



# San Luis Obispo County

## Department of Planning and Building Environmental Division

**TO:** Interested Party  
**DATE:** July 21, 2010  
**FROM:** Jeff Oliveira, Environmental Resource Specialist  
**VIA:** John Nall, Principal Environmental Specialist  
**SUBJECT:** Morro Bay to Cayucos Connector -- Notice of Availability of Final EIR  
(ED 08-252)

The Final Environmental Impact Report (FEIR) for the Morro Bay to Cayucos Connector project is complete and available for review. The FEIR addresses the environmental impacts that may be associated with a future request for a Conditional Use/Coastal Development Permit to develop the project, which would include incorporating existing bikeways and construction of a new "Class I bikeway", completely separated from vehicular traffic.

The proposed project is within multiple land use categories and is located on the west side of Highway 1 between Cloisters Park in the City of Morro Bay, and the site of Norma Rose Park in the community of Cayucos.

### **ENVIRONMENTAL IMPACTS:**

The EIR focuses on the following issues: aesthetic resources, air quality, biological resources, cultural resources, geology, soils, and drainage, hazards and hazardous materials, and transportation and circulation. The EIR also considers two alternatives in addition to the "No Project" alternative.

### **HOW TO GET MORE INFORMATION:**

Copies of the Final EIR are available at the following locations: Cal Poly Library and City/ County Library of San Luis Obispo. Copies are also available on loan and for review at the Environmental Division of the Planning Department, located at 976 Osos St., Room 200, San Luis Obispo, 93408-2040. The EIR is on the Planning Department's web site at: [www.sloplanning.org](http://www.sloplanning.org) under "Environmental Information and Natural Resources" then "Environmental Notices, Proposed Negative Declarations, EIRs and other Documents". If you need more information about this project, please contact Jeff Oliveira at (805)781-4167 (or e-mail: [joliveira@co.slo.ca.us](mailto:joliveira@co.slo.ca.us)).

### **PUBLIC HEARINGS:**

A public hearing to discuss the Final EIR has been scheduled for August 26, 2010 at the Parks and Recreation Commission meeting. The meeting will start at 6:00 p.m. in the County Government Center Board Chambers located at 1055 Monterey Street, Room D-170, San Luis Obispo.

A public hearing before the San Luis Obispo Board of Supervisors to certify the EIR has not been scheduled at this time. The hearing would only involve consideration of the EIR, because at this time, no formal application has been filed for the proposed project. Please contact the project manager if you plan to attend the EIR certification hearing.







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FINAL

# MORRO BAY TO CAYUCOS CONNECTOR ENVIRONMENTAL IMPACT REPORT

SCH #2009081001

Prepared for  
County of San Luis Obispo  
General Services Agency  
County Parks  
1087 Santa Rosa Street  
San Luis Obispo, CA 93408

Prepared by  
SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

July 2010



# **Morro Bay to Cayucos Connector Path**

Final Environmental Impact Report  
SCH No. 2009081001

**Prepared for:**

County of San Luis Obispo  
General Services Agency, County Parks  
1087 Santa Rosa Street  
San Luis Obispo, CA 93408  
Contact: Shaun Cooper, Parks Planner  
(805) 781-4388

**Prepared by:**

SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, California 93401  
Contact: Keith Miller, Project Manager  
(805) 543-7095

**July 2010**

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## INTRODUCTION

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A Final Environmental Impact Report (EIR) as defined by the California Environmental Quality Act (CEQA) *Guidelines* §15132 must contain:

- The draft EIR or a revision of the draft.
- Comments and recommendations received on the draft EIR either verbatim or in summary.
- A list of persons organizations and public agencies commenting on the draft EIR
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- Any other information added by the Lead Agency.

This volume constitutes the Final EIR (FEIR) and contains an Errata Sheet and Response to Comments on the April 2010 Draft EIR. Due to the minor nature of changes required to the Draft EIR, an erratum was prepared that lists the revisions to the Draft EIR. The Response to Comments section of this volume consists of tables listing persons, organizations, and public agencies commenting on the Draft EIR; verbatim comments received through the EIR process; and responses by the lead agency to comments received. The Draft EIR is available on line at [www.slocountyparks.com](http://www.slocountyparks.com).

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## RESPONSE TO COMMENTS

The Response to Comments section includes comment letters for the Morro Bay to Cayucos Connector Draft EIR. An errata sheet has been prepared summarizing the changes to the Draft EIR. Where appropriate, the number of the errata will be mentioned in the response to comments so that the reviewers can see the proposed changes to the Draft EIR. Once the County has certified the EIR, these comment letters, responses, and the errata, will be considered the Final EIR. The errata also include additional references identified in this chapter.

The following agencies and members of the public have prepared comments on the Draft EIR:

Respondent	Code	Contact	Page
<b>State of California</b> <b>Office of Planning and Research</b> <b>State Clearinghouse and Planning Unit</b> On Line Announcement of Filing Received: April 20, 2010	SCH	1400 10th Street Sacramento, CA 95812 <a href="http://www.ceqanet.ca.gov">www.ceqanet.ca.gov</a>	9-3
<b>Robert Fuller Davis</b> Email dated: May 27, 2010	RFD	<a href="mailto:slobike@me.com">slobike@me.com</a>	9-5
<b>San Luis Obispo County</b> <b>Air Pollution Control District</b> Letter dated: May 28, 2010	APCD	3433 Roberto Court San Luis Obispo, CA 93401 <i>Contact: Meghan Field</i>	9-
<b>David Dabritz</b> Letter dated: May 28, 2010	DD(a)	3650 Studio Drive Cayucos, CA 93430	9-
<b>James L. Christiansen</b> Letter dated: June 1, 2010	JLC	3640 Studio Drive Cayucos, CA 93430	9-
<b>United States Department of the Interior</b> <b>Fish &amp; Wildlife Service</b> Letter dated: June 3, 2010	USFWS	2493 Portola Road, Suite B Ventura, CA 93003 <i>Contact: Julie Vanderwier</i>	9-
<b>State of California</b> <b>Department of Parks and Recreation</b> <b>San Luis Obispo Coast District</b> Letter dated: June 3, 2010	DPR	750 Hearst Castle Road San Simeon, CA 93452 <i>Contact: Nicholas Franco</i>	9-
<b>Cayucos Citizens' Advisory Council</b> Email dated: June 3, 2010	CCAC	<a href="mailto:jcarsel@aol.com">jcarsel@aol.com</a> <i>Contact: John Carsel</i>	9-
<b>Carol Baptiste</b> Email dated: June 3, 2010	CB	150 El Sereno Avenue Cayucos, CA 93430	9-
<b>David Dabritz</b> Letter dated: June 3, 2010	DD(b)	3650 Studio Drive Cayucos, CA 93430	9-
<b>John Diodati</b> Letter dated: June 3, 2010	JD	175 Capri Morro Bay, CA 93442	9-

Respondent	Code	Contact	Page
<b>State of California</b> <b>Department of Transportation</b> <b>District 5</b> Letter dated: June 7, 2010	DOT	50 Higuera Street San Luis Obispo, CA 93401 <i>Contact: James Kilmer</i>	9-
<b>San Luis Obispo Council of Governments</b> Letter dated: June 7, 2010	COG	1114 Marsh Street San Luis Obispo, CA 93401 <i>Contact: Richard Murphy</i>	9-
<b>Chevron Environmental Management Company</b> Letter dated: June 24, 2010	CEMC	4000 Highway One Morro Bay, CA 93442 <i>Contact: John Westenberger</i>	9-

The letters of comment are given in the above order with the responses following the individual letters. Letters of comment are reproduced in total, and numerical annotation has been added as appropriate to delineate and reference the responses to those comments. The pages of the letters have been re-numbered to conform to the page sequence of this section.



California Home

Wednesday, June 9, 2010



OPR Home &gt; CEQAnet Home &gt; CEQAnet Query &gt; Search Results &gt; Document Description

**Morro Bay to Cayucos Connector****SCH Number:** 2009061001**Document Type:** EIR - Draft EIR**Alternate Title:** Morro Bay to Cayucos Connector Trail**Project Lead Agency:** San Luis Obispo County**Project Description**

The proposed project includes incorporating existing bikeways and construction of a new "Class I bikeway", completely separated from vehicular traffic. It would be located on the west side of Highway 1 between Cloisters Park in the City of Morro Bay, and the site of Norma Rose Park in the community of Cayucos.

**Contact Information****Primary Contact:**

Jeff Oliveira  
San Luis Obispo County  
(805) 761-4167  
576 Ocean Street, Room 500  
San Luis Obispo, CA 93408-2040

**Project Location**

County: San Luis Obispo  
City:  
Region:  
Cross Streets: Toro Creek Rd, Old Creek Rd, Yerba Buena Dr  
Latitude/Longitude:  
Parcel No: multiple  
Township:  
Range:  
Section:  
Base:  
Other Location Info: Nearest Community: Cayucos

**Proximity To**

Highways: Hwy 1  
Airports:  
Railways:  
Waterways: Toro Creek, Pacific Ocean  
Schools:  
Land Use: Recreation, Residential single family, Agriculture

**Development Type**

Recreational, Transportation: Other

**Local Action**

Other Action

**Project Issues**

Aesthetic/Visual, Agricultural Land, Air Quality, Archaeologic-Historic, Biological Resources, Coastal Zone, Cumulative Effects, Drainage/Absorption, Flood Plain/Flooding, Geologic/Seismic, Landuse, Soil Erosion/Compaction/Grading, Toxic/Hazardous, Traffic/Circulation, Vegetation

**Reviewing Agencies** (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

<http://www.ceqanet.ca.gov/DocDescription.asp?DocPK=641861>

6/9/2010

Resource Agency: California Coastal Commission; Department of Fish and Game, Region 4; **Department of Parks and Recreation**; Department of Water Resources; California Highway Patrol; Caltrans, District 5; Air Resources Board; Transportation Projects; Regional Water Quality Control Board, Region 3; Department of Toxic Substances Control; Native American Heritage Commission

**Date Received:** 4/20/2010 **Start of Review:** 4/20/2010 **End of Review:** 6/9/2010

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<http://www.ceqanet.ca.gov/DocDescription.asp?DocPK=641861>

6/9/2010

**State Clearinghouse Online Notification**

Comment No.	Response
SCH-1	This notification identifies the agencies that were notified by the State Clearinghouse. This notification is included for informational purposes and no further response to this letter is necessary.

From: Robert Fuller Davis <slobike@me.com>  
 To: joliveira@co.slo.ca.us  
 Cc: scooper@co.slo.ca.us  
 Date: 05/27/2010 08:53 AM  
 Subject: MB-Cayucos Draft EIR comments attached

Hello Mr Oliveira. May I give you my comments via email? Thanks. Red Davis

Visual Impact p. 4-8 Views from Northbound Highway 1

Placing the bike trail within Caltrans ROW in Segment 3 at grade with Highway 1 requires a barrier that presents significant and unavoidable visual impact. An alternative not discussed is building the bike trail below highway grade on pilings across the top of existing rip rap from North Point to Toro Creek. Is this a viable alternative?

RFD-1

Bluff Retreat p. 4-58

You note that the dominant force behind recorded bluff erosion may be the result of stormwater erosion, poor drainage channelization, rather than tidal erosion. Can you note as a mitigation measure that proposed culverts and bridges will improve this drainage and may reduce erosion over the next 25 years?

RFD-2

4.7.5.5 Safety p.4-94

Can you note that existing bicycle traffic on Highway 1 northbound from Morro Bay is required to cross Toro Creek Bridge in the motor vehicle lane competing for space with motorized traffic traveling at 65 mph? The bridge does not have a shoulder for bicyclists to use. This project will provide a safe alternative for northbound cyclists to cross Toro Creek. (See attached file: mb\_draft\_eir\_response.pdf) Robert Fuller Davis Morro Bay California slobike@me.com

RFD-3

**Response to Letter from Robert Fuller Davis, dated May 27, 2010**

<b>Comment No.</b>	<b>Response</b>
RFD-1	Due to the presence of the riprap, this alternative would be technically challenging. It would also require additional disturbance within sensitive habitat and would potentially subject the bikeway to more significant risk of damage due to wave run-up. Further, Caltrans has suggested that the barrier would be required for any portion of the bikeway within 30 feet of the edge of travelled way (white stripe), in which case a barrier may still be necessary (refer to response DOT-2).
RFD-2	Bluff erosion is expected to continue at approximately the same rate whether or not the proposed project is implemented. The proposed project is not expected to reduce bluff erosion, nor is it expected to increase it. Restoration of the remnant road in the North Point Natural Area may reduce stormwater runoff and reduce erosion in that area (Segment 2 of the proposed project), although the potential reduction would not be known until the drainage plan is prepared for the project.
RFD-3	Comment noted. The proposed project is intended to provide a safer connection for bicyclists between Cayucos and Morro Bay.



May 28, 2010

Jeff Oliveira  
San Luis Obispo County Department of Planning and Building  
Government Center  
San Luis Obispo CA 93408

SUBJECT: APCD Comments Regarding the Morro Bay to Cayucos Connector Trail  
Notice of Availability of Draft Environmental Impact Report. (ED 08-252)

Dear Mr. Oliveira,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the proposed Morro Bay to Cayucos Trail Connector. APCD originally commented on this project on August 31, 2009. The proposed project would complete a segment in the non-motorized transportation network along Highway 1 and would be a dedicated Class I bicycle path and pedestrian corridor, completely separated from vehicular traffic, from the intersection of Yerba Buena Street and Highway 1, to the southern end of Studio Drive in the unincorporated community of Cayucos. This project would provide a connection between existing designated bikeways to the north and the south.

The project would also include the demolition and removal of the remnant road in the North Point Nature Area (NPNA). The road is approximately 560 feet long and 40 feet wide. The total disturbance area would be approximately 22,000 square feet. The EIR indicates that the disturbed area would be revegetated with native species.

The proposed project is broken up into five segments which will have such activities as earthwork, paving, demolition and construction of retaining walls and the construction of a bridge. Staging areas for construction may include the disturbed or developed areas of the Pier Landing parking area, the Marine Terminal, and the site of Norma Rose Park for Segment 2 and the short-term use of the beach west of Highway 1 for construction of Segment 3.

The proposed project would formalize the existing parking area located at the south end of Studio Drive and would include parking available at Norma Rose Park. The total earthwork proposed for this project will be less than 5,000 cubic yards and would occur over a relatively long period (2 months) due to intensive biological resources mitigation and geographic constraints. The proposed project would require approximately 42,000 square feet of asphalt with the permanent area of disturbance associated with the bikeway being approximately 80,000 square feet (6,600 feet long by 12 feet wide). Total construction for this proposed project is estimated at less than one year.

3433 Roberto Court • San Luis Obispo, CA 93401 • 805-781-5912 • FAX: 805-781-1002  
info@slcleanair.org • www.slcleanair.org

printed on recycled paper

Draft Environmental Impact Report for Morro Bay to Cayucos Connector Trail  
May 28, 2010  
Page 2 of 5

The following are APCD comments that are pertinent to this project.

#### GENERAL COMMENTS

The proposed Morro Bay to Cayucos Connector Trail is consistent with the APCD's Clean Air Plan call for alternative transportation choices in order to reduce air quality impacts from historic vehicle dependent development. Vehicular impacts account for over 50% of the County's traditional air pollution and greenhouse gas emissions. For this reason, the APCD supports this project.

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each. **Please address the action items contained in this letter that are highlighted by bold and underlined text.**

#### CONSTRUCTION PHASE MITIGATION

The APCD staff considered the construction impacts of this development by running the URBEMIS2007 version 9.2.4 computer model, a tool for estimating construction emissions related to the development of land uses. This indicated that construction phase impacts will likely be less than the APCD's significance threshold values of 137 lbs/day of ROG + NOx and/or 2.5 tons/year ROG + NOx. Therefore, with the exception of the requirements below, the APCD is not requiring other construction phase mitigation measures for this project.

#### Hydrocarbon Contaminated Soil

**Should hydrocarbon contaminated soil be encountered during construction activities, the APCD must be notified as soon as possible and no later than 48 hours after affected material is discovered to determine if an APCD Permit will be required. In addition, the following measures shall be implemented immediately after contaminated soil is discovered:**

- Covers on storage piles shall be maintained in place at all times in areas not actively involved in soil addition or removal;
- Contaminated soil shall be covered with at least six inches of packed uncontaminated soil or other TPH –non-permeable barrier such as plastic tarp. No headspace shall be allowed where vapors could accumulate;
- Covered piles shall be designed in such a way to eliminate erosion due to wind or water. No openings in the covers are permitted;
- During soil excavation, odors shall not be evident to such a degree as to cause a public nuisance; and,
- Clean soil must be segregated from contaminated soil.

**The notification and permitting determination requirements shall be directed to the APCD Engineering Division at (805) 781-5912.**

APCD-1

APCD-2

APCD-3

<p><i>Draft Environmental Impact Report for Morro Bay to Cayucos Connector Trail</i> May 28, 2010 Page 3 of 5</p>	<p><u>Naturally Occurring Asbestos</u></p>	<p>The EIR indicated that a geologic analysis would be completed to ensure the presence/absence of serpentine rock onsite. Naturally occurring asbestos (NOA) has been identified by the state Air Resources Board as a toxic air contaminant. Serpentine and ultramafic rocks are very common throughout California and may contain naturally occurring asbestos. The SLO County APCD has identified areas throughout the County where NOA may be present (see the APCD's 2009 CEQA Handbook, Technical Appendix 4.4). The proposed project site is located in a candidate area for Naturally Occurring Asbestos (NOA) and the following requirements apply. Under the ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations, <b>prior to any construction activities at the site, the project proponent shall ensure that a geologic evaluation is conducted to determine if NOA is present within the area that will be disturbed. If NOA is not present, an exemption request must be filed with the APCD.</b> If NOA is found at the proposed project site the applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD. More information on NOA can be found at: <a href="http://www.socleanair.org/business/asbestos.asp">http://www.socleanair.org/business/asbestos.asp</a>.</p>	<p>APCD-4</p>	<p><i>Draft Environmental Impact Report for Morro Bay to Cayucos Connector Trail</i> May 28, 2010 Page 4 of 5</p>	<p><b>implement the following mitigation measures to minimize nuisance impacts and to significantly reduce fugitive dust emissions:</b></p>	<p>APCD-7 (cont'd)</p>
	<p><u>Demolition of Asbestos Containing Materials</u></p>	<p>Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos containing material (ACM). Asbestos containing materials could be encountered during demolition or remodeling of existing buildings. Asbestos can also be found in utility pipes/pipelines (transite pipes or insulation on pipes). <b>If utility pipelines are scheduled for removal or relocation, or building(s) are removed or renovated this project may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M - asbestos NESHAP).</b> These requirements include but are not limited to: 1) notification requirements to the APCD, 2) asbestos survey conducted by a Certified Asbestos Inspector, and 3) applicable removal and disposal requirements of identified ACM. Please contact the APCD Enforcement Division at (805) 781-5912 for further information.</p>	<p>APCD-5</p>		<ul style="list-style-type: none"> <li>a. Reduce the amount of the disturbed area where possible;</li> <li>b. Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water should be used whenever possible;</li> <li>c. All dirt stock pile areas should be sprayed daily as needed;</li> <li>d. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil disturbing activities;</li> <li>e. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating, non-invasive, grass seed and watered until vegetation is established;</li> <li>f. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD;</li> <li>g. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used;</li> <li>h. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;</li> <li>i. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with CVC Section 23114;</li> <li>j. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site;</li> <li>k. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where feasible;</li> <li>l. All PM10 mitigation measures required should be shown on grading and building plans; and,</li> <li>m. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20% opacity, and to prevent transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD Compliance Division prior to the start of any grading, earthwork or demolition.</li> </ul>	
	<p><u>Developmental Burning</u></p>	<p>Effective February 25, 2000, <b>the APCD prohibited developmental burning of vegetative material within San Luis Obispo County.</b> If you have any questions regarding these requirements, contact the APCD Enforcement Division at 781-5912.</p>	<p>APCD-6</p>			
	<p><u>Dust Control Measures</u></p>	<p>Construction activities can generate fugitive dust, which could be a nuisance to local residents and businesses in close proximity to the proposed construction site. Dust complaints could result in a violation of the APCD's 402 "Nuisance" Rule. <b>Projects with grading areas that are within 1,000 feet of any sensitive receptor shall</b></p>	<p>APCD-7</p>		<p><u>Construction Permit Requirements</u></p>	<p>APCD-8</p>
					<p>Based on the information provided, we are unsure of the types of equipment that may be present during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities may require California statewide portable</p>	



*Draft Environmental Impact Report for Morro Bay to Cayucos Connector Trail*  
 May 28, 2010  
 Page 5 of 5

equipment registration (issued by the California Air Resources Board) or an APCD permit. Operational sources may also require APCD permits.

The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendices, page 4-4, in the APCD's 2009 CEQA Handbook.

- Power screens, conveyors, diesel engines, and/or crushers
- Portable generators and equipment with engines that are 50 hp or greater
- Electrical generation plants or the use of standby generator
- Internal combustion engines
- Rock and pavement crushing
- Unconfined abrasive blasting operations
- Tub grinders
- Trommel screens
- Portable plants (e.g. aggregate plant, asphalt batch plant, concrete batch plant, etc)

**To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.**

#### **OPERATIONAL PHASE MITIGATION**

In order to ensure the continued functionality of this proposed bike trail, an ongoing operational maintenance program needs to be developed.

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at (805) 781-5912.

Sincerely,



Meghan Field  
 Air Quality Specialist

MDF/lmg

cc: San Luis Obispo County General Services Agency  
 Karen Brooks, Enforcement Division, APCD  
 Tim Fuhs, Enforcement Division, APCD  
 Gary Willey, Engineering Division, APCD

#### **Attachments:**

- Naturally Occurring Asbestos – Construction & Grading Project Exemption Request Form, Construction & Grading Project Form

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APCD-8  
 (cont'd)

APCD-9



**Response to Letter from San Luis Obispo County Air Pollution Control District, dated May 28, 2010**

<b>Comment No.</b>	<b>Response</b>
APCD-1	Comment noted.
APCD-2	Comment noted.
APCD-3	Mitigation measure HAZ/mm-1 requires preparation and approval of a Contaminated Materials Management Plan (CMMP). That plan would include protocols that will be utilized during the project to safely and appropriately recover, handle, characterize, store, transport, and dispose of any contaminated materials encountered during construction of the project. No additional mitigation is required.
APCD-4	Refer to AQ/mm-1.
APCD-5	Comment noted.
APCD-6	No developmental burning is proposed.
APCD-7	Dust control is already required by local ordinance. No additional measures are required.
APCD-8	Comment noted.
APCD-9	Comment noted.



May 28, 2010

Jeff Oliveria, Project Manager  
County Planning & Building Department  
976 Osos St. Rm.300  
San Luis Obispo, CA 93408-2040

Subject: Morro Bay to Cayucos Connector-- Draft EIR (ED 08-252)

Topic: Comments to Report

Dear Mr. Oliveria,

You have already received my comments to an earlier Draft EIR of August 26, 2009. These comments will be in response to the Draft EIR noticed April 19, 2010 and the undated Executive Summary.

The comments will be by page number of that report and the Executive Summary. The report is exhaustive and covers most of the project. It does not follow through on the projected extension to Norma Rose Park, segment 5.

Page 3

The Draft Report of July 31, 2009

Mention is made that to evaluate this EIR, evaluation an alternative trail alignment along the east side of Highway 1 will be done... No such evaluation has been done. Therefore this report has no probative value. Without the alternatives no judgment can be made.

Also! The 2 other alternative mentioned in the Executive Summary are not mentioned nor discussed.

Whether the construction of a wall 32 inches above the roadway with an 22 inch fence meets with the Cal Trans scenic highway standards is not addressed. 1 c) Change the visual character of an area is potentially significant.

Should lighting be placed on the bridges for safety?

Encroachment onto Hwy. 1 ROW on the narrow cliff edge south of Chevron pier landing will narrow the class 2 bikeway that already exists and create an additional traffic hazard.

Page 7

The biological resources that are critical along the bluff are very sensitive to the amount of rain and also to the timing of that rain. 2006-8 were dry years while 2009-

*Hi Shawn  
Thank you for your  
quick replies  
Don*

10 has been a relatively wet year. Surveys need to be done over several consecutive years and in different seasons.

Recent clearing of ice plant on some coastal bluffs has resulted in the emergence of species previously unknown to inhabit that location. This bluff is a unique isolated micro ecosystem that will be adversely impacted by increased human use. The recent publication of the flora of the State Parks in this area; specifically those covering the bluff communities; should be reviewed.

The path covering two acre loss of habitat in a 20-25 acre corridor may be critical. Because of run-off from Highway 1 the area near the fence gets the most moisture and the path will cover that area and may block down slope migration of the moisture.

The statement on page 10 paragraph three fifth line should read "and long term impacts will result".

As the report concludes much more study has to be done.

Page 12, 19 & 20 together

An eight foot trail with two 2 foot shoulders creates a 12 foot impermeable barrier to water percolation. The narrow bluff is in some cases less than 60 feet from the ROW fence. Increasing the water load from this path onto already fragile hard pan soil that is "very poorly drained" creates a greater potential for increasing bluff erosion beyond the natural progression.

Page 14

Should the north end of Studio Dr. become more congested and the bluffs receive more visitors, access to the area by emergency responders can be compromised; as it has in the past during sunny weather and good surfing conditions.

Page 16

See page 14 above

Page 17

Should the trail increase use of the "park" area would public restrooms be identified as additional needs. Beach use from Studio Dr. to North point has increased greatly with the closure of the Morro Bay Strand to unrestrained dogs. This beach is heavily used by dog owners as an off leash area. This off leash use apparently is legal or at least the leash law is not enforced.

Page 18

There are 10-15 unmarked parallel parking spaces that are heavily used by surfers, beach goers, dog owners, and beach party gatherers at the south end of Studio Dr. On

DD(a)-4  
(cont'd)

DD(a)-1

DD(a)-2

DD(a)-3

DD(a)-4

DD(a)-5

DD(a)-6

DD(a)-7

DD(a)-8

DD(a)-9

many days and most weekends there are numerous times when no space is available for more cars. THE LOT IS FULL . This raises the impact to Potentially Significant. The two informal parking spaces near the Chevron Marine Terminal are in the ROW. They are separated from the proposed bikeway by a six foot chain link fence. Getting a bike from these parking lots to the bikeway would entail scaling this fence.

DD(a)-9  
(cont'd)

Traffic studies need be done on both Studio and Beachcomber Dr. during weekends when the most likely use of the bikeway would exist. A ride down Studio Dr. on a summer weekend will show the evaluator the extent of the traffic problem.

DD(a)-10

Page 19

Why are no public restrooms being planned? The increased use of the "Chevron" bluff has increased need for such facilities.

DD(a)-11

Addenda

There is already a great class 2 bikeway between these 2 points.

DD(a)-12

Thank you for an opportunity to comment on this report.

David Dabritz  
3650 Studio Dr.  
Cayucos. CA 93430-1943  
805-995-3875  
seasidestories@gmail.com

cc: Cherie Aispuro  
Jim Christian  
Bud Strauss  
Cayucos Advisory Council, Traffic committee  
✉ Paul Choucalas  
CCAC, Sec.  
Larry Fishman  
*SHAUN ROOPER*

**Response to First Letter from David Dabritz, dated May 28, 2010**

<b>Comment No.</b>	<b>Response</b>
DD(a)-1	Comment noted.
DD(a)-2	Comment noted.
DD(a)-3	Appendix F includes an analysis of an alternative alignment. No lighting is proposed for the project. The barrier as proposed would be necessary to address safety concerns. It would also result in an unavoidable aesthetic impact.
DD(a)-4	Significant biological resource field surveys have been performed by qualified biologists for both the 2006 Constraints Analysis and this EIR. Sensitive species and habitat have been identified and mitigation proposed. Mitigation measures proposed would reduce impacts to a less than significant level. Those measures include implementing erosion control during construction and avoiding disturbance of existing drainages.
DD(a)-5	The bikeway would alter drainage patterns onsite; however not significantly. The impermeable surface is limited (shoulders would be gravel and allow stormwater to infiltrate) and is not expected to significantly affect drainage patterns. Bluff erosion is not expected to increase or decrease as a result of the proposed project.
DD(a)-6	The DEIR notes that the parking area at the south end of Studio Drive can be at capacity during peak periods. This would not change as a result of the proposed project. The parking area would still be at capacity during peak periods.
DD(a)-7	See response to comment DD(a)-6.
DD(a)-8	Additional restrooms are not proposed. Lack of restrooms in the vicinity of the south end of Studio Drive may be an inconvenience, but it does not represent a physical impact on the environment that requires mitigation.
DD(a)-9	The DEIR notes that this parking area can be at capacity during peak periods and is heavily used. This would not change as a result of the proposed project. Lack of parking is not necessarily a physical impact that requires mitigation. The DEIR notes that the proposed project has been designed to allow continued access from the informal parking areas, across the project and to the bluffs and beach. Access would not require scaling a chainlink fence.
DD(a)-10	The DEIR notes that there is the potential for conflicts between cyclists and automobiles on Studio and Ocean. Both roads are identified in the County Bikeways Plan as Class III bikeways. Additional mitigation, TC/mm-2 has been recommended in the DEIR to address potential conflicts.
DD(a)-11	Lack of restrooms is an inconvenience, but is not a physical impact on the environment that necessarily warrants consideration in an EIR.
DD(a)-12	There is not an existing Class II bikeway between Cloisters Park and Norma Rose Park.

<p style="text-align: center;">June 1, 2010</p> <p>Dear Mr. Oliveria,</p> <p>The following are my comments regarding the EIR for the proposed Morro Bay Cayucos Connector Trail.</p> <p>I live at 3640 Studio Drive, Cayucos, which is in the area at the south end of Studio Drive between Chaney and the dead-end at the Chevron property. This little stretch of street is, at times, heavily used by surfers, dog walkers, and beach day-use people. During peak periods, which are normally weekends, there is heavy use of the limited parking spaces available. I believe that having the connector path on the west (ocean) side and using Studio Drive will create serious safety issues for the users of the path.</p> <p>During these heavy use periods, there are many cars driving down to the dead-end on Studio Drive, pulling into the resident's driveways, backing blindly across the street, while turning around to find a parking space or leaving the area. This is the first safety hazard I see to pedestrians and cyclists.</p> <p>Secondly, when this area is used by surfers, they have their equipment, which includes surfboards, wetsuits, tubs, etc. on the ground around their vehicles, and many times extending into the street. We, as residents, have to be careful as we drive down our street so we do not run over them or their equipment. Adding cyclists and pedestrians will only further congest the street.</p> <p>Thirdly, many people, daily, use this area to take their dogs to the off-lease beach area at the Chevron property. They typically let their dogs out of their vehicles and the excited dogs run up and down the street before they head down the beach access. This too, will create a safety hazard to the connector trail users.</p> <p>Fourthly, let's be realists and consider the attitudes of the aforementioned people that routinely use this area. Surfers are not timid people. They can certainly develop an attitude quickly when they are challenged. I have seen too many displays of it in the street. Accordingly, cyclists have the same type of attitude and they are not particularly yielding of the street on which</p>	<p>they are riding. I have seen many displays of their attitude as well. Now let's add the dog owners, which are equally protective of their pets, and we have a mix of people, each protective of their activity, that can lead to serious conflict. If the connector trail uses Studio Drive, I believe this will be an area of very diverse people with different interests competing for very limited space. Serious conflicts are inevitable.</p> <p>Another safety concern I have is the entire use of Studio Drive. I routinely drive Studio Drive from my home to the Old Creek Road intersection because it is safer to enter the highway through a traffic light controlled intersection. There are areas on Studio Drive where there are cars parked parallel on each side of the street across from each other. In these areas two cars driving in opposite direction cannot pass each other due to the narrow street. One driver must pull behind one of the parked cars and allow the other car to pass. In my experience, when there are cyclists using the street in this situation, they will not cooperate in this give-and-take situation. They just continue to come right down the middle of the street. This refusal to "Share the Road" will further test the patience of drivers on this street. Let's hope one of those drivers, who always seem to be in a big hurry, does not lose their patience with cyclists and force them to yield and become injured.</p> <p>The last comment I will make concerns the environment. Considering building a bridge across Toro Creek on the west side of the highway on a pristine beach and natural creek makes no sense at all to me. It disrupts the natural setting and impedes the view from Highway 1. If there is a bridge to be built, I believe it should be on the east side of Highway 1. People who use Highway 1 look at the ocean and beach, not the eastern upstream side of the creek. I thought we were moving away from such things as building permanent structures and such in beautiful natural settings. I oppose the consideration of the bridge on the west side of Highway 1, especially for a project that is primarily recreational and will have limited use.</p> <p>James L. Christiansen 3640 Studio Drive Cayucos, CA 93430 805-995-3116 cayucosjimandpam@charter.net</p>
	JLC-5 (cont'd)
JLC-1	JLC-6
JLC-2	
JLC-3	JLC-7
JLC-4	
JLC-5	

**Response to Letter from James L Christiansen, dated June 1, 2010**

Comment No.	Response
JLC-1	The bluffs and adjacent beach are popular with a variety of recreational uses, including surfers, dog walkers, and cyclists, among others. The DEIR indicates that safety conflicts and inadequate parking capacity may result as a result of implementation of the proposed project.
JLC-2	Mitigation measure TC/mm-2 has been recommended to address potential conflicts.
JLC-3	See response to JLC-1 and 2.
JLC-4	See response to JLC-1 and 2.
JLC-5	See response to JLC-1 and 2.
JLC-6	See response to JLC-1 and 2.
JLC-7	The proposed bridge is relatively limited in size and scope. Based on the analysis in the Aesthetics Resources section, it would not result in an impact to aesthetic resources. There are sensitive biological resources on both the west and east side of Toro Creek. Mitigation measures have been proposed that would reduce potential impacts to these resources to a less than significant level.

Morro shoulderband snail	The Morro shoulderband snail	FE/--/--
Suitable Conditions Absent:	Soils	
Helminthoglypta walkeriana	(MSS) is restricted to Baywood	(within the
BSA consist of clay		
	ifine sand in coastal dune and	
and will not support MSS. MSS		
	coastal sage scrub communities	
will not utilize sand on the		
	near Morro Bay. MSS often occurs	beaches
and foredunes. The BSA is		
	under shrubs that exhibit dense,	
located north of the known MSS		
	low growth and have ample contact	
range. Species not observed		
	with the ground. Mock heather,	

USFWS-3

**Response to Letter from United States Fish and Wildlife Service, dated June 3, 2010**

Comment No.	Response
USFWS-1	Subsequent correspondence with USFWS indicates (Vanderweir 2010) that the agency did receive a copy of the DEIR.
USFWS-2	Based on a review of the relevant literature and discussions with USFWS staff, there is debate regarding the accuracy of the species range for the Morro shoulderband snail (MSS). Currently, literature describes MSS habitat as consisting of coastal dune, coastal dune scrub, and maritime chaparral associated with back dune and stabilized dune systems. In these communities, MSS are typically found in association with shrubs that have ample branches that touch the ground. Such shrubs include mock heather, seaside golden yarrow, deerweed, sand almond and others. MSS is not expected to occur in areas supporting clay soils, even if shrub vegetation is present. Based on the current understanding of MSS habitat preferences and the existing conditions at Segments 2 and 3, the presence of MSS in the project area is unlikely. However, if MSS are present in foredune habitat areas, the individuals could be impacted by project related activities such as grading, path construction, and habitat restoration. The Biological Resources section of the DEIR shall be amended to include a substantial discussion of MSS and an additional mitigation measure addressing potential MSS impacts. Refer to Errata #1.
USFWS-3	M. Walgren (Walgren 2010) was contacted regarding the project for additional information.



