASE Policy 3.1 regarding climate-informed flood management would increase the installation of green infrastructure improvements to manage stormwater runoff, including rain gardens, bioswales, detention basins, permeable parking lots, and permeable pavements. The features would typically be installed in the place of gray infrastructure such as gutters, drains, pipes, and ditches to manage runoff volumes generated by urban development. CASE Programs 4.4 and 4.5 regarding the city's urban tree canopy and strategy to mitigate urban heat island effect would increase the number of trees planted and maintained in the city, and also increase the use of building and site design techniques that address urban heat island effect, including reflective roofing and placement of solar carports over surface parking lots. In addition, CASE Policy 4.3, which directs the City to update its building retrofit program to incorporate improvements that increase resilience to extreme heat events and wildfire risk, such as HVAC-systems, air filtration systems, weatherization and energy efficiency improvements, and home hardening against wildfire, would result in physical improvements to the interiors and exteriors of buildings in the city. These types of improvements could occur at designated historic properties, within historic districts, or in areas where archaeological resources may be present or with high sensitivity for human burials. Because these types of improvements can involve minor ground disturbance (e.g., excavation to install stormwater improvements) or changes to building and site design (e.g., solar carports, reflective roofing), there is potential for archaeological resources to be encountered or historic properties or districts to be altered.

In addition, implementation of CASE Policy 5.4 would result in installation of access roads, where feasible, to ensure adequate access for emergency equipment and civilian evacuation during wildfires. New access roads, if installed, would link existing residential developments in the city to the existing circulation network to facilitate emergency access and evacuation during emergencies. Depending on the location, installation of access roads can involve ground disturbing activities such as clearing and grubbing, grading, compacting, and laying of pavement or other impervious or all-weather surfaces, during which archaeological resources could be encountered.

Existing regulatory requirements, including the National Historic Preservation Act, the City's Historic Preservation Ordinance, Historic Program Preservation Guidelines, and Archaeological Resource Preservation Program Guidelines, the federal Archaeological Resources Protection Act and Native American Graves Protection and Repatriation Act, California Health and Safety Code Section 7050.5 regarding disturbance of human remains, as well as existing Conservation and Open Space Element policies and programs set forth procedures protecting historic properties and districts, and unique archaeological resources from substantial adverse changes (e.g., 3.2, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.5.1 through 3.5-12, and 3.6.1 through 3.6-10). Building and site improvements resulting from CASE policies and programs would not be allowed to adversely affect the integrity of an historic property or district, and any potential resources or human remains encountered during ground-disturbing activities would be protected, reviewed, and handled in accordance with federal and State laws and local requirements. Therefore, implementation of the CASE would not result in substantial adverse changes to historic or archaeological resources or disturbance to human remains.

## **Conclusion**

Less than significant impact.

## 6. ENERGY

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	1, 7	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### **Evaluation**

a), b) Implementation of the CASE would result in the construction of smaller-scale physical improvements within the city, which would involve use of vehicles and operation of equipment that would consume energy, including diesel and gasoline fuel and electricity. For example, CASE Programs 4.4 and 4.5 to increase the number of trees planted and maintained in the city would involve minor operation of small pieces of construction equipment (e.g., digging holes, trimming established trees). CASE Programs 4.4 and 3.7 would also involve small-scale construction operations, such as installation of solar carports and green infrastructure improvements like bioswales or permeable pavement. Installation of access routes as called for in CASE Policy 3.7 would involve construction activities such as clearing and grubbing, grading, compacting, and laying of pavement or other impervious or all-weather surfaces.

Overall, implementation of the CASE would not result in large-scale construction activities, such as new housing, commercial, or institutional developments, or major infrastructure improvements, which involves substantial consumption of energy resources over temporary, short-term periods. It also would not meaningfully increase energy consumption over the long-term, because it would not, for example, substantially increase the amount of vehicle travel within, and to and from, the city, or energy consumed by existing or new buildings in the city. In fact, the CASE would support increased use of renewable energy sources (e.g., through installation of solar carports under CASE Policy 4.4) and more efficient use of energy (e.g., through reflective roofing, planting of shade trees, and other features to mitigate the urban heat island effect under CASE Programs 4.4, 4.5, and 4.6).

Therefore, implementation of the CASE would not involve wasteful, inefficient, or unnecessary consumption of energy resources, because it would support increased use of renewable energy resources and more efficient use of energy. It would further, and not conflict or interfere with, State and local plans for renewable energy and energy efficiency, including the City's Climate Action Plan for Community Recovery (CAP), which identifies strategies and policies to increase use of cleaner and renewable energy resources including renewable energy financing options, incentivizing renewable energy generation in new and existing developments, and increasing community awareness of renewable energy programs. Refer to Section 8, Greenhouse Gas Emissions, for analysis of the CASE for potential conflicts with the City's CAP.

### **Conclusion**

Less than significant impact.

## 7. GEOLOGY AND SOILS

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) 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.	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in substantial soil erosion or the loss of topsoil?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) 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?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) 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?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Evaluation

a), b), c), d) As described in the CASE, the city is located in a geologically complex and seismically active region. Seismic conditions have the potential to result in significant harm to people and property. Some fault locations and characteristics have been identified; however, recent earthquakes in California have shown that not all active faults are revealed by surface features. The CASE establishes Policies 6.1, 6.2, and 6.3 intended to protect people and property from the direct effects of an earthquake: rupture of the ground surface along a fault, and ground shaking that results from fault movement, as well as other hazards associated with earthquakes: settlement, liquefaction, landslide, collapse of structures. In addition, CASE implementation would not result in the development of any habitable structures that could expose people or property to geologic hazards. Small-scale construction activity associated with implementation of CASE policies, such as installation of solar carports, green stormwater infrastructure improvements, and emergency access roads, would be conducted in accordance with California Building Code requirements and site-specific recommendations of geotechnical studies and therefore not result in substantial risks to people or property.