State of California • The Resources Agency

DEPARTMENT OF PARKS AND RECREATION  
San Luis Obispo Coast District  
750 Hearst Castle Road  
San Simeon, CA 93452  
(805) 927-2065 telephone  
[nfranco@hearstcastle.com](mailto:nfranco@hearstcastle.com)

June 3, 2010

Attn: DPLA Environmental Review Unit  
California Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236-0001

Re: San Luis Obispo County Parks & Recreation Division  
Morro Bay to Cayucos Connector Trail  
Draft Environmental Impact Report. SCH # 2009081001

Dear Sir/Madam,

Thank you for providing California State Parks, San Luis Obispo Coast District (State Parks) with the opportunity to comment on the draft Environmental Impact Report (DEIR) for the Morro Bay to Cayucos Connector Trail. State Parks strongly supports this project which will create a critical connector trail in the California Coastal Trail (CCT) system. State Parks will undertake similar planning efforts in the Piedras Blancas area and views the two projects as complimentary and necessary for completing the CCT in San Luis Obispo County.

• **Separated bicycle and pedestrian right of way**

State Parks supports the proposed design incorporating in the new segments, a completely separated right of way exclusively for bicycles and pedestrians. This will provide trail users with the highest quality of recreational experience along the coast. A non-motorized, multi-mode trail that is completely separated from the highway shoulder will provide trail users with a superior recreational experience that is not negatively impacted by interaction with vehicles and the associated issues of safety, noise, and emissions, while providing unimpeded views of the coastline and Morro Rock.

• **Impact to Biological Resources**

As previously stated in meetings with County Parks, State Parks Environmental Scientists continue to have concerns about impacts to biological resources. The project is obviously constrained by a long, narrow footprint with a retreating bluff and special species of concern and associated foredune habitat on the western perimeter. Not surprisingly, State Parks Environmental Scientists prefer the environmentally superior alternative of the Eastern alignment.

With regard to federally listed Western Snowy Plover, while the DEIR does contain mitigation measures during construction, there does not appear to be much analysis of design mitigation with respect to nesting sites. Because the proximity of the bike path to potential nesting sites will add to site disturbance for federally listed species, specific design measures should be incorporated that eliminate interaction between trail users and the foredune habitat. Without appropriate design separation between the trail and foredunes, proposed dune habitat restoration would be subject to future degradation and impacts from trail users and pets.

Arnold Schwarzenegger, Governor

Ruth Coleman, Director

San Luis Obispo County Parks & Recreation Division  
Morro Bay to Cayucos Connector Trail, Draft EIR SCH # 2009081001  
June 3, 2010, Page 2

It is noted that in addition to impacts to federally listed Western Snowy Plover, there are potential impacts to Morro Shoulderband Snail in the foredune habitat. The Western and East/West alignments would also include construction activities within known habitat for the federally listed Morro shoulderband snail (*Helminthoglypta walkeriana*). Morro shoulderband snail (MSS) occurrences at this location have been documented in CNDDB, published literature, and a Master's thesis (Walgren 2003). In particular MSS have been documented in the North Point Natural Area, including portions of the old roadway, and on clay/sandy soils located on the Toro Creek beach bluff area. In addition, the DEIR includes comments (P. D13) regarding soil requirements of MSS that are inconsistent with the current literature regarding MSS habitat occupancy. Consultation with US Fish and Wildlife regarding appropriate mitigation measures should be undertaken and approved prior to ground disturbing activities.

The need to protect biological resources must be balanced by obvious public safety concerns about multiple highway cross walks associated with the Eastern alignment as well as the less than ideal recreational experience that an Eastern alignment would provide. Ultimately, the decision about preferred alignment rests with County Parks as the project applicant, and State Parks will respect and support that decision.

• **Impacts to State Parks Infrastructure and Resources**

The DEIR briefly mentions impacts to certain State Parks resources adjacent to the project area, such as projected parking congestion at Morro Strand day use parking lot associated with the Eastern alignment (page F-41). Presumably there would be impacts to the Morro Strand day use parking lot with either alignment. The same argument can be made for the Studio Drive northern unpaved parking lot and beach access, and the Norma Rose Park terminus of segment 5 of the trail (Norma Rose Park is a state property operated by County Parks under an "Operating Agreement"). What specific improvements are planned for: 1) the Studio Drive northern unpaved parking lot; 2) the trail terminus at Norma Rose Park; or 3) the Morro Strand day use parking lot? Under either alignment scenario, there will likely be an increased use of these parking lots and restroom facilities. How will the trail transition to the existing class 3 bike path on Ocean Avenue that connects with north western Cayucos? Some analysis of these questions and appropriate mitigation is requested for inclusion in the final EIR. If staging of equipment or personnel from State Parks properties or beaches is anticipated, a Right of Entry Permit would be required and State Parks would intend to issue such a permit. As a minor technical clarification, on page 2-5 in segment 4, the beach across from Toro Creek Rd is incorrectly identified as Morro Strand State Beach. The beach property in front of the Chevron facility is not state park beach property.

State Parks staff look forward to working with staff from County Parks and other interested agencies to ensure a successful project that is completed in a timely manner. Thank you again for providing us with the opportunity to comment on the Morro Bay to Cayucos Connector draft EIR.

Sincerely,  
  
Nicholas Franco  
District Superintendent

cc: Clarissa Sampaga, DPR Natural Resources Division  
Jeff Oliveira, Project Manager, San Luis Obispo County Planning & Bldg. Dept.  
Shaun Cooper, Senior Planner, San Luis Obispo County Parks

DPR-5

DPR-6

DPR-7

DPR-8

DPR-1

DPR-2

DPR-3

DPR-4



**Response to Letter from State of California Department of Parks and Recreation San Luis Obispo Coast District,  
dated June 3, 2010**

<b>Comment No.</b>	<b>Response</b>
DPR-1	Comment noted.
DPR-2	Comment noted.
DPR-3	The Environmentally Superior Alternative identified in the DEIR is east of Highway 1
DPR-4	Bio/mm-14 requires fencing to be constructed between the proposed project and foredune habitat to limit trampling of the dunes. In response to concerns from State Parks, it has been modified to require more substantial fencing of foredunes, which would offer greater protection. Specifically, the fencing will need to be approximately 36 inches tall and include posts, horizontal support and metal fencing (2 inch by 4 inch grid) similar to the fencing utilized at Cloisters Park. In areas where this fencing would be required, the 58 inch safety barrier would be required on the highway side of the project. Therefore, this modification to Bio/mm-14 would not result in secondary impacts to aesthetic resources. See Errata # 2.
DPR-5	Refer to response to comment USFWS-2 and Errata #1.
DPR-6	Comment noted.
DPR-7	<p>No specific improvements are proposed at the unpaved northern Studio Drive lot, Norma Rose Park, or at the Morro Strand day use area. The DEIR notes that the proposed project would increase use of these facilities. It also notes that during peak times, the facilities may be at or over capacity under existing conditions. Lack of adequate parking, while a potential nuisance is not necessarily a physical impact on the environment that requires mitigation. At this time, no staging is anticipated on State Parks properties.</p> <p>The proposed project would terminate at Norma Rose Park. From there riders could connect to the existing Class I bikeway adjacent to the wastewater treatment plant, and follow 13<sup>th</sup> Street, a designated Class III bikeway, south to Ocean Avenue, an existing Class II bikeway.</p> <p>Comment noted in regards to Morro Strand State Beach label on page 2-5. It should be removed. See Errata #3.</p>
DPR-8	Comment noted.

From: JCarssel@aol.com

To: joliveira@co.slo.ca.us

Cc: bgibson@co.slo.ca.us, SEARAPTISTE@SBCGLOBAL.NET, JCarssel@aol.com

Date: 06/03/2010 02:53 PM

Subject: Cayucos to Morro Bay Connector Draft EIR

Mr. Jeff Oliveria:

The Cayucos Citizens' Advisory Council discussed the above draft EIR last night at our regularly scheduled meeting. Unfortunately, most of the advisory council members had not been able to complete their reading of the document and comments were, therefore, very limited. The Council itself took no formal action regarding the draft EIR and I continued the matter until our next meeting in July for formal action and realistic comments. I understand that today, however, is the last day to submit comments to you on the draft EIR. Following are some of the individual comments made by individual members of the Council. They do not necessarily reflect any opinion other than the one person making the comment.

"I do not support the connector trail being developed on the west side of Highway 1 due to the traffic congestion that it will cause on Studio Drive. Additionally, there is just too little space along the very south end of Studio Drive (Chaney to the Chevron property) to add a trail there. Also, I do not support the building of a bridge across Toro Creek on the west side of the highway. It will disturb the area too much and impede the view from Highway 1."

Aerial photos are very detailed and great. The West side is very narrow in the area south of Toro Creek. On the East side there will have to be constructed on the hillside a retaining wall and fence to protect the bicycle path and that really unsightly. I would prefer the option which has the least environmental impact.

Need to review the 2008 Firma and Boyle Report before can accurately analyze this EIR.

I like the concept of building the path on the east side to Toro Creek Road and then having an underpass (which we have been discussing with Parks and Cal Trans) under Highway 1 there and continuing on the West side to Studio Drive. Take some of Chevron's property at the corner and make it into a parking lot to provide lots of access to the ocean and beach.

I envisioned this as a path I could walk on along the beach when the day comes when I'm physically unable to walk on the sand.

That was about it. Thank you for your attention to this and if we can do any more please let us know. John Carssel, President, Cayucos Citizens' Advisory Council

CCAC-1

CCAC-2

CCAC-3

CCAC-4

CCAC-5

CCAC-6

CCAC-7

**Response to Letter from Cayucos Citizens' Advisory Council, dated June 3, 2010**

<b>Comment No.</b>	<b>Response</b>
CCAC-1	Comment noted.
CCAC-2	Comment noted.
CCAC-3	No trail would be added in this location. It is already designated a Class III bikeway, and would continue to be a Class III bikeway. The DEIR has concluded that the bridge would not result in significant impacts to aesthetic resources.
CCAC-4	Comment noted.
CCAC-5	Comment noted.
CCAC-6	This alternative has not been considered in the DEIR, although an at-grade crossing was considered.
CCAC-7	Comment noted.

From: Carol Baptiste <seabaptiste@sbcglobal.net>  
 To: joliveira@co.slo.ca.us  
 Cc: Carol Baptiste <seabaptiste@sbcglobal.net>  
 Date: 06/03/2010 10:07 AM  
 Subject: Morro Bay to Cayucos Connection Trail

Joe Oliveira

I have received some information that there may be a deadline of today to give input about the connection trail.

That may be incorrect, but just in case, I would like to explain some of my main concerns.  
 I have studied the EIR draft at slocountyparks to some extent.

My number one main concern is the bluff along highway 1 south of Studio Drive in Cayucos.  
 I have walked this many times. There is only a small section here that is left undisturbed and this is it.

CB-1

This is a narrow area. I have come to know a family of gopher snakes that live there. One very large beautiful specimen who I am sure only lives there because it is undisturbed. And some of his family.  
 Narrow and undisturbed.  
 A wide, paved bicycle path as proposed would wipe out the natural state of that area.

CB-2

This narrow section of bluff is also where the para-gliders land. It is beautiful to see the para-gliders flying over head. I'm sure they do a lot of searching to find just the right hill with just the right updraft and a landing spot. It is a narrow landing spot as it is between the freeway and the water.

CB-3

I live on Ocean Avenue across the freeway from this bluff.  
 The alternate route, on the East side of the freeway, would send hundreds of bicyclists right by my front deck.  
 Well, fine, that is okay.  
 I can accept that it is necessary to share this beautiful treasure where we live.

CB-4

Please choose the route that is the least destructive to the environment and put the section of the path that is south of Studio Drive on the East side of the freeway.

CB-5

Thank you for your time and consideration.  
 (I am sending this note as an individual and not as a part of any organization.)

CB-6

Carol Baptiste  
 150 El Sereno Ave.  
 Cayucos, California  
 805-995-3577

**Response to Letter from Carol Baptiste, dated June 3, 2010**

<b>Comment No.</b>	<b>Response</b>
CB-1	Comment noted.
CB-2	Segment 3 of the proposed project would permanently disturb an approximately 12 foot wide corridor along the bluff. Gopher snakes are known to exist in the vicinity of the developed bluff trail in Montana de Oro State Park. It should be noted that the project also includes some restoration of the remnant road in the North Point Natural Area.
CB-3	The project area is heavily used for various recreational activities.
CB-4	Comment noted.
CB-5	The Right-of-way alternative was identified in the DEIR as the Environmentally Superior Alternative.
CB-6	Comment noted.

June 3, 2010

Jeff Oliveira, Project Manager  
County Planning & Building Department  
976 Osos St. Rm.300  
San Luis Obispo, CA 93408-2040

Dear M. Oliveira

This is an addenda to my letter of May 28, 2010 re; Morro Bay to Cayucos Connector trail – Draft EIR ( ED 08-252)

DD(b)-1

My remarks were made by review of the Initial Study Summary-Environmental Checklist. This list was directed to me as the report to comment on. I just learned that the entire report is much more detailed and was available soon after 4-20 on the WEB. Unfortunately I did not see that report at that time. Going back last night to the WEB site I found the entire report.

DD(b)-2

My comments on the prior letter regarding no comparison are incorrect and I apologies for that and they should be ignored.  
Reviewing pertinent parts of the 468 page report last night I have additional comments.

DD(b)-3

Table 5-1 Alternative Impact Summary  
Transportation element for the Proposed Project rates Safety and Parking as (yellow) Significant but mitigated through standard measures.  
Report Article 4.7.5.4 Parking Lists the impact as potentially significant.  
This should be raised to significant and therefore on table 5-1 raised to (red) Significant and unavoidable impacts despite application of mitigation measures.  
Striping will not make fewer car parks nor will it cut congestion. When the parking is now agreed to be at capacity more cars will not reduce congestion. The amount of traffic on the narrow Studio Dr. is at times hazardous now and would only increase.

DD(b)-4

Aesthetic Resources; Scenic Vistas and Visual Quality for segment 5 Studio South end to Old Creek Road are (red) Significant and unavoidable as you can't see the ocean from Studio because of the houses, garages are not of much artistic value and have to dodge traffic.

DD(b)-5

Thank you your consideration.  
David Dabritz  
3650 Studio Dr.  
Cayucos, CA 93430-1943  
805-995-3875  
seasidestories@gmail.com

Cc: joliveira@co.slo.ca.us

**Response to Second Letter from David Dabritz, dated June 3, 2010**

<b>Comment No.</b>	<b>Response</b>
DD(b)-1	Comment noted.
DD(b)-2	Comment noted.
DD(b)-3	Comment noted.
DD(b)-4	As noted, the existing parking facilities, particularly at Studio Drive, are at capacity during peak periods. This existing condition would not change as a result of the proposed project. Mitigation measure TC/mm-2 has been recommended to reduce potential conflicts between multiple users. However, lack of parking is not necessarily a physical impact on the environment that warrants mitigation.
DD(b)-5	The significant unavoidable impact noted in the table is related to Segment 3. It is true that aesthetic resources along Segment 5 are limited due to existing development.

June 3, 2010

Jeff Oliveira, Project Manager  
County Planning & Building Department  
976 Osos St. Rm. 300  
San Luis Obispo, CA 93408-2040

Subject: Draft EIR Comments for the Morro Bay to Cayucos Connector

Dear Mr. Oliveira,

Thank you for this opportunity to comment on the Draft EIR (DEIR) for the Morro Bay to Cayucos Connector. As a resident of Morro Bay and property owner along the proposed path, I fully support the development of this important connector. However, I believe the following issues deserve to be highlighted and/or incorporated into the project.

JD-1

**2.4.3.1 Segment 1: Cloisters to Yerba Buena Street** – This segment, which follows Sandalwood and Beachcomber Drives to Yerba Buena, has no proposed changes to the existing conditions. On May 3, 2010, during consideration of the Morro Bay Bicycle Transportation Plan, residents within this neighborhood who reside along these streets gave compelling public testimony to the Morro Bay Planning Commission that these sections of the proposed path become Class I or equivalent. Their main arguments were that the lack of sidewalk infrastructure, combined with increased pedestrian/bicycle usage and increased vehicle usage create unsafe conditions, especially as an existing route to the local schools. The Planning Commission unanimously voted to recommend these changes. Please incorporate these changes into the DEIR, as they should not create any new impacts.

JD-2

**2.4.4.2 Parking Spaces & 4.7.5.4 Parking** – I am in full support of formalizing the parking spaces on Studio Drive. As a high frequency beach user at this location, I find the unidentified parking spaces create an environment that increases the risk of car accidents. The defined parking will also facilitate the safe interaction of pedestrians and vehicles, which will be a superior improvement over the existing conditions. Additionally, I concur that there are no significant impacts as determined in Section 4.7.5.4 and that current peak demand on holidays and weekends already exists, therefore the formalization of the Studio Drive parking area would not create a new impact (TC Impact 2).

JD-3

**5.3.2 Eastern Alignment Alternative, 5.3.3 East/West Alignment Alternative & 5.3.4 Right of Way Alignment Alternative** – These proposed alternatives, all of which incorporate the use of HWY 1 through physical crossings or use of the right of way, are vastly inferior to the proposed project. Interfaces with HWY 1 would create a significant deterrent to usage, especially with families, who do not desire to have their children interface with HWY 1. Development of a project alternative would result in increased impacts to other components of the project, such as increased parking at Studio Drive when Morro Bay families or tourists choose to drive and park instead of ride or walk.


JD-4

Sincerely,  
  
John Diodati  
175 Capri  
Morro Bay, CA 93442



**Response to Letter from John Diodati, dated June 3, 2010**

<b>Comment No.</b>	<b>Response</b>
JD-1	Comment noted.
JD-2	The General Services Agency is not proposing to reclassify the status of Sandalwood or Beachcomber Drives or create Class I bikeways along them. Nor has construction of Class I bikeways in this area been considered in the DEIR. Creating Class I bikeways on those roads could be a subsequent project to be implemented by the City of Morro Bay.
JD-3	Comment noted.
JD-4	The DEIR notes the potential safety hazards associated with crossing Highway 1. It should be noted that the proposed project would include a crossing of Highway 1 at Old Creek Road.

<p>CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY  <b>DEPARTMENT OF TRANSPORTATION</b>  501 HIGUERA STREET  SAN LUIS OBISPO, CA 93401-5415  PHONE: (805) 549-3101  FAX: (805) 549-3329  TTY: 711  <a href="http://www.dot.ca.gov/dist05/">http://www.dot.ca.gov/dist05/</a></p> <p>ARNOLD SCHWARZENEGGER, Governor</p>  <p><i>Flex your power! Be energy efficient!</i></p> <p>June 7, 2010</p> <p>SLO -001 31.97 – 33.86</p> <p>Jeff Oliveira, Project Manager  County Building &amp; Planning Department  976 Osos Street, Rm. 300  San Luis Obispo, CA. 93408-2040</p> <p>Dear Mr. Oliveira,</p> <p>MORRO BAY TO CAYUCOS CONNECTOR PATH, DRAFT ENVIRONMENTAL IMPACT REPORT, SCH No. 2009081001</p> <p>Thank you for providing Caltrans the opportunity to comment on the County's Morro Bay to Cayucos Connector Path Draft Environmental Impact Report (DEIR). Caltrans views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California. Caltrans recognizes that bicycle, pedestrian, and transit modes are integral elements of a comprehensive transportation system. We offer the following comments so that the County can recognize early the engineering and environmental standards that Caltrans will require in order to implement the proposed Connector Path Plan.</p> <p><u>General Comments on Engineering, Safety and Design Standards Needed for the Encroachment Permit.</u></p> <p>Because the segment of State Route (SR) 1 adjacent to the Connector Path is an expressway per the 2002 California State Highway Log for District 5, the clear recovery zone standard shall be 30 feet from edge of traveled way (ETW) (outside white stripe). Based on what the DEIR states in terms of bike path design template, the connector path may enter the State Highway Right of Way with the provision that a physical barrier (concrete barrier) be constructed where the connector path comes within 30 feet of the ETW. Please be advised that the barrier will need to be constructed whether it is in the State's Right of Way or not for safety reasons, if the path is less than 30 feet from the SR 1 ETW. Also, the County should be advised that Caltrans may not be supportive of the use of steel guardrail as a "barrier" for the path. Early consultation with District 5 Traffic Safety Staff is encouraged. Please contact Mr. Steve Talbert, Traffic Safety Engineer at (805) 549-3484. Caltrans recommends that a pavement section be designed by a Registered Civil Engineer to accommodate the appropriate design life and expectation of the pavement over its life.</p> <p><i>"Caltrans improves mobility across California"</i></p>	<p>Mr. Oliveira  June 7, 2010  Page 2</p> <p>For the segment of State Route 1 between post mile 31.13 and R35.95, the collision rate is .75 per million vehicle miles traveled. For a similar State highway facility the current statewide average is .69 collisions per million vehicle miles traveled.</p> <p>DOT-3</p> <p>Because of the scope, cost, and complexity of this project, it is suggested that the County enter into a cooperative agreement with Caltrans. Please contact Mr. Larry Newland at, (805) 549-3103 for more information regarding the Cooperative Agreement process. This is a prudent action because Project Development staff will need to see certain details of the project in order to approve it for construction. The certain details in question are plan and profile details, drainage provisions, and highway safety standards.</p> <p>DOT-4</p> <p>When submitting the project to Caltrans Encroachment Permits, the applicant must have plan and profile plans that satisfy Caltrans Encroachment Permit Plan Guidelines (attached). The attachments provide ample resources to construct a plan set that will be acceptable to Caltrans.</p> <p>DOT-5</p> <p>Also, future maintenance of the bike path may be done under a Freeway Maintenance Agreement or under Encroachment Permit by the maintaining agency.</p> <p>DOT-6</p> <p><u>Specific Comments Focusing on Environmental Issues</u></p> <p>1. The Federal Funding for this project should be clearly identified in the DEIR, perhaps in the Introduction.</p> <p>DOT-7</p> <p>2. (Pages 2-9 and 2-10, Chapter 2, Section 2.5) Please list the responsible agencies and the associate permits that will be needed for this project. There is no mention of Section 7 consultation, United States Fish and Wildlife Service (USFWS), or National Marine Fisheries Service (NMFS). Please make mention of these.</p> <p>DOT-8</p> <p>3. (Chapter 3, Section 3.1.2, <i>Plans and Policies</i>) The DEIR contains no section providing for federal plans and policies, (i.e. Section 7, 404 permitting, Coastal Zone Management Act, etc.). Please provide this Section.</p> <p>DOT-9</p> <p>4. (Page 4-33, Section 4.3.2.1 <i>Regulatory Setting, Federal Endangered Species Act (FESA) of 1973</i>) The discussion on Federally Endangered Species Act states, "Impacts to listed species...would require the responsible agency or individual to formally consult with USFWS or NMFS to determine the extent of the impact to a particular species. If USFWS or NOAA Fisheries determine that impacts to a species would likely occur, alternatives and measures to avoid or reduce impacts must be identified."</p> <p>DOT-10</p> <p>While this is somewhat the process for Section 10 of the FESA (i.e. no federal nexus), it is incorrect for Section 7 (federal nexus = funding). Under Section 7, the lead Federal Agency determines the extent of impact and appropriate avoidance and minimization measures and USFWS/NMFS provides their "biological opinion". This must occur before the federal agency can complete their National Environmental Protection Act (NEPA) Determination for the project. In 2007, The Federal Highway Administration (FHWA) assigned NEPA and federal consultation responsibilities, including Section 7, to Caltrans. This section needs to clarify the "federal lead agency" role in the process by noting that Caltrans will be the lead federal agency for this project.</p> <p>DOT-11</p> <p><i>"Caltrans improves mobility across California"</i></p>
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Mr. Olivieria  
June 7, 2010  
Page 3

Caltrans suggests the following revisions to text (strikethroughs and italics):

"Impacts to listed species... would require the responsible agency ~~or individual~~ (*Caltrans in the case*) ~~to formally consult with the USFWS or NMFS, to determine the extent of impact to a particular species.~~ If USFWS or NOAA Fisheries studies determine that impacts to a ~~species would likely~~ *federally listed species or critical habitat* may occur, alternatives and measures to avoid or reduce impacts must be identified."

5. (Appendix F, Page F-30, Bio/mm-E5) This measure for the eastern alignment states "...General Services Agency shall receive an incidental take permit form the USFWS..." Because the project will be utilizing federal funding, Caltrans will act as the lead federal agency and is responsible for obtaining a Biological Opinion and Incidental Take Statement from the Service. The same is true for consultation with NMFS. The need for consultation is not mentioned in the preceding steelhead section. Caltrans suggests making the following change: "The project will require that the lead federal agency initiate Section 7 consultation to obtain a Biological Opinion and an Incidental Take Statement from the USFWS..."

6. (Section 4.4 *Cultural Resources*) The DEIR should identify that the project has federal funding and will be required to meet the requirements of Section 106 of the Historic preservation Act. The County will need to follow Caltrans' Programmatic Agreement for Section 106 and procedures outlined in the Caltrans Environmental Handbook, Volume 2. These procedures will include ongoing Native American consultation, developing alternatives to avoid impacts to cultural resources, Phase II testing to determine National Register eligibility, etc.

Again, thank you for the opportunity to comment on the Morro Bay to Cayucos Connector DEIR. If you have any questions regarding the foregoing, please contact me.

Sincerely:



**James Kilmer**  
District 5  
CEQA Coordinator/Development Review for San Luis Obispo County

Telephone: (805) 549-3683  
Email: [James\\_kilmer@dot.ca.gov](mailto:James_kilmer@dot.ca.gov)

"Caltrans improves mobility across California"

Attachment:

**Caltrans District 5 Encroachment Permits-  
Engineering Plans Preparation and Formatting Requirements**

Your plans were difficult to read, difficult to understand, and did not meet Caltrans guidelines for plans preparation. Please refer to the following website for guidance in preparing plans for Caltrans Encroachment Permits approval. Industry engineering plan standards, developed by professional engineering organizations or engineering companies, will generally be very similar to these guidelines.

Plans Preparation Manual: <http://www.dot.ca.gov/hq/opdp/cadd/usta/ppman/default.htm>; this resource is good for plan sheet format, content, and readability. There are several examples of plans here that were used on Caltrans projects.

CADD Users Manual: <http://www.dot.ca.gov/hq/opdp/cadd/usta/caddman/default.htm>; this resource is helpful in providing different line type format examples. The Standard Plans also provide graphic examples of abbreviations and line type configurations for various features on State highways and freeways.

**Encroachment Permit Plan Guidelines:**

<http://www.dot.ca.gov/hq/traffops/developserv/permits/applications/index.html>; this resource provides general categories of items found on different types of permit applications.

**Design and Plan Preparation Responsibilities:**

A registered civil engineer must prepare, stamp, and sign highway improvement or traffic control plans. A licensed traffic engineer may sign some studies for supporting permit related documents. A licensed landscape architect may prepare, stamp, and sign light grading, planting, and landscape irrigation plans.

Utility companies regulated by the California Public Utilities Commission are not required to have plans prepared by a registered civil engineer. However, a proposed utility facility requiring a Caltrans engineering report or document must have it prepared by a California Registered Civil Engineer.

DOT-11  
(cont'd)

DOT-12

DOT-13

DOT-14

attachment :

#### CONSTRUCTION PROJECTS PLAN SETS CONTENT

The type and scope of the proposed improvement or activity will dictate the additional information and/or plan sets that will be needed with your application submittal.

A California Registered Engineer shall sign and stamp all submitted plan set sheets, except for utility plans (per CPUC requirements)

On those proposed improvements that also require submittal to a city or county for permit, will require the following information to be submitted on the plan sets within your encroachment permit application submittal. Plan sets (6 folded copies) will be required to include part and/or all of the information listed below:

- ◆ North Arrow, scale and index
- ◆ Site plan (location)
- ◆ Plan profiles
- ◆ Grading plan
  - Contour grading plan
  - Profile and topography plan
- ◆ Street improvement plan
  - Striping plan
  - Signal & Lighting plan
  - Traffic control plan
  - Distances
    - Centerline to edge of pavement
    - Centerline to proposed improvement
    - Property lines
    - State R/W lines
  - Existing pavement
    - Identification (A.C. or P.C.C.)
    - Lane lines
    - Location of edge of pavement (EP)
    - Shoulder areas
    - Curb & gutters
    - Sidewalks
    - Drainage facilities
- ◆ Excavations
  - Length, width and depth
  - Shoring plans (if required)
  - Steel plating (if required)
- ◆ Materials
  - Type of proposed carrier product (PVC, HDPE, STEEL, etc.)
  - Type of product (gas, electrical, sewer, telecommunications, etc.)
  - Classification (psi, voltage, gravity flow, fiber, hard wire, etc.)
  - Length and dimensions of proposed carrier product, encasement or improvement
  - Quantity

DOT-14  
(cont'd)

- Identification of Manholes, Vaults or Splice-boxes
- ◆ Planting and irrigation plans
  - Landscaping (if required)
    - Identification of existing and proposed
- ◆ Irrigation facilities
  - Identification of existing and proposed
  - Sizes and dimensions
- ◆ Notes
  - General notes
  - Construction notes
  - Details
  - Material notes
    - Types
    - Quantities
    - Locations
- ◆ Utilities and facilities
  - Identification between existing and proposed
  - Elevations, invert and top
  - Clearances
- ◆ Structural plan and calculations
- ◆ Drainage plan
- ◆ Hydrology map and calculations
- ◆ Cross sections
- ◆ Electrical plans
  - Identification of existing and proposed
  - Splice boxes
  - Location of loops
  - Location of power source
- ◆ Traffic impact data
  - Detour plans
  - Placement of temporary signs
- ◆ Contingency plans – dealing with encounters of hazardous waste or materials
- ◆ Storm Water Pollution Control plans
- ◆ Environmental documentation

DOT-14  
(cont'd)

#### UTILITY INSTALLATION PLAN SETS CONTENT

Minimal information required in plan sets:

- ◆ North Arrow, scale and index
- ◆ Site plan (location)
- ◆ Plan profiles
- ◆ Distances
  - Centerline to edge of pavement

- Centerline to proposed improvement
- Property lines
- State R/W lines
- ♦ Existing pavement
  - Identification (A.C. or P.C.C.)
  - Lane lines
  - Location of edge of pavement (EP)
  - Shoulder areas
  - Curb & gutters
  - Sidewalks
  - Drainage facilities
- ♦ Excavations
  - Length, width and depth
  - Shoring plans (if required)
  - Steel plating (if required)
- ♦ Materials
  - Type of proposed carrier product (PVC, HDPE, STEEL, etc.)
  - Type of product (gas, electrical, sewer, telecommunications, etc.)
  - Classification (psi, voltage, gravity flow, fiber, hard wire, etc.)
  - Length and diameter or size of proposed carrier product, encasement or improvement
  - Quantity
  - Identification of Manholes, Vaults or Splice-boxes
- ♦ Landscaping (if required)
  - Identification of existing and proposed
  - Identification of irrigation facilities
- ♦ Notes
  - General notes
  - Construction notes
  - Details
  - Material notes
    - Types
    - Quantities
    - Locations
- ♦ Utilities and facilities
  - Identification between existing and proposed
  - Elevations, invert and top
  - Clearances

#### SIGNALIZATION AND/OR LIGHTING PLAN SET CONTENT

1. The applicant shall be the local agency on all signalization and street lighting projects.
2. The applicant shall submit the following within the encroachment permit application package:
  - a) A Permit Engineering Evaluation Report (PEER), form TR-0112.
    - i) Sections 1 – 5 shall be completed, signed and stamped by a Registered Engineer as the preparer. The preparer can be either the consulting engineer for the local agency or a traffic

**DOT-14**  
(cont'd)

- engineer within the department.
- ii) The PEER shall then be signed "Approved By" a departmental traffic engineer. If the preparer was a departmental traffic engineer, their supervisor shall sign in the "Approved By" signature box.
- b) Plan Sets.
- i) 6 complete folded sets of plans, in dual units (metric/english), specifications, special provisions, Cooperative and/or Maintenance agreements and concurrence from the utility company on the request for power shall be submitted within the application package.
  - ii) The application package for an encroachment permit will not be accepted for processing unless all items in **b) i)** are included.
  - iii) Plan sets submitted shall conform to State of California Drafting and Plans Preparation Manual, State Standard Plans, State Standard Specifications, Traffic Manual and Signal and Lighting Design Guide.
  - iv) Plan sets content shall consist of:
    - North Arrow, scale and index
    - Site plan (location)
    - Plan profiles
    - Street improvement plan
      - ♦ Striping plan
        - Removal of existing
        - Installation of proposed
        - Lane widths
        - Directional and Left Turn Arrows
        - Left Turn pockets
      - ♦ Signal and/or Lighting plan
        - Phasing details
        - Signal standard and base details
        - Pole and equipment schedule
        - Conductor and conduit schedule
        - Signal layout details
        - Bicycle detection systems
        - Pedestrian appurtenances
        - Details on Signal Heads
        - Placement of loops and setbacks from limit line
        - Placement of Controller Cabinet
        - Placement of splice boxes
        - Placement of advanced signs
      - ♦ Traffic control plan
        - Tapers
        - Safety devices
        - Signs
        - Arrow boards
      - ♦ Distances
        - Centerline to edge of pavement
        - Centerline to proposed improvement
        - Property lines
        - State R/W lines
      - ♦ Existing pavement

**DOT-14**  
(cont'd)

- Identification (A.C. or P.C.C.)
- Lane lines
- Location of edge of pavement (EP)
- Shoulder areas
- Curb & gutters
- Sidewalks
- Drainage facilities
- ◆ Planting and irrigation plans
  - Landscaping (if required)
    - Identification of existing and proposed
  - Irrigation facilities
    - Identification of existing and proposed
    - Sizes and dimensions
- ◆ Utilities and facilities
  - Identification between existing and proposed
  - Elevations, invert and top
  - Clearances
- ◆ Electrical plans
  - Identification of existing and proposed
  - Splice boxes
  - Location of loops
  - Location of power source
- ◆ Notes
  - General notes
  - Construction notes
  - Details
  - Material notes
    - Types
    - Quantities
    - Locations

- c) Relocation of any existing utilities or facilities shall be addressed and completed prior to issuance of the applicant's permit.
  - d) Dedication of Right of Way in conjunction with the project shall be completed prior to permit issuance.
3. Signals, Safety lighting and/or streetlights shall be in conformance with departmental requirements.
  4. Signalization and lighting projects shall be in conformance with the Guidelines for Traffic Signal Controllers and Inspection (appendix E – Encroachment Permits Manual).
  5. When required, permittee shall provide third-party inspection (electrical inspector and/or project inspector). Departmental representative shall provide oversight.
  6. When required, seven – fourteen day notification is required prior to Signal turn on. Signal turn-on is **only permitted** on Tuesday- Thursday, **not on** weekends or holidays.