e) Implementation of the CASE would not involve development or activities that result in new or increased use of septic tanks or alternative waste water systems.

f) The only fossil resources likely to occur in the city limits and SOI are of Quaternary (Pleistocene) age. The Quaternary is the most recent of the three Periods of the Cenozoic Era in the geologic time scale. It follows the Tertiary Period, spanning from about 2,588,000 years ago to the present. The Quaternary includes two geologic epochs: the older Pleistocene-- sometimes known as the "Ice Ages"-- and the younger Holocene, which began approximately 10,000 ybp (years before present). The small-scale

construction activity associated with implementation of CASE policies, such as installation of solar carports, green stormwater infrastructure improvements, and emergency access roads, would occur in existing developed areas of the city and also be unlikely to involve subsurface disturbance at a depth where paleontological resources could be encountered. In the unlikely event that such a construction activity could encounter paleontological resources, relevant criteria from the City’s Archeological Resource Preservation Program Guidelines would be followed, including mandatory completion of a Phase 1 study to determine the likelihood of resource discovery during construction, and implementation of protective measures to avoid destroying unique paleontological resources or site. Conservation and Open Space Element Policy 8.3.2 requires buffers between development and scenic rock outcrops and other significant geological features. Therefore, implementation of the CASE would not result in the destruction of a unique geologic feature.

**Conclusion**

Less than significant impact.

**8. GREENHOUSE GAS EMISSIONS**

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	1, 7	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	1, 7	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Evaluation**

a), b) The City’s CAP strives to achieve an approximately 43 percent reduction in communitywide greenhouse gas (GHG) emissions below 1990 levels by 2030 and an approximately 66 percent reduction in communitywide GHG emissions below 1990 levels by 2035. The CAP strives to achieve these reductions through implementation of measures that reduce natural gas use in buildings, increase the amount of electricity procured from zero-carbon sources, increase the use of low- and zero emission vehicles, reduce vehicle miles of travel, and decrease GHG emissions resulting from consumption of water and disposal of solid waste.

Implementation of the CASE would result in the construction of smaller-scale physical improvements within the city, which would involve use of vehicles and operation of equipment consuming gasoline and diesel that would generate GHG emissions. For example, CASE Programs 4.4 and 4.5 to increase the number of trees planted and maintained in the city would involve minor operation of small pieces of construction equipment (e.g., digging holes, trimming established trees). CASE Policies 4.4 and 3.7 would also involve small-scale construction operations, such as installation of solar carports and green infrastructure improvements like bioswales or permeable pavement. Installation of access routes as called for in CASE Policy 3.7 would involve construction activities such as clearing and grubbing, grading, compacting, and laying of pavement or other impervious or all-weather surfaces.

Overall, implementation of the CASE would not result in large-scale construction activities, such as new housing, commercial, or institutional developments, or major infrastructure improvements, which generate substantial amounts of GHG emissions. It also would not meaningfully increase the amount of GHG emissions generated in the city over the long-term, because it would not, for example, substantially increase the amount of vehicle travel within, and to and from, the city, or energy consumed by existing or new buildings in the city. In fact, the CASE would support increased use of renewable energy sources (e.g., through installation of solar carports under CASE Program 4.4) and more efficient use of energy (e.g., through reflective roofing, planting of shade trees, and other features to mitigate the urban heat island effect under CASE Program 4.4, 4.5, and 4.6), which would contribute to the reductions in annual GHG emissions achieved by CAP implementation. Therefore, GHG emissions generated due to implementation of the CASE would not have a significant impact on the environment., In addition, as shown in Table 8-1, the CASE would not conflict with, and would support, implementation of GHG reduction measures in the City’s adopted CAP.

**Table 8-1. Analysis of Potential for Conflicts Between the Community Safety & Resilience Element and the Climate Action Plan for Community Recovery**

<b>CAP Foundational Actions</b>	<b>Analysis</b>
Leadership 1.1 – Adopt a municipal carbon neutrality plan in 2021.	The CASE would not conflict with the municipal carbon neutrality plan. It directly calls to continue support for the City’s Carbon Neutral City Facilities Plan.
Leadership 2.1 – Include carbon neutrality, social equity, and a focus on developing a green local economy in the updated Economic Development Strategic Plan.	The CASE would not conflict with including carbon neutrality, social equity, and a focus on developing a green local economy in the Economic Development Strategic Plan. It supports this action because it calls for policies and programs that increase energy efficiency and reduce greenhouse gas emissions, improve equity and environmental justice, and diversify the City’s economy to avoid overreliance on economic sectors that are vulnerable to climate impacts.
Leadership 2.2 – Research methods to support local contractors and labor.	The CASE would not interfere with research methods to support local contractors and labor because it does not address this topic.
Leadership 3.1 – Create a formal approach to support and empower community collaboration for climate action.	The CASE would not conflict with creating a formal approach to support and empower community collaboration for climate action. It broadly supports this action by calling to develop and administer a Community Resilience Enterprise Fund that provides micro-grants to implement projects that support social cohesion as it relates to climate change impacts and disaster recovery. The CASE also calls for integrating regional collaboration as a key component of the City’s climate adaptation planning strategy and for continued participation in the Central Coast Climate Collaborative.
Energy 1.1 – Launch Monterey Bay Community Power and achieve a 98% participation rate while advocating for programs that support equity and achieve maximum local benefit.	The CASE would not conflict with the launch of Monterey Bay Community Power and the achievement of a 98% participation rate because it does not address this topic directly. The CASE also supports advocating for programs that support equity and achieve maximum local benefit because it promotes the inclusion of equity and justice in all policies and programs.
Energy 2.1 – Work with MBCP and PG&E to develop a regional grid reliability strategy.	The CASE would not conflict with working with MBCP and PG&E to develop a regional grid reliability strategy. It supports this action by calling to seek funding sources from PG&E’s Community Microgrid Enablement Program (CMEP) to conduct a potential feasibility study for developing a clean energy microgrid for key City facilities to provide clean back-up power during utility disruptions. It also calls to develop a streamlined permitting process and proactively provide information on funding sources and financing options for the installation of battery storage systems.
Energy 3.1 – Partner with SoCal Gas to research options for reducing greenhouse gas emissions associated with the existing natural gas grid.	The CASE would not interfere with partnering with SoCal Gas to research options for reducing greenhouse gas emissions associated with the existing natural gas grid because it does not address this topic.
Connected 1.2 – Research and develop an approach to a “Mobility as a Service” platform for people to easily use all modes of low carbon mobility in the City.	The CASE would not interfere with research and development of a “Mobility as a Service” platform because it does not address this topic.
Connected 2.1 – Complete Active Transportation plan and begin implementation immediately.	The CASE would not interfere with completing and implementing an Active Transportation plan because it does not address this topic.
Connected 2.2 – Launch micro mobility program by 2021.	The CASE would not interfere with launching a micro mobility program because it does not address this topic.
Connected 3.1 – Establish a policy and strategic approach to leveraging existing and new parking garages for downtown residential and visitor serving uses and to allow for further implementation of the Downtown Concept Plan.	The CASE would not interfere with establishing a policy and strategic approach to leveraging existing and new parking garages for downtown residential and visitor serving uses and allowing further implementation of the Downtown Concept Plan because it does not address this topic.