DOT-14  
(cont'd)

**Response to Letter from State of California Department of Transportation, District 5, dated June 7, 2010**

Comment No.	Response
DOT-1	Comment noted.
DOT-2	<p>Based on subsequent correspondence with Caltrans (Kilmer; Talbert 2010), the safety barrier described in the DEIR is shorter than the one that would be required. The barrier described in the DEIR consists of a 32-inch concrete barrier with a 22-inch tall fence, for a total height of 54-inches. Caltrans has indicated that the concrete portion of the barrier would need to be 36-inches tall, making the total barrier height 58 inches. Further, Caltrans has indicated that the barrier would need to be installed anywhere that the bikeway is located within 30 feet of the edge-of – travelled-way (ETW), also known as the outer white stripe. As a result, the barrier length described in the DEIR and shown specifically in Appendix G underestimates the length of barrier necessary for the project.</p> <p>In addition to the barrier location shown in Appendix G, it would also need to be constructed along Segment 2, from Yerba Buena <i>north</i> approximately 1,000 feet. The barrier along the rip-rap (Segment 3) would extend approximately 100 feet further <i>south</i> than is currently indicated in Appendix G. North of Toro Creek, the Highway 1 right-of-way fence is approximately 45 feet from the ETW. As such, north of Toro Creek, the extent of the barrier shown in Appendix G is accurate.</p> <p>For the Eastern Alignment Alternative, the extent of the barrier as shown in Appendix G is accurate.</p> <p>As noted in the Aesthetic Resources section, the safety barrier would result in significant and unavoidable impacts to scenic resources. The fact that the barrier may be 4-inches taller than previously indicated and longer, does not change that conclusion. Where the additional 1,000 feet of barrier would be necessary, the bikeway is located below the grade of the highway, making it less visible. This is particularly true heading north from the Yerba Buena intersection. These changes would not result in new impacts, nor would additional mitigation measures reduce them. Impacts would still be significant and unavoidable.</p>
DOT-3	Comment noted.
DOT-4	Comment noted.
DOT-5	Comment noted.
DOT-6	Comment noted.
DOT-7	Section 2.6, page 2-10 of the DEIR indicates that the project would likely receive funding through the Federal Highway Administration.

Comment No.	Response
DOT-8	Section 2-5, and Table 2-1 of the DEIR have been modified to address the potential need for permit from responsible agencies not currently listed, including the NMFS and USFWS. Refer to Errata #4.
DOT-9	Discussions of Section 7 and 404 permitting are included in the Biological Resources chapter. Chapter 3, section 3.1.2, has been modified to include federal plans and policies. Refer to Errata #5.
DOT-10-11	Section 4.3.2.1 has been amended to reflect this comment. Refer to Errata #6.
DOT-12	Bio/mm-E5 has been amended to reflect this comment. Refer to Errata #7.
DOT-13	Section 4.4.2.1 has been amended to indicate that Caltrans, as the NEPA lead agency, would be required to comply with Section 106 of the NHPA, prior to implementation of the project. Refer to Errata 8.
DOT-14	The preliminary plans in Appendix G of the DEIR were not necessarily intended to meet Caltrans requirements.



# San Luis Obispo Council of Governments



Regional Transportation Planning Agency  
Metropolitan Planning Organization  
Rideshare Program / Census Data Affiliate  
Service Authority for Freeways and Expressways

Arroyo Grande  
Atascadero  
Grover Beach  
Morro Bay  
Paso Robles  
Pismo Beach  
San Luis Obispo  
San Luis Obispo County

June 7, 2010

Mr. Jeff Oliveira

County of San Luis Obispo  
Department of Planning and Building  
Division of Environmental and Resource Management  
County Government Center Room 200  
San Luis Obispo, CA 93408

RE: Draft Environmental Impact Report for the Morro Bay to Cayucos Connector

Dear Mr. Oliveira,

Thank you for providing us the opportunity to comment on the Morro Bay to Cayucos Connector DEIR. Per email from Shaun Cooper of County General Services, we also thank you for allowing us to provide comment by June 7, 2010, as opposed to the prior due date of June 2, 2010.

As SLOCOG discussed with County Staff and Caltrans, SLOCOG has grave concerns about any alignment that is on the eastern side of Highway One in the project area. We have several reasons for this concern. As part of the California Coastal Trail, the alignment should be next to the Pacific Ocean. Placing the trail on the east side of highway endangers lives of people crossing at unsignalized or locations and jeopardizes the County's ability to receive construction funding for the project from both the Coastal Conservancy and SLOCOG.

The Draft EIR shows the preferred alignment as traveling along the western side of the highway moving in and out of Caltrans Right of Way. SLOCOG supports this alignment. We understand that Caltrans has some concerns about the project being within their ROW (page 5-4) and that barrier types become an aesthetic issue along the corridor (pages ES-7 and 9, 5-2, 5-13). However, we would like to point out that the Highway Design Manual allows more flexibility in barrier type than what is presented in the EIR. Options include shrubs, fence, guardrail and concrete barrier, and while the probability of vehicles entering the bike path is a factor in barrier selection, no accident study was performed to see if vehicles historically ran off the road in the vicinity of the proposed path, which would justify a concrete barrier.

The Draft EIR also reviews at project level an Eastern Alignment. SLOCOG does not support an eastern alignment of the trail. The eastern alignment would contribute to existing safety issues associated with bicyclists and pedestrians crossing at the Chevron Marine Terminal, Toro Creek Road, and Ocean/Chaney intersections. Cyclists would have to cross four lanes; the speed limit on SR 1 at these intersections is 65 mph. Given the safety issues associated with pedestrian and cyclist crossings at these intersections, scenarios which increase such crossings should be discouraged. SLOCOG does not support a recreational bicycle and pedestrian route that separates user from beach access and forces them to cross at multiple locations. Furthermore, the proposed signal at the Toro Road location would not meet the traffic warrants that would allow a signal at this location.

SLOCOG would like to reiterate our support for a Morro Bay to Cayucos Connector. Over the years we have supported the project conceptually and financially. We would like to do so in the future. We are not in support of a project that is on the eastern side of Highway One as we think this is both dangerous and in conflict with the intent of a California Coastal Trail. If you have any questions, please call me at 805-781-5754.

Sincerely,

*Richard Murphy*  
Richard Murphy  
Programming and Project Delivery Manager

1114 Marsh St., San Luis Obispo, CA 93401 • Tel. (805) 781-4219 • Fax (805) 781-5703  
Email: [slocog@slocog.org](mailto:slocog@slocog.org) • Internet: <http://www.slocog.org>

## Specific Comments:

**Page ES-3** final paragraph indicates that "State Parks specifically raised concerns about the compatibility of the bikeway with snowy plover habitat".  
SLOCOG Comment: Please clarify that the snowy plover habitat is below the bluffs and the path shouldn't interfere with the habitat.

COG-5

**Page ES-7 and ES-9** indicate that there are Class I impacts to aesthetic resources  
SLOCOG Comment: Strongly disagree. Class I impacts are based on incorrect assumption that the barrier has to be concrete, mitigation measures (AR/mm-1) should include other acceptable options referenced in the Highway Design Manual (1003.1 section 5) such as fencing, landscaping, three-beam barrier, etc.

COG-6

**Page ES-25** Describes parking demand exceeding supply  
SLOCOG Comment: Disagree. All assessment of parking available have neglected to include informal parking on Beachcomber street. Additionally the assessment on page 4-83 shows parking is at 75% capacity on holidays and weekends. SLOCOG does not feel inclusion of a bicycle/pedestrian path would increase the use peak time parking lot use to more than 100% and might, in fact decrease the parking lot usage since beach users will be able to walk or bike to the beach once the path is constructed.

COG-7

**Page 4-80** states, "The San Luis Obispo County Circulation Element estimates a marginal level of service along Highway 1 in the future; however, no serious capacity deficiencies are predicted."  
SLOCOG Comment: the SLOCOG traffic model shows 2008 AADT is 13,255 vehicles with an increase to 15,730 in 2035. This indicates that LOS will continue to be A at this location. We do not consider this LOS "marginal". LOS A is very good.

COG-8

**Pages 4-81 and 4-85** neglect to mention on-street parking on Beachcomber Drive.  
SLOCOG Comment: If parking on Beachcomber Drive was included in the study, there would be approximately 175 additional parking spaces available. Beachcomber drive is approximately 4/10ths of a mile (2,100 ft). If the area was striped for 12 ft parallel parking spaces, an additional 175 spaces would be created.

COG-9

**Page 4-87** indicates that "some residents, particularly on Studio Drive have concerns regarding existing traffic safety on Studio Drive. They have indicated that those visiting Studio Drive to take advantage of coastal access sites are less aware of pedestrians and cyclists in the area"  
SLOCOG Comment: This comment is perception, not proven nor verified by data or assessment.

COG-10

**Page 4-89** states that the Highway Design Manual requires "bike paths closer than 1.5 m (5 feet) from the edge of the shoulder shall include a physical barrier to prevent bicyclists from encroaching onto the highway. Bike paths within the clear recovery zone of freeways shall include a physical barrier separation"  
SLOCOG Comment: the sentence after this in the HDM states, "Suitable barriers could include chain link fences or dense shrubs." This statement should be included and all references to a barrier should include this possibility, as it has been used along Highway One in other locations throughout the State (see attachment). Discussions that exclude use of a see-through barrier or assume that a concrete barrier will be required are inaccurate. This has not been determined to be the case.

COG-11

**Page 4-95** states "the increased traffic in established neighborhoods could create potentially dangerous driving conditions in residential areas..."  
SLOCOG Comment: Strongly disagree. This is not fact, nor is consistent with the State and Federal governments' focus on Complete Streets. AB 1358, the Complete Streets Act of 2008 requires all jurisdictions in the State of California to develop Complete Streets policies in their Circulation Element updates to meet the needs of all users (bicyclist, pedestrian, individuals with disabilities across all ages). While the City of Morro Bay and the County do not yet have an approved Complete Streets policies, the assumption that driving conditions for cars are more important than access for all users is contrary to current political sentiment or law.

COG-12

**Page 4-99** references the California Coastal Act of 1976  
SLOCOG Comment: The California Coastal Act also includes the following goal:

COG-13

<p>Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners (Section 30001.5 c).</p> <p>The California Coastal Act also required the California Coastal Commission to enter into an agreement the State Coastal Conservancy to provide funding to carry out the goals of the Act (Section 30532).</p> <p>In discussions with SLOCOG and County Staff, the Coastal Conservancy has indicated that they will not fund the construction of the trail if it runs on the eastern side of Highway One. Additionally, if the County is unable to leverage Coastal Conservancy funds, SLOCOG may not provide match funds for the project. SLOCOG feels strongly that if the trail runs on the eastern side of Highway One, it will not be considered part of the California Coastal Trail and both the utility of the trail and the ability to access competitive funds will be compromised.</p>	COG-13 (cont'd)	<p>Page 5-13, Table 5-1 shows that the proposed project has significant and unavoidable impacts (to scenic vistas) despite application of mitigation measures.</p> <p>SLOCOG Comment: Strongly disagree. As noted earlier, barriers do not have to be concrete and can be made of material that does not impede views as severely as concrete will. Other more suitable barriers should be included in the mitigation discussion to reduce the aesthetic impact.</p>	COG-20
<p>Page 4-103 references California Coastal Conservancy Standards and Recommendations for Accessway Location and Development</p> <p>SLOCOG Comment: Siting and Design Standards for the CCT state, "The trail should be sited and designed to be located along or as close to the shoreline as is physically and aesthetically feasible." SLOCOG does not feel that the environmental constraints are severe enough to warrant placing the California Coastal Trail on the eastern side of Highway One, and, as noted above, the trail will not be competitive for funding if it is not part of the Coastal Trail.</p>	COG-14		
<p>Page 5-2 Project Objectives</p> <p>SLOCOG Comment: The California Coastal Trail should be included as a primary objective of the project.</p>	COG-15		
<p>Page 5-2 lists significant aesthetic impacts resulting from the proposed project includes impacts associated with the Highway One bikeway barrier necessary for segment three</p> <p>SLOCOG Comment: Strongly disagree. As previously noted, mitigation could include less visually obstructive barriers than concrete; this is allowed per Highway Design Manual (Section 1003.1, 5). Visual obstruction can be minimized with better design. Design does not have to consist of concrete barrier, a more suitable barrier will have less impact.</p>	COG-16		
<p>Page 5-3 East West Alignment alternative suggests the project would cross west over Highway One at Toro Creek Road, using a proposed signalized bicycle crossing.</p> <p>SLOCOG Comment: This is not a safe alternative, SLOCOG does not support a crossing of this sort at this location, nor does the amount of traffic warrant a signalized intersection. Caltrans will not approve a new traffic signal on a high speed route unless it meets the warrants.</p>	COG-17		
<p>Page 5-4 Right of way alternative says that Caltrans has "indicated that any bikeway alignment should avoid the Highway One ROW to maximum extent feasible".</p> <p>SLOCOG Comment: Caltrans Deputy Directive 64-R1 Completes Streets Implementation Action Plan states that, "Bicyclists, pedestrians, and nonmotorized traffic are permitted on all State facilities, unless prohibited (CVC, section 21960). Therefore the Department and local agencies have the duty to provide for the safety and mobility needs of all who have legal access to the transportation system". In addition the following actions are identified:</p> <ul style="list-style-type: none"> <li>• Ensure bicycle, pedestrian, and transit user needs are addressed and deficiencies identified during system and corridor planning, project initiation, scoping, and programming.</li> <li>• Collaborate with local and regional partners to plan, develop, and maintain effective bicycle, pedestrian, and transit networks.</li> </ul> <p>SLOCOG staff will work with the County, Coastal Conservancy and other agencies to ensure that Caltrans follows the directive issued and the intent of the directive which is to create and maintain access for all users.</p>	COG-18		
<p>Page 5-9 EastWest Alignment Alternative, "would require the installation of a new signalized crossing of Highway One at Toro Creek Road."</p> <p>SLOCOG Comment: SLOCOG would not recommend or endorse a crossing at this location. Project would also not meet warrants that would allow for a signalized intersection.</p>	COG-19		

**Response to Letter from San Luis Obispo Council of Governments, dated June 7, 2010**

<b>Comment No.</b>	<b>Response</b>
COG-1	The DEIR notes potential safety concerns with all potential Highway 1 crossings.
COG-2	Based on information from Caltrans, the accident for this section of Highway 1 is 0.75 per million vehicle miles travelled, while a current statewide average is 0.69 collisions per million vehicle miles travelled. As part of the project development process, Caltrans was consulted regarding barrier design. During preparation of this response to comments they have confirmed that a barrier such as the one proposed would be necessary to address safety concerns. Refer to response DOT-2.
COG-3	Crossing Highway 1 at unsignalized intersections raises safety issues as noted in the DEIR.
COG-4	Comment noted.
COG-5	Plover habitat exists on the central foredunes. This area would be disturbed by the proposed project through undirected egress. This impact to foredunes occurs under existing conditions, but would be potentially increased as a result of construction of the trail.
COG-6	Refer to response to comment DOT-2.
COG-7	The DEIR does note that onstreet parking is available and would likely be utilized when designated formal or informal parking areas are full – particularly when the North Point Natural Area and Morro Strand Day Use areas are full. Based on the analysis in the DEIR and public comment, some lots are at capacity during peak periods, and this condition would continue as a result of the proposed project.
COG-8	The text has been amended to note that LOS A exists and would remain until at least the year 2035. Refer to Errata #9.
COG-9	The DEIR concluded that parking impacts would be less than significant. If regulatory agencies conclude that additional mitigation for parking impacts is necessary, striping parking spaces on Beachcomber could be considered a potential option. It should be noted that a lack of parking is not necessarily considered a physical impact on the environment.
COG-10	The comment was based on neighborhood impact during project development and the scoping process. The comment is considered relevant to the DEIR analysis as it was made by various residents over many years. It was considered one piece of data along with the parking data and the consultant's knowledge of local conditions.
COG-13	Comment noted.
COG-14	Comment noted.

Comment No.	Response
COG-15	The objectives were developed by the General Services Agency, as they are the project proponent.
COG-16	Refer to response to comment DOT-2.
COG-17	This alternative raises significant safety concerns and would potentially be infeasible. It was developed in an attempt to address the significant aesthetic and geologic impacts of the proposed project.
COG-18	It should be noted that avoidance of Caltrans right of way was suggested during project development because it would potentially result in a less burdensome permitting and design process.
COG-19	Comment noted.
COG-20	Refer to response to comment DOT-2.



**Chevron Environmental  
Management Company**  
4000 Highway One  
Morro Bay, CA 93442

June 24, 2010

County of San Luis Obispo  
Environmental Division  
County Government Center Room 200  
San Luis Obispo, California 93408

Attention: Mr. Jeff Oliveira

Subject: Morro Bay to Cayucos Connector Draft Environmental Impact Report, dated April 2010

Dear Mr. Oliveira:

Chevron has reviewed the Draft Environmental Impact Report (EIR) for the County-proposed Morro Bay to Cayucos Connector Trail project, dated April 2010. Chevron's comments on the Draft EIR are as follows:

Section 4.4 Cultural Resources – Impact CR-1: The Draft EIR has identified a significant impact to existing cultural resources along the proposed trail alignment. As you are aware, the Estero Marine Terminal sits on an extensive cultural resources site. The EIR recommends the completion of Phase II testing at a later date prior to starting construction on the trail project. As landowner and steward of the cultural resources at the Estero property, I am concerned that the County is deferring mitigation for impacts to cultural resources. Chevron has been required to complete full Phase II cultural resources testing for projects at the terminal site. Chevron requests that the County complete Phase II cultural resources testing now and recirculate the Draft EIR so that the public and interested parties are provided with full disclosure of the potential impacts from the proposed trail.

Section 4.6 Hazards and Hazardous Materials – The cumulative impact discussion within the Hazards and Hazardous Materials section does not address potential impacts from the construction of the concrete separator wall which will block Chevron's access to its existing pier landing and access ramp to the beach area. Chevron has submitted preliminary application information to the California State Lands Commission for the decommissioning of the offshore marine terminal. The decommissioning activities will require construction access to the pier landing and the beach parcel for up to a year. Impacts to public safety would result if a concrete wall is built that will prevent access to the pier landing and beach area and Chevron is required to find alternative access to its property. Chevron again requests that the EIR address the construction of the concrete barrier and its impact on Chevron's access to its property during the planned offshore terminal decommissioning project.

August 31, 2009

Page 2

If you should have any questions, please contact me at (805) 772-2611, ext. 3.

Sincerely,

John Westenberger  
Project Manager

cc: Mr. Bill Almas, Chevron BRES  
Mr. Eric Snelling, Padre Associates, Inc.

CEMC-1

CEMC-2

**Response to Letter from Chevron Environmental Management Company, dated June 24, 2010**

Comment No.	Response
CEMC-1	<p>Numerous cultural resource surveys have been prepared for the proposed project, including a Phase I prepared for the 2006 Constraints Analysis, and an Extended Phase I (XP1) prepared for this EIR. The XP1 included subsurface excavation. The surveys indicated no surface resources and yielded only one subsurface artifact in the project area, west of Highway 1. Therefore, it appears that the significant resources, the "site", is predominately east of the highway, and that impacts from the proposed project would be less than significant. In some cases, appropriate mitigation for conditions such as these would include only monitoring during construction as a precautionary measure. However, in this case, because of the proximity of the project area to the significant resources east of Highway 1, and the significance of those resources, the recommended mitigation includes performing additional Phase II testing prior to construction. This will further refine the specific boundaries of the site and allow avoidance of any subsurface resources not detected during the XP1.</p>
CEMC-2	<p>Chevron has indicated that decommissioning activities at the Marine Terminal, including possible restoration of the Pier Landing area would potentially occur in the Summer of 2011. Even if the removal does not occur until 2012, due to funding and regulatory constraints it is unlikely that that the proposed project would be ready for construction in 2012. In any event, the General Services Agency has indicated that they do not intend to implement the proposed project until Chevron and the relevant regulatory agencies consider the decommissioning complete and access to the Pier Landing is no longer necessary. Refer to Errata #10.</p>

## ERRATA SHEET

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This Errata sheet contains the minor changes to the EIR to incorporate changes identified in the response to comments from agencies and the public. Deletions are shown as strikeout and additions in italics.

1. The following language shall be added to the Biological Resources section, after the Coast horned lizard discussion and prior to the section 4.3.6 Cumulative Impacts:

### *Morro shoulderband snail*

On December 15, 1994 the USFWS listed Morro shoulderband snail (MSS, [*H. walkeriana*]) as an endangered species, under the Federal Endangered Species Act. At the time of its listing MSS was considered to be a single species composed of two subspecies, *Helminthoglypta walkeriana walkeriana* and *H. walkeriana morroensis*. *H. walkeriana morroensis* was thought to be extinct at the time of listing (USFWS 2006). Studies completed by Roth and Tupen in 2004, determined that the two subspecies are actually two separate species, *H. walkeriana* and *H. morroensis* (USFWS 2006). Surveys completed in the greater San Luis Obispo area found that *H. morroensis* is not extinct and in fact is rather common in scrub habitats on many soil types extending from Cayucos in the north to San Luis Obispo in the south. Studies have indicated that *H. morroensis* occurs in shrubby vegetation on clay and serpentine soils; whereas, *H. walkeriana* occurs in shrubby vegetation on stabilized or back dune soils (Roth and Tupen 2004). This theory is further expressed on page 10 of the USFWS 2006 5-Year Review for MSS.

In their September 11, 2006 5-Year Review for MSS, USFWS recommended down-listing *H. walkeriana* to “threatened” and delisting *H. morroensis*. This opinion is also reflected in a USFWS letter dated June 7, 2004. The 2004 letter states “*To re-establish the spirit and intent of the original listing of walkeriana and eliminate unintended regulation of morroensis, we [USFWS] will continue to provide walkeriana the protections afforded it under the Endangered Species Act of 1973, as amended, in and around the community of Los Osos. Morroensis will not be provided these protections*”. The 2006 5-year review and the 2004 letter include maps of the range in which *H. walkeriana* will be protected. The *walkeriana* range includes all of the Los Osos area in the south and extends north to Alva Paul Creek in Morro Bay. The project area is approximately 0.85 miles north of Alva Paul Creek, indicating that the project would be located outside of the accepted range for *walkeriana*.

Even though the range for *walkeriana* is established in USFWS documents, debate on the accuracy of the species range exists. Staff from the State Department of Parks and Recreation (DPR) has indicated that they have observed *H. walkeriana morroensis* in foredune habitats at Morro Strand State Beach (Walgren pers. comm. 2010). Based on the timing of the observations (pre 2006), it is unclear if these observations were of *H. walkeriana* or *H. morroensis*. Morro Strand State Beach is located just south of Segment 2 and north of the *H. walkeriana* range as mapped by USFWS. Considering these observations and the potential affects of the proposed project activities, *H. walkeriana* deserves special considerations while planning and developing the project.

While providing considerations for MSS on the proposed project, this analysis is based on the current understanding of MSS habitat preferences. Currently, literature describes MSS habitat as consisting of coastal dune, coastal dune scrub, and maritime chaparral associated with back dune and stabilized dune systems (USFWS 2006). In these communities, MSS are typically

found in association with shrubs that have ample branches that touch the ground. Such shrubs include mock heather, seaside golden yarrow, deerweed, sand almond and others. MSS is not expected to occur in areas supporting clay soils, even if shrub vegetation is present.

Construction of Segments 2 and 3 of the proposed project will impact foredune habitat with sandy soil, and various other habitats on clay soils. The foredune habitat at Segments 2 and 3 does not support the shrub vegetation or back dune (stabilized dune) characteristics that MSS is typically associated with. However, the DPR observations at Morro Strand State Beach on similar foredune habitat indicate that MSS may occur in the foredune habitat on Segments 2 and 3. Based on the current understanding of MSS habitat preferences and the existing conditions at Segments 2 and 3, the presence of MSS in the project area is unlikely. However, if MSS are present in foredune habitat areas, the individuals could be impacted by project related activities such as grading, path construction, and habitat restoration. Such impacts may include being struck or crushed by equipment, stockpiled materials or construction personnel.

**BIO Impact 14    The proposed project could result in direct take of Morro shoulderband snail during construction of Segments 2 and 3.**

*BIO/mm-21    Within 30 days prior to site grading, a qualified biologist in possession of a valid 10(a)(1)(A) permit for MSS shall conduct a pre-construction survey for MSS in all areas of Segments 2 and 3 that contain sandy soil. The surveyor shall utilize hand search methods in areas of disturbance where MSS may be found (e.g., under vegetation and debris).*

*If MSS are observed in the work area and may be impacted by project activities, project activities in the area shall be delayed until the County can coordinate with USFWS regarding impacts to the individual(s).*

*If MSS are observed near the work area and project activities can avoid the individual(s), the contractors shall erect exclusion fencing that separates the individual(s) from the work areas. The exclusion fence shall be installed at the direction of the qualified MSS biologist, be constructed of t-posts and silt fence, and create a ten-foot buffer (minimum) between work activities and the individual(s). No work or other disturbances shall be allowed in the exclusion area. In addition, the following measures shall be applied:*

- a. All work shall be performed during dry conditions. If precipitation is predicted within 24 hours of the work day, work shall be postponed and rescheduled for a dry period.*
- b. Prior to site grading, all personnel shall attend an environmental awareness training conducted by the qualified MSS biologist. At a minimum, the training should included a description of the MSS and its habitat, the general provision of the Endangered Species Act of 1973, as amended, the specific measures being implemented to conserve the MSS as they relate to the project, the access routes to the project site, and the project boundaries. Brochures, photographs, books and briefings may be used in the training session, provided a qualified MSS biologist is available to answer any questions*



*If no MSS is observed during the survey, work may proceed without any further coordination in regards to MSS.*

#### Residual Impact

With implementation of the above mitigation measures, long-term impacts resulting from this project to Morro shoulderband snail would be *less than significant*.

2. Bio/mm-14 shall read as follows:

*BIO/mm-14 At the time of application for grading permits, the project plans shall clearly show habitat protection fencing extending parallel to the bikeway from the northern end of the riprap (where fencing on the west side of the bikeway is currently proposed to end) to the Toro Creek bridge. To minimize visual impacts of the fencing it shall be no more than 18" high wood post or steel rod, and cable. Fencing shall be approximately 36 inches tall, with horizontal rails and metal grid fencing (2-inch by 4-inch), similar to the fencing utilized at the Cloisters Park. The intent of the fence would be to deter bikeway users from trampling the foredune habitat while accessing the beach from the bikeway. One opening in the fence shall be allowed at the Pier Landing to maintain existing beach access.*

3. The Morro Strand State Beach label on Figure 2-2, page 2-5 shall be deleted.

4. Chapter 2, Section 2-5 shall read as follows:

Table 2-1 shows the permits and responsible agencies for the proposed project. *The General Services Agency would be required to obtain a A-coastal development permit ~~would be required~~ from the California Coastal Commission, as well as the County of San Luis Obispo and the City of Morro Bay, because a portion of the project is located in Coastal Original Jurisdiction. Caltrans has indicated that they would be the federal lead agency for the proposed project, and as such would be responsible for obtaining the take permits from USFWS and NMFS shown in Table 2-1, as necessary.*

Table 2-1 shall read as follows:

**Table 2-1. Responsible Agencies and Associated Permits**

Permit	Responsible Agency
Coastal Development Permit	County of San Luis Obispo Department of Planning and Building
Conditional Use Permit Coastal Development Permit Building Permits	City of Morro Bay Community Development Department
Coastal Development Permit	California Coastal Commission
Section 401, Stormwater Pollution Prevention Plan	Regional Water Quality Control Board

**Table 2-1. Responsible Agencies and Associated Permits**

Permit	Responsible Agency
Section 404	Army Corps of Engineers
Section 1603 Streambed Alteration Agreement	California Department of Fish and Game
Section 7	United States Fish and Wildlife Service and/or National Marine Fisheries Service Take Permits
Encroachment Permit	California Department of Transportation

5. The following discussions of relevant federal policies shall be added to Chapter 3, Section 3.2:

#### Coastal Zone Management Act

*The U.S. Congress passed the Coastal Zone Management Act (CZMA) in 1972. The Act, administered by NOAA's Office of Ocean and Coastal Resource Management (OCRM), provides for management of the nation's coastal resources, including the Great Lakes, and balances economic development with environmental conservation. The CZMA creates a broad program based on land development controls within coastal zones, incorporating State involvement through the development of programs for comprehensive State management. The CZMA also requires Federal agencies or licensees to carry out their activities in such a way that they conform to the maximum extent practicable with a state's coastal zone management program. The California Coastal Act (CCA) is California's coastal zone management program.*

#### Federal Endangered Species Act

*The primary focus of the Federal Endangered Species Act (FESA) of 1973 is that all Federal agencies must seek to conserve threatened and endangered species through their actions. Section 7 imposes limits on the actions of Federal agencies that might impact listed species. In the case of salt water fish and other marine organisms, the requirements of FESA are enforced by the National Marine Fisheries Service (NMFS). The USFWS enforces all other cases.*

*Under Section 7 of FESA, all Federal agencies must, in consultation with USFWS (or NMFS), ensure that their actions do not jeopardize the continued existence of listed species or destroy or adversely modify critical habitat. Federal actions include permitting, funding, and entitlements for both Federal projects, as well as private projects facilitated by Federal actions (e.g., a private landowner applying to the Corps for a permit). In the case of the proposed project, Federal actions include the funding of the project by the Federal Highway Administration, through Caltrans. As a result, Caltrans becomes the "federal lead agency" and is responsible for complying with FESA.*

#### Resources Conservation and Recovery Act of 1986 (RCRA)

*The EPA is the Federal agency responsible for enforcement and implementation of Federal laws and regulations pertaining to hazardous materials; in addition, the EPA provides oversight*

and supervision for some site investigation/remediation projects. For disposal of certain hazardous wastes, the EPA has developed land disposal restrictions and treatment standards. Legislation includes the Resources Conservation and Recovery Act of 1986 (RCRA), the Superfund Amendments and Reauthorization Act of 1986 (SARA), and the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA).

RCRA provides Federal regulation over facilities that generate, store, transport, treat, or dispose of hazardous waste. Federal, State, and local governmental agencies identify and track hazardous waste from the point of generation to the point of disposal. Facilities that are under permit from the EPA to treat, store, and/or dispose of hazardous waste are tracked in the Resource Conservation and Recovery Information System (RCRIS) database. The California Solid Waste Information System (SWIS) database consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations (including surface impounds) pursuant to the Hazardous Waste Control Law (HWCL) of 1972.

#### Section 404 of the Clean Water Act of 1977

Pursuant to Section 404 of the Clean Water Act (33 USC 1344), the United States Army Corps of Engineers (USACE) is responsible for the issuance of permits for the placement of dredged or fill material into "Waters of the United States". As defined by USACE at 33 CFR 328.3(a)(parts 1-6), the following summarizes Waters of the United States:

*"Those waters that are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; tributaries and impoundments to such waters; all interstate waters including interstate wetlands; and territorial seas."*

Waters of the United States are typically identified by the presence of an OHWM and connectivity to traditional navigable waters or other jurisdictional features. If a project would result in dredge or fill of USACE jurisdictional waters, the project would be subject to USACE review under Section 404 of the Clean Water Act. Based on the site characteristics, three of the bluff drainages and Toro Creek are likely waters of the United States. In addition, areas below the mean high tide line are waters of the United States. Activities resulting in dredge or fill of these features would be subject to Section 404 of the Clean Water Act.

#### Section 401 of the Clean Water Act of 1977

Section 401 of the Clean Water Act and its provisions ensure that federally permitted activities comply with the federal Clean Water Act and state water quality laws. Section 401 is implemented through a review process that is conducted by the Regional Water Quality Control Board (RWQCB), and is triggered by the Section 404 permitting process. The RWQCB certifies via the 401 process that a proposed project complies with applicable effluent limitations, water quality standards, and other conditions of California law. Evaluating the effects of the proposed project on both water quality and quantity falls under the jurisdiction of the RWQCB. Proposed project activities that have the potential to result in impacts to water quality and quantity would require certification by the RWQCB.

6. Chapter 4, Section 4.3.2.1, the Federal Endangered Species Act of 1977 discussion shall read as follows:

Federal Endangered Species Act of 1973

The Federal Endangered Species Act provides legislation to protect federally listed plant and animal species. Impacts to listed species resulting from the implementation of a project would require the responsible agency, *Caltrans in this case, or individual* to formally consult with the USFWS or National Marine Fisheries Service (NMFS) ~~(NOAA Fisheries) to determine the extent of impact to a particular species.~~ If ~~USFWS or NOAA Fisheries~~ studies determine that impacts to ~~a species would likely~~ *federally listed species or critical habitat may occur*, alternatives and measures to avoid or reduce impacts must be identified. USFWS and ~~NMFS NOAA Fisheries~~ also regulate activities conducted in federal critical habitat, which are geographic units designated as areas that support primary habitat constituent elements for listed species.

7. BIO/mm-E5 shall read as follows:

BIO/mm-E5      ~~Prior to initiation of construction that the federal lead agency (Caltrans) shall initiate Section 7 consultation to obtain a Biological Opinion and Incidental Take Statement General Services Agency shall receive an incidental take permit from the USFWS that allows for capturing and relocating individuals as necessary. A qualified biologist shall survey the project area within 24 hours prior to ground disturbing activities and if any life stage of the California red-legged frog is found and these individuals are likely to be killed or injured by work activities, disturbance of the riparian vegetation shall be halted until the California red-legged frog individuals leave the area on their own accord, or until the biologist has coordinated with the USFWS and received permission to capture and relocate the individuals.~~

Before any construction activities begin on the project, the biologist will conduct a training session for all construction personnel. At a minimum, the training will include a description of the California red-legged frog and its habitat, the specific measures that are being implemented to conserve the species for the current project, and the boundaries within which the project may be accomplished.

.      The biologist will be present at the construction site until all initial disturbance of the upland habitat has been completed.

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

8. Chapter 4, Section 4.4.2.1 shall read as follows:

#### **9.1.1.1 Federal Policies and Regulations**

Authorized under the National Historic Preservation Act (NHPA) of 1966, the NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect our historic and archeological resources. Properties listed in the NRHP include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture. The NRHP is administered by the National Park Service, which is part of the U.S. Department of the Interior.

*Section 106 of the NHPA requires Federal agencies, in this case Caltrans, to take into account the effects of their undertakings on historic properties, and afford the Advisory Council on Historic Preservation a reasonable opportunity to comment. During the subsequent NEPA process for the proposed project, compliance with Section 106 would require the General Services Agency, on behalf of Caltrans, to follow Caltrans Programmatic Agreement for Section 106 and procedures outlined in the Caltrans Environmental Handbook.*

9. Section 4.7.1.1, fourth paragraph, shall be amended as follows:

~~The San Luis Obispo County Circulation Element estimates a marginal level of service along Highway 1 in the future; however, no serious capacity deficiencies are predicted. SLOCOG has indicated that the level of service in the vicinity of the proposed project is "A" and will continue to be "A" at least until the year 2035, which indicates there are no capacity issues. The other streets in the project area operate at acceptable levels. The Morro Bay Circulation Element reports that "traffic volumes on most streets in Morro Bay are well within their design capacities." Intersection traffic controls in Morro Bay are also satisfactory for present volume levels, except for a few locations which are not located within the project area.~~

10. Section 2.6 Timing shall include the following language:

*Chevron has indicated that decommissioning activities at the Marine Terminal, including possible restoration of the Pier Landing area would potentially occur in the Summer of 2011. Even if the removal does not occur until 2012, due to funding and regulatory constraints it is unlikely that that the proposed project would be ready for construction in 2012. In any event, the General Services Agency has indicated that they do not intend to implement the proposed project until Chevron and the relevant regulatory agencies consider the decommissioning complete and access to the Pier Landing is no longer necessary.*

11. The following references shall be added to Chapter 8:

*Kilmer, J.; Talbert, S. 2010 personal communication via electronic mail with Keith Miller on June 30, 2010.*

*United States Fish and Wildlife Service, 2006 (USFWS 2006). Banded Dune Snail (Helminthoglypta walkeriana) [Morro shoulderband snail (Helminthoglypta walkeriana) and Chorro shoulderband snail (Helminthoglypta morroensis)] 5-Year Review: Summary and Evaluation. U.S. Fish and Wildlife Service Ventura Fish and Wildlife Office. Ventura California. September 11, 2006.*

*United States Fish and Wildlife Service, 2004 (USFWS 2004). Type written letter to Stakeholders and Interested Parties (PAS 1475.1626.2205). U.S. Fish and Wildlife Service Ventura Fish and Wildlife Office. Ventura California. June 7, 2004.*

*Walgren, M. 2010 personal communications with Travis Belt and Bob Sloan on June 23, 2010.*

*Vanderweir J. 2010 personal communications with Bob Sloan on June 22, 2010.*

*Vanderweir J. 2010 personal communications via electronic mail with Travis Belt on July 8, 2010.*





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DRAFT

# MORRO BAY TO CAYUCOS CONNECTOR ENVIRONMENTAL IMPACT REPORT

SCH #2009081001

Prepared for  
County of San Luis Obispo  
General Services Agency  
County Parks  
1087 Santa Rosa Street  
San Luis Obispo, CA 93408

Prepared by  
**SWCA Environmental Consultants**  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

**April 2010**







# San Luis Obispo County

## Department of Planning and Building Environmental Division

**TO:** Interested Party  
**DATE:** April 19, 2010  
**FROM:** Jeff Oliveira, EIR Manager  
**VIA:** John Nall, Principal Environmental Specialist  
**SUBJECT:** Morro Bay to Cayucos Connector -- Notice of Availability of Draft EIR  
(ED 08-252)

The Draft Environmental Impact Report (DEIR) for the Morro Bay to Cayucos Connector (proposed project) is complete and available for public review and comment. The DEIR addresses the environmental impacts that may be associated with a future request for a Conditional Use/Coastal Development Permit to develop the project, which would include incorporating existing bikeways and construction of a new "Class I bikeway", completely separated from vehicular traffic.

The proposed project is within multiple land use categories and is located on the west side of Highway 1 between Cloisters Park in the City of Morro Bay, and the site of Norma Rose Park in the community of Cayucos.

Copies of the Draft EIR are available at the following locations: Cal Poly Library and City/County Library of San Luis Obispo. Copies are also available on loan and for review at the Environmental Division of the Planning Department, located at the 976 Osos St., Room 300, San Luis Obispo, 93408-2040. The EIR is on the Planning Department's web site at: **[www.sloplanning.org](http://www.sloplanning.org)** under "Environmental Information and Natural Resources", then "Environmental Notices, Proposed Negative Declarations, EIRs and other Documents".

### **ENVIRONMENTAL IMPACTS:**

The EIR focuses on the following issues: aesthetic resources, air quality, biological resources, cultural resources, geology, soils, and drainage, hazards and hazardous materials, and transportation and circulation. The EIR also considers two alternatives in addition to the "No Project" alternative.

Per CEQA Section 15087(c)(6), the proposed project is within close proximity of one or more sites described under Government Code Section 65962.5 (known as the "Cortese List"), which includes hazardous waste facilities, land designated as hazardous waste property, hazardous waste disposal sites, or is subject to the Hazardous Waste Substances Statement required under subsection (f) of that Section, or is found on a list at the <http://www.calepa.ca.gov/SiteCleanup/CorteseList/default.htm>

**HOW TO COMMENT OR GET MORE INFORMATION:**

Anyone interested in commenting on the draft EIR should **submit a written statement by 5:00 p.m. on June 3, 2010**, to me at:

Jeff Oliveira, Project Manager  
County Planning & Building Dept.  
976 Osos St., Rm. 300  
San Luis Obispo, CA 93408-2040

If you need more information about this project, please contact Jeff Oliveira at (805)781-4167 (or e-mail: [joliveira@co.slo.ca.us](mailto:joliveira@co.slo.ca.us)).

**PUBLIC HEARING:**

The public hearing before the San Luis Obispo Board of Supervisors to certify the EIR has been scheduled for June 22, 2010, in the Board of Supervisors Chambers, County Government Center, San Luis Obispo. This hearing would only involve consideration of the EIR, because at this time, no formal application has been filed for the proposed project. If you plan to attend, please call two weeks before this date to verify.

# **Morro Bay to Cayucos Connector Path**

Draft Environmental Impact Report  
SCH No. 2009081001

**Prepared for:**

County of San Luis Obispo  
General Services Agency, County Parks  
1087 Santa Rosa Street  
San Luis Obispo, CA 93408  
Contact: Jan Di Leo, Parks Planner  
(805) 781-4089

**Prepared by:**

SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, California 93401  
Contact: Keith Miller, Project Manager  
(805) 543-7095

**April 2010**

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- Appendix B. Plans and Policies Consistency Analysis Table
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- Appendix E. Bluff Retreat Study and Geotechnical Feasibility Report  
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- Appendix F. Eastern Alignment Project Description and  
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# EXECUTIVE SUMMARY

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## PURPOSE OF THE EIR

The purpose of this Environmental Impact Report (EIR) is to identify the potential significant impacts of the Morro Bay to Cayucos Connector (project) on the environment, indicate the manner in which such significant impacts will be mitigated or avoided, and identify alternatives to the proposed project that avoid or reduce these impacts. The EIR is intended to serve as an informational document for use by the County of San Luis Obispo (County), the California Environmental Quality Act (CEQA) lead agency, the other responsible agencies, and the general public in their consideration and evaluation of the environmental consequences associated with implementation of the proposed project. The document is provided to the public and decision-makers for their review and comment as required by CEQA. The EIR addresses potentially significant impacts to Aesthetic Resources; Air Quality; Biological Resources; Cultural Resources; Geology, Soils, and Drainage; Hazards and Hazardous Materials; and Transportation and Circulation. Impacts identified and measures recommended to avoid them are shown in Table ES-2 and ES-3.

Throughout the document, references are also made to bikeway “classes.” The Caltrans *Highway Design Manual* provides a description of bikeways, and those descriptions are also utilized in the EIR. The term “recreational bicycle route” is also used in the EIR. This designation is used on bike maps prepared by San Luis Obispo’s Regional Rideshare. These bikeways, and examples, are shown in Table ES-1 below.

**Table ES-1. Bikeway Terminology**

Agency/Organization	Term Used	Definition	Example
Caltrans	Class I	Provides a completely separated right of way for the exclusive use of bicycles and pedestrians with cross flow minimized	Bob Jones Pathway
	Class II	Provides a striped lane for one-way bike travel on a street or highway	Santa Rosa Street, San Luis Obispo
	Class III	Provides for shared use with pedestrian or motor vehicle traffic	Ocean Boulevard, Cayucos
SLO Regional Rideshare	Recreational Route	Scenic route on rural roads. You might find high speed vehicle traffic, varying shoulder widths, and challenging climbs. Your travel way is shared with pedestrian and or motor traffic.	Toro Creek Road

## PROJECT LOCATION

The project would be located in San Luis Obispo County, west of and adjacent to Highway 1, between the highway and the Pacific Ocean (refer to Figures ES-1 and ES-2). The southern end of the project would include approximately 1.2 miles of an existing designated recreational bicycle route along Beachcomber Drive and Sandalwood Avenue in the city of Morro Bay, and incorporate a portion of the existing Class I bikeway which begins at Cloisters Park and extends to downtown Morro Bay. The northern end of the proposed project would include approximately 1.5 miles of existing Class III bikeways on Studio Drive and Ocean Boulevard which connect to a bikeway which begins at the site of Norma Rose Park and continues to the downtown area of the community of Cayucos. The project corridor would incorporate existing parking and staging areas at Cloisters Park, the North Point Natural Area (NPNA), Studio Drive, Morro Strand State Beach, and future ones at Norma Rose Park (refer to Figure ES-2).

The new Class I portion of the project would be approximately 1.25 miles long and connect the northern and southern segments of the proposed project. It would extend from the northern portion of Morro Bay at the Yerba Buena Street/Highway 1 intersection to the south end of Studio Drive in the community of Cayucos (refer to Figure ES-2). The Class I portion would be located along existing coastal access points at the NPNA in Morro Bay, and the south end of Studio Drive, and informal coastal access areas, such as the Chevron Marine Terminal pier landing (Pier Landing), across from Toro Creek Road (refer to Figure ES-2).

## PROJECT BACKGROUND

The County policy is to pursue dedicated bikeways along highways where no street frontage exists. Specifically, the Parks and Recreation Element of the County's General Plan (Chapter 8, Table 3b) includes the following language:

Provide a separated bicycle path near Highway 1 whenever a parallel local road is not available. Near Cayucos, the path should connect the southerly end of either Ocean Boulevard or Studio Drive to Toro Lane in Morro Bay.

This same area is also located within the California Coastal Trail corridor. The proposed project has been in development since 2004. During project development, two alignments were considered, one on the west side of Highway 1 and one on the east. At that time, a project review team coordinated by the County General Services Agency, County Parks (County Parks) was created and included representatives from the various local groups and local and state agencies.

The team reviewed and commented on project developments, including preparation of the preliminary design, and an Environmental Constraints Analysis (ECA). The Draft ECA was completed in March 2006 by Morro Group (now SWCA Environmental Consultants [SWCA]). At that time, County Parks met with staff from various agencies including the County, California Department of Transportation (Caltrans), California Department of Parks and Recreation (State Parks), California Coastal Commission, and the City of Morro Bay. County Parks also met with local advisory groups to discuss the project and the relative effects of identified constraints. These groups all provided comments on the project and the ECA.

Based on comments received and recommendations in the ECA, County Parks prepared additional background technical data, including a bluff retreat study and geotechnical feasibility report. A Preliminary Design Report, incorporating all of the available information to date was

prepared by Firma in 2008. The design report includes both a western and an eastern project alignment. Based on input received from the City of Morro Bay, advisory agencies, and the County Parks and Recreation Commission, it was determined that the western alignment should be pursued as long as there were no major environmental issues, as it appeared to provide a superior user experience. However, because the objective of the ECA was not to identify an environmentally superior alternative, the EIR includes the eastern alignment as an alternative to the proposed project and it is evaluated at a "project-specific level." As a result, in the event that the eastern alignment is determined to be the environmentally superior alternative, and the regulatory agencies prefer it, the EIR would contain sufficient analysis to allow approval of either alignment.

## **PROPOSED PROJECT**

The Morro Bay to Cayucos Connector would complete an important segment in the non-motorized transportation network along Highway 1. The project corridor would extend from Cloisters Park in Morro Bay to the site of Norma Rose Park in the community of Cayucos. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic where no bikeways currently exist.

The proposed project has been broken into five segments in this EIR. The existing bikeways compose the southern (Segment 1) and northern (Segment 5) segments of the bikeway network. The proposed new bikeway segments (Segments 2, 3, and 4) would compose the central segments and extend from the intersection of Yerba Buena Street and Highway 1 in Morro Bay, to the southern end of Studio Drive in Cayucos. The project corridor includes numerous existing bike and recreational facilities, including bikeways, parking and staging areas, coastal access points, and county and state parks. The project applicant is County Parks.

## **SCOPING AND NOTICE OF PREPARATION PROCESS**

In compliance with State CEQA Guidelines, during the environmental determination process an effort was made to contact various federal, state, regional, and local governmental agencies and other interested parties to solicit comments and inform the public of the proposed project. This included the distribution of the Notice of Preparation (NOP) on July, 2009. The close of the NOP review period was August 31, 2009. Agencies, organizations, and interested parties have the opportunity to comment during the 45-day public review period on the Draft EIR which begins on April 19, 2010 and ends on June 3, 2010. A scoping meeting was held in Cayucos on August 10, 2009.

During the development of the project and the scoping process, agencies raised concerns primarily regarding biological resources located west of Highway 1. State Parks specifically raised concerns about the compatibility of the bikeway with snowy plover habitat. The safety of locating the bikeway so close to Highway 1 and the necessary Highway 1 crossing(s) was also discussed at length with Caltrans. Neighbors of the proposed project repeatedly raised concerns regarding the lack of available parking along the project corridor (specifically at the south end of Studio Drive) and were concerned with potential hazards of introducing additional bicycles and pedestrians onto the relatively narrow Studio Drive.

**Figure ES-1. Site Vicinity Map**





Figure ES-2. Project Site Map





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## SIGNIFICANT ENVIRONMENTAL IMPACTS IDENTIFIED

Table ES-1 shows each impact identified and all mitigation measures recommended to reduce or avoid impacts. The most significant impacts identified in the EIR include:

- Aesthetic Resource impacts associated with the barrier system necessary to construct Segment 2.
- Biological Resource impacts to Environmentally Sensitive Habitat Areas (ESHA), including wetlands, foredune habitat, Toro Creek, and sensitive plant and animal species along Segments 2,3, and 4.
- Bluff retreat (Geology, Soils, and Drainage) that could affect Segments 2, 3, and 4 in less than 75 years.
- Drainage (Geology, Soils, and Drainage) impacts in the NPNA, Segment 2.

All but the Aesthetic Resource impact and bluff retreat effects can be reduced to a level of insignificance with mitigation.

## PROJECT ALTERNATIVES

Due to the limited space between the highway and the beach, feasible alternatives to the proposed project do not exist west of Highway 1. Alternatives on the east side of Highway 1 are also limited due to the topography near a large Highway 1 cutslope and the desire to have the bikeway efficiently connect the two communities while minimizing intrusions into private property. Four potential alternatives to the proposed project were identified and evaluated in the EIR:

- No Project Alternative (required by CEQA)
- Eastern Alignment Alternative
- East/West Alignment Alternative
- Right-of-Way (ROW) Alignment Alternative

The EIR included a detailed project specific analysis of the Eastern Alignment Alternative and, because the East/West Alignment Alternative and the ROW Alternative included significant portions of the Eastern Alignment and/or the proposed project, speculation regarding potential impacts of alternatives was minimized.

Based on the alternatives analysis, the Proposed Project and the East/West Alignment would result in the greatest number of environmental impacts. Both the Eastern Alignment and the ROW Alignment would best avoid or reduce potential impacts while still meeting the project objectives. Ultimately the ROW Alternative was chosen as the Environmentally Superior Alternative.

## IMPACT SUMMARY TABLE

The table on the following pages provides a summary of the potential impacts of the proposed project. Also summarized in these tables are the mitigation measures associated with each impact that are to be implemented by the project applicant in order to reduce the environmental

impacts to a level of insignificance. In accordance with CEQA, the Summary Tables identify the following types of potential impacts associated with the proposed development.

**Class I Impacts**—Significant environmental impacts that cannot be fully mitigated or avoided. The decision maker must adopt a “Statement of Overriding Considerations” as required under CEQA Guidelines Section 15093 if the project is approved.

**Class II Impacts**—Significant environmental impacts that can be feasibly mitigated or avoided. The decision maker must issue “Findings” under CEQA *Guidelines* §15091(a) if the project is approved.

**Class III Impacts**—Environmental impacts that are adverse but not significant for which the decision maker does not have to adopt “Findings” under CEQA.

**Class IV Effect**—An effect that would be beneficial and would reduce existing environmental impacts or hazards.

**Table ES-2. Unavoidable Significant Environmental Impacts (Class I)**

(Decision-maker must issue a “Statement of Overriding Considerations” under CEQA *Guidelines* §15093 if the project is approved.)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
<b>AESTHETIC RESOURCES</b>			
<b>AR Impact 1</b> Construction of the barrier between the Pier Landing and the North Point Natural Area would result in significant impacts to scenic vistas.	Long-term	<b>AR/mm-1</b> Prior to initiation of construction the General Services Agency shall provide the specific barrier plan to the Department of Planning and Building, Caltrans, and the City of Morro Bay for review and approval. The plan shall: <ul style="list-style-type: none"> <li>▪ recommend the shortest barrier and railing combination allowed by Caltrans;</li> <li>▪ soften the appearance of the barrier through use of “sandy beach” or similar muted-color concrete;</li> <li>▪ minimize vertical elements (supports) and the use of embellishment (finials, etc.); and</li> <li>▪ reduce the reflectivity of the vertical railing elements through treatment of the materials</li> </ul>	Class I Significant and Unavoidable
<b>GEOLOGY, SOILS, AND DRAINAGE</b>			
<b>GSD Impact 3</b> Bluff retreat would potentially undermine the Class I bikeway between Toro Creek and Studio Drive within 25 years or less, resulting in a potentially significant impact.	Long-term	<b>GSD/mm-3</b> North of Toro Creek, the proposed Class I bikeway shall be setback from the bluff edge and as close to the Highway 1 ROW as is feasible.	Class I Significant and Unavoidable

**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue “Findings” under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
<b>AESTHETIC RESOURCES</b>			
<b>AR Impact 2</b> Construction of the various bikeway improvements would degrade the existing visual quality of the area and result in significant impacts.	Long-term	<b>AR/mm-2</b> Prior to initiation of construction the General Services Agency shall submit a plan detailing proposed signage type and location, retaining wall design, and bridge design to the Department of Planning and Building and the City of Morro Bay for review and approval. Signage shall be no higher than 42 inches, minimized and focused at existing developed area (i.e. North Point Natural Area, the south end of Studio Drive, etc.). Retaining walls shall be colored “sandy beach” or a similar muted color, and/or textured concrete to minimize their contrast with the surrounding landscape. Bridge railing shall be the lowest allowed considering safety requirements, and shall be a muted color.	Class III Less than Significant
<b>AIR QUALITY</b>			
<b>AQ Impact 1</b> Earth moving activities for development of the proposed project components would result in grading activities that may expose naturally occurring asbestos, resulting in an indirect short-term impact.	Short-term	<b>AQ/mm-1</b> Prior to initiation of construction, the Department of General Services shall:  a. Conduct a geologic analysis to ensure the presence/absence of serpentine rock onsite. The geologic analysis shall identify if naturally occurring asbestos is contained within the serpentine rock onsite; and, if found, the applicant must comply with all requirements outlined in the Asbestos Airborne Toxic Control Measures (ATCM). In addition, the applicants shall work with the APCD to prepare an APCD-approved Asbestos Health and Safety Program and an Asbestos Dust Control Plan prior to development plan approval.	Class III Less Than Significant

**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
<b>BIOLOGICAL RESOURCES</b>			
<b>BIO Impact 1</b> The proposed project is located within close proximity to several ESHAs and other sensitive resources. Work activities could result in direct or indirect disturbances to the ESHAs.	Short-term	<p><b>BIO/mm-1</b> Prior to issuance of construction permits/notices to proceed, the Department of General Services shall designate a qualified environmental monitor for all measures requiring environmental mitigation to ensure compliance with Conditions of Approval and EIR mitigation measures. The monitor shall be responsible for: (1) ensuring that procedures for verifying compliance with environmental mitigations are followed; (2) lines of communication and reporting methods; (3) daily and weekly compliance reporting; (4) construction crew training regarding environmentally sensitive areas; (5) authority to stop work; and (6) action to be taken in the event of non-compliance. Monitoring shall be at a frequency and duration determined by the affected natural resource agencies (e.g., USACE, CDFG, RWQCB, California Coastal Commission, USFWS, and the County).</p> <p><b>BIO/mm-2</b> At the time of application for construction permits all grading plans shall clearly show the location of project delineation fencing that excludes adjacent ESHAs from disturbance. With exception to the portions of Segment 3 that require beach access, the project delineation fencing shall provide no more than a 22 foot wide work area throughout the length of Segments 3 and 4. In the portions of Segment 3 that require beach access, the project delineation fencing may allow for an additional 16 feet (as necessary) immediately adjacent to the proposed path alignment. The grading plans shall clearly show all staging areas, which shall avoid ESHAs.</p> <p><b>BIO/mm-3</b> At the time of application for permits, the plans shall clearly show the placement of environmental interpretive signs along the bikeway. The signs shall inform bikeway users of the ecology of bluff habitat, central foredune habitat, beach habitat, and plant and wildlife species that utilize these areas. Signs shall be</p>	Class III Less Than Significant

**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue “Findings” under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
		<p>placed at the northern terminus of Segment 2, at the Pier Landing and at the northern terminus of Segment 4.</p> <p><b>BIO/mm-4</b> Prior to the initiation of construction, the monitoring biologist shall conduct environmental awareness training for all construction personnel. The environmental awareness training shall include discussions of the ESHAs, and sensitive plant and animal species identified within the project corridor. Topics of discussion shall include: description of the species' habitats; general provisions and protections afforded by the Endangered Species Act; measures implemented to protect special-status species; review of the project boundaries and special conditions; the monitor's role in project activities; lines of communications; and procedures to be implemented in the event a special-status species is observed in the work area.</p> <p><b>BIO/mm-5</b> Prior to the initiation of construction, the applicant's contractors and the monitoring biologist shall coordinate the placement of project delineation fencing throughout the work areas. The monitoring biologist shall field fit the placement of the project delineation fencing to minimize impacts to ESHAs and other sensitive resources. The project delineation fencing shall remain in place and functional throughout the duration of the project. During construction, no project related work activities shall occur outside of the delineated work area.</p>	
<b>BIO Impact 2</b> Vegetation removal, grading, and construction activities could result in indirect impacts including erosion and down-gradient sedimentation and pollutant discharges (e.g., sediment, oil, fuel, materials) into ESHAs.	Short-term	<p><b>BIO/mm-6</b> During construction, to avoid erosion and downstream sedimentation, no work within or immediately adjacent to the ephemeral drainages or Toro Creek shall occur during the rainy season (October 15 through April 15).</p> <p><b>BIO/mm-7</b> During construction, equipment access and construction shall be conducted from the banks or upland areas</p>	Class III Less Than Significant



**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue “Findings” under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
		<p>rather than from within drainages. No equipment or fill material shall be staged in or adjacent to any of the site drainages, unless authorized by the appropriate permits.</p> <p><b>BIO/mm-8</b> At the time of application for grading permits, all applicable plans shall clearly show stockpile and staging areas. Stockpiles and staging areas shall not be placed in areas that have potential to experience significant runoff during the rainy season. All project-related spills of hazardous materials within or adjacent to project sites shall be cleaned up immediately. Spill prevention and cleanup materials shall be on-site at all times during construction. Cleaning and refueling of equipment and vehicles shall occur only within designated staging areas. The staging areas shall conform to standard BMPs applicable to attaining zero discharge of storm water runoff. No maintenance, cleaning or fueling of equipment shall occur within wetland or riparian areas, or within 50 feet of such areas. At a minimum, all equipment and vehicles shall be checked and maintained on a daily basis to ensure proper operation and to avoid potential leaks or spills.</p> <p><b>BIO/mm-9</b> Prior to issuance of construction permits, the applicant shall submit a detailed sediment and erosion control plan for approval, which shall address both temporary and permanent measures to control erosion and reduce sedimentation. Erosion and soil protection shall be provided on all cut and fill slopes. Revegetation shall be facilitated by mulching, hydro-seeding, or other methods, and shall be initiated as soon as possible after completion of grading, and prior to the onset of the rainy season (October 15). Permanent revegetation and landscaping shall emphasize native shrubs, and trees, to improve the probability of slope and soil stabilization without adverse impacts to slope stability due to irrigation infiltration and long-term root development. All plans shall show that sedimentation and erosion control measures</p>	

**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
		are installed prior to any other ground disturbing work.  <b>BIO/mm-10</b> Prior to issuance of construction permits, the applicant shall prepare and submit a Notice of Intent and SWPPP to the RWQCB. A copy of the SWPPP shall be submitted to the County of San Luis Obispo for approval to show that sedimentation and erosion control measures are installed prior to any other ground disturbing work.	
<b>BIO Impact 3</b> The proposed project includes installing a culvert extension in Waters of the U.S. and California, which would result in approximately 0.002 acre (87 square feet) of direct impacts to the jurisdictional feature.	Long-term	<b>BIO/mm-11</b> At the time of application for grading permits, all applicable plans shall clearly show the placement of a clear span bridge over the ephemeral drainage. The clear span bridge shall rest on abutments located outside of the drainage banks and the construction of the bridge shall avoid the placement of fill in the drainage. Bridge design shall comply with measures in the Aesthetics Resource section.	Class III Less Than Significant
<b>BIO Impact 4</b> Inadvertent depositions of sediment, materials, tools, or hazardous materials into the creek bed could occur during installation of the proposed bridge over Toro Creek.	Short-term	Implement <b>BIO/mm-1 through BIO/mm-10</b> .	Class III Less Than Significant
<b>BIO Impact 5</b> The proposed project would result in 0.30 acre of permanent impacts and 0.87 acre of temporary impacts to central foredunes.	Long-term	<b>BIO/mm-12</b> At the time of application for grading permits, the applicant shall prepare and submit a Dune Habitat Restoration Plan (HRP) for review and approval by the CDFG and Department of Planning and Building. The HRP shall be prepared by a qualified biologist and/or botanist and shall detail the methods for restoring or enhancing 1.47 acres (1:1 for temporary impacts and 2:1 for permanent impacts) of central foredune habitat within the project corridor. The goal of the HRP would be to restore temporary and mitigate permanent impacts to central foredunes, so that project impacts do not significantly disrupt the habitat. The HRP shall focus	Class III Less Than Significant

**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
		<p>on restoring and enhancing central foredune habitat by removing invasive species (iceplant and sea rocket) and planting the appropriate native species (beach saltbush, red sand verbena, beach bur, and suffrutescent wall flower). At a minimum, the HRP should include the following elements:</p> <ul style="list-style-type: none"> <li>a. Identification of locations, amounts, size and types of plants to be replanted, as well as any other necessary components (e.g., temporary irrigation, amendments, etc.) to insure successful reestablishment.</li> <li>b. Provide for a native plant salvage effort prior to ground disturbing activities. Salvaged plants shall include but not be limited to red-sand verbena and beach saltbush;</li> <li>c. Provide for driftwood salvage and replacement efforts to minimize loss of avian nesting substrates;</li> <li>d. Quantification of impact and mitigation areas.</li> <li>e. A program schedule and success criteria for a five year monitoring and reporting program that is structured to ensure the success of the HRP.</li> <li>f. Provide for the in-kind replacement of any red sand verbena that are removed or damaged at a 3:1 ratio.</li> </ul> <p><b>BIO/mm-13</b> Prior to initiation of construction, the applicant shall retain a qualified biologist/botanist to supervise the implementation of the HRP. The qualified biologist/botanist should supervise plant salvage, site preparation, implementation timing, species utilized, planting installation, maintenance, monitoring, and reporting of the restoration efforts. The qualified biologist/botanist</p>	

**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
		shall prepare and submit four annual reports and one final monitoring report to the County for review and approval. The annual and final monitoring reports should include discussions of the restoration activities, project photographs, and an assessment of the restoration efforts attainment of the success criteria.	
<b>BIO Impact 6</b> The proposed project would allow undirected egress into central foredune habitat, which would result in long term trampling and erosion of dunes.	Long-term	Implement <b>BIO/mm-1 through BIO/mm-5.</b>  <b>BIO/mm-14</b> At the time of application for grading permits, the project plans shall clearly show habitat protection fencing extending parallel to the bikeway from the northern end of the riprap (where fencing on the west side of the bikeway is currently proposed to end) to the Toro Creek bridge. To minimize visual impacts of the fencing it shall be no more than 18" high wood post or steel rod, and cable. The intent of the fence would be to deter bikeway users from trampling the foredune habitat while accessing the beach from the bikeway. One opening shall be allowed at the Pier Landing to maintain existing access.	Class III Less Than Significant
<b>BIO Impact 7</b> The proposed project would fill approximately 0.003 acre (131 square feet) of the head of an ephemeral drainage and install a clear span bridge over a second drainage resulting in the removal of vegetation that is minimizing erosion and provides shelter habitat for common wildlife species.	Long-term	Implement <b>BIO/mm-6, BIO/mm-9, and BIO/mm-10.</b>  <b>BIO/mm-15</b> At the time of application for grading permits, all applicable plans shall clearly show the placement of a clear span bridge over the ephemeral drainage. The clear span bridge shall rest on abutments located outside of the drainage banks and the construction of the bridge shall avoid the placement of fill in the drainage.  If complete avoidance of the ephemeral drainage is not feasible, the General Services Agency shall prepare and implement a detailed sediment and erosion control plan as discussed in BIO/mm-9.	Class III Less than Significant

**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
<b>BIO Impact 8</b> The proposed project would directly disturb 0.28 acres of seasonal wetlands, potentially disrupting the hydrology of the resources.	Long-term	<b>BIO/mm-16</b> At the time of application for construction permits, the plans shall clearly show the avoidance of the seasonal wetlands. In order to avoid the wetlands, the proposed alignment shall be relocated approximately fifty feet to the east towards the Highway 1 right-of-way. Figure 4-3.3 includes an alternative alignment that would avoid the seasonal wetlands.	Class III Less than Significant
<b>BIO Impact 9</b> Construction of the temporary beach access could impact red sand verbena.	Short-term	<b>BIO/mm-17</b> Prior to commencement of site grading, the temporary beach access shall be clearly delineated with construction fencing. The biological monitor directing placement of the project delineation fencing shall ensure that the temporary beach access routes avoid the red sand verbena and any other special-status resource that may exist. If complete avoidance of the red sand verbena is not feasible, the monitor shall salvage the individuals that would be impacted. The salvaged individuals shall be utilized in the Central foredune Habitat Restoration Plan, as discussed in BIO/mm-12 and 13.	Class III Less than Significant
<b>BIO Impact 10</b> Construction activities conducted during the nesting season (March through September) could directly or indirectly impact nesting birds.	Short-term	<p><b>BIO/mm-18</b> If commencement of construction begins between March and September, prior to installation of the project delineation fencing and the commencement of site grading, the environmental monitor shall conduct pre-construction nesting bird surveys. If nesting activity is identified, the following measures shall be implemented:</p> <ul style="list-style-type: none"> <li>a. If active nest of common passerine or shorebird species' are observed in the work area or within 100 feet of the work area, construction activities shall be modified and or delayed as necessary to avoid direct take or indirect disturbance of the nests, eggs, or young;</li> <li>b. If active nest sites of raptors or other special-status species</li> </ul>	Class III Less than Significant

**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
		<p>are observed within the work area or 300 feet of the work area, the environmental monitor shall establish a suitable buffer around the nest site. Construction activities in the buffer zone shall be prohibited until the young have fledged the nest and achieved independence.</p> <p>c. Active raptor or special-status species nests should be documented by a qualified biologist and a letter report should be submitted to the County, USFWS, and CDFG, documenting project compliance with the MBTA and applicable project mitigation measures.</p>	
<b>BIO Impact 11</b> Construction activities conducted during the nesting season (March through September) could directly or indirectly impact nesting western snowy plover.	Short-term	<p>Implement <b>BIO/mm-4</b>.</p> <p><b>BIO/mm-19</b> Avoid ground disturbing activities conducted within 300 feet of the central foredune and sandy beach habitats during the snowy plover nesting season to the extent feasible. If work activities must occur during the nesting season the following measures should be taken:</p> <ol style="list-style-type: none"> <li>1. Prior to installation of the project delineation fencing and the commencement of site grading, a qualified biologist shall conduct a series of pre-construction nesting bird surveys for western snowy plover. Surveys shall be conducted every other day for two weeks prior to any project related disturbances.</li> <li>2. Surveys for snowy plovers shall include walking through all potential nesting and foraging habitat within 300 feet of the site on each survey day. The survey area shall include all available snowy plover nesting habitat within 300 feet of anticipated project activities.</li> </ol>	Class III Less than Significant

**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
		3. The number of snowy plover individuals observed and their activities (e.g. nesting, foraging, resting, etc) shall be documented. All documented occurrences would be reported to USFWS and documented on the CNDDDB.  4. If nesting activity is identified, all project activities within 300 feet of the nest shall be delayed until the nesting activity has ceased.  5. During construction, the environmental monitor shall conduct snowy plover surveys twice a week (preferably two to three days apart).	
<b>BIO Impact 12</b> The proposed project would allow undirected egress into western snowy plover nesting habitat, potentially impacting nests and nesting behavior over the long-term.	Long-term	Implement <b>BIO/mm-3</b> and <b>BIO/mm-14</b> .	Class III Less than Significant
<b>BIO Impact 13</b> The proposed project could result in direct take of coast horned lizard.	Short-term	<b>BIO/mm-20</b> Prior to site grading, the environmental monitor shall conduct a survey for coast horned lizard and other reptiles. The surveyor shall utilize hand search methods in areas of disturbance where coast horned-lizards are expected to be found (e.g., under shrubs, other vegetation, or debris). Any lizards located during this survey should be safely removed from the construction area and placed in suitable habitat.	Class III Less than Significant
<b>CULTURAL RESOURCES</b>			
<b>CR Impact 1</b> The proposed project would potentially disturb intact subsurface cultural resources associated with a known cultural	Short-term	<b>CR/mm-1</b> Prior to submittal of application for construction permits, the General Services Agency shall perform a Phase II cultural resources investigation. The investigation shall be	Class III Less than