Connected 4.1 – Develop transit electrification strategic plan and begin implementing in 2020.	The CASE would not interfere with the development and implementation of a transit electrification strategic plan because it does not address this topic.
Connected 4.2 – Shorten transit headways through accelerated implementation of the existing Short-Range Transit Plan.	The CASE would not interfere with shortening transit headways through accelerated implementation of the existing Short-Range Transit Plan because it does not address this topic.
Connected 4.3 – Explore additional innovative transit options in the 2022 Short-Range Transit Plan (e.g., on-demand deviated routes, electric fleet expansion, micro transit, Bus Rapid Transit, Transit Signal Priority)	The CASE would not interfere with exploring additional innovative transit options in the 2022 Short-Range transit Plan because it does not address this topic.
Connected 4.4 – Assess feasibility of a “free to the user” transit ridership program.	The CASE would not interfere with assessing the feasibility of a “free to the user” transit ridership program because it does not address this topic.
Connected 5.1 – Complete the 2019-21 Housing Element of the General Plan Update and Flexible Zoning Requirements for Downtown.	The CASE would not interfere with completing the 2019-21 Housing Element of the General Plan Update and Flexible Zoning Requirements for Downtown because it does not address this topic.
Connected 6.1 – Develop and begin implementing electric mobility plan to achieve a goal of 40 percent electric vehicle miles traveled (VMT) by 2035.	The CASE would not interfere with the development and implementation of an electric mobility plan because it does not address this topic.
Circular Economy 1.1 – Adopt an ordinance requiring organic waste subscription for all residential and commercial customers by 2022.	The CASE would not conflict with the adoption of an ordinance requiring organic waste subscription for all residential and commercial customers. It supports this action because it calls for program implementation of Senate Bill 1383 to reduce food waste and associated greenhouse gas emissions.
Circular Economy 1.2 – Develop and implement programs to increase edible food rescue by 20 percent.	The CASE would not conflict with the development and implementation of programs to increase edible food rescue by 20 percent. It supports this action because it calls for partnerships with community organizations to address food insecurity and opportunities to support food recovery efforts as part of implementation of Senate Bill 1383 to reduce food waste and associated greenhouse gas emissions.
Circular Economy 1.3 – Develop and implement a waste stream education program for HOA/Property Managers and the commercial sector.	The CASE would not interfere with the development and implementation of a waste stream education program for HOA/Property Managers and the commercial sector because it does not address this topic.
Circular Economy 2.1 – Update the Municipal Code solid waste section and bin enclosure standards.	The CASE would not interfere with updating the Municipal Code solid waste section and bin enclosure standards because it does not address this topic.
Circular Economy 2.2 – Develop and expand funding for a Solid Waste section in the Utilities Department	The CASE would not interfere with the development and expansion of funding for a Solid Waste section in the Utilities Department because it does not address this topic.
Natural Solutions 1.1 – Conduct Carbon Farming Study and Pilot Project in 2021. If feasible, begin implementation by 2023.	The CASE would not conflict with conducting a Carbon Farming Study and Pilot Project. It broadly supports this action by calling for sustainable flood management and open space programs that achieve multiple benefits, including land conservation carbon farming.
Natural Solutions 2.1 – Prepare the City’s first Urban Forest Master Plan by 2021 and plant and maintain 10,000 new trees by 2035.	The CASE would not conflict with the preparation of the City’s first Urban Forest Master Plan and planting and maintaining 10,000 new trees by 2035. It supports this action directly by calling to maintain and enhance the City’s tree canopy and to integrate the Climate-Smart Green Infrastructure Strategy into this action of the City’s Climate Plan.

**Conclusion**

Less than significant impact.

## 9. HAZARDS AND HAZARDOUS MATERIALS

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

### **Evaluation**

a), b), c), d) The City Emergency Operations Plan (EOP) addresses the planned response to emergencies in, or affecting the City. The EOP identifies the emergency management organization to coordinate response to emergencies or disasters, describes procedures, and establishes framework for preparedness and response actions. The CALFIRE and San Luis Obispo County Strategic Fire Plan collaboratively addresses fire protection planning efforts within the County and provides a planning level framework for hazardous fuel assessment and strategies to reduce the potential for wildfire ignition. The goals of the plan include coordination between multiple jurisdictions within the County and improvement of fire suppression capabilities. The Airport Land Use Plan for the San Luis Obispo County Regional Airport establishes zones based on flight patterns, with the aim of having future development be compatible with airport operations, considering safety and noise exposure.