**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue “Findings” under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
resources site, resulting in a significant impact.		<p>developed and implemented by a qualified archaeologist approved by the Environmental Coordinator. It shall, at minimum, confirm the western boundary of the cultural resources site and the integrity of the resource as they relate to the proposed area of disturbance. The results of the Phase II investigation, along with recommendations for either avoidance, monitoring (refer to CR/mm-5, 6, and 7 below), and/or further testing (refer to CR/mm-3 through 7) shall be identified in a technical report.</p> <p><b>CR/mm-2</b> Upon submittal of application for construction permits, the General Services Agency shall provide verification that a Phase II cultural resources investigation has been completed and that the final bikeway alignment has been modified, as necessary, to address recommendations in the Phase II technical report.</p> <p>Or;</p> <p><b>CR/mm-3</b> Prior to issuance of construction permits, the General Services Agency shall submit to the Environmental Coordinator for review and approval, a detailed research design for a Phase III (data recovery) archaeological investigation. The Phase III program shall be prepared by a subsurface qualified archaeologist approved by the Environmental Coordinator. The consulting archaeologist responsible for the Phase III program shall be provided with a copy of the previous archaeological investigations. The Phase III program shall include at least the following:</p> <ul style="list-style-type: none"> <li>a. standard archaeological data recovery practices;</li> <li>b. recommendation of sample size adequate to mitigate for impacts to archaeological site, including basis and justification of the recommended sample size.</li> </ul>	Significant



**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
		<ul style="list-style-type: none"> <li>c. identification of location of sample sites/test units;</li> <li>d. detailed description of sampling techniques and material recovery procedures (e.g. how sample is to be excavated, how the material will be screened, screen size, how material will be collected);</li> <li>e. disposition of collected materials;</li> <li>f. proposed analysis of results of data recovery and collected materials, including timeline of final analysis results;</li> <li>g. list of personnel involved in sampling and analysis.</li> </ul> <p>Once approved, these measures shall be shown on all applicable plans and implemented during construction.</p> <p><b>CR/mm-4</b> Prior to issuance of construction permit, the applicant shall submit to the Environmental Coordinator, a letter from the consulting archaeologist indicating that all necessary field work as identified in the Phase III program has been completed.</p> <p><b>CR/mm-5</b> Prior to issuance of construction permit, the applicant shall submit a monitoring plan, prepared by a subsurface-qualified archaeologist, for the review and approval by the Environmental Coordinator. The monitoring plan shall include at a minimum:</p> <ul style="list-style-type: none"> <li>a. List of personnel involved in the monitoring activities;</li> <li>b. Description of how the monitoring shall occur;</li> <li>c. Description of frequency of monitoring (e.g. full-time, part</li> </ul>	

**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
		<p>time, spot checking);</p> <p>d. Description of what resources are expected to be encountered;</p> <p>e. Description of circumstances that would result in the halting of work at the project site (e.g. What is considered "significant" archaeological resources?);</p> <p>f. Description of procedures for halting work on the site and notification procedures;</p> <p>g. Description of monitoring reporting procedures.</p> <p><b>CR/mm-6</b> During all ground disturbing construction activities, the applicant shall retain a qualified archaeologist (approved by the Environmental Coordinator) and Native American to monitor all earth disturbing activities, per the approved monitoring plan. If any significant archaeological resources or human remains are found during monitoring, work shall stop within the immediate vicinity (precise area to be determined by the archaeologist in the field) of the resource until such time as the resource can be evaluated by an archaeologist and any other appropriate individuals. The applicant shall implement the mitigation as required by the Environmental Coordinator.</p> <p><b>CR/mm-7</b> Upon completion of all monitoring/mitigation activities, and prior to final inspection (whichever occurs first), the consulting archaeologist shall submit a report to the Environmental Coordinator summarizing all monitoring/mitigation activities and confirming that all recommended mitigation measures have been met. If the analysis included in the Phase III program is not complete by the time final inspection or occupancy will occur, the</p>	

**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue “Findings” under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
		applicant shall provide to the Environmental Coordinator, proof of obligation to complete the required analysis.	
<b>GEOLOGY, SOILS, AND DRAINAGE</b>			
<b>GSD Impact 1</b> The proposed project improvements would be subject to damage or failure may become unstable when a seismic event results in liquefaction of the underlying soils.	Long-term	<b>GSD/mm-1</b> Prior to initiation of construction a design-level geotechnical report for the proposed project, including the bridge abutments, shall be prepared. The report shall address erosion, liquefaction, lateral spreading, rockfall, and seismic settlement potential along the creek banks, and be prepared in accordance with local and state regulations.	Class III Less than Significant
<b>GSD Impact 2</b> Construction activities, including soil disturbance, removal of the remnant road, and removal of vegetation would cause erosion and down-gradient sedimentation, resulting in a potentially significant impact.	Short-term	Implement <b>BR/mm-6 through BIO/mm-10.</b>	Class III Less than Significant
<b>GSD Impact 4</b> Construction of the bikeway, retaining walls, and the barrier system, and removal of the remnant road would alter local drainage patterns potentially increasing erosion and sedimentation from Yerba Buena St to Studio Drive (Segments 2 through 4) by increasing impervious surfaces, capturing and concentrating stormwater, and filling drainage swales.	Long-term	Implement <b>GSD/mm-2 and BR/mm-9.</b>  <b>GSD/mm-3</b> Prior to issuance of permits, a drainage plan shall be submitted for review and approval by the Departments Public Works and Caltrans. The drainage plan shall be coordinated with the sedimentation and erosion control plan and specifically shall address: <ul style="list-style-type: none"> <li>The two existing storm drains that appear to outfall adjacent to or underneath the proposed improvements to ensure that the function of the storm drains is not compromised by the bikeway and that the outfall would not compromise the integrity of the retaining walls.</li> </ul>	Class III Less than Significant

**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
		<ul style="list-style-type: none"> <li>The potential for retaining walls and the barrier to capture and concentrate stormwater runoff. Any improvements shall be coordinated with any existing drainage improvements along Toro Lane and Highway 1 so that these facilities can continue to function as designed.</li> <li>Using the restoration of the remnant road to reduce stormwater runoff from the North Point Natural Area.</li> </ul> <p><b>GSD/mm-4</b> Prior to issuance of permits, the General Services Agency shall prepare a hydraulic analysis which verifies that the bikeway improvements, including the proposed bridge over Toro Creek, will not affect flood levels in a way that negatively impacts use of Highway 1. The report will identify existing flood levels and wave run-up conditions and identify changes to these levels that may result from construction of the new bridge over Toro Creek. Measures to reduce any impacts should include:</p> <ol style="list-style-type: none"> <li>1. Minimizing fill within the floodplain;</li> <li>2. Design suggestions which allow for the unrestricted flow of Toro Creek floodwaters;</li> <li>3. Maintenance requirements, which can be coordinated with Caltrans to minimize the capture and trapping of debris under the bridges.</li> </ol>	
<b>HAZARDS AND HAZARDOUS MATERIALS</b>			
<b>HAZ Impact 1</b> Hydrocarbon-contaminated soils would potentially be encountered during construction of bikeway improvements within the	Short-term	<b>HAZ/mm-1</b> Prior to initiation of construction, the General Services Agency shall submit to Environmental Health Services and Regional Water Quality Control Board for approval, a Contaminated	Class III Less than Significant

**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
Marine Terminal property, resulting in a release of hazardous materials into the environment.		<p>Materials Management Plan (CMMP). The plan shall be implemented throughout construction of bikeway improvements that occur within the Marine Terminal (Chevron property).</p> <p>The CMMP shall at minimum present an overview of the procedures and protocols that will be utilized during the project to safely and appropriately recover, handle, characterize, store, transport, and dispose of any contaminated materials encountered during construction of the project. In the event that petroleum hydrocarbon-containing soil is encountered during excavation activities, the contaminated soil shall be excavated to the extent necessary to safely construct the project.</p> <p><b>HAZ/mm-2</b> Prior to final inspection, the General Services Agency shall provide verification that the approved CMMP was implemented in accordance with RWQCB and Environmental Health rules and regulation.</p>	
<b>TRANSPORTATION AND CIRCULATION</b>			
<b>TC Impact 1</b> Implementation of the proposed project would result in periodic lane closures along Highway 1 during construction, resulting in a potentially significant impact.	Short-term	<b>TC/mm-1</b> No less than 60 days prior to construction, the General Services Agency shall notify Caltrans of the proposed construction schedule. Construction activities affecting Highway shall be performed in accordance with all regulations or restrictions imposed on the project by Caltrans.	Class III Less than Significant
<b>TC Impact 2</b> Implementation of the proposed project would result in parking demand exceeding proposed supply, as well as an increase in neighborhood curbside parking in areas where existing parking may be insufficient to meet user needs, resulting in a potentially significant impact.	Long-term	<b>TC/mm-2</b> Prior to initiation of construction, the General Services Agency shall prepare a Signage and Striping Plan in consultation with the County Public Works Department, the County Bicycle Advisory Committee, the Cayucos Advisory Committee, and the City of Morro Bay. The Signage and Striping Plan shall include,	Class III Less than Significant

**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**(Decision-maker must issue “Findings” under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
		<p>but not be limited to:</p> <ul style="list-style-type: none"> <li>▪ Methods for ensuring all ten identified parking areas supporting the proposed project are utilized to the maximum extent feasible;</li> <li>▪ A plan for educating motorists on the presence of cyclists and pedestrians in the area, and related car safety measures;</li> <li>▪ Designs for providing for bicycle and car interaction along the proposed route that would minimize conflicts through the use of striping, signage, lighting, bollards, etc.;</li> <li>▪ Examples of the signage, striping, lighting, designs, etc. for safe bicycle and car interaction;</li> <li>▪ Methods for encouraging users to stay on designated trails; and,</li> <li>▪ Methods for ensuring all bikeway users are directed and encouraged to use lighted intersections to cross Highway 1.</li> </ul>	
<b>TC Impact 3</b> The proposed project would increase cyclist and pedestrian use of surface streets, and require them to navigate streets with fairly dense housing, substantial on-street parking, narrow streets, and limited visibility.	Long-term	Implement to <b>TC/mm-2</b> .	Class III Less than Significant
<b>TC Impact 4</b> Implementation of the proposed project would result in increased bicycle and pedestrian traffic the Highway 1/Old Creek Road intersection, and at undesignated locations along	Long-term	Implement <b>TC/mm-2</b> .	Class III Less than Significant

**Table ES-3. Significant Environmental Impacts That Can be Feasibly Mitigated or Avoided**

(Decision-maker must issue "Findings" under CEQA *Guidelines* §15091(a) if the project is approved)

Description of Impact	Short/ Long-term	Mitigation Measure Summary	Residual Impact
Highway 1.			
<b>TC Impact 5</b> Implementation of the proposed project would contribute to cumulative impacts associated with population and tourism growth in the area, resulting in increased traffic congestion, parking demand, and motorist and cyclist interaction safety issues.	Long-term	Implement <b>TC/mm-1 and 2.</b>	Class III Less than Significant

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# CHAPTER 1

## INTRODUCTION

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The County of San Luis Obispo (County), serving as the lead agency under the California Environmental Quality Act (CEQA) of 1970, has prepared this Environmental Impact Report (EIR) to assess the impacts that may result from development of the Morro Bay to Cayucos Connector (project). The project would complete an important segment in the non-motorized transportation network along Highway 1. The project corridor would extend from Cloisters Park in the City of Morro Bay to the site of Norma Rose Park in the community of Cayucos. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic where no bikeways currently exist.

### 1.1 PURPOSE OF THE EIR

The purpose of this EIR is to identify the proposed project's significant impacts on the environment, indicate the manner in which such significant impacts would be mitigated or avoided, and identify alternatives to the proposed project that avoid or reduce these impacts. This EIR is intended to serve as an informational document for use by the County, the other responsible agencies, and the general public in their consideration and evaluation of the environmental consequences associated with the implementation of the proposed project. This document is provided to the public and decision-makers for their review and comment as required by CEQA.

Under the CEQA process, an EIR must serve as a full disclosure document that enables the lead and responsible agencies to fully evaluate potential environmental impacts and the consequences of their decision on a proposed project. This EIR has been written to comply with the requirements of CEQA for the analysis of both the proposed project and alternatives.

### 1.2 SCOPING AND NOTICE OF PREPARATION PROCESS

In compliance with State CEQA Guidelines, the County has taken steps to provide opportunities to participate in the environmental process. During the environmental determination process, an effort was made to contact various federal, state, regional, and local governmental agencies and other interested parties to solicit comments and inform the public of the proposed project. This included the distribution of the Notice of Preparation (NOP) on July 31, 2009, to various agencies, organizations, and interested persons throughout the San Luis Obispo County and surrounding area. The proposed project was described, the scope of the environmental review was identified, and agencies and the public were invited to review and comment on the NOP. The close of the NOP review period was August 31, 2009. Agencies, organizations, and interested parties not contacted or who did not respond to the request for comments about the project during the preparation of the Draft EIR currently have the opportunity to comment during the 45-day public review period on the Draft EIR. In addition, a scoping meeting was held on August 10, 2009 at the Cayucos Veteran's Hall. There were approximately 10 attendees and over 30 questions and/or comments were received.

## 1.3 EIR CONTENTS

The scope of the EIR includes issues identified by the lead agency during the preparation of the NOP for the proposed project, as well as environmental issues raised by agencies and the general public in response to the NOP and at the scoping meeting. The EIR is divided into the following major sections:

**Executive Summary.** Provides a brief summary of the project background, description, impacts and mitigation measures, and alternatives.

**Introduction.** Provides the purpose of an EIR, as well as scope, content, and the use of the document.

**Project Description.** Provides the general background of the project, objectives, a detailed description of the project characteristics, and a listing of necessary permits and government approvals.

**Environmental Setting.** Describes the physical setting and surrounding land uses.

**Environmental Impacts and Mitigation Measures.** Discusses the environmental setting as it relates to the various issue areas, regulatory settings, thresholds of significance, impact assessment and methodology, project-specific impacts and mitigation measures, cumulative impacts, and secondary impacts. The EIR analyzes the potentially significant impacts to the following resource areas, as identified during the preparation of the NOP:

- |                                   |                                  |
|-----------------------------------|----------------------------------|
| ▪ Aesthetic Resources             | ▪ Population and Housing         |
| ▪ Agricultural Resources          | ▪ Public Services/Utilities      |
| ▪ Air Quality/Climate Change      | ▪ Recreation                     |
| ▪ Biological Resources            | ▪ Transportation and Circulation |
| ▪ Cultural Resources              | ▪ Wastewater                     |
| ▪ Geology, Soils and Drainage     | ▪ Water                          |
| ▪ Hazards and Hazardous Materials | ▪ Land Use                       |
| ▪ Noise                           |                                  |

**Alternatives.** Summarizes the environmental advantages and disadvantages associated with the project and alternatives. As required, the “No Project” alternative is included among the alternatives considered. An “Environmentally Superior Alternative,” is identified.

**Environmental Analysis.** Identifies growth inducing impact and a discussion of long-term/short-term productivity and irreversible environmental changes.

**Mitigation Monitoring and Reporting Plan.** This section contains a matrix of all mitigation measures contained in the EIR, the requirements of the mitigation measures, the applicant’s responsibility and timing for implementation of these measures, the party responsible for verification, the method of verification, and verification timing.

**Eastern Alignment Alternative Discussion (Appendix F).** Appendix F evaluates an Eastern Alignment at a “project level”. As a result, the EIR provides “decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences,” (CEQA *Guidelines* §15151) of the western (proposed) and eastern alignments.

## 1.4 PROJECT SPONSORS

**Lead Agency:**

County of San Luis Obispo  
Planning and Building Department  
County Government Center, Room 300  
San Luis Obispo, CA 93408

Mr. Jeff Oliveira, Environmental Resource Specialist

**Project Applicant:**

County of San Luis Obispo, General Services Agency  
1087 Santa Rosa Street  
San Luis Obispo, CA 93408

Jan Di Leo, Parks Planner

**Environmental Consultant:**

SWCA Environmental Consultants  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401

Ms. Shawna Scott, Project Director  
Mr. Keith Miller, Project Manager

## 1.5 REVIEW OF THE DRAFT EIR

This Draft EIR was distributed to responsible and trustee agencies, other affected agencies, surrounding cities, interested parties, and all parties requesting a copy of the Draft EIR in accordance with Public Resources Code 21092(b)(3). The Notice of Completion of the Draft EIR was also distributed as required by CEQA. The 45-day public review period begins on April 19, 2010. During this period the EIR, including technical appendices, is available for review at the following locations:

County of San Luis Obispo  
Environmental Coordinator's Office  
County Government Center Room 200  
San Luis Obispo, CA 93408

San Luis Obispo City/County Library  
995 Palm Street  
San Luis Obispo, CA 93401

On behalf of the lead agency, comments on the Draft EIR shall be addressed to:

Mr. Jeff Oliveira  
 County of San Luis Obispo  
 Department of Planning and Building  
 Division of Environmental and Resource Management  
 County Government Center Room 200  
 San Luis Obispo, CA 93408

The 45-day public review period will end on June 3, 2010. Written responses to all significant environmental issues raised will be prepared and included as part of the Final EIR and the environmental record for consideration by decision-makers for the project.

## 1.6 COMMONLY USED DEFINITIONS AND ACRONYMS

### 1.6.1 Definitions

Throughout the document references are also made to bikeway “classes”. The California Department of Transportation (Caltrans) *Highway Design Manual* provides a description of bikeways, and those descriptions are also utilized in the EIR. The term “recreational bicycle route” is also used in the EIR. This designation is used on bike maps prepared by San Luis Obispo’s Regional Rideshare. These bikeways, and examples, are shown in Table 1-1 and Figure 1-1.

**Table 1-1. Bikeway Terminology**

Agency/Organization	Term Used	Definition	Example
Caltrans	Class I	Provides a completely separated right of way for the exclusive use of bicycles and pedestrians with cross flow minimized	Bob Jones Pathway
	Class II	Provides a striped lane for one-way bike travel on a street or highway	Santa Rosa Street, San Luis Obispo
	Class III	Provides for shared use with pedestrian or motor vehicle traffic	Ocean Boulevard, Caycuos
San Luis Obispo Regional Rideshare	Recreational Route	Scenic route on rural roads. You might find high speed vehicle traffic, varying shoulder widths, and challenging climbs. Your travel way is shared with pedestrian and or motor traffic.	Toro Creek Road

**Figure 1-1. Typical Bikeways**



**Class I Bikeway**

Provides a completely separated right of way for exclusive use of bicycles and pedestrians.



**Class II Bikeway**

Provides striped lane for one-way bike travel on a street.



**Class III Bikeway**

Provides for shared use with pedestrian or motor vehicle traffic.

## 1.6.2 Acronyms

The following acronyms are used extensively in the EIR. The acronyms are spelled out the first time they are used in a section or chapter, but are also provided in table 1-2 below.

**Table 1-2. Commonly Used Acronyms**

Acronym	Term
AEP	Association of Environmental Professionals
ATCM	Airborne Toxic Control Measures
BMP	Best Management Practices
CAAA	Federal Clean Air Act Amendments
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CAP	Clean Air Plan
CCA	California Coastal Act
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CHRIS	California Historical Resources Information System
cm	centimeter
CMMP	Contaminated Materials Management Plan
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society's
CO	Carbon Monoxide
County	County of San Luis Obispo
County Parks	County of San Luis Obispo General Services Agency, County Parks
CZLUO	Coastal Zone Land Use Ordinance

**Table 1-2. Commonly Used Acronyms**

<b>Acronym</b>	<b>Term</b>
DTSC	Department of Toxic Substances Control
EAS	Emergency Alert System
ECA	Environmental Constraints Analysis
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
ESHA	Environmentally Sensitive Habitat Area
ESU	Evolutionarily Significant Units
FHWA	Federal Highway Administration
GHG	greenhouse gas
HRP	Habitat Restoration Plan
KVA	Key Viewing Area
LCP	Local Coastal Program
LOS	levels of service
LUFT	Leaking Underground Fuel Tank
MBTA	Migratory Bird Treaty Act
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NO <sub>2</sub>	Nitrogen Dioxide
NOAA Fisheries	National Marine Fisheries Service
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System

**Table 1-2. Commonly Used Acronyms**

<b>Acronym</b>	<b>Term</b>
NPNA	North Point Natural Area
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O <sub>3</sub>	Ozone
OES	Office of Emergency Services
OHP	Office of Historic Preservation
OHWM	ordinary high water mark
Pier Landing	Chevron Marine Terminal pier landing
PM <sub>10</sub>	Respirable Particulate Matter
PM <sub>2.5</sub>	Fine Particulate Matter
ppm	parts per million
ROW	Right-of-Way
RSP	rock slope protection
RWQCB	Regional Water Quality Control Board
SB 18	Senate Bill 18
SLOAPCD	San Luis Obispo County Air Pollution Control District
SLOCOG	San Luis Obispo Council of Governments
SO <sub>2</sub>	Sulfur Dioxide
SRA	Sensitive Resource Area
State Parks	California Department of Parks and Recreation
STU	Shovel Test Unit
SWCA	SWCA Environmental Consultants



**Table 1-2. Commonly Used Acronyms**

<b>Acronym</b>	<b>Term</b>
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
URL	urban reserve line
USACE	U.S. Army Corps of Engineers
USGS	U.S. Geological Survey
XPI	Extended Phase I

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# CHAPTER 2

## PROJECT DESCRIPTION

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### 2.1 PROJECT SUMMARY

The Morro Bay to Cayucos Connector (proposed project; project) would complete an important segment in the non-motorized transportation network along Highway 1. The project corridor would extend from Cloisters Park in the City of Morro Bay north to the site of Norma Rose Park in the community of Cayucos. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic where no bikeways currently exist.

The existing bikeways compose the southern and northern segments of the bikeway network. The proposed new bikeway would compose the central segments and extend from the intersection of Yerba Buena Street and Highway 1 in Morro Bay, to the southern end of Studio Drive in Cayucos. The project corridor includes numerous existing bike and recreational facilities, including bikeways, parking and staging areas, coastal access points, and county and state parks. The project applicant is the County of San Luis Obispo General Services Agency, County Parks (County Parks).

### 2.2 PROJECT BACKGROUND

The County of San Luis Obispo (County) policy is to pursue dedicated bikeways along highways where no street frontage exists. This condition exists between the northern end of Morro Bay and the southern end of Cayucos. The proposed project, in particular, is identified in the County's Parks and Recreation Element of the General Plan. This same area is also located within the California Coastal Trail corridor. The proposed project has been in development since 2004. During project development, two alignments were considered, one on the west side of Highway 1 and one on the east. At that time, a project review team coordinated by County Parks was created and included representatives from the following groups and agencies:

- San Luis Obispo Council of Governments (SLOCOG)
- California Coastal Conservancy
- California Department of Transportation (Caltrans)
- California Department of Parks and Recreation (State Parks)
- City of Morro Bay
- County of San Luis Obispo (Department of Planning and Building, County Parks, and Department of Public Works)
- Cayucos Citizens Advisory Committee
- San Luis Obispo Bike Club
- San Luis Obispo County Bicycle Coalition

The team reviewed and commented on project developments, including the preparation of the preliminary design and an Environmental Constraints Analysis (ECA). The Draft ECA was completed in March 2006 by Morro Group (now SWCA Environmental Consultants [SWCA]). At that time, County Parks met with staff from various agencies including Caltrans, State Parks, California Coastal Commission, County, and the City of Morro Bay. County Parks also met with

local advisory groups to discuss the project and the relative effects of identified constraints. These groups included the Cayucos Citizens Advisory Council, City of Morro Bay Public Works Advisory Board, City of Morro Bay Recreation & Parks Commission, and the San Luis Obispo County Parks & Recreation Commission. These groups all provided comments on the project and the ECA.

Based on comments received and recommendations in the ECA, County Parks retained Earth Systems Pacific in 2008 to prepare additional background technical data, including a bluff retreat study and geotechnical feasibility report (refer to Appendix E). A Preliminary Design Report, incorporating all of the available information to date was prepared by Firma in 2008. The design report includes both a western and an eastern project alignment and is available for review at the County of San Luis Obispo Department of Planning and Building. Based on input received from the City of Morro Bay, advisory agencies, and the County Parks and Recreation Commission, it was determined that the western alignment should be pursued, as it appeared to provide the superior user experience.

It should be noted that it was not the objective of the ECA to identify an environmentally superior alternative. It was determined that both alignments include significant environmental constraints and effectively connect Morro Bay and Cayucos; therefore, this Environmental Impact Report (EIR) includes the eastern alignment as an alternative to the proposed project. Specifically, this document evaluates the eastern alignment at a “project-specific level” in Appendix F. The objective of this approach is that in the event that the eastern alignment is determined to be the environmentally superior alternative, and the regulatory agencies prefer it, the EIR would contain “sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences,” (CEQA *Guidelines* §15151) of the western and eastern alignments.

## **2.3 PROJECT OBJECTIVES**

The project objectives, which reflect goals in the Parks and Recreation Element and were developed as a result of project development process, include:

1. Provide continuous off-highway connectivity from Morro Bay to Cayucos;
2. Provide a safe and scenic bicycle/pedestrian route; and,
3. Maximize user’s contact with the coastline while avoiding environmental impacts.

## **2.4 PROPOSED PROJECT**

### **2.4.1 Project Location**

The project would be located in San Luis Obispo County, west of and adjacent to Highway 1, between the highway and the Pacific Ocean (refer to Figures 2-1 and 2-2). The southern end of the project would include approximately 1.2 miles of an existing designated “recreational bicycle route” along Beachcomber Drive and Sandalwood Avenue in Morro Bay, and incorporate a portion of the existing Class I bikeway which begins at Cloisters Park and extends to downtown Morro Bay (see bikeway class definition below). The northern end of the proposed project would include approximately 1.5 miles of existing Class III bikeways on Studio Drive and Ocean Boulevard which connect to a bikeway which begins at the site of Norma Rose Park and continues to downtown Cayucos. The project corridor would incorporate existing parking and

staging areas at Cloisters Park, the North Point Natural Area (NPNA), Studio Drive, Morro Strand State Beach, and future parking at Norma Rose Park (refer to Figure 2-2).

The proposed new Class I portion of the project would be approximately 1.25 miles long and connect the northern and southern segments of the proposed project. It would extend from the northern portion of Morro Bay at the Yerba Buena Street/Highway 1 intersection to the south end of Studio Drive in Cayucos (refer to Figure 2-2). The Class I portion would be located along existing coastal access points at the NPNA in Morro Bay, and the south end of Studio Drive, as well as informal coastal access areas, such as the Chevron Marine Terminal pier landing (Pier Landing), across from Toro Creek Road (refer to Figure 2-2).

## 2.4.2 Bikeway Design Criteria

The Caltrans *Highway Design Manual* provides a description of bikeways generally recognized as standards by local and State agencies. Those descriptions are also utilized in the EIR, and described in Table 1-1. The proposed project would incorporate the following general design criteria:

- Existing Class III bikeways within the project corridor would be signed as such and identified as part of the Morro Bay to Cayucos Connector.
- The Class I bikeway would be 12 feet wide (two 4-foot travel lanes, and two 2-foot shoulders on each side).
- Bridge segments would be 12 feet wide, inside railing to inside railing.
- Segments within 5 feet of the Highway 1 edge of pavement would include a 32 inch high concrete barrier and 22 inch high railing/fence (total height of 54 inches) separating the bikeway from the highway pavement, unless adequate vertical separation exists.
- Where conflicts could occur between motorists and the Class I bikeways users (at the Pier Landing parking area, for example), the barrier and fencing system described above would be designed to accommodate continued pedestrian access across the bikeway while separating users from parking areas. This system may include steel guardrails.
- At-grade segments of the bikeway would be composed of asphaltic-concrete paving over approximately 6 inches of compacted aggregate base.

Due to the relatively long project corridor and linear nature of the project, the bikeway component is broken into five segments for discussion. Segment 1 and Segment 5 include the existing bikeways in the project corridor. Segments 2 through 4 include the new Class I bikeway. Segments 1 through 5 are shown in Figures 2-3 through 2-7. Cross sections of the new Class I bikeway are shown on Figure 2-8. It should be noted that these segments do not correspond to the segments in the ECA or the Preliminary Design Report as they only relate to the western alignment and the project has been modified since preparation of the ECA and technical documentation.

**Figure 2-1. Site Vicinity Map**





Figure 2-2. Project Site Map





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## **2.4.3 Project Segments**

### **2.4.3.1 Segment 1: Cloisters Park to Yerba Buena Street**

Segment 1, the southernmost segment, would begin at Cloisters Park in Morro Bay. This segment would follow an existing Class I bikeway through the park (this same bikeway heads south to downtown Morro Bay as well, although it is not a part of the proposed project). Once leaving the park, the segment follows Sandalwood and Beachcomber Drives to Yerba Buena Street. This segment is approximately 1.3 miles and is identified as a “recreational route” on the County Bike Map. Segment 1 incorporates existing parking facilities for the project at Cloisters Park, the end of Azure Street, and at Morro Strand State Beach (refer to Figure 2-3). No improvements other than signage of the route are proposed for this segment. This segment links with Segment 2 on Yerba Buena Street adjacent to Highway 1.

### **2.4.3.2 Segment 2: Yerba Buena Street to North Point Natural Area**

Segment 2 would be approximately 1,800 feet long and extend from the intersection of Yerba Buena Street and Highway 1 (refer to Figure 2-4), continuing north parallel to Toro Lane and Highway 1, and terminating just north of the NPNA. Segment 2 would begin within the Highway 1 right-of-way (ROW). Given the relatively narrow width of the ROW and steeper slopes adjacent to Highway 1, retaining walls would be required on both sides of the bikeway, in some places (refer to Figure 2-8, cross-sections F and G). Retaining wall height and fill depth would reach a maximum of approximately 5 feet. The bikeway would be located parallel to Toro Lane for approximately 1,200 feet until just north of the NPNA parking lot where it would turn northwest, leaving the Highway 1 ROW. Segment 2 would then parallel a partially paved, abandoned section of road (i.e., remnant road) within the NPNA for approximately 600 feet. The bikeway would be constructed at grade along the remnant road.

### **2.4.3.3 Segment 3: North End of the NPNA to North Side of Toro Creek**

Segment 3 would be approximately 2,300 feet long and extend from the north end of the NPNA to the north side of Toro Creek (refer to Figure 2-5). The topography is such in this area that retaining walls would be required to construct the bikeway. Due to the narrow width of bluff north of the NPNA, the bikeway would re-enter the Highway 1 ROW, this time adjacent to the edge of pavement. Retaining walls approximately 1 to 3 feet high would be required for approximately 800 feet on the western edge of this segment, and the proximity to Highway 1 would require that the barrier and fencing system be located on the eastern edge of the segment, for a length of approximately 850 feet (refer to Figure 2-8, cross-sections B, C, and D). Existing chain link fencing would be removed along this portion of Highway 1. Starting just south of Pier Landing and for the next 450 feet north, the bikeway would be constructed at grade. It would pass through the northern end of the informal parking area and approach Toro Creek.

Segment 3 would require a new bridge across Toro Creek. The bridge would be a free-standing 120-foot span with a 6 inch thick, 12 foot wide surface, and two 4 foot deep steel girders resting on concrete piers outside of creek banks. The side rails would be wire fabric approximately 54 inches tall. The bridge deck would be at or slightly below the grade of Highway 1. After crossing Toro Creek, Segment 3 would require retaining walls for an additional 200 feet, at which point it would approach an existing informal parking area and Segment 4.

#### **2.4.3.4 Segment 4: North Side of Toro Creek to the South End of Studio Drive**

Segment 4 would be approximately 2,300 feet long and extend from approximately 200 feet north of Toro Creek near the informal parking area across from Toro Creek Road to the south end of Studio Drive (refer to Figure 2-6). North of the parking area, Segment 4 would be located outside of the Highway 1 ROW and at grade until it reaches Studio Drive. Given the relatively flat topography, minimal earthwork would be required for this segment; however, there are a number of well-developed drainages that would require culvert extensions and, in some cases, bridges. Two additional bridges are proposed for Segment 4: a 50-foot span and a 70-foot span (refer to Figure 2-6). These bridges would be 12 feet wide, with 54-inch railings and constructed to span the entire drainage. The project would also partially fill one drainage area to allow for culvert extension. Approximately 100 feet south of Studio Drive, this segment would split into two 5 foot wide bikeways, separating northbound and southbound users. This brief split would allow for clearer ingress and egress to the Class I bikeway. Segment 4 would terminate at the south end of Studio Drive.

#### **2.4.3.5 Segment 5: South End of Studio Drive to Norma Rose Park**

Segment 5 would extend from the South end of Studio Drive to the site of Norma Rose Park, a distance of approximately 6,600 feet, or 1.25 miles (refer to Figure 2-7). This segment includes the existing parking area located at the south end of Studio Drive. The proposed project would formalize this parking area (which may accommodate 13 spaces) by adding striping. A small amount of additional pavement may also be necessary at this location. According to the County's Bikeway Plan, Studio Drive is an existing Class III bikeway, although it is not currently signed as such. Segment 5 would follow Studio Drive to Old Creek Road where the segment would cross Highway 1 to another existing Class III bikeway on Ocean Boulevard. This crossing is considered the safest place to cross Highway 1, as it is currently signalized. From the intersection of Ocean Boulevard and Old Creek Road, the segment would head north to the site of the proposed Norma Rose Park where additional bikeways lead to downtown Cayucos via Ocean Boulevard and 13<sup>th</sup> Street. Alternatively, bikeway users could choose to remain on Studio Drive and reach the coastal access and parking lot at the north end of Studio Drive (refer to Figure 2-7). No disturbance is proposed for Segment 5, other than signage and striping located on the south end of Studio Drive.

### **2.4.4 Other Proposed Improvements**

#### **2.4.4.1 Demolition of Remnant Road**

The proposed project would include demolition and removal of the remnant road in the NPNA (refer to Figure 2-4). The road is approximately 560 feet long and 40 feet wide. The total disturbance area would be approximately 0.4 acre. The disturbed area would be revegetated with native species.

#### **2.4.4.2 Parking Spaces**

The proposed project would formalize the existing public parking area located at the south end of Studio Drive that holds approximately 12 vehicles. Thirteen spaces would be formally striped and identified. Five would be striped perpendicular to Studio Drive, and eight would be parallel (refer to Figure 2-9). No other parking improvements are proposed, although the propose project would incorporate existing parking facilities located throughout the project alignment (refer to Figure 2-2).

### **2.4.4.3 Signage and Striping**

Some striping would be required to: (1) formalize the Studio Drive parking area, and (2) separate Segment 3 from the Studio Drive parking area and the start of Segment 2. Proposed signage identifying the bikeways and periodically direct bikeway users would include 42 inch tall wood posts.