Implementation of the CASE would result in the construction of smaller-scale physical improvements within the city, which would involve use routine use, transport, handling, and disposal of hazardous materials, including within ¼ mile of an existing or proposed school. For example, CASE Programs 4.4 and 3.7 would involve small-scale construction operations, such as installation of solar carports and green infrastructure improvements like bioswales or permeable pavement. Installation of access routes as called for in CASE Policy 3.7 would involve construction activities such as clearing and grubbing, grading, compacting, and laying of pavement or other impervious or all-weather surfaces. In addition, construction-related ground disturbance could occur on sites included on a hazardous materials site list compiled pursuant to Government Code Section 65962.5. Overall, implementation of the CASE would not result in large-scale construction activities, such as new housing, commercial, or institutional developments, or major infrastructure improvements, which involve substantial quantities of hazardous materials.

Compliance with State and federal laws and regulations governing the use, transport, and disposal of hazardous materials, including those of the Occupational Safety and Health Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Superfund Amendments and Reauthorization Act Title III; the Resource Conservation and Recovery Act; and the Toxic Substances Control Act California Department of Health Services, California Highway Patrol, U.S. Department of Transportation, and San Luis Obispo County Environmental Health Services Division would prevent hazardous materials use and ground disturbance on existing hazardous waste or hazardous release sites associated with CASE implementation from creating significant hazards to people or the environment, or emitting hazardous emissions near schools.

Implementation of the CASE would not increase the amount of hazardous materials or wastes used, handled, or transported in the city over the long-term, because it would not, for example, result in development of any new facilities that use or produce hazardous materials, or infrastructure that could increase the transport of hazardous materials in the city. It also would not result in any physical changes that could increase the likelihood of hazardous materials release due to upset or accident conditions.

e) The San Luis Obispo County Regional Airport is located near the City's southern boundary and provides commuter, charter, and private aviation service. Implementation of the CASE would not involve physical changes to the environment that could affect aircraft approach or takeoff operations in a manner that would create safety hazards or generate excessive noise for people living or working near the County Airport because physical improvements resulting from its policies and programs would not occur in locations or at heights that could interfere with airport operations and would not increase the number of people living or working near the Airport.

f) Implementation of the CASE would not involve physical changes to the environment that physically interfere with adopted plans for emergency response and evacuation. In fact, it would improve emergency response and evacuation access in the city through CASE Policy 7.3 which requires that future substantial development in the city, including industrial, commercial, and institutional uses, multifamily housing, and projects with more than ten single-family dwellings, be allowed only where multiple routes of road access can be provided, consistent with other General Plan policies on development location and open space protection. Multiple routes include vehicle connections that provide emergency access only, as well as public and private streets. In addition, CASE Policy 5.8 would restrict on-street parking in high wildfire risk areas during Red Flag Days to increase available roadway capacity for emergency response and evacuation.

g) Implementation of the CASE would not increase the exposure of people or structures in the city to a significant risk of loss, injury, or death involving wildland fires because it would not result in new development, including residents, workers, or students, in or near any wildfire hazard areas. In addition, the small-scale construction activity that would result from CASE implementation, for example, installation of green infrastructure improvements to manage stormwater runoff per CASE Policy 3.1, including rain gardens, bioswales, detention basins, permeable parking lots, and installation of access roads per CASE Policy 5.11 to, where feasible, ensure adequate access for emergency equipment and civilian evacuation during wildfires, would occur in existing developed areas of the city and are not anticipated to expose people or structures to increased risk of loss, injury, or death involving wildland fires. In addition, the CASE includes several policies and programs to reduce exposure of people and structure to risks from wildland fires (e.g., Policies 5.1 through 5.11, and Programs 5.12 and 5.13) by continuing to implement fuel reduction projects identified in the City Vegetation Management Plan and perform roadside vegetation clearance, avoid new development in high and very high fire hazard severity zones and strengthen fire protection requirements for new development, locate critical public facilities outside of wildfire hazard areas, and allocate resources to property owners for implementation of defensible space and structure hardening improvements.

**Conclusion**

Less than significant impact

## 10. HYDROLOGY AND WATER QUALITY

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	1, 5	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
v. Result in substantial erosion or siltation on or off site;	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
vi. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
vii. 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
viii. Impede or redirect flood flows?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	1, 5	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### **Evaluation**

a), b), c), d), e) The city is located within the San Luis Obispo Creek Hydrologic Subarea of the Estero Bay Hydrologic Unit, which extends roughly 80 miles between the Santa Maria River and the Monterey County line and includes numerous individual stream systems. Within the Estero Bay Hydrologic Unit, the San Luis Obispo Creek watershed drains approximately 84 square miles, generally to the south-southwest via San Luis Obispo Creek to the Pacific Ocean at Avila Beach. San Luis Obispo Creek is one of four major drainage features that create flood hazards in the city, with the others being Stenner Creek, Prefumo Creek, and Old Garden Creek. In addition, many minor waterways drain into these creeks, and also present flood hazards. Because of the high surrounding hills and mountains in the area, the creek's drainage sheds are relatively small, but the steep slopes and high gradient can lead to intense, fast moving flood events in the city. In addition, a portion of the San Luis Valley Subbasin of the San Luis Obispo Valley Groundwater Basin underlies the city. A Groundwater Sustainability Plan (GSP) was adopted for this groundwater basin in October 2021.

Implementation of the CASE would result in minor physical changes to the city. For example, CASE Policy 3.1 regarding climate-informed flood management would increase the installation of green infrastructure improvements to manage stormwater runoff, including rain gardens, bioswales, detention basins, permeable parking lots, and permeable pavements. The features would typically be installed in the place of gray infrastructure such as gutters, drains, pipes, and ditches to manage runoff volumes generated by urban development.

CASE Programs 4.4 and 4.5 regarding the city’s urban tree canopy and strategy to mitigate urban heat island effect would increase the number of trees planted and maintained in the city, and also increase the use of building and site design techniques that address urban heat island effect, including reflective roofing and placement of solar carports over surface parking lots. Increasing the amount of green infrastructure and trees in the city would have beneficial impacts to surface and ground water quality within the San Luis Obispo Creek watershed and San Luis Obispo Valley Groundwater Basin; green infrastructure and trees also reduce levels of inundation and risk of pollutant release during flooding by increasing retention and absorption of flood waters and filtering pollutants conveyed in flood waters. In addition, the CASE sets forth policies and programs that would improve flood management in the city and lessen the potential risk of pollutant release during a flood hazard event.

Small-scale construction activities associated with the above-described policies, as well as with implementation of CASE Policy 5.4 regarding installation of access roads, could result in changes to drainage patterns or create new sources of polluted runoff. However, compliance with applicable regulations including the Construction General Permit, preparation of Storm Water Pollution Prevention Plans, and the City’s Storm Water Management Program requirements to implement best management practices (BMPs) and Pollution Prevention Methods (PPMs) would prevent adverse impacts to surface and ground water quality and avoid conflicts with plan that protect water quality. In addition, implementation of CASE policies could result in minor increases in impervious surface area in localized areas (e.g., where new access roads are installed), but not at a scale that would interfere with groundwater recharge levels or sustainable management of groundwater within the San Luis Obispo Valley Groundwater Basin.

**Conclusion**

Less than significant impact.

**11. LAND USE AND PLANNING**

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Evaluation**

a), b) Implementation of the CASE would result in minor physical changes to the city. For example, CASE Policy 3.1 would increase the installation of green infrastructure improvements to manage stormwater runoff, CASE Programs 4.4 and 4.5 would increase the number of trees planted and maintained in the city, and also increase the use of building and site design techniques that address urban heat island effect, including reflective roofing and placement of solar carports over surface parking lots, and CASE Program 4.4, which directs the City to update its building retrofit program to incorporate improvements that increase resilience to extreme heat events and wildfire risk, such as HVAC-systems, air filtration systems, weatherization and energy efficiency improvements, and home hardening against wildfire, would result in physical improvements to the interiors and exteriors of buildings in the city. These types of improvements would not physically divide established communities within the city, and would not conflict with any land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect; the CASE is consistent with the City’s General Plan, including the Land Use Element.

Implementation of CASE Policy 5.4 would result in installation of access roads, where feasible, to ensure adequate access for emergency equipment and civilian evacuation during wildfires. New access roads, if installed, would link existing residential developments in the city to the existing circulation network to facilitate emergency access and evacuation during emergencies; these improvements would physically connect, rather than divide, established communities in the city.

**Conclusion**

Less than significant impact.

## 12. MINERAL RESOURCES

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b><u>Evaluation</u></b></p> <p>a), b) There are no known mineral resources of value to the region or State located in the city, and no locally-important mineral resource recovery sites are identified in the General Plan, specific plan, or any other land use plan. The CASE would not result in the loss of mineral resources.</p> <p><b><u>Conclusion</u></b></p> <p>No impact.</p>					

## 13. NOISE

Would the project result in:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b><u>Evaluation</u></b></p> <p>a), b) Implementation of the CASE would result in the construction of smaller-scale physical improvements within the city, which would involve the temporary use of vehicles and operation of equipment generating noise and vibration. For example, CASE Programs 4.4 and 4.5 to increase the number of trees planted and maintained in the city would involve minor operation of small pieces of construction equipment (e.g., digging holes, trimming established trees). CASE Programs 4.4 and 3.7 would also involve small-scale construction operations, such as installation of solar carports and green infrastructure improvements like bioswales or permeable pavement. Installation of access routes as called for in CASE Policy 3.7 would involve construction activities such as clearing and grubbing, grading, compacting, and laying of pavement or other impervious or all-weather surfaces, all of which temporarily increase noise levels and can produce vibration. These types of smaller-scale construction activities do not involve techniques or activities, such as pile driving or blasting, which are known to generate substantial levels of vibration.</p>					

Overall, implementation of the CASE would not result in large-scale construction activities, such as new housing, commercial, or institutional developments, or major infrastructure improvements, that temporarily generate substantial amounts of noise or vibration. It also would not meaningfully increase permanent noise levels generated in the city, because it would not, for example, substantially increase the amount of vehicle travel and associated noise in the city.

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

c) The San Luis Obispo County Regional Airport provides commuter, charter, and private aviation service. Implementation of the CASE would not involve physical changes to the environment that could affect aircraft approach or takeoff operations in a manner that would generate excessive noise levels for people living or working near the County Airport.

**Conclusion**

Less than significant impact.

**14. POPULATION AND HOUSING**

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Evaluation**

a), b) The CASE would not directly affect the amount of planned growth in the city because it would change the land use designations of the adopted General Plan. The small-scale construction activities and physical improvements to the city that would result from CASE implementation, such as green infrastructure, trees, and building retrofits, would increase the resilience of the city’s existing built and natural environments, and planned growth. These types of improvements would not indirectly induce substantial unplanned population growth because they would not create demand for residential or non-residential development beyond what is currently contemplated by the adopted General Plan.

Implementation of CASE Policy 5.4 would result in installation of access roads, where feasible, to ensure adequate access for emergency equipment and civilian evacuation during wildfires. New access roads, if installed, would link existing residential developments in the city to the existing circulation network to facilitate emergency access and evacuation during emergencies; these improvements would be designed to provide emergency access for existing and planned communities and therefore would not indirectly induce additional growth in the city. Implementation of the CASE would not result in physical changes that could displace substantial numbers of existing people or housing, and therefore would not result in the need for construction of replacement housing.