### **2.4.4.4 Earthwork and Construction Techniques**

The proposed project would not require significant cut and fill or earthwork, although topographic constraints associated with Segments 2 and 3 would require retaining walls and cut and fill in some places. The majority of Segments 3 and 4 would be constructed at grade. Total earthwork for the proposed project would be less than 5,000 cubic yards and occur over a two month period due to anticipated intensive biological resources mitigation and geographic constraints. The proposed project would require approximately 42,000 square feet of asphalt (6,600 feet long by 8 feet wide). The permanent area of disturbance associated with the bikeway would be approximately 80,000 square feet (6,600 feet long by 12 feet wide).

The project site is constrained by Highway 1 and the Pacific Ocean. Potential construction staging areas have been shown in Figure 2-10. It is likely that staging for construction of Segment 2 would occur in the NPNA on the remnant road. Other staging areas may include the disturbed or developed areas of the Pier Landing parking area, the Marine Terminal, and the site of Norma Rose Park. It is likely that construction of Segment 3 would require the use of the beach west of Highway 1. Construction equipment may need to access the project site from the west, requiring the use of heavy equipment on the beach. The EIR analysis assumes there would be only one short-term access point to the beach, located at the Pier Landing parking area.

At minimum, one lane of southbound Highway 1 would be closed periodically during construction of Segment 3. The southbound lane(s) of Highway 1 may also need to be closed during construction of the proposed bridge over Toro Creek.

## **2.5 REQUIRED PERMITS**

Table 2-1 shows the permits and responsible agencies for the proposed project. A coastal development permit would be required from the California Coastal Commission, as well as the County and the City of Morro Bay, because a portion of the project is located in Coastal Commission Original Jurisdiction.

**Table 2-1. Responsible Agencies and Associated Permits**

Permit	Responsible Agency
Coastal Development Permit	County of San Luis Obispo Department of Planning and Building
Conditional Use Permit Coastal Development Permit Building Permits	City of Morro Bay Community Development Department
Coastal Development Permit	California Coastal Commission
Section 401, Stormwater Pollution Prevention Plan	Regional Water Quality Control Board (RWQCB)
Section 404	U.S. Army Corps of Engineers (USACE)
Section 1603 Streambed Alteration Agreement	California Department of Fish and Game (CDFG)
Encroachment Permit	Caltrans

## 2.6 PROJECT TIMING

Due to anticipated funding through the Federal Highway Administration (FHWA), the project would also need to go through National Environmental Policy Act (NEPA) review prior to construction. It is estimated that the environmental review and permitting process may take two to three years, at which time, if funding is available, construction of the proposed project would begin. The project would be completed in less than one year.



Figure 2-3. Proposed Project – Segment 1

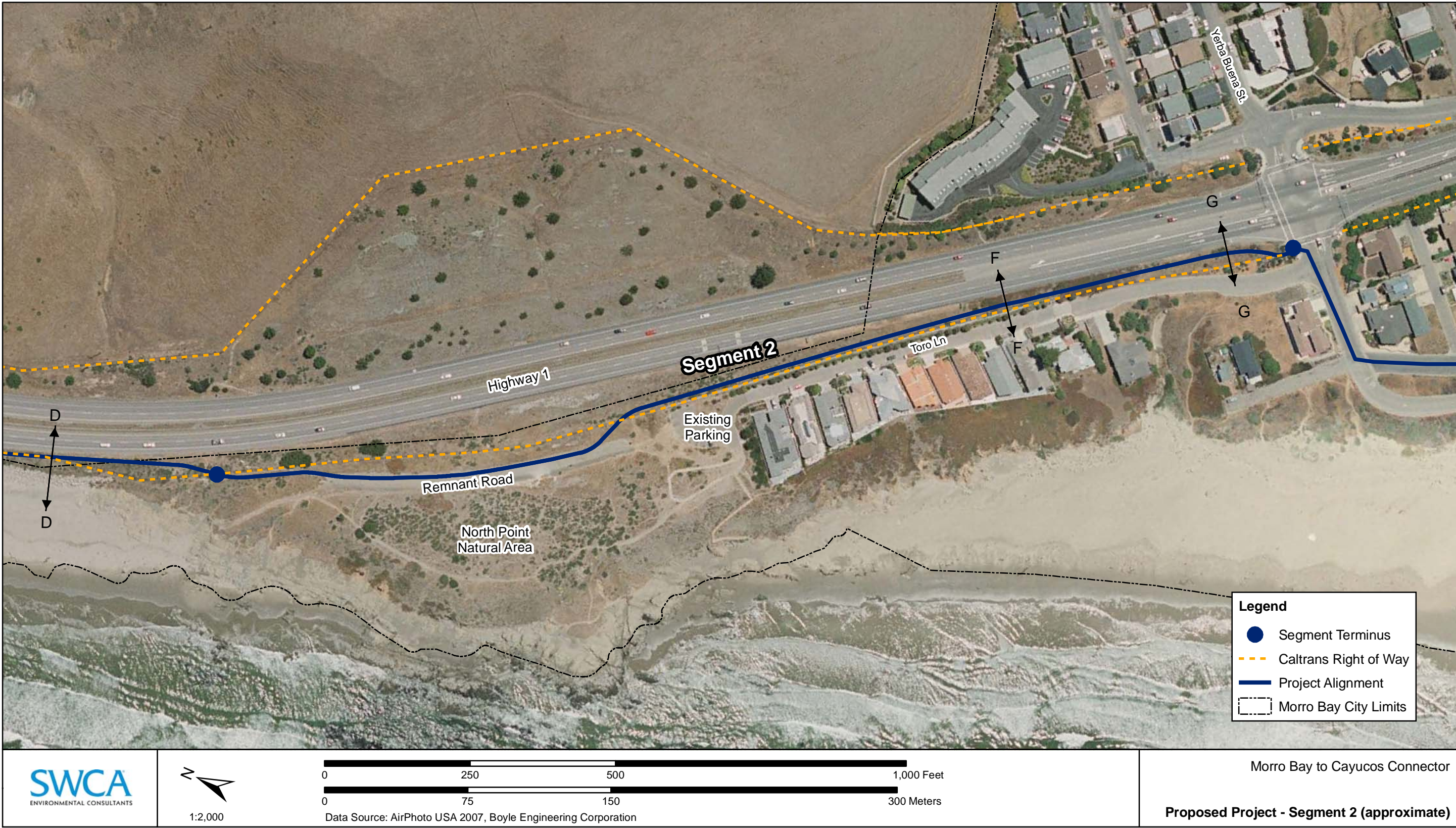




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Figure 2-4. Proposed Project – Segment 2





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Figure 2-5. Proposed Project – Segment 3





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Figure 2-6. Proposed Project – Segment 4





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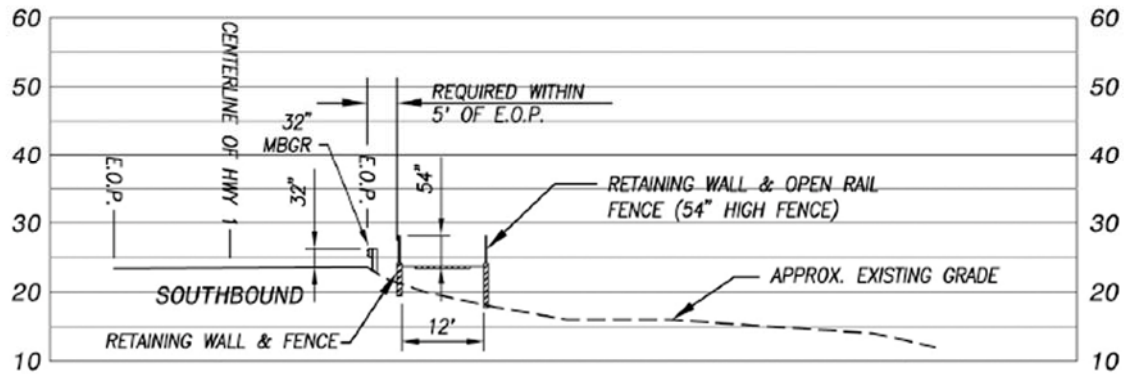
Figure 2-7. Proposed Project – Segment 5





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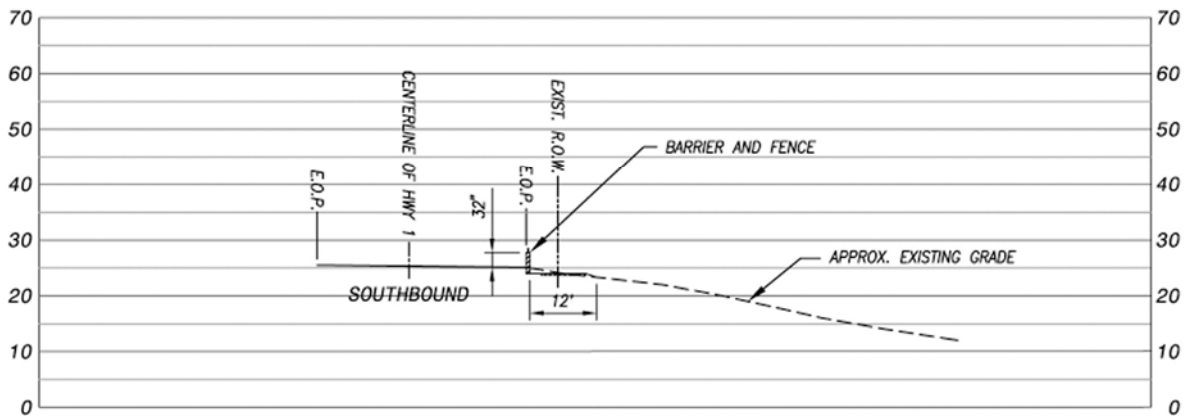
Figure 2-8a. Cross Sections A and B



\*\*NOTE:

1. TOP OF BARRIER IS 32" ABOVE HIGHWAY GRADE AT EDGE OF PAVEMENT. TOP OF FENCE IS 54" ABOVE THE BIKE PATH GRADE.

ALTERNATE SECTION A-A VIEW



\*\*NOTE:

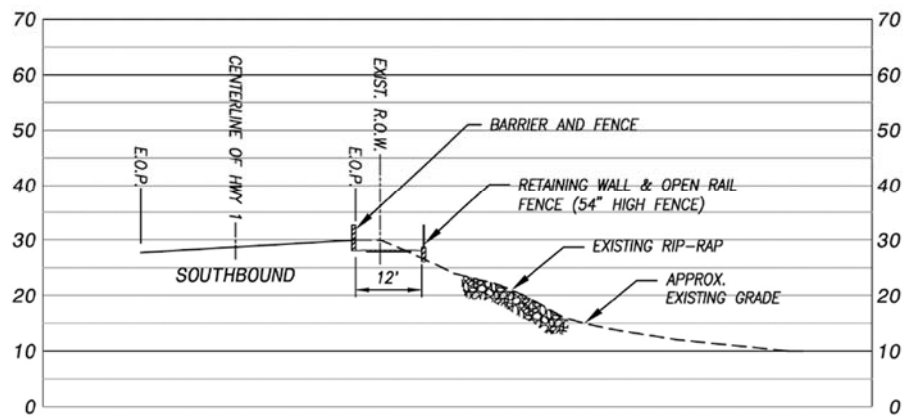
1. TOP OF BARRIER IS 32" ABOVE HIGHWAY GRADE AT EDGE OF PAVEMENT. TOP OF FENCE IS 54" ABOVE THE BIKE PATH GRADE.

SECTION B-B VIEW



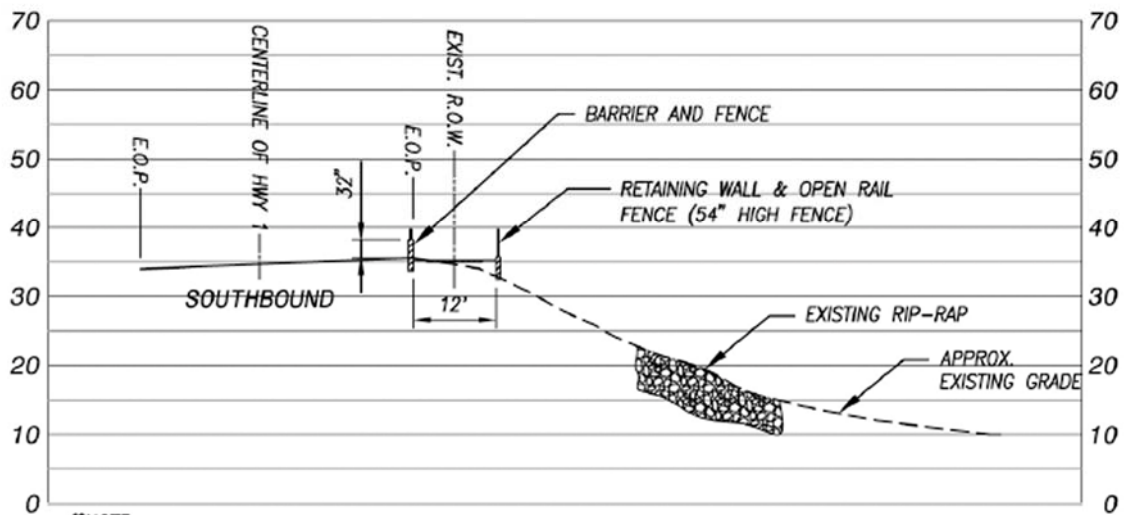
Morro Bay to Cayucos Connector  
Cross Sections A and B

Figure 2-8b. Cross Sections C and D



**\*\*NOTE:**  
 1. TOP OF BARRIER IS 32" ABOVE HIGHWAY GRADE AT EDGE OF PAVEMENT. TOP OF FENCE IS 54" ABOVE THE BIKE PATH GRADE.

SECTION C-C VIEW

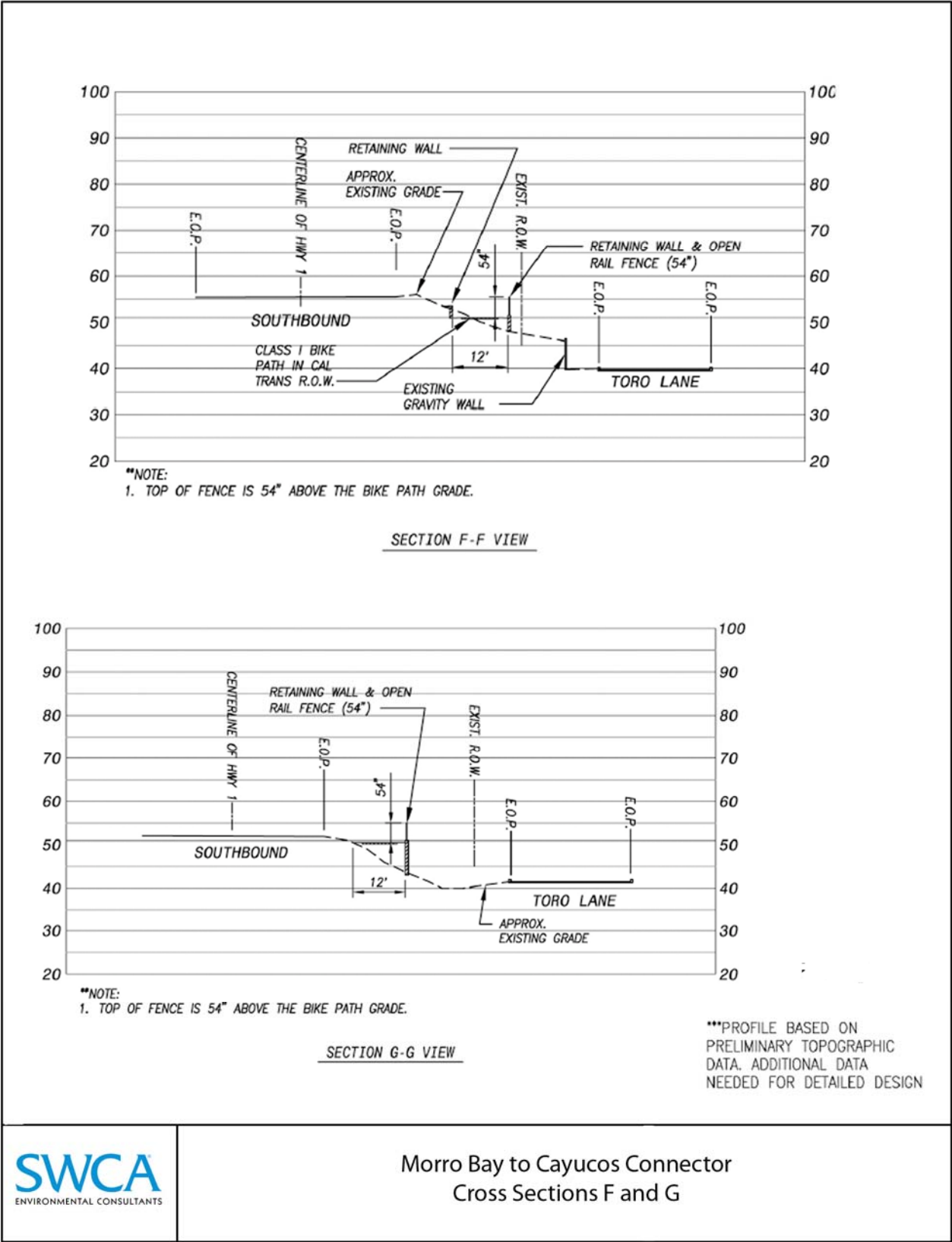


**\*\*NOTE:**  
 1. TOP OF BARRIER IS 32" ABOVE HIGHWAY GRADE AT EDGE OF PAVEMENT. TOP OF FENCE IS 54" ABOVE THE BIKE PATH GRADE.

SECTION D-D VIEW



Figure 2-8c. Cross Sections F and G



**Figure 2-9. Proposed Formalized Parking at Studio Drive**

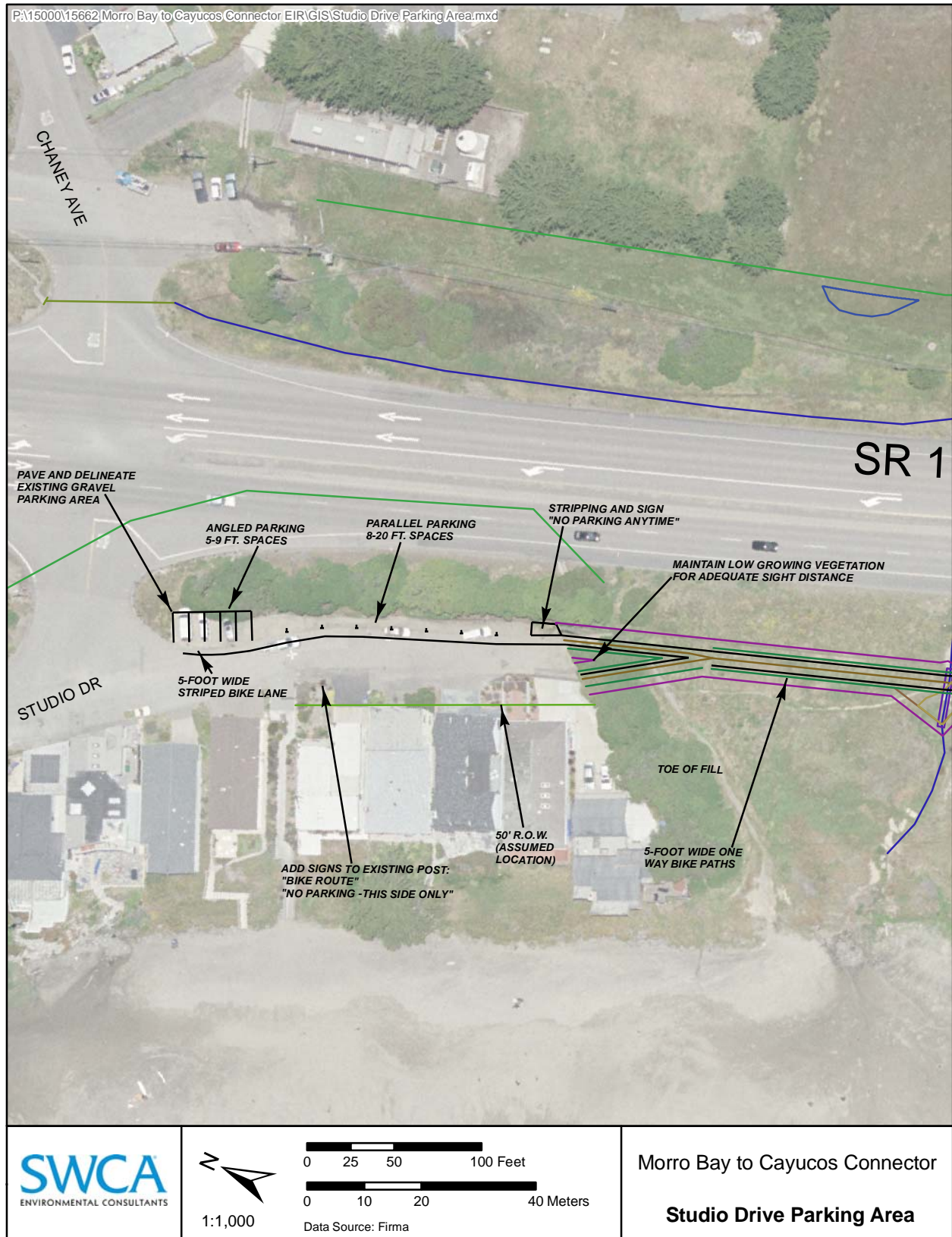




Figure 2-10. Proposed Staging Areas



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# CHAPTER 3

## ENVIRONMENTAL SETTING

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This section of the Environmental Impact Report (EIR) addresses the project environmental setting, existing and designated land uses in the project area, and provides an overview of relevant lands use plans. A list of applicable local plans and policies and a policy consistency analysis is included in Appendix B. Also included in this section is a discussion of the cumulative development scenario.

### 3.1 EXISTING CONDITIONS

#### 3.1.1 Physical Setting

The proposed project is located in San Luis Obispo County and the City of Morro Bay, west of and adjacent to Highway 1, between the highway and the Pacific Ocean (refer to Figures 3-1 and 3-2). The project follows an approximately 4.0 mile long corridor, extending from Cloisters Park in Morro Bay to the site of Norma Rose Park within the community of Cayucos. Morro Bay and Cayucos, and the entire project, are located within the coastal zone. The southern half of the corridor (Segments 1 and 2, and a portion of 3) is located within Morro Bay city limits. The next approximately 0.5 mile (Segments 3 and 4) is located between Morro Bay and the Cayucos urban reserve line (URL). Segment 5 is located entirely within the Cayucos URL.

The portions of the project corridor within Morro Bay are located almost exclusively in recreational or relatively low density residential land use designated zones. This is also true of the portions of the project in Cayucos. Segment 5 passes through various single family residential neighborhoods, and one small area of commercial land use at Old Creek Road, before reaching the Cemetery and site of Norma Rose Park.

Between the urbanized areas, the project corridor is composed of marine terraces, bluffs, and the sandy beach west of Highway 1. The bluffs give way to sand dunes and eventually the beach and surf of Estero Bay, which extends from Point Buchon in the south to Point Estero in the north. Much of this area is actively used by surfers, pedestrians, and other visitors year round, and is popular with both local residents and tourists. The Coast Range is located to the east of Highway 1, trending approximately north-south along the project corridor, and slopes down to a grassy plain. The plain contains several main drainage features including Toro Creek, Willow Creek, and Old Creek, which run generally east-west and convey runoff towards the Pacific Ocean. Other features include seasonal swales, generally dominated by nonnative grasses or pockets of coastal scrub. Cattle grazing is the predominant agricultural activity in the hills and plain.

#### 3.1.2 Plans and Policies

##### 3.1.2.1 State Plans and Policies

###### California Coastal Act

The California Coastal Act (CCA) (Public Resources Code §30000 et seq.) is intended to “protect, maintain, and, where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources.” By state law, the coastal zone is established by the California Coastal Commission, which has authority to permit, restrict, or

prohibit certain development within the zone. The CCA mandates protection of public access, recreational opportunities, and marine and land resources. This umbrella legislation mandates local governments to prepare a land use plan and schedule of implementing actions to carry out the policies of the CCA within local jurisdictions. The project is consistent with these principles in that it allows and encourages increased visitor use of the coast and ocean along the project corridor, and completes the segment of the non-motorized transportation network along Highway 1 between Morro Bay and Cayucos.

### California Coastal Conservancy

The California Coastal Conservancy is charged with preserving, protecting, and restoring the resources of the California coast. The California Coastal Conservancy adopted its Standards and Recommendations for Accessway Location and Development to ensure a consistent approach was used for access and construction along the coastline. This document was reviewed for applicable standards pertaining to the development of the connector path project.

Standard #10 governs development of coastal bikeways. Standards include a minimum surface width of 8 feet for a two-way Class I bikeway, and provision for 2 foot wide shoulders adjacent to either edge of the paths. These standards are similar to the California Department of Transportation (Caltrans) design standards and are consistent with the project description.

### Morro Strand and Atascadero State Beach General Plan

Various levels of regulation within the California Department of Parks and Recreation (State Parks) guide the management of natural resources within the state. These directives are outlined in the Morro Strand and Atascadero State Beach General Plan, which includes policies relevant to resource management at the Morro Strand State Beach (formerly known as Atascadero and Morro Strand State Beach), both of which lie adjacent to the proposed project.

The General Plan includes policies that regulate human activities to prevent destruction of the natural dune environment, and seek to restrict hiking, horseback riding and other recreational uses to designated areas and routes (i.e. trails, pathways). The General Plan seeks to restrict vehicular trespass and egress from adjacent residences onto the dunes through signing and fencing. The proposed project has been designed to encourage use of the designated pathway for bikers and other pedestrians, and includes signage as well as increased designation of formal parking areas and beach access sites. The portions of the proposed project within or adjacent to Morro Strand State Beach would appear to be consistent with the General Plan.

### **3.1.2.2 County of San Luis Obispo**

#### Coastal Zone Land Use Ordinance

Combining designations are used to identify and highlight areas of San Luis Obispo County having natural or manmade features that are sensitive, hazardous, fragile, of cultural or educational value, or of economic value as extractable natural resources. The purpose of combining designation standards is to require project design that will give careful consideration to the land features, structures, and activities identified by the combining designations. These standards provide for more detailed project review where necessary to support public safety or proper use of public resources, or to satisfy the requirements of the CCA and the Local Coastal Plan, the certified Land Use Plan of the San Luis Obispo County Local Coastal Program. Identified combining designations within the project corridor are described below. Applicable combining designations have been included within each individual resource section.

Development within a designated Sensitive Resource Area (SRA) could create inconsistencies with SRA development restrictions set forth in the Coastal Zone Land Use Ordinance (CZLUO) Combining Designations. Development of impermeable surfaces is restricted within 100 feet of the mean high tide line and development that could degrade watercourses is regulated. The proposed project is generally located at least 150 feet or more from the shoreline, but portions of Segment 2 and 3 are closer in some cases. Construction activities are necessary near Toro Creek. The CZLUO requires the land use permit application to include a description of the measures proposed to protect the identified protected resources. Impacts to these potentially sensitive resources and related proposed mitigation measures are more fully discussed in the Biological Resources Section.

The CZLUO also includes regulations related to flood hazard avoidance and construction standards to limit potential damage caused by flooding, collapse, lateral movement, or floatation. Development within a designated Flood Hazard Area will be necessary along the coast and in connection with the Toro Creek crossings. The CZLUO also requires that proposed development is set back from the bluff edge a distance that would allow for 75 years of bluff retreat to occur without damaging the integrity of the development. The proposed project is inconsistent with that requirement (refer to Section 4-5).

### Estero Area Plan

The project corridor is located within the County of San Luis Obispo Estero Planning Area. The plan provides goals to guide the general direction for the Estero Area Plan over a 20-year planning period. They were developed by the public, primarily Cayucos, and seek to provide maximum public access, and protect existing public access, to the coast, the shoreline, the bay, and public recreation areas, consistent with the need to protect natural and agricultural resources and private property rights. The land use policies and programs are implemented through application of the CZLUO.

The Estero Area Plan does not provide specific planning area standards for development of bike paths; however, general standards would be applicable to development within the project corridor. The Estero Area Plan includes policies and programs to protect marine resources and provide coastal access, among other things. The land use policies and programs are implemented through application of the CZLUO. The Estero Area Plan's Rural Land Use and Circulation Policies encourage construction of the Morro Bay to Cayucos Class I Bike path, and the Coastal Access chapter includes policies for areawide planning of a bike path connecting Morro Bay and Cayucos. A more detailed listing of applicable circulation policies can be found in the Traffic and Circulation Section of this document. Generally, the proposed project is consistent with the Estero Area Plan policies.

### County of San Luis Obispo General Plan, Parks and Recreation Element

The purpose of the Parks and Recreation Element is to: (1) provide policy guidance regarding the provision of park and recreation services; (2) document the County's existing park and recreation resources, including those resources that are outside of the County's management; and (3) facilitate the evaluation of park and recreation needs during the land use decision process. The Parks and Recreation Element establishes goals, policies, and implementation measures for management, renovation, and expansion of existing, and development of new, parks and recreation facilities in order to meet existing and projected needs and to assure an equitable distribution of parks throughout the county.

The Element was adopted December 19, 2006, and the proposed Morro Bay to Cayucos Connector was identified as a proposed park, recreation, or natural area in the Parks and Recreation Project List. The project is also included as a “Proposed Public Facility” in the Parks and Recreation Element. The description directs the County to: “Provide a separated bicycle path near Highway 1 whenever a parallel local road is not available. Near Cayucos, the path should connect to the southerly end of either Ocean Boulevard or Studio Drive to Toro Lane in Morro Bay.” The proposed project is consistent with and encourages compliance with these goals.

### Bikeways Plan

The County has developed the Bikeways Plan in order to identify needed bikeway routes, accessory facilities such as bike parking, coordination with other modes of transportation, promotional and educational programs, and potential funding sources for these facilities and programs. The first plan was completed in the early 1990s and it has been updated completely several times since then. The plan recognizes and encourages a favorable quality of life through further enhanced use of bicycle transportation, which can lead to better air quality, reduced traffic, parking congestion and noise levels, and increased mental and physical health of those who ride. The Bikeways Plan shares many of the goals of the County General Plan Circulation Element, the San Luis Obispo County Air Pollution Control District’s (SLOAPCD) Clean Air Plan, the San Luis Obispo Council of Government’s (SLOCOG) Regional Transportation Plan, and the local surrounding cities’ Bikeways Plans as well as surrounding unincorporated communities’ circulation and planning studies. Together, these documents form an important resource as the base condition for bicycle transportation planning in the county.

The Morro Bay to Cayucos Connector project is a “Recommended Bikeway” in the County Bikeways Plan. It is described as a potential Class I bikeway and the Plan recommends Class I bike paths along Highway 1 whenever a parallel local road is not available. The Bikeways Plan identifies the section between Morro Bay and Cayucos as a Class II path with a substantial shoulder for most of the length, since Caltrans design standards call for an 8-foot shoulder. The plan recommends developing a parallel route to this section as adjacent roadways and properties are developed, combining Class II and III bikeways on parallel roads with Class I bikeways connecting them. The project includes construction of Class I, Class II, and Class III bike paths consistent with standards set forth in the Bikeways Plan.

### City of Morro Bay Circulation Element

The City of Morro Bay’s Circulation Element includes a number of policies guiding the development of walkways and bikeways. It refers to the Caltrans Highway Design Manual for design guidance. One program recommended in the element includes developing a “safe bike path through North Morro Bay”. The proposed project would further that program. Programs and policies in the Circulation Element are discussed further in the Transportation and Circulation section.

### City of Morro Bay Zoning Ordinance

The Morro Bay Zoning Ordinance sets forth regulations for areas within the Morro Bay city limits. The Zoning Ordinance regulates land uses, building height, setbacks, provisions of open space, and other factors that relate to development on individual properties. Under state law, cities and counties have broad latitude in establishing zoning standards and procedure. One key requirement, however, is that zoning regulations be consistent with the general plan. The Morro Bay Zoning Ordinance provides for a total of 18 primary districts, plus 13 overlay districts.



The proposed project currently extends through several zones and overlay districts, including the Single Family Residential District with a Special Building Site and Yard Standards overlay, and Open Area 1. The Zoning Ordinance has been codified through Ordinance 540, enacted May 27, 2008.

Pursuant to Chapter 17 of the City of Morro Bay's Zoning Ordinance, the proposed project must demonstrate consistency with the development standards contained therein. A Conditional Use Permit would be required for any development on coastal bluff properties. Applications for a Conditional Use Permit as required by Chapter 17.45 for development on bluff faces and bluff tops shall be accompanied by a geologic report prepared by a licensed engineering geologist or a professional civil engineer with expertise in soils and foundation engineering, or a registered geologist with a background in engineering applications.

## **3.2 CUMULATIVE ANALYSIS**

### **3.2.1 CEQA Requirements**

§15355 of the CEQA *Guidelines* defines "cumulative impact" as two or more individual effects that, when considered together, are considerable or will compound other environmental impacts. Cumulative impacts are changes in the environment that result from the incremental impact of development of the proposed project and all other nearby "related" projects. For example, the traffic impacts of two projects in close proximity may be insignificant when analyzed separately, but could have a significant impact when the projects are analyzed together.

CEQA *Guidelines* require that cumulative impacts shall be discussed when they are significant. The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as much detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness. The CEQA *Guidelines* state the following:

"Cumulative impacts include either option:

1. A list of past, present, and probable future projects producing related or cumulative impacts, including those projects outside the control of the agency, or
2. A summary of projections contained in an adopted general plan or related planning document or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency (§15130 (b)(1))."

### **3.2.2 Cumulative Development Scenario**

For the purposes of this EIR a qualitative discussion of community buildout and its relationship to the impacts discussed in Chapters 4 and Appendix F is more relevant as the list of past, present, and reasonably anticipated future projects is limited. For example, there are no

specific projects that would, along with the proposed project, cumulatively impact parking capacity within the project area. However, it is generally assumed in the EIR that buildout of Cayucos and Morro Bay, along with an increase in tourism from the Central Valley and other locations, would incrementally increase the demand for parking. One exception to this is the Chevron Marine Terminal Decommissioning project.

Activities associated with the decommissioning include excavating petroleum hydrocarbon-containing soil from three excavation areas east of Highway 1 adjacent to Toro Creek, removal or proper abandonment of beach and surfzone pipelines and associated facilities; and removal of the Pier Landing. The fencing and existing concrete pad would be removed, as would the wooden pilings and planking. Approximately 5,000 cubic yards of sand and soil would be excavated from inside the bulkhead prior to removal. This project is described further in the Hazards and Hazardous Materials section of Chapter 4. These activities would be short-term but could result in impacts to biological resources, cultural resources, release of hazardous materials. Removal of the Pier Landing bulkhead could affect bluff retreat conditions as well.