**Conclusion**

Less than significant impact.

## 15. PUBLIC SERVICES

Would the project:	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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b><u>Evaluation</u></b></p> <p>a) Implementation of the CASE would not increase demand for public services in the city, including fire and police protection, schools, parks and other recreational facilities, or other public facilities such as libraries, because it would not increase the population or physical size of the city. In addition, the CASE includes policies to increase the city's resilience to wildfires, for example Program 4.1 is intended to encourage defensible space around structures and home hardening improvements in or near very high fire hazard severity zones, which could lessen the demand for fire protection services in the city. CASE policies to provide residential developments with at least two emergency access routes would help the city maintain adequate response times for fire and police protection. As a result, implementation of the CASE would not require construction of new or physically altered government facilities in order to maintain acceptable levels of these public services in the city.</p> <p><b><u>Conclusion</u></b></p> <p>No impact.</p>					

## 16. RECREATION

Would the project:	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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b><u>Evaluation</u></b></p> <p>a), b) Demand for and use of parks and recreational facilities is based on the population of the city and surrounding areas. Implementation of the CASE would not increase the use of parks and recreational facilities because it would not increase the population of the city or surrounding areas. Therefore, it would not result in physical deterioration of existing facilities, or require that new or expanded recreational facilities be constructed.</p> <p><b><u>Conclusion</u></b></p> <p>No impact.</p>					



## 17. TRANSPORTATION

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	1, 8	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	1, 9	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Evaluation

The City's 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 include maintaining accessibility and protecting the environment throughout the City's SOI while reducing single-occupancy vehicle trips, reducing use of cars and increasing travel by walking, riding buses and bicycles, using car pools, and widening and extending streets only when there is a demonstrated need and significant, long-term environmental problems would not result. The City's 2021 Active Transportation Plan outlines the City's official policies for the design and development of bikeways within the City and in adjoining territory under County jurisdiction but within the City's Urban Reserve and includes specific objectives for reducing vehicle use and promoting other modes. SLO Transit operates transit service in the City of San Luis Obispo and San Luis Obispo Regional Transit Authority (SLORTA) operates transit service throughout San Luis Obispo County and adjacent areas. On June 16, 2020, the City Council adopted resolutions to replace Level of Service (LOS) with Vehicle Miles Traveled (VMT) as the City's performance measure for CEQA analysis of transportation impacts, and approved revisions to the City's Multimodal Transportation Impact Study Guidelines, consistent with CEQA Guidelines Section 15064.3(b).

a), c) Implementation of the CASE would result in the construction of smaller-scale physical improvements within the city, such as CASE Programs 4.4 and 4.5 that would increase the number of trees planted and maintained in the city, CASE Programs 4.4 and 3.7, which would also involve small-scale construction operations, such as installation of solar carports and green infrastructure improvements like bioswales or permeable pavement. CASE Policies 5.4 and 7.3 would lead to the installation of emergency access routes. These types of physical improvements would not conflict with implementation of the City's circulation system goals to decrease driving alone and overall vehicle trips, increase walking, biking, and transit trips, and only widen or extend streets when needed and long-term environmental problems would not result. Compliance with existing City policies and development review procedures would ensure that these types of smaller-scale physical improvements would not result in a substantial increase in hazards, for example, requirements to maintain adequate line of sight at intersections.

b) Implementation of the CASE would not result in short- or long-term increases in the amount of VMT within, and to and from, the city, because it would not result in new land use development, such as new housing, commercial, or institutional developments, or major infrastructure improvements. New emergency access routes installed pursuant to CASE Policies 5.4 or 7.3 would not induce substantial levels of VMT because they would be provided in hazards areas to facilitate evacuation and emergency vehicle and equipment access during emergencies. Implementation of the CASE would not generate significant levels of VMT as defined the City's Multimodal Transportation Impact Study Guidelines, and therefore would not result in conflicts or inconsistencies with CEQA Guidelines section 15064.3, subdivision (b).

d) As described in Section 9 (Hazards and Hazardous Materials) f), implementation of the CASE would not involve physical changes to the environment that physically interfere with adopted plans for emergency response and evacuation. In fact, it would improve emergency response and evacuation access in the city through, for example, CASE Policy 7.5, which requires that future substantial development in the city, including industrial, commercial, and institutional uses, multifamily housing, and projects

with more than ten single-family dwellings, be allowed only where multiple routes of road access can be provided, consistent with other General Plan policies on development location and open space protection. Multiple routes include vehicle connections that provide emergency access only, as well as public and private streets. Implementation of CASE Policy 5.4 would also result in installation of access roads, where feasible, to ensure adequate access for emergency equipment and civilian evacuation during wildfires. In addition, CASE Policy 5.8 would restrict on-street parking in high wildfire risk areas during Red Flag Days to increase available roadway capacity for emergency response and evacuation.

**Conclusion**

Less than significant impact.

**18. TRIBAL CULTURAL RESOURCES**

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	1, 6	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	1, 6	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Evaluation**

a), b) Archaeological evidence demonstrates that Native American groups (including the Chumash) have occupied the Central Coast for at least 10,000 years, and that Native American use of the central coast region may have begun during the late Pleistocene, as early as 9000 B.C., demonstrating that historical resources began their accumulation on the central coast during the prehistoric era. The City is located within the area historically occupied by the Obispeño Chumash, the northernmost of the Chumash people of California. Burial points and burial sensitivity areas are also located in the city.

On August 8, 2022, the following Native American tribes that have a cultural or traditional affiliation to the area were formally noticed pursuant to AB 52 (Public Resources Code Section 21080.3.1 subd. [d]) that an Initial Study of Environmental Review was being completed for the CASE. None of the noticed tribes requested consultation or identified a tribal cultural resource that could be affected by implementation of the CASE.

- Santa Ynez Band of Mission Indians
- Barbareno/Ventureno Band of Mission Indians
- Salinan Tribe of San Luis Obispo, Monterey, and San Benito Counties
- Xolon-Salian Tribe
- Yak Tityu Tityu – Northern Chumash Tribe
- Northern Chumash Tribal Council
- Torres Martinez Desert Cahuilla Indians
- Chumash Council of Bakersfield

- Coastal Band of the Chumash Nation
- San Luis Obispo County Chumash Council

Implementation of the CASE would result in minor physical changes to the city. For example, CASE Policy 3.1 regarding climate-informed flood management would increase the installation of green infrastructure improvements to manage stormwater runoff, including rain gardens, bioswales, detention basins, permeable parking lots, and permeable pavements. The features would typically be installed in the place of gray infrastructure such as gutters, drains, pipes, and ditches to manage runoff volumes generated by urban development. CASE Programs 4.4 and 4.5 regarding the city’s urban tree canopy and strategy to mitigate urban heat island effect would increase the number of trees planted and maintained in the city, and also increase the use of building and site design techniques that address urban heat island effect, including reflective roofing and placement of solar carports over surface parking lots. In addition, CASE Program 4.4, which directs the City to update its building retrofit program to incorporate improvements that increase resilience to extreme heat events and wildfire risk, such as HVAC-systems, air filtration systems, weatherization and energy efficiency improvements, and home hardening against wildfire, would result in physical improvements to the interiors and exteriors of buildings in the city. These types of improvements could occur in areas where tribal cultural resources may be present. Because these types of improvements can involve minor ground disturbance (e.g., excavation to install stormwater improvements), there is potential for archaeological resources to be encountered

In addition, implementation of CASE Policy 5.4 would result in installation of access roads, where feasible, to ensure adequate access for emergency equipment and civilian evacuation during wildfires. New access roads, if installed, would link existing residential developments in the city to the existing circulation network to facilitate emergency access and evacuation during emergencies. Depending on the location, installation of access roads can involve ground disturbing activities such as clearing and grubbing, grading, compacting, and laying of pavement or other impervious or all-weather surfaces, during which tribal cultural resources could be encountered. Existing regulatory requirements, including the National Historic Preservation Act, the City’s Historic Preservation Ordinance, Historic Program Preservation Guidelines, and Archaeological Resource Preservation Program Guidelines, the federal Archaeological Resources Protection Act and Native American Graves Protection and Repatriation Act, California Health and Safety Code Section 7050.5 regarding disturbance of human remains, as well as existing Conservation and Open Space Element policies and programs set forth procedures protecting cultural and archaeological resources from substantial adverse changes (e.g., 3.2, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.5.1 through 3.5-12, and 3.6.1 through 3.6-10). Any potential tribal cultural resources encountered during ground-disturbing activities would be protected, reviewed, and handled in accordance with federal and State laws and local requirements. Therefore, implementation of the CASE would not result in substantial adverse changes to tribal cultural resources.

**Conclusion**

Less than significant impact.

**19. UTILITIES AND SERVICE SYSTEMS**

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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, 10	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	1, 10	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	1, 10	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Evaluation**

The City of San Luis Obispo Utilities Department is the sole water provider within the city, provides potable and recycled water to the community, and is responsible for water supply, treatment, distribution, and resource planning. The City is served by four primary water sources, including the Whale Rock Reservoir, Salinas Reservoir, Nacimiento Reservoir, and recycled water (for irrigation), with groundwater serving as a fifth supplemental source. The City's Water Treatment Plant is designed to produce up to 16 million gallons daily (mgd). The City Water Resource Recovery Facility (WRRF) treats all of the wastewater from the City, Cal Poly, and the County airport. The WRRF treated an average of 3.57 million gallons of wastewater per day in 2019. The WRRF has a design capacity of 5.1 million gallons per day and will have a design capacity of 5.4 mgd when the construction of upgrades are completed in 2023. Solid waste is disposed of at the Cold Canyon Landfill, Chicago Grade Landfill, and Paso Robles Landfill. Cold Canyon Landfill has adequate capacity to serve the City's build-out population as identified in the General Plan.

a) Implementation of the CASE would not increase demand placed on utilities and service systems in the city, including water supply, wastewater, stormwater drainage, electric power, natural gas, or telecommunications facilities, because it would not increase the population or physical size of the city. It would result in the installation of stormwater management improvements pursuant to CASE Program 3.7, such as rain gardens, bioswales, detention basins, and permeable pavements, and solar carports providing electric power pursuant to CASE Program 4.4, the environmental effects of which are evaluated throughout this checklist. As a result, implementation of the CASE would not require relocation or construction of new or physically altered utilities and service systems.

b) According to the General Plan Land Use Element, the City procures water supplies to serve the build-out population of the General Plan. Increasing the number of trees planted and maintained in the city pursuant to CASE Programs 4.4 and 4.5 would nominally increase water demand for irrigation, but because the CASE would not increase the population of the city, or result in other land use development (e.g., housing, retail, office, farming operations) that would increase demand for water, it would not interfere with the City's ability to provide sufficient water supplies during normal, single-dry, or multiple-dry year scenarios.

c), d), e) Implementation of the CASE would not increase the population of the city, or result in other land use development (e.g., housing, retail, office, farming operations) that would increase demand for wastewater treatment or generation of solid waste. Therefore, the CASE would not adversely affect the existing adequate capacity of the WRRF or Cold Canyon Landfill, or fail to comply with federal, state, or local solid waste management and reduction statutes and regulations.

**Conclusion**

Less than significant impact.