Potential cumulative impacts resulting from the cumulative development scenario are addressed in the individual issue area discussions that follow.

# CHAPTER 4

## ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

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The Environmental Impacts and Mitigation Measures section of this Environmental Impact Report (EIR) has been divided into sub sections, as follows:

- **Existing Conditions:** The description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation (NOP) is published (baseline physical conditions).
- **Regulatory Setting:** The regulations in force at the time the NOP is published. These are the applicable regulations governing each environmental topic, such as the Clean Air Act and its requirements for maintaining air quality. This is not an exhaustive analysis of the regulations, but rather information to assist the reader in understanding the potential impacts of the project from a regulatory perspective.
- **Thresholds of Significance:** The thresholds used to evaluate each environmental topic are based on Appendix G of the California Environmental Quality Act (CEQA) *Guidelines*, the County's Initial Study checklist, or are standard procedures related to existing regulations or are standards in the industry.
- **Impact Assessment and Methodology:** Methodology used to determine the impacts associated with the project, such as measurements or field investigative processes.
- **Project-Specific Impacts and Mitigation Measures:** These include the significant environmental effects of the proposed project, as further defined below. The impacts are identified and then are followed by the mitigation measures that can minimize significant impacts; mitigation measures must be enforceable and feasible. Where more than one mitigation measure could be used to reduce the significant effect, each should be discussed and rationale given for determining the preferable mitigation measure. In addition, there must be an essential nexus between the mitigation measure and a legitimate governmental interest, and the mitigation measure also must be "roughly proportional" to the impacts of the project.
- **Residual Impacts:** The statement of the level of impact, significant or insignificant, that is residual once mitigation is applied.
- **Secondary Impacts:** If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure are discussed in this section.
- **Cumulative Impacts:** The effects of the project when the project is considered along with those identified in the Cumulative Development Scenario.

All residual impacts in the EIR have been classified according to the following criteria (note: CEQA does not recognize a beneficial effect as an impact):

- **Significant and unavoidable impacts:** Significant impacts that cannot be fully and effectively mitigated. No measures could be taken to avoid or reduce these adverse effects to insignificant or negligible levels.
- **Less than significant impacts:** These impacts would be reduced to a less than significant level by the recommended mitigation measures. No additional mitigation is required.

The term “significance” is used throughout the EIR to characterize the magnitude of the projected impact. For the purpose of this EIR, a significant impact is a substantial or potentially substantial change to resources in the proposed project area or project vicinity. In the discussions of each issue area, thresholds are identified that are used to distinguish between significant and insignificant impacts. To the extent feasible, distinctions are also made between local and regional significance and whether or not impacts are short-term or long-term. Where possible, measures have been identified to reduce project impacts to less than significant levels. CEQA requires that public agencies should not approve projects as proposed if there are feasible mitigation measures available which would substantially lessen the environmental effects of such projects (CEQA Statute §21002). Included with each mitigation measure are the plan requirements needed to ensure that the mitigation is included in the plans and construction of the project and the required timing of the action (e.g., prior to development of final construction plans, prior to commencement of construction, prior to operation, etc.).

## **4.1 AESTHETIC RESOURCES**

The Aesthetic Resources section assesses visual impacts which may result from the proposed project. This analysis determines if a change in the visual environment would occur, whether that change would be perceived as a positive or negative one, and the significance of any change relative to the existing setting. Because limited improvements (i.e., signage) are proposed for Segments 1 and 5 the focus of the Aesthetic Resources section is on the potential for Segments 2, 3, and 4 to result in impacts to sensitive coastal visual resources, as seen from public roadways and viewing areas.

### **4.1.1 Existing Conditions**

The project site is located adjacent to the Pacific Ocean, in San Luis Obispo County, a largely rural area on California's central coast. The project area is a popular destination for visitors, in part due to its scenic variety and beauty. The diverse geologic features that characterize the project corridor include forms of volcanic rock (most notable is the Morro formation which includes Morro Rock, and extends southeast from Morro Bay to the City of San Luis Obispo), the rolling and steep hillsides of the Santa Lucia Range to the east, relatively broad valleys, marine terraces, and sand dunes.

The project site and surroundings include several features which provide value to the visual environment and viewing experience. These visual resources are important because they either support or enhance the natural visual character of the corridor, they are a unique or interesting example of their type, they function to screen or filter objectionable views, they have some degree of "landmark" characteristic, or they serve to define the project visual context as seen from the surrounding communities. Some of the visual resources have value mainly as seen from a distance, while others provide a close-in aesthetic benefit. Following are the primary broad-scale visual resources of the area.

#### **4.1.1.1 Highway 1**

Principal travel corridors are important to an analysis of aesthetic features because they define the vantage point for the largest number of viewers. Highway 1 is the most important transportation feature and travel route within the area and offers many scenic views to travelers. The highway, which traverses the study corridor, is designated within the County of San Luis Obispo's Local Coastal Plan as a visually scenic corridor to be protected. The Highway is also officially designated an "All American Road" within the National Scenic Byway program by the Federal Highway Administration and as a State Scenic Highway by the California Department of Transportation (Caltrans). The All American Road designation extends from the northern limits of the City of San Luis Obispo, north to the community of Carmel in Monterey County. North of Morro Bay, the highway offers striking views in both directions of the shoreline and ocean, as well as expansive views inland and up to the Santa Lucia Range. A point of particular viewing interest is Morro Rock, a state historic landmark within the City of Morro Bay. During clear days, views of the distant Irish Hills can be seen south and beyond Morro Rock. Highway 1 in the vicinity of the project corridor averages approximately 11,000 vehicles per day (Carr 2007.)

#### **4.1.1.2 Pacific Ocean and Coastal Bluffs**

The coastline of the Pacific Ocean within the project corridor is an exceptional area where the interface between land and water can be experienced in many different ways. Residents and visitors to the area have the opportunity to view the coastline, with its hillsides, terraces, bluffs,

creeks and dunes, from visual vantage points along the bluffs or further inland, from community beaches and from the water and the Morro Bay Harbor area. The strong visual image created by this blend is a unifying element, easily recognized and remembered, having fundamental importance and value.

#### **4.1.1.3 Morro Rock**

Morro Rock is the northernmost visible of nine extinct volcanic peaks that run in an approximately straight line for 12 miles, stretching from the City of Morro Bay to the City of San Luis Obispo. These peaks, known as the “Morros,” are approximately 21 million years old and separate the Los Osos and Chorro Valleys. The elevation of Morro Rock is 576 feet. It is also called “the Gibraltar of the Pacific” and is the most famous peak on the Central Coast. At one time it was surrounded by water; however, quarrying during the 1940’s is responsible for its current shape, and rock material from it supplied construction of breakwater structures in Morro Bay and Port San Luis. It is now home to the protected and Federally Endangered peregrine falcon.

#### **4.1.1.4 Santa Lucia Mountains**

The steep Santa Lucia mountain range is the major physical barrier dividing San Luis Obispo County into coastal and inland portions. It trends northwesterly to define the project corridors eastern visual boundary. The dark tones of the chaparral and oak woodlands that cover the slopes of the Santa Lucia Mountains provide contrast to the grasslands of the range’s lower slopes. This area is sparsely developed, as the steep slopes, dense vegetative cover, and lack of extensive transportation, infrastructure, and public service networks have historically limited urbanization and agricultural activity. This oak covered ridge is one of the important visual features of the project corridor. It is recognizable from the surrounding community, helps establish a natural scenic character for the area as well as the adjacent neighborhoods, provides visual variety and interest, and helps define spatial zones.

#### **4.1.1.5 Chevron Marine Terminal**

The Chevron Marine Terminal property in the vicinity of the project corridor includes a number of smaller one story structures, including an office, garage, small parking lot, storage facilities, fencing, limited signage, and some ornamental landscaping. Generally the structures are clustered on the south side of Toro Creek east of Highway 1. The Chevron Marine Terminal pier landing (Pier Landing) and associated fencing is located west of the highway. Landscaping, including a number of Monterey cypress partially shield the development from Highway 1.

#### **4.1.1.6 Topographic Variety of the Site**

The existing landforms of the Coast Range, marine terraces, and bluffs, offers visual interest as seen from both internal and external viewing locations, allows viewing opportunities from the elevated areas and visual enclosure at the lower elevations. Views of the hills or the Pacific Ocean in the distance are quite prevalent; they provide an attractive backdrop and visually frame the regional setting. The Caltrans cutslope, east of Highway 1 across from Segment 2 is the most prominent manmade topographic feature within the project corridor.



## **4.1.2 Regulatory Setting**

The project is located within the jurisdiction of the County of San Luis Obispo, the City of Morro Bay, and small portion of the project at Toro Creek may also fall within the Coastal Commissions Original Jurisdiction. The regulatory setting is defined in applicable planning policies and in California Environmental Quality Act (CEQA) Guidelines. The regulatory setting pertaining to visual resources includes review of the proposed project's consistency with respect to the City and County's implementation of CEQA, General Plans and Local Coastal Programs. Relevant documents also include the Estero-Coastal Area Plan, Title 23 County Coastal Zone Land Use Ordinance, and other supporting documentation.

### **4.1.2.1 State and National Scenic Designations**

In 1999, Highway 1 was designated by the State of California as an Officially Designated Scenic Highway. The County of San Luis Obispo promoted the designation based on the high level of existing visual quality along the corridor as well as the desire to protect its visual resources in the future. In 2003, Highway 1 was also bestowed the title of "All-American Road" in the National Scenic Byway program. This designation recognizes the visual characteristics of Highway 1 corridor as being among the highest quality in the nation. These designations illustrate the highest level of concern and sensitivity for the aesthetics within the project area and beyond. The state and national scenic designations for Highway 1 hinge on maintaining the high visual quality of the scenic corridor.

### **4.1.2.2 California Coastal Act**

Implementation of the Coastal Act is delegated to the County of San Luis Obispo through adoption of the County General Plan Local Coastal Program. Policy clarification regarding consideration of public views versus private views is provided by the California Coastal Commission concerning Section 30251 of the Coastal Act:

The primary concern under this section of the Act is the protection of ocean and coastal views from public areas such as highways, roads, beaches, parks, coastal trails and accessways, vista points, coastal streams and waters used for recreational purposes, and other public preserves rather than coastal views from private residences where no public vistas are involved.

### **4.1.2.3 County of San Luis Obispo Regulations**

The Local Coastal Program, Coastal Plan Policies, Chapter 10, Visual and Scenic Resources cite the California Coastal Act as follows:

30251 – Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of the surrounding areas, and where feasible, to restore and enhance visual quality in visually degraded areas.

The County of San Luis Obispo General Plan Agriculture and Open Space Element, OSP 24 lists Highway 1 as a candidate County "Scenic Corridor". The following summarizes open space policies which address the protection of vistas along Scenic Corridors:

- Locate structures, roads, and grading on portions of a site that minimize visual impact.
- Encourage the least obtrusive architectural/ structural solutions.
- Use natural landforms and vegetation to screen development. Where that cannot be done, it is preferred to screen development with native vegetation that is compatible with the scenic resource being protected and does not obstruct public vistas.
- Design structures with colors that are taken from the natural landscape.
- Minimize the visibility of utilities from public view corridors and place them underground where feasible.
- Minimize signs, especially freestanding signs, and locate them so they do not interfere with vistas from scenic corridors.

#### **4.1.2.4 City of Morro Bay Local Coastal Program**

Policy 12.01 of the City's Local Coastal Program (LCP), Visual Resources Chapter XIII reflects the Coastal Act standards, whose text is included in San Luis Obispo County's LCP Policy 30251 shown above.

### **4.1.3 Thresholds of Significance**

The significance of potential aesthetic resources impacts are based on thresholds identified within Appendix G of the CEQA *Guidelines*. According to the *Guidelines*, aesthetic impacts would be considered significant if the proposed project would:

- a. Have a substantial adverse effect on a scenic vista?
- b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- c. Substantially degrade the existing visual character or quality of the site and its surroundings?
- d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

### **4.1.4 Impact Assessment and Methodology**

Locations of critical project components were identified during field visits to the site using preliminary plan information and elevations provided by County Parks. Resulting from this initial review, representative viewpoints were determined for further analysis, based on dominance of the site within the view, duration of views, and expected sensitivity of the viewer group. Of those representative viewpoints, Key Viewing Areas (KVA) were selected which best illustrate the visual changes proposed by the project (refer to Figure 4.1-1). Photographs were taken from the KVAs, and photo-simulations were prepared illustrating the appearance of the project as proposed. Visibility of the surveyed reference flags was used to ensure accuracy of the photo simulations. The completed simulations were used to quantify potential project visibility and to

assess related impacts. The project site was then field-reviewed to assist in determining possible mitigation measures. Images of the existing views, along with photo-simulations of the proposed project can be seen in Figures 4.1-2a through 4.1-4b.

Photographic images and simulations included in this report are important tools for understanding the estimated appearance of the proposed project. It is important to note however that photographs do not represent the same level of visual acuity and sensitivity to detail as the human eye. As a result, photo-simulations tend to understate the anticipated perception of impacts.

Sensitivity to change in the visual environment varies with the viewer's activities and expectations. In determining the viewer sensitivity level for purposes of assessing visual impacts associated with this project, the number of viewers as well as exposure, duration and dominance of views were also considered.

### **4.1.5 Project-Specific Impacts and Mitigation Measures**

The project is proposed on a sensitive site in terms of viewer expectations and highway corridor aesthetic character. The majority of the project corridor (Segments 2, 3 and 4) is clearly visible from north and southbound Highway 1 and is within the foreground views of the Pacific Ocean and the adjacent coastal terrace. The location of Segments 2, 3, and 4 is also visible from the beach looking to the east towards the Santa Lucia Range. The discussion of impacts begins with a qualitative discussion of the potential visibility of the project from Highway 1 and west from the beach, includes photographs of the existing setting and simulations of the proposed project, and concludes with a discussion of the impacts to existing aesthetic resources, using the four thresholds of significance described above.

#### **4.1.5.1 Project Visibility**

##### **Views from Southbound Highway 1**

Segment 4 would first be visible from Highway 1 as motorists past the south end of Studio Drive. The bikeway at this northern portion of Segment 4 would be approximately ten feet below the grade of Highway 1, run parallel to the traffic lanes and be located from 50 to 120 feet away from the shoulder of the highway. These general conditions continue for most of Segment 4 and the northern portion of Segment 3. Existing views and the views after implementation of the proposed project are illustrated in Figure 4.1-2a and b, KVA 1. Views in this area include the coastal terrace in the foreground, but are dominated by the Pacific Ocean and more distant views of Morro Rock and the Irish Hills and Point Buchon beyond. Existing infrastructure and urban development in this area is limited to the highway and associated improvements. A few low structures on the Marine Terminal are visible to the east. Motorists can also see surfers, and pedestrians using the beach and the marine terrace

The proposed bridge across Toro Creek (Segment 3) would be visible from the southbound lanes of Highway 1; existing vegetation immediately north of the creek and adjacent to the highway currently shield views of the existing bridge until the motorist is nearly adjacent to it; however some of this vegetation would be removed to allow for construction of the bridge landing and bikeway north of the creek. The wire fabric bridge railings may extend approximately 24 inches above the existing bridge rails. The wire fabric is "no climb" grid, which is smaller than chain link, but can still be seen through.

Project improvements would be highly visible south of the Pier Landing due to the barrier and fencing system required in this area. The existing views from this portion of Segment 3 are of exceptional quality and include sweeping views of the Pacific Ocean, Estero Bay, Morro Rock and Point Buchon. The proposed project would replace the existing chainlink fence with the 32-inch tall barrier and 22-inch high wire fabric fence. The bikeway surface would not be visible as it is behind the barrier, however the barrier would dominate the foreground. The existing views and the views after implementation of the proposed project are illustrated in Figure 4.1-3a and b, KVA 2. This barrier system would be approximately 825 feet long. The barrier shown in Figure 4.1-3b is modeled after that in place on northbound Highway 101 at Ortega Hill in Santa Barbara County.

As motorists approach the urbanized area of the City of Morro Bay south of the barrier system (Segment 2), the proposed project would generally be below the grade of the highway and shielded by topography and existing vegetation, or would be unobtrusive due to its limited height above grade. Near the intersection of Yerba Buena the bikeway improvements would be seen as consistent with the existing aesthetics, which include substantial urban development.

#### Views from Northbound Highway 1

From northbound Highway 1 the proposed project would first be visible from the Yerba Buena intersection, the southern end of Segment 2. By the time motorists are 500 feet north of the intersection the bikeway would be 5 feet below the grade of Highway 1 and would not be visible. Views in this area are dominated by the Pacific Ocean and distant ridgelines to the north.

As motorists passed the Caltrans cutslope to the east, the barrier system would become visible. Due to its distance from the northbound lanes, and the fact that Highway 1 is higher in elevation and is sloping downward at this point, the prominence of the barrier system is reduced when compared to views from the southbound lanes. Existing views and simulations of the proposed project after implementation are illustrated in Figure 4.1-4a and b, KVA 3.

Given the distance of the bikeway from the northbound lanes, its relatively flat profile, and that the bikeway grade along the northern portion of Segments 3, and Segment 4, would generally be between five and ten feet below the grade of Highway 1 it would likely not be visible to the casual observer. The bridge over Toro Creek would be an exception. The new bridge at Toro Creek would be visible, with the wire mesh railing system rising approximately 24 inches above and adjacent to the existing southbound bridge railing. The two other free span bridge structures, located within Segment 4 would also be visible, but based on the elevations provided, the top of the railings would likely be slightly below the grade of the highway.

#### Views from the Beach

Generally beach users would be focused on views of the beach, ocean and horizon to the west, but views of the Coast Range and ridgelines, and Toro Creek to the east are exceptional and expansive. Because it is considerably higher than the beach, and has flat profile, Segment 2 which extends to the north end of the North Point Natural Area would not be visible from the beach. The improvements required for Segment 3 between the rip-rap and Highway 1 would be visible from the beach. A short retaining wall (approximately 2 feet tall) and 54-inch high wire mesh fence would be visible from the beach. These views are somewhat compromised already by the existence of the large area of riprap, exposed utility lines to the south, and chainlink fencing along the right of way. The bikeway improvements would generally be in the foreground, but expansive views of the hills and ridgelines would still dominate.

Figure 4.1.1- KVA Location Map

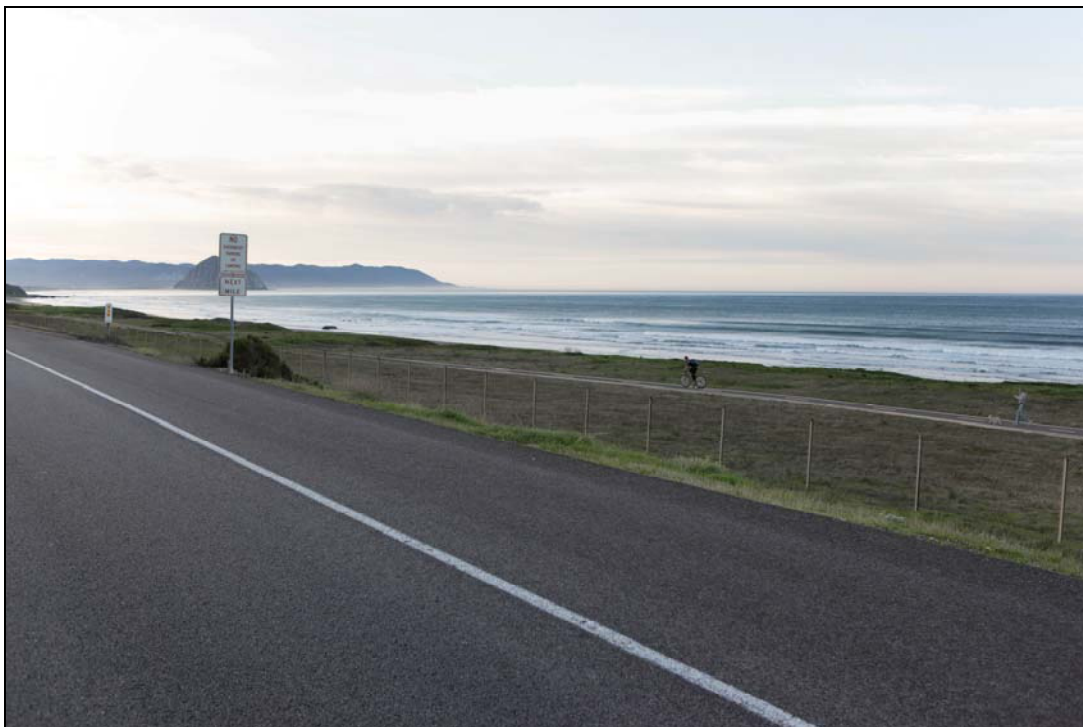




**Figure 4.1-2a. KVA 1 – Existing View**

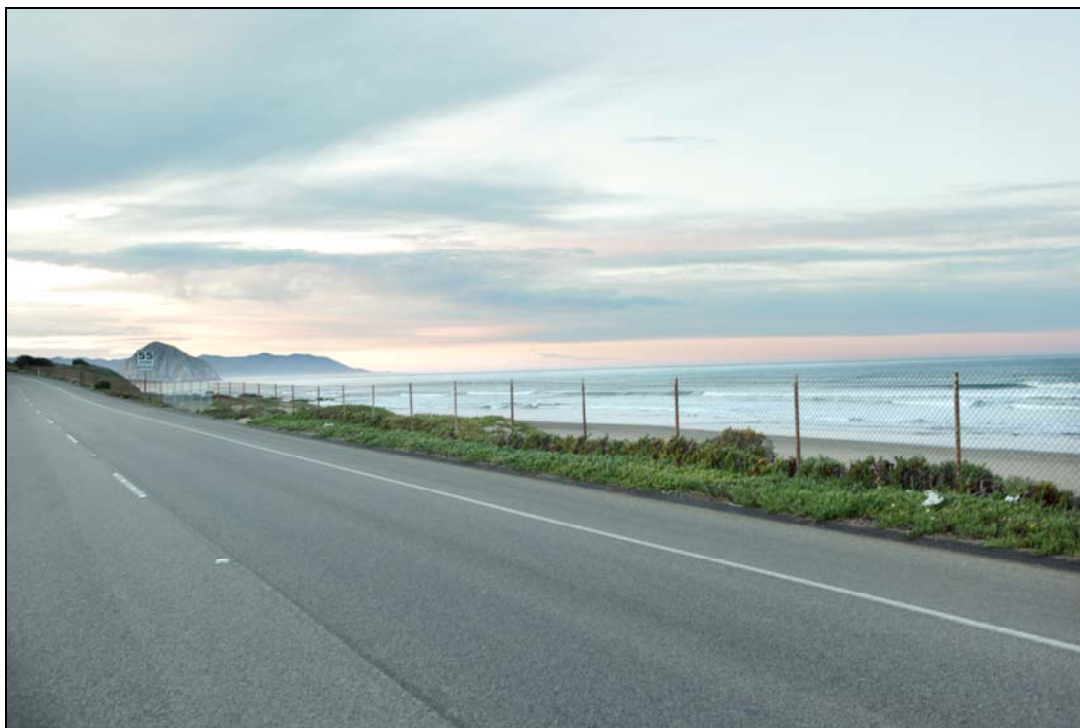


**Figure 4.1-2b. KVA 1 – Simulation**

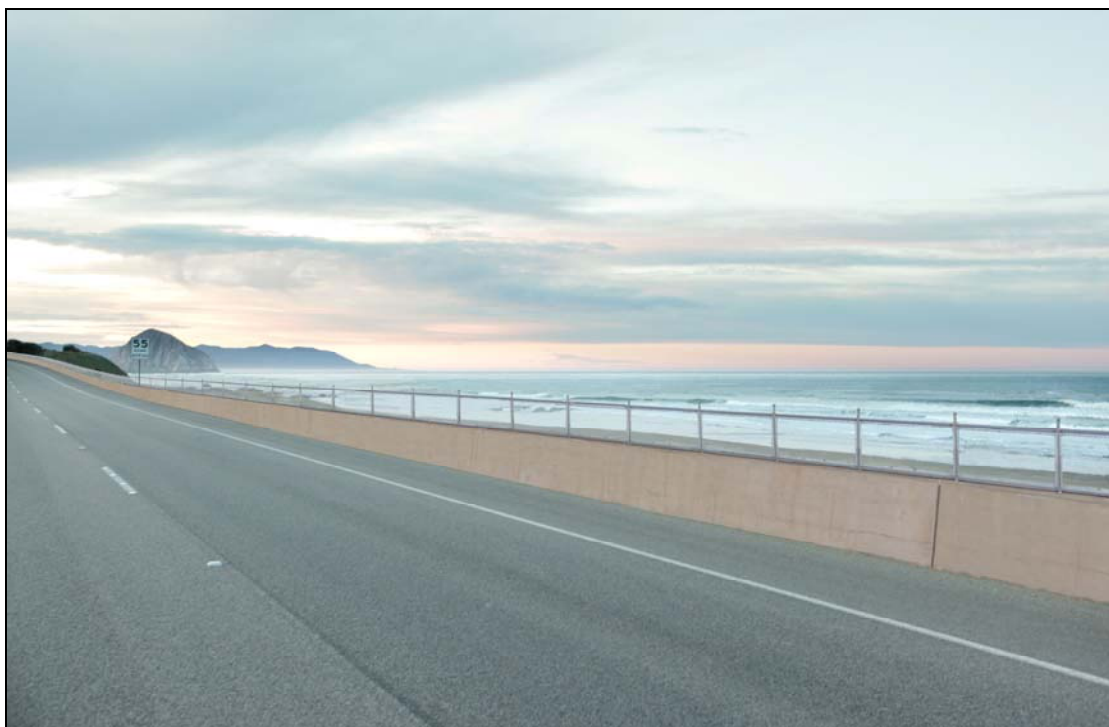




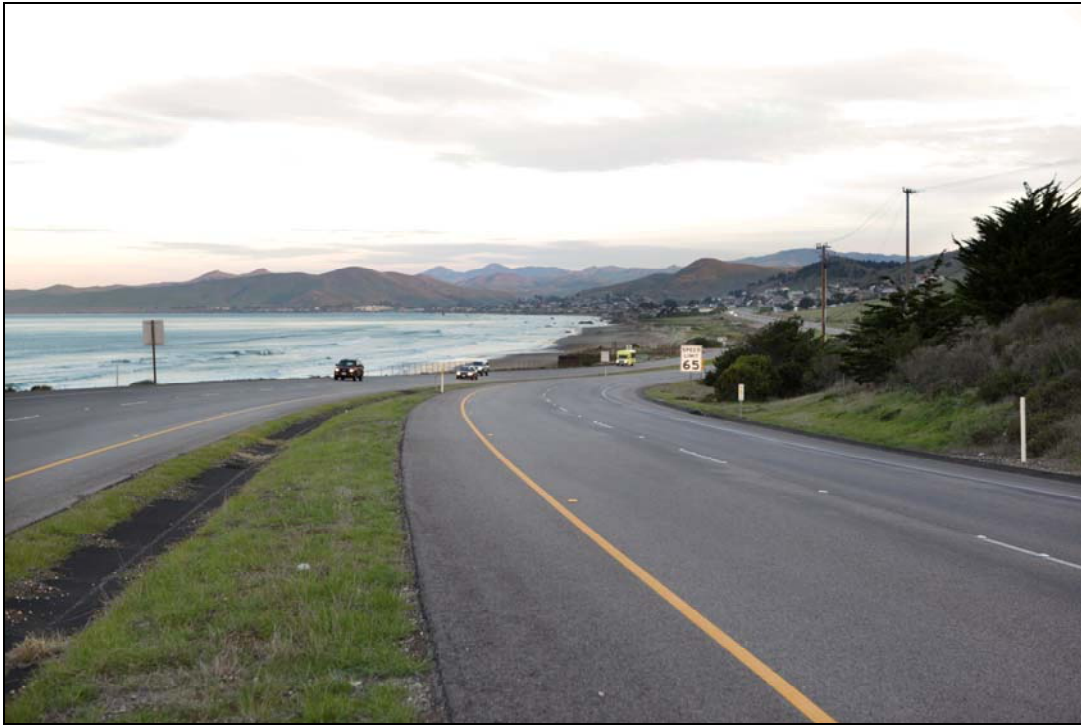
**Figure 4.1-3a. KVA 2 – Existing View**



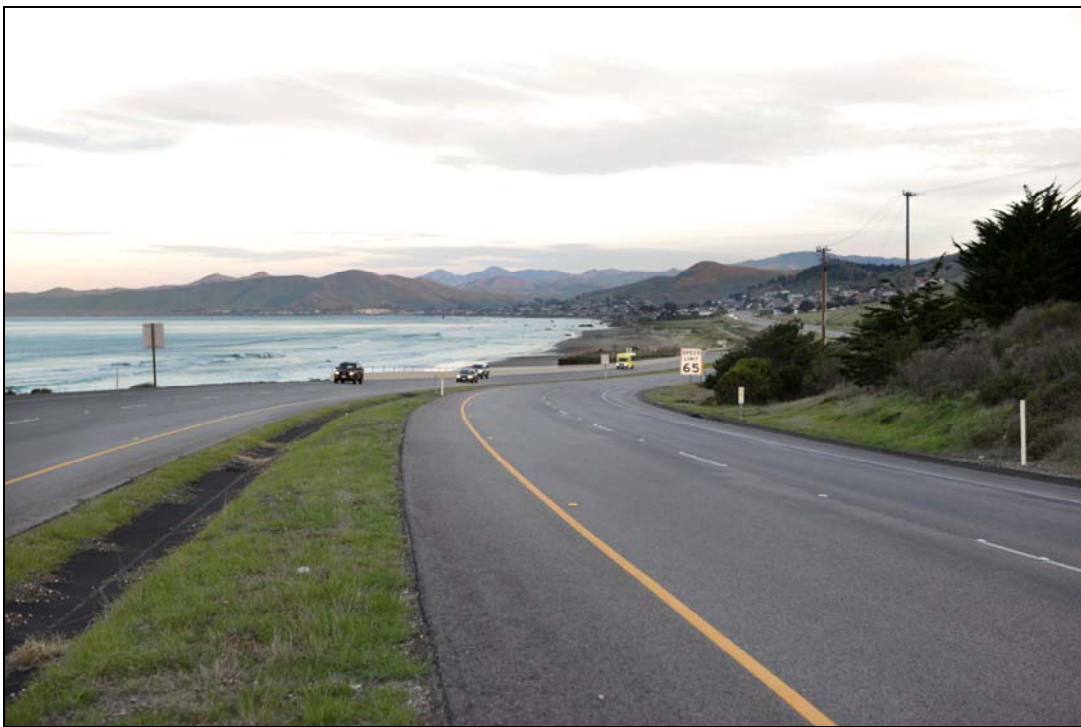
**Figure 4.1-3b. KVA 2 – Simulation**



**Figure 4.1-4a. KVA 3 – Existing View**



**Figure 4.1-4b. KVA 3 – Simulation**



The bridge over Toro Creek would be visible from the beach. Construction of the bridge and the bikeway would also require removal of some of the existing vegetation. The new bridge and the retaining walls required for the approach would be visible to beach users.

North of Toro Creek the proposed project would generally not be visible to the casual observer due to its distance from the beach, location on the terrace above the beach, and flat profile. However, it would be visible to those walking on the terrace. The two clear span bridges in Segment 4 would be visible for brief periods from the beach.

### Effects on Scenic Vistas

Scenic vistas exist throughout the project area and typify the highest quality aesthetic resources of the Central Coast which local and state regulations seek to protect. They include distant ridgelines, rolling hills, marine terraces and bluffs, sandy and rocky beaches, and the Pacific Ocean. The proposed project would increase public access opportunities and allow the public an additional location from which to view these scenic resources on foot or by bicycle.

Generally speaking, because of its relatively low profile and limited scale (8-feet wide paved surface) the proposed project would not impact the sweeping views of scenic vistas when viewed from Highway 1 and the beach. This is particularly true of Segments 2 and 4.

The improvements associated with Segment 3 are substantial enough that they would impact scenic vistas. As shown in Figure 4.1-3b the barrier required along the shoulder of the southbound lanes of Highway 1 would not block views of Morro Rock, silhouette above ridgelines or block the horizon; nonetheless, its form, including the vertical surface of the concrete wall, and its length, would alter the views and diminish the quality of an exceptional scenic vista where limited physical improvements currently exist. This is especially true when considering the perspective of the photo-simulation. So that the photo could accommodate the wide viewshed and distant but significant elements of the view at this location, it was taken from the inside lane of southbound Highway 1 from an elevation of approximately 54 inches (4.5 feet). The barrier would potentially be more dominant to motorists than depicted in 4.1-3b when viewed from the outside lane.

**AR Impact 1      Construction of the barrier between the Pier Landing and the North Point Natural Area would result in significant unavoidable impacts to scenic vistas.**

*AR/mm-1      Prior to initiation of construction the General Services Agency shall provide the specific barrier plan to the Department of Planning and Building, Caltrans, and the City of Morro Bay for review and approval. The plan shall:*

- *recommend the shortest barrier and railing combination allowed by Caltrans;*
- *soften the appearance of the barrier through use of “sandy beach” or similar muted-color concrete;*
- *minimize vertical elements (supports) and the use of embellishment (finials, etc.); and*
- *reduce the reflectivity of the vertical railing elements through treatment of the materials.*

## Residual Impact

Implementation of this measure would reduce impacts to scenic resources by ensuring that the barrier would be as unobtrusive as possible both in color and form. In some cases, these barriers are textured so that they better blend with the surrounding environment. This was done along Highway 1 approximately eight miles to the south, where it was determined that adding texture (fake stone) and using appropriate colors softened the appearance of a barrier placed between the north and south bound lanes. In this case, because the viewshed includes the ocean and beach, texturing the barrier may draw attention to it. Instead, the mitigation measure has been crafted to minimize the appearance of the barrier through use of the appropriate colors. Additional mitigation measures are limited. Safety concerns and Caltrans standards require a relatively substantial barrier, and the terrace width is limited in this area so the bikeway cannot be “pushed back” from the highway. As a result of this and the high viewer sensitivity of those travelling on Highway 1 or using the beach, impacts would be *significant and unavoidable*.

### **4.1.5.2 Damage Scenic Resources within a State Scenic Highway**

The State of California has officially designated Highway 1 a State Scenic Highway; however trees, rock outcroppings, and structures are limited within the project area of disturbance. Morro Rock is a local and state landmark but it is located a great distance from the project and is considered in discussions of scenic vistas. The proposed project would not be located adjacent to or remove structures such as barns or houses which would be considered scenic or contribute to the scenic resources. The existing chainlink fence along the Highway 1 right-of-way would be removed and replaced with the safety barrier in some places. *Impacts would be less than significant*. No mitigation is required.