## 20. WILDFIRE

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

### Evaluation

a), b), c), d) As described in Section 9 (Hazards and Hazardous Materials) g), implementation of the CASE would not increase the exposure of people or structures in the city to a significant risk of loss, injury, or death involving wildland fires because it would not result in new development, including residents, workers, or students, in or near any wildfire hazard areas. In addition, the small-scale construction activity that would result from CASE implementation, for example, installation of green infrastructure improvements to manage stormwater runoff per CASE Program 3.7, including rain gardens, bioswales, detention basins, permeable parking lots, and installation of access roads per CASE Policy 5.4 to, where feasible, ensure adequate access for emergency equipment and civilian evacuation during wildfires, would occur in existing developed areas of the city and are not anticipated to expose people or structures to increased risk of loss, injury, or death involving wildland fires, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

In addition, the CASE includes several policies and programs to reduce exposure of people and structure to risks from wildland fires (e.g., Policies 5.1 through 5.11, and Programs 5.12 and 5.13) by continuing to implement fuel reduction projects identified in the City Vegetation Management Plan and perform roadside vegetation clearance, avoid new development in high and very high fire hazard severity zones and strengthen fire protection requirements for new development, locate critical public facilities outside of wildfire hazard areas, and allocate resources to property owners for implementation of defensible space and structure hardening improvements.

In addition, as described in Section 9 (Hazards and Hazardous Materials) f), implementation of the CASE would not involve physical changes to the environment that substantially impair adopted plans for emergency response and evacuation. In fact, it would improve emergency response and evacuation access in the city through CASE Policy 7.5 which requires that future substantial development in the city, including industrial, commercial, and institutional uses, multifamily housing, and projects with more than ten single-family dwellings, be allowed only where multiple routes of road access can be provided, consistent with other General Plan policies on development location and open space protection. Multiple routes include vehicle connections that provide emergency access only, as well as public and private streets. In addition, CASE Policy 5.8 would restrict on-street parking in high wildfire risk areas during Red Flag Days to increase available roadway capacity for emergency response and evacuation.

### Conclusion

Less than significant impact.

## 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?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>a) As described in Sections 4 and 5, implementation of the CASE would result in small-scale construction activities, such as green infrastructure improvements to manage stormwater and flooding, tree plantings, solar carports, home hardening against wildfires, emergency access roads, and improvements to building exteriors that would not adversely affect biological or cultural resources.</p> <p>As a result, implementation of the CASE would not 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.</p>					
	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>b) As described throughout this Initial Study checklist, the implementation of the CASE would result in minor physical changes in localized areas of the city. These changes would result from installation of green infrastructure improvements to manage stormwater and flooding, tree plantings, solar carports, home hardening against wildfires, emergency access roads, and improvements to building exteriors. These incremental effects of the CASE would be negligible when viewed in connection with the effects of part, current, and probable future projects implementing the General Plan, such as new residential and non-residential developments, or infrastructure improvements (e.g., Circulation Element roadways, WRRF capacity upgrades). Therefore, the impacts of the CASE would not be cumulatively considerable.</p>					
	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>c) As described throughout this Initial Study checklist, the implementation of the CASE would not directly or indirectly cause substantial adverse effects on human beings. In fact, it would benefit human beings through implementation of policies that protect people from the direct and indirect effects of climate change and other natural and manmade hazards, including wildfire flooding, extreme heat, fire, earthquakes and other geological hazards, hazardous materials, and electromagnetic fields. The CASE would improve the long-term resilience of the city's natural, physical, and social systems to climate and other hazards, and would not achieve short-term environmental goals to the disadvantage of long-term environmental goals.</p>					

## 22. EARLIER ANALYSES

<p>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:</p>
<p>a) <b>Earlier analysis used.</b> Identify earlier analyses and state where they are available for review.</p>
<p>Final Environmental Impact Report, LUCE Updates; available online at: <a href="https://www.slocity.org/government/department-directory/community-development/planning-zoning/general-plan">https://www.slocity.org/government/department-directory/community-development/planning-zoning/general-plan</a> or at the Community Development Department, 919 Palm Street, San Luis Obispo, CA 93401.</p>
<p>b) <b>Impacts adequately addressed.</b> Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.</p>
<p>Resolution No. 10567 (2014 Series) summarizes the environmental impact, mitigation, monitoring and overriding considerations for the 2014 LUCE update: <a href="http://opengov.slocity.org/WebLink/DocView.aspx?id=26033&amp;dbid=0&amp;repo=CityClerk">http://opengov.slocity.org/WebLink/DocView.aspx?id=26033&amp;dbid=0&amp;repo=CityClerk</a>.</p>
<p>c) <b>Mitigation measures.</b> For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions of the project.</p>
<p>As described in the Initial Study Environmental Checklist, implementation of the CASE would not result in any potentially significant effects for which mitigation measures are required.</p>

## 23. SOURCE REFERENCES

1.	City of San Luis Obispo LUCE and Final EIR, 2014.
2.	City of San Luis Obispo Zoning Map, 2022.
3.	California Department of Fish and Wildlife. California Forests and Timberlands in the California Department of Fish and Wildlife Regions.
4.	San Luis Obispo County Attainment Status, 2019.
5.	San Luis Obispo Valley Groundwater Basin Groundwater Sustainability Agencies, San Luis Obispo Valley Basin Groundwater Sustainability, 2021.
6.	City of San Luis Obispo Conservation and Open Space Element, 2006.
7.	Climate Action Plan for Community Recovery, 2020.
8.	City of San Luis Obispo Active Transportation Plan, 2021.
9.	City of San Luis Obispo Multimodal Transportation Impact Study Guidelines, 2020.
10.	City of San Luis Obispo Water and Wastewater Element, 2018.

### Attachments

1. Draft CASE, City of San Luis Obispo, September 2022.