### **4.1.5.3 Degrade the Existing Visual Character or Quality**

Degradation of the visual quality of the area in this section is considered over the entire length of the project corridor. That is, the changes to the aesthetic resources that would result from development of the proposed project components are considered in the context of the visual resources of the entire site and surrounding area. The project site and surroundings can be characterized as exceptional from an aesthetic resources perspective. Expansive views of rolling hills, ridgelines, sandy beaches, and the ocean exist from most vantage points along this portion of Highway 1, northbound and southbound, and from the beach. Other resources, including the riparian vegetation of Toro Creek and the landmark Morro Rock also contribute to the high visual quality of the site and surroundings.

Project components that may degrade these resources include retaining walls, the barrier, bridges over Toro Creek and two other drainages, signage, and the long linear paved bikeway surface. Other than the barrier, which has been previously discussed, none of these improvements individually would necessarily degrade the visual character of the area. However given the high quality of the existing visual character and the high sensitivity of those who would be travelling along Highway 1, using the bikeway, or the beach, small changes would result in significant impacts. Generally speaking, these improvements would increase the perception of development of a segment of coastline bounded by two urban areas, but would likely be considered “natural” by local residents and tourists. Additional signage, retaining walls, and the bridges proposed would not block views of the ocean or the hills, silhouette along ridgelines or view lines, or look particularly out of place in the setting; however each component would contribute to a more developed appearance of the project corridor.

**AR Impact 2      Construction of the various bikeway improvements would degrade the existing visual quality of the area and result in significant impacts.**

*AR/mm-2      Prior to initiation of construction the General Services Agency shall submit a plan detailing proposed signage type and location, retaining wall design, and bridge design to the Department of Planning and Building and the City of Morro Bay for review and approval. Signage shall be no higher than 42 inches, minimized and focused at existing developed area (i.e. North Point Natural Area, the south end of Studio Drive, etc.). Retaining walls shall be colored “sandy beach” or a similar muted color, and/or textured concrete to minimize their contrast with the surrounding landscape. Bridge railing shall be the lowest allowed considering safety requirements, and shall be a muted color.*

**Residual Impact**

Implementation of this measure would reduce impacts to the visual quality of the area. The Toro Creek bridge would be located adjacent to the existing Highway 1 bridge, and the two other bridges would be limited in size and profile. Based on the relatively limited topographic changes, retaining walls would also be of limited size. Implementation of AR/mm-2, impacts would be *less than significant*. No additional mitigation is required.

**4.1.5.4 Create a New Source of Substantial Light or Glare**

The vertical surface of the barrier could potentially reflect light in the evening. However during sunset viewers would likely be looking west. It may also partially block headlights from vehicles on Morro Bay, improving the user experience in the evening hours. In addition, the wall is at some distance from the viewer and would be partially screened by topography and the outside railing of the bikeway. The proposed project would not include any new lighting or large surfaces that could reflect light or add glare to the project area or surroundings. Impacts would be *less than significant*. No mitigation measures are required.

**4.1.6 Cumulative Impacts**

The discussion of cumulative impacts relates to the potential for implementation of the proposed project to contribute to an aggregate change in visual quality of the area. The Highway 1 corridor through the north coast of San Luis Obispo County has undergone relatively few visual changes over recent years. Development of residences within the community of Cayucos and the City of Morro Bay has been the most common form of new development. The area where Segments 3 and 4 would be located has seen little to no development in the last 20 years.

The proposed project would introduce a variety of new visual elements into the public view. In general, the most potentially noticeable new elements would be the barrier and the bridges. Proposed improvements such as the parking areas, retaining walls, and signage would contribute to a slightly more developed look from roads and beaches.

The mitigation measures identified in this aesthetic resources section reduce potential cumulative visual impacts and noticeability of the project. Restoration of the remnant road in the North Point Natural Area, a component of the proposed project, would offset some of the proposed developments visual impact on the area. The barrier system along the southbound lanes of Highway 1 has been identified as a significant and unavoidable project-specific impact;

however given that there is not likely to be additional development in this area, west of Highway 1, between the community of Cayucos and the City of Morro Bay, this impact would not contribute to a cumulative degradation of aesthetic resources. Cumulative impacts would be *less than significant*. No additional mitigation is required.



## **4.2 AIR QUALITY**

The following section describes the existing air quality setting in San Luis Obispo County and the potential short-term and long-term impacts associated with development of the proposed project. Short-term construction emissions would result from grading and construction operations, transport of materials, and construction-related vehicle emissions. Long-term operational emissions would result from vehicle emissions. Emission rates were generated using standard emission factors and the URBEMIS2007 (version 9.2) modeling program, as applicable. URBEMIS data sheets and other emission calculations are included in Appendix C. The air quality analysis is based on information provided by County Parks, the County of San Luis Obispo, and the San Luis Obispo County Air Pollution Control District (SLOAPCD).

### **4.2.1 Existing Conditions**

San Luis Obispo County constitutes a land area of approximately 3,316 square miles with varied vegetation, topography, and climate. From a geographical and meteorological standpoint, the County can be divided into three general regions: the Coastal Plateau, the Upper Salinas River Valley, and the East County Plain. Air quality in each of these regions is characteristically different, although the physical features that divide them provide only limited barriers to the transport of pollutants between regions.

Approximately 75 percent of the County population and a corresponding portion of the commercial and industrial facilities are located within the Coastal Plateau. Due to higher population density and closer spacing of urban areas, emissions of air pollutants per unit area are generally higher in this region than in other regions of the County. The project location is located within the Coastal Plateau.

#### **4.2.1.1 San Luis Obispo County Air Quality Monitoring**

The County's air quality is measured by multiple ambient air quality monitoring stations, including one in Morro Bay, close to the proposed project. There are four SLOAPCD operated permanent stations, two state-operated permanent stations, two special stations, and one station operated by Tosco Oil Refinery for monitoring Sulfur Dioxide (SO<sub>2</sub>) emissions. Air quality monitoring is rigorously controlled by Federal and State quality assurance and control procedures to ensure data validity. Gaseous pollutant levels are measured continuously and averaged each hour, 24 hours a day. Particulate pollutants are generally sampled by filter techniques for averaging periods of three to 24 hours. PM<sub>10</sub> (inhalable particulate matter 10 microns or less in size) and PM<sub>2.5</sub> (inhalable particulate matter 2.5 microns or less in size) are sampled for 24 hours every sixth day on the same schedule nationwide.

#### **4.2.1.2 San Luis Obispo County Existing Air Quality**

The significance of a given pollutant can be evaluated by comparing its atmospheric concentration to State and Federal air quality standards, which are presented in Table 4.2-1. These standards represent allowable atmospheric contaminant concentrations at which the public health and welfare are protected, and include a factor of safety.

In San Luis Obispo County, ozone and PM<sub>10</sub> are the pollutants of main concern, since exceedances of state health-based standards for those are experienced here in most years. For this reason the County has been designated as a non-attainment area for the State PM<sub>10</sub> standard. The County is in attainment for all other standards.

The following summary is taken from the most recently completed (2007) Annual Air Quality Report prepared by the SLOAPCD:

“Although most populated areas of San Luis Obispo County enjoyed good air quality this year, ozone levels exceeding both federal and state standards were measured on numerous days in north county inland areas due to locally formed as well as transported pollution. Two days exceeding the federal 8-hour ozone standard of 0.08 parts per million (ppm) were recorded in 2007: one federal 8-hour exceedance day was recorded at the Carrizo Plains station and two exceedance days at the Red Hills station. Exceedance of the more stringent state 8-hour ozone standard of 0.070 ppm occurred on 45 days: 31 days at the Carrizo Plains station; 32 days at the Red Hills station; one exceedance day in Atascadero, and one exceedance day in Paso Robles. There was no measured exceedance of the state one hour ozone standard of 0.09 ppm in 2007.”

#### **4.2.1.3 Global Climate Change**

The issue of global climate change has recently been debated and discussed on the local, state, national, and international level. These changes are caused by the buildup of gases in the atmosphere that trap heat, similar to a greenhouse. These “greenhouse gases” include carbon dioxide, methane, nitrous oxide and others. A portion of them exist naturally and help regulate the temperature of the earth (Association of Environmental Professionals [AEP] 2007). Emissions from human activities, such as burning fossil fuels, have elevated greenhouse gas levels. The effects of global warming are unclear at this time, but there is strong evidence to suggest that it could result in, among other things:

- Increased average temperatures
- Extreme heat and cold waves
- The spread of infectious diseases such as malaria and yellow fever
- Drought

These changes to temperature and rainfall patterns may in turn change the geography of habitats, increasing and/or decreasing habitat types in relatively short period of times. They may also affect the distribution of agricultural regions, making production more difficult in areas that are currently major producers (Environmental Protection Agency [EPA] 2006). Currently, no complete greenhouse gas inventory for San Luis Obispo County exists, although efforts are being made to develop one. Local efforts to quantify and reduce greenhouse gas (GHG) emissions have primarily been undertaken by the SLOAPCD.

**TABLE 4.2-1. Ambient Air Quality Standards**

Pollutant	Averaging Time	California Standards <sup>1</sup>	National Standards <sup>2</sup>	
		Concentration <sup>3</sup>	Primary <sup>3,4</sup>	Secondary <sup>3,5</sup>
<b>Ozone (O<sub>3</sub>)</b>	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	0.12 ppm (235 µg/m <sup>3</sup> ) <sup>6</sup>	Same as Primary Standard
	8 Hour	-----	0.08 ppm (157 µg/m <sup>3</sup> )	
<b>Fine Particulate Matter (PM<sub>2.5</sub>)</b>	24 Hour	No California Standards	65 µg/m <sup>3</sup>	Same as Primary Standard
	Annual arithmetic mean		15 µg/m <sup>3</sup>	
<b>Respirable Particulate Matter (PM<sub>10</sub>)</b>	Annual geometric mean	30 µg/m <sup>3</sup>	-----	
	24 Hour	50 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>	
	Annual arithmetic mean	-----	50 µg/m <sup>3</sup>	
<b>Carbon Monoxide (CO)</b>	8 Hour	9.0 ppm (10 mg/m <sup>3</sup> )	9 ppm (10 mg/m <sup>3</sup> )	-----
	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	35 ppm (40 mg/m <sup>3</sup> )	
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>	Annual arithmetic mean	-----	0.053 ppm (100 µg/m <sup>3</sup> )	Same as Primary Standard
	1 Hour	0.25 ppm (470 µg/m <sup>3</sup> )	-----	
<b>Lead</b>	30 day average	1.5 µg/m <sup>3</sup>	-----	-----
	Calendar quarter	-----	1.5 µg/m <sup>3</sup>	Same as Primary Standard
<b>Sulfur Dioxide (SO<sub>2</sub>)</b>	Annual arithmetic mean	-----	0.030 ppm (80 µg/m <sup>3</sup> )	-----
	24 Hour	0.04 PPM (105 µg/m <sup>3</sup> )	0.14 PPM (365 µg/m <sup>3</sup> )	-----
	3 Hour	-----	-----	0.5 ppm (1300 µg/m <sup>3</sup> )
	1 Hour	0.25 PPM (655 µg/m <sup>3</sup> )	-----	-----
<b>Visibility Reducing Particles</b>	8 Hour (10 am to 6 pm, PST)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer – visibility of ten miles or more due to particles when the relative humidity is less than 70 percent.	No National Standards	
<b>Sulfates</b>	24 Hour	25 µg/m <sup>3</sup>		
<b>Hydrogen Sulfide</b>	1 Hour	0.03 PPM (42 µg/m <sup>3</sup> )		

## NOTES:

1. California standards for ozone, carbon monoxide, sulfur dioxide (1- and 24-hour), nitrogen dioxide, respirable particulate matter (PM<sub>10</sub>), and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded.
2. National standards, other than ozone, fine particulate matter (PM<sub>2.5</sub>), and those based on annual averages or annual arithmetic mean, are not to be exceeded more than once a year. The 1-hour ozone standard is attained when the expected number of days per calendar year with maximum hourly concentrations above the standard is equal to or less than one. The 8-hour ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM<sub>2.5</sub> the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national Policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 mm of mercury (1,013.2 millibar). Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 mm of mercury; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
5. National Secondary Standards: The levels of quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
6. New national 8-hour ozone and fine particulate matter standards were promulgated by U.S. EPA on July 18, 1997. The national 1-hour ozone standard continues to apply in areas that violated the standard. Contact U.S. EPA for further clarification and current national policies.

Source: CARB

## **4.2.2 Regulatory Setting**

### **4.2.2.1 Federal Policies and Regulations**

Air quality protection at the national level is provided through the Federal Clean Air Act Amendments (CAAA). The current version was signed into law on November 15, 1990. These amendments represent the fifth major effort by the U.S. Congress to improve air quality. The 1990 CAAA are generally less stringent than the California Clean Air Act. However, unlike the California law, the CAAA set statutory deadlines for attaining federal standards. The 1990 CAAA added several new sections to the law, including requirements for the control of toxic air contaminants; reductions in pollutants responsible for acid deposition; development of a national strategy for stratospheric ozone and global climate protection; and requirements for a national permitting system for major pollution sources.

### **4.2.2.2 State Policies and Regulations**

The CCAA was signed into law in September of 1988. It requires all areas of the State to achieve and maintain the California ambient air quality standards by the earliest practicable date. These standards are generally more stringent than the Federal standards; thus, emission controls to comply with the State law are more stringent than necessary for attainment of the Federal standards. The CAAA requires that all APCDs adopt and enforce regulations to achieve and maintain the State ambient air quality standards for the area under its jurisdiction. Pursuant to the requirements of the law, the SLOAPCD adopted a Clean Air Plan (CAP) for their jurisdiction.

### **4.2.2.3 Local Policies and Regulations**

The Final 2001 San Luis Obispo County CAP is used by the SLOAPCD to address attainment of national and State fugitive dust ( $PM_{10}$ ) and ozone standards for the entire County (SLOAPCD 2003). The CAP is a comprehensive planning document intended to provide guidance to the SLOAPCD and other local agencies, including the County of San Luis Obispo, on how to attain and maintain the State standard for ozone and  $PM_{10}$ . The CAP presents a detailed description of the sources and pollutants which impact the jurisdiction, future air quality impacts to be expected under current growth trends, and an appropriate control strategy for reducing ozone precursor emissions, thereby improving air quality.

## **4.2.3 Thresholds of Significance**

The significance of potential air quality impacts are based on thresholds identified within Appendix G of the California Environmental Quality Act (CEQA) *Guidelines* and standards established within the SLOAPCD CEQA Air Quality Handbook (2009). The specifics of these guidelines are defined below.

### **4.2.3.1 California Environmental Quality Act Guidelines**

Appendix G of the CEQA *Guidelines* provides the following thresholds for determining significance with respect to air quality. Air quality impacts would be considered significant if the proposed project would:

- a. Conflict with or obstruct implementation of the applicable air quality plan;
- b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation;

- c. Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- d. Expose sensitive receptors to substantial pollutant concentrations; or,
- e. Create objectionable odors affecting a substantial number of people.

#### 4.2.3.2 SLOAPCD CEQA Air Quality Handbook

The CEQA Air Quality Handbook (2009) defines thresholds for short-term construction related emissions. Use of heavy equipment and earth-moving operations during project construction can generate fugitive dust and combustion emissions that may have substantial temporary impacts to local air quality. Fugitive dust emissions result from land clearing, demolition, ground excavation, cut and fill operations, and equipment traffic over temporary roads at the construction site. Table 4.2-2 summarizes the level of construction-related emissions requiring mitigation.

**Table 4.2-2 Level of Construction Activity Requiring Mitigation**

Pollutant	Threshold	
	Daily (lbs.)	Quarterly (tons)
ROG and NOx	137	2.5
Diesel Particulate Matter (DPM)	7	0.13
Fugitive Particulate Matter	N/A	2.5
Greenhouse Gases	Not Yet Established	

To determine whether or not an analysis of long term operational emissions thresholds was necessary for the proposed project, Table 1-1 of the CEQA Air Quality handbook was consulted. Table 1-1 indicates projects (by type and size) that would typically exceed operational thresholds. Recreational projects identified in that table that most closely resemble the proposed project include “City Park”. Based on the Table 1-1 of the handbook, a City Park of 69 acres would generate operational emissions that would exceed SLOAPCD thresholds. The proposed project is considerably smaller than 69 acres. The impacts section is therefore limited to a qualitative discussion.

#### 4.2.3.3 Greenhouse Gas Emissions

At the current time there is no regulatory guidance available to assist lead agencies in establishing thresholds of significance for greenhouse gas emissions that result from proposed projects. Given the significant amount of greenhouse gases emitted on a daily basis worldwide, it seems unlikely that an individual project could impact global climate change. At the same time, it seems reasonable to assume that nearly all projects that involve the consumption of fossil fuels, for example, would contribute cumulatively to global warming.

## 4.2.4 Impact Assessment and Methodology

Through the scoping process, the SLOAPCD has recommended that a quantified air quality assessment be prepared for the proposed project. The URBEMIS air quality modeling program was used to quantify potential construction emissions. Potential earthwork and a conceptual reasonable worst case scenario construction were developed so that the modeling could be performed. Operational emissions were not quantified as the proposed project is a bikeway and is considerably smaller than a recreational project that would typically exceed operational emissions thresholds established by the SLOAPCD.

The project components were also reviewed to identify whether or not SLOAPCD regulations regarding issues such as developmental burning and disturbance of naturally-occurring asbestos, among others, are relevant. Finally, the proposed project was evaluated for consistency with the County's CAP.

## 4.2.5 Project-Specific Impacts and Mitigation Measures

### 4.2.5.1 Short-term Construction Emissions

#### Combustion Emissions (ROG and NOx) and Dust (PM10)

The URBEMIS modeling program was used to determine the potential emissions resulting from construction of the project. The results of the modeling are summarized in table 4.2-3 below. The URBEMIS data sheets, including defaults selected and other parameters used are included in Appendix C. The daily emissions below include a worst case scenario during a week when grading and paving occurring simultaneously.

**Table 4.2-3. Short-term Construction Emissions**

Activity	Length of Activity	Emission Estimates (lbs/day)		
		ROG and NOx	DPM	PM10 (Dust)
Grading/Paving	8 weeks	30	3.28	40.43
Threshold		137	7	N/A

These results indicate that construction activities would result in emissions substantially below SLOAPCD thresholds. However, because San Luis Obispo County is already in non-attainment for PM<sub>10</sub> dust generated by the proposed project would still be considered a potentially significant impact. County code already requires dust control to be implemented for all grading projects. There is no indication that measures beyond those already required by ordinance would be required. Impacts would be *less than significant*.

#### Naturally-Occurring Asbestos Exposure

The Environmental Constraints Analysis (ECA) prepared for the project also noted the presence of geologic formations that may include naturally-occurring asbestos. The project site has been



identified by the SLOAPCD as an area that has the potential to contain naturally occurring asbestos. Construction and development of the project could result in an exposure of naturally occurring asbestos due to earthwork and the excavation of serpentine rock.

**AQ Impact 1      Earth moving activities for development of the proposed project components would result in grading activities that may expose naturally occurring asbestos, resulting in an indirect short-term impact.**

*AQ/mm-1      Prior to initiation of construction, the General Services Agency shall:*

- a. Conduct a geologic analysis to ensure the presence/absence of serpentine rock onsite. The geologic analysis shall identify if naturally occurring asbestos is contained within the serpentine rock onsite; and, if found, the applicant must comply with all requirements outlined in the Asbestos Airborne Toxic Control Measures (ATCM). In addition, the applicants shall work with the SLOAPCD to prepare a SLOAPCD-approved Asbestos Health and Safety Program and an Asbestos Dust Control Plan prior to development plan approval.*

**Residual Impact**

Implementation of this measure would reduce impacts associated with naturally-occurring asbestos to a *less than significant* level.

**4.2.5.2 Long-term Operational Emissions**

The proposed project includes a multi-use trail intended to provide a link between existing bikeways and other recreational facilities. It would provide an alternative transportation link separate from vehicles, between the City of Morro Bay and the community of Cayucos. Because trail users would be travelling on foot or by bicycle no vehicle-related operational emissions would result from direct use of the bikeways. Some users would reach the bikeway by vehicle, and while some of these vehicle trips would have otherwise been made to the same facilities, the project would still generate additional vehicle trips. A precise number of daily trips that would be generated by the project is difficult to estimate, but the number would vary considerably throughout the year. Use of the existing trails and beach is highest on weekends and holidays, and this would still be the case if the bikeway were constructed.

The Bob Jones bikeway near the community of Avila Beach is a local project with some similar characteristics to the proposed project. The main parking lot used to access the Bob Jones bikeway holds approximately 50 cars (when the unpaved portion is utilized), and can be at capacity during peak summer weekend periods. Use of the Bob Jones bikeway is likely higher than the proposed project because it is an entirely Class I bikeway, completely separated from traffic, and the terminus at downtown Avila Beach includes substantial recreational and urban amenities. It also draws from the larger communities of San Luis Obispo and Pismo Beach.

If the proposed project generated new trips, possibly 50 on busy weekend days and five on weekdays, the project would generate a total of 125 trips per week, or 18 per day. Based on County standard trip generation rates, a single family residence generates up to 10 trips per day. Therefore the proposed project would result in fewer trips and associated vehicle emissions than are generated by two new single family residences. Even if the project generated 100 new trips on weekends and five on weekdays (225 trips total per week), the project would result in the same number of trips as three or four single family residences.

In addition, the projects ability to connect existing bicycle and other recreational facilities could potentially reduce the number of vehicle trips currently made between Morro Bay and Cayucos that are currently made by vehicle. Long term operational impacts resulting from the proposed project would be *less than significant*. No mitigation measures are required.

#### **4.2.5.3 Greenhouse Gas Emissions**

The proposed project is generally limited to open space and recreational uses. Construction emissions would be relatively insignificant, as noted in Table 4.2-3. Daily use of the proposed project would not necessarily generate any greenhouse gas emissions, as bikeway users would be on foot or bicycle. Based on the type of project proposed, the projects contribution to the generation of greenhouse gases would be *less than significant*.

#### **4.2.5.4 Consistency with County Clean Air Plan**

In the CEQA Air Quality Handbook, the SLOAPCD recommends evaluating consistency with the CAP by evaluating the following questions:

Are the population projections used in the plan or project equal to or less than those used in the most recent CAP for the same area?

The proposed project is a recreational facility intended to serve the existing and future populations. The proposed project would not have a direct or indirect affect on local or regional populations. This question is not relevant to the proposed project.

Is the rate of increase in vehicle trips and miles traveled less than or equal to the rate of population growth for the same area?

The proposed project may attract some vehicle trips that would have previously gone to another recreational facility but would also generate additional trips. Trips would not increase at a rate faster than the rate of population growth. The proposed project may reduce vehicle trips because it provides an alternative transportation link between Morro Bay and Cayucos.

Have all applicable land use and transportation control measures and strategies from the CAP been included in the plan or project to the maximum extent feasible?

The proposed project provides an opportunity to use alternatives to the private automobile for both commuting and recreational activities. By design it encourages walking and bicycling, not use of the automobile. In this sense the project is a transportation control technology. The proposed project is consistent with the CAP.

#### **4.2.6 Cumulative Impacts**

Potential construction-related air quality impacts are location-specific to the extent that they may temporarily result in significant impacts on the localized environment; however, based on the size of the project, the impacts are not considered project or cumulatively significant. Based on the location and type of project proposed, the project-specific contribution to the generation of greenhouse gases would also not be significant. The proposed project's contribution to cumulative air quality impacts would be *less than significant*. No mitigation is required.

## 4.3 BIOLOGICAL RESOURCES

This section evaluates the proposed project to identify project-related impacts to biological resources. Segments 1 and 5 would be located entirely within existing roadways, parking areas, or bikeways. Segments 2, 3, and 4 would require construction of a new bikeway in areas where some dirt trails exist, but would be considered “undeveloped” in regards to biological resources. Due to the urbanized setting and lack of biological resources in Segments 1 and 5, further discussion of these segments is not included in this section.

The following describes biological resources and associated regulatory environment that exist within the project corridor. The project corridor includes the proposed alignment of Segments 2, 3, and 4 and areas extending west of the alignment to the mean high tide line and east approximately 250 feet and is depicted in Figures 4.3-1 through 4.3-3. Biological resources within the project area are intensive. To keep this section accessible to the public, technical information has been summarized in this section. More detailed technical information, such as species tables and specific descriptions of sensitive species, is provided in Appendix D.

### 4.3.1 Existing Conditions

The project corridor is bisected by Highway 1. To the east of Highway 1, the Santa Lucia Range foothills slope down toward the highway. The foothills support annual grasslands and patches of coastal scrub. Areas west of Highway 1 consist of disturbed coastal bluffs that support grasslands and sporadic occurrences of coastal bluff scrub. Sand dunes and the beach are located just below the bluffs. The bluffs, dunes, and beach have been disturbed by passive recreational use and a number of dirt volunteer trails exist. Several ephemeral drainages have their headwaters in the foothills, travel under Highway 1 in culverts and terminate at the beach. Toro Creek conveys much of the flow from the Coast Range under the highway and onto the beach.

The elevation of the project corridor ranges from zero to approximately 40 feet. According to the *Soil Conservation Service Soil Survey of San Luis Obispo County, California Coastal Part* (Natural Resources Conservation Service [NRCS] 1984), soils in the study area consist of Cropley clay and Diablo and Cibo clays. These soils are deep, well developed, and are moderately to well drained.

#### 4.3.1.1 Plant Communities and Wildlife Habitats

The project corridor supports the following plant communities:

- Ruderal and Ornamental (disturbed)
- Non-native annual grassland
- Coastal scrub
- Riparian scrub
- Coastal and valley freshwater marsh
- Northern coastal saltmarsh
- Central foredunes
- Sandy beach

The locations of these communities are shown on Figures 4.3-1 through 4.3-3 and discussed in the following paragraphs.

### Ruderal and Ornamental

Ruderal vegetation occurs in disturbed areas including roadsides, fence-lines, and near developments. Plants found within this habitat are typically Mediterranean species that exhibit special adaptations that assist their invasion of disturbed lands. Ornamental vegetation includes areas that have been planted with landscape varieties of plant species. Ornamental vegetation usually includes shrubby varieties with a ruderal understory. Wildlife use of ruderal and ornamental areas is expected to be low because these communities typically provide little vegetative diversity and cover for wildlife species. Approximately 8 acres of ruderal and ornamental vegetation is scattered throughout the project corridor. These communities are largely associated with the shoulders of Highway 1 and the Chevron Marine Terminal pier landing (Pier Landing). Ruderal species observed include prickly ox-tongue (*Picris echioides*), rip-gut brome (*Bromus diandrus*), horehound (*Marrubium vulgare*), and horseweed (*Conyza* sp.) among numerous others.

### Non-native Annual Grassland

California's non-native annual grasslands consist of introduced and native grass species. These grasslands are characterized by a dense to sparse cover of annual grasses (Holland 1986; Holland and Keil 1995). Native perennial grasses occur in some areas but are not dominant. Annual grassland communities are often associated with numerous species of wildflowers and can support various wildlife species including small burrowing mammals, nesting birds, and reptiles. Approximately 15.8 acres of non-native annual grasslands are located throughout the project corridor. The Coast Range foothills to the east of Highway 1 and portions of the coastal bluff within the project alignment support this community. The foothills are regularly grazed by cattle. The non-native annual grassland along the bluff and in the project alignment is not subject to grazing but has numerous undesignated trails that access the beach. Despite the regular disturbance in these areas, numerous native wildflower species were observed in the non-native grasslands.

### Coastal Scrub

Coastal scrub communities are restricted to areas along the coast of California and extending inland for approximately 2 miles. Along the central coast, this community may be sparsely to densely vegetated, and will typically lack grassy openings (Holland 1986). Coastal scrub generally grows on exposed slopes with a variety of substrates (Holland and Keil 1995). Typical associates include coyote brush (*Baccharis pilularis*), California sagebrush (*Artemisia californica*), bush monkeyflower (*Mimulus aurantiacus*), and sages (*Salvia* spp.). Coastal scrub provides habitat for numerous common wildlife species including brush rabbit (*Sylvilagus bachmani*), California thrasher (*Toxostoma redivivum*), and western fence lizard (*Sceloporus occidentalis*). Approximately 6.9 acres of Coastal scrub were observed in the project corridor. These occurrences consist of remnant patches within the non-native annual grassland and larger stands located in the bluff drainages and at the North Point Natural Area (NPNA). These areas largely consist of coyote brush and show evidence of periodic disturbances.

### Central Coast Riparian Scrub

Central coast riparian scrub consists of scrubby streamside thickets dominated by willow species (Holland 1986). The understory commonly supports California blackberry (*Rubus ursinus*), stinging nettle (*Urtica dioica*), and poison oak (*Toxicodendron diversilobum*). This community occurs in areas that are close to groundwater, or near the mouths of perennial and intermittent streams. A variety of bird species utilize riparian scrub for foraging and cover habitat. This community also provides important cover habitat for aquatic and amphibious

species. Approximately 0.5 acre of riparian scrub exist is in the project corridor. This community is confined to the portions of Toro Creek located east of Highway 1. The riparian area supports an arroyo willow (*Salix lasiolepis*) canopy and a dense understory dominated by California blackberry and poison oak.

### Coastal and Valley Freshwater Marsh

Coastal and valley freshwater marsh communities are dominated by perennial, emergent monocots such as cattails (*Typha* spp.) and bulrushes (*Scirpus* spp.). These wetlands are found on the coast and coastal valleys near river mouths and around the margins of aquatic areas. Coastal and valley freshwater marsh supports habitat for a variety of wildlife species, especially birds and amphibians, which utilize the emergent vegetation for cover. The California Department of Fish and Game's (CDFG) California Natural Diversity Database (CNDDDB) (2009) includes coastal and valley freshwater marsh on the list of "special communities." Several small coastal and valley freshwater marsh areas are located in the Toro Creek channel. These areas support broadleaf cattail (*Typha latifolia*) and bull rush. In addition, a small, seasonal freshwater marsh with emergent hydrophytic vegetation is located on the Marine Terminal property, just south of the facility entrance. Approximately 0.33 acre of coastal and valley freshwater marsh occurs in the project corridor.

### Northern Coastal Salt Marsh

Northern coastal salt marsh communities consist of herbaceous and succulent, salt-tolerant hydrophytes forming moderate to dense cover. Most species are active in summer and dormant in the winter. This community is usually found along sheltered inland margins of bays, lagoons, and estuaries which contain hydric soils subject to regular tidal inundation by salt water for at least part of the year. Rallid birds (rails, gallinules, and coots) and scolopacid birds (sandpipers and phalaropes) frequent coastal salt marsh areas. The CNDDDB includes this community on the list of "special communities." Occurrences of northern coastal salt marsh vegetation within the project corridor are limited to small patches (approximately 0.03 acre) at the terminus of the various bluff drainages. Three-square (*Scirpus pungens*), Pacific potentilla (*Potentilla anserina* ssp. *pacifica*), and saltgrass (*Distichlis spicata*) were observed in these areas.

### Central Foredunes

Foredunes are dominated by low, often succulent, perennial herbs and sub-shrubs (Holland 1986). Vegetative cover can be scattered to dense and often consisting of a few individuals occupying most the available space. Conditions allow plants to become established on small sand dunes, which partially stabilize the dunes. Central foredunes may support habitat for the western snowy plover, other shorebirds, and crabs. The CNDDDB includes this community on the list of "special communities." Approximately 6.1 acres of central foredunes are located to the west of the project alignment. This community forms a transitional area between the sandy beaches and the bluff areas. The foredunes are vegetated by seafig (*Carpobrotus edulis*), beach saltbush (*Atriplex leucophylla*), and salt grass, with associate species such as red sand-verbena (*Abronia maritima*), silver beachweed (*Ambrosia chamissonis*), and sea rocket (*Cackile maritima*).

### Sandy beach

Sandy beach habitat is classified as marine, intertidal, unconsolidated shore, consisting of regularly flooded sand (Cowardin et al. 1979). This habitat is characterized by sandy substrate lacking vegetation except for occasional pioneering plants. Erosion and deposition by tidal influences produce a number of landforms such as beaches, bars, and flats. Common and

special-status shorebirds including long-billed curlew (*Numenius americanus*) and California brown pelican (*Pelecanus occidentalis californicus*) frequently forage on sandy beach habitats. Sandy beaches also provide habitat for the western snowy plover and numerous invertebrates. Sandy beach habitat in the project corridor extends west of the central foredunes to the Pacific Ocean.

#### **4.3.1.2 Sensitive Biological Resources**

Sensitive biological resources include Environmentally Sensitive Habitat Areas (ESHA), special-status plants, and special-status wildlife and those that currently exist or have been documented in the project corridor are discussed below.

##### Environmentally Sensitive Habitat Areas

The California Coastal Act defines ESHAs as "any area in which plant or animal life or their habitats are either rare or especially valuable because of their nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments." Under this definition, unique plant habitats; rare and endangered animal habitats; wetlands; coastal streams; rocky points; intertidal areas; and kelp beds are typically considered ESHAs. Based on this definition, the various jurisdictional waters, Toro Creek, seasonal wetlands, and the CNDDDB special communities that occur in the project corridor are ESHAs.

##### *Jurisdictional Waters*

Thirteen drainages, including 12 ephemeral drainages and Toro Creek, occur in the project corridor. All of the drainages convey storm flows to the mean high tide line and support sporadic wetland vegetation. All features support surface water or saturated soils for some portion of a typical year. Based on these characteristics, all the drainages are coastal wetlands under the California Coastal Act. Impacts to these features are subject to review by the California Coastal Commission and CDFG.

Toro Creek is perennial, has a clearly definable ordinary high water mark (OHWM), supports wetland hydrology, contains wetland vegetation, and wetland soils. Based on these characteristics, Toro Creek is also waters of the U.S. and California and subject to U.S. Army Corps of Engineers (USACE) jurisdiction.

Four of the ephemeral drainages show evidence of an OHWM and convey flows from surrounding watersheds. Three of these drainages are hydrologically connected to the foothills by culverts running under Highway 1. The fourth ephemeral drainage conveys overland flows from the NPNA. Based on the hydrology, connectivity to tidal waters, and presence of an OHWM, these four drainages are likely "other waters" under USACE jurisdiction (refer to Figures 4.3-1 through 4.3-3).

##### *Critical Habitat Designations*

Of the nine federally protected species that have suitable conditions or documented occurrences within or near the project corridor, only the South-central California coast steelhead has designated critical habitat in the project corridor. The main channel of Toro Creek occurs within the south-central California coast steelhead critical habitat unit defined as Estero Bay Hydrologic Unit 3310; Toro Creek Hydrologic Sub-area 331018. Currently, there are no significant barriers of passage through the project corridor.



Figure 4.3-1. Segment 2 Biological Resources Map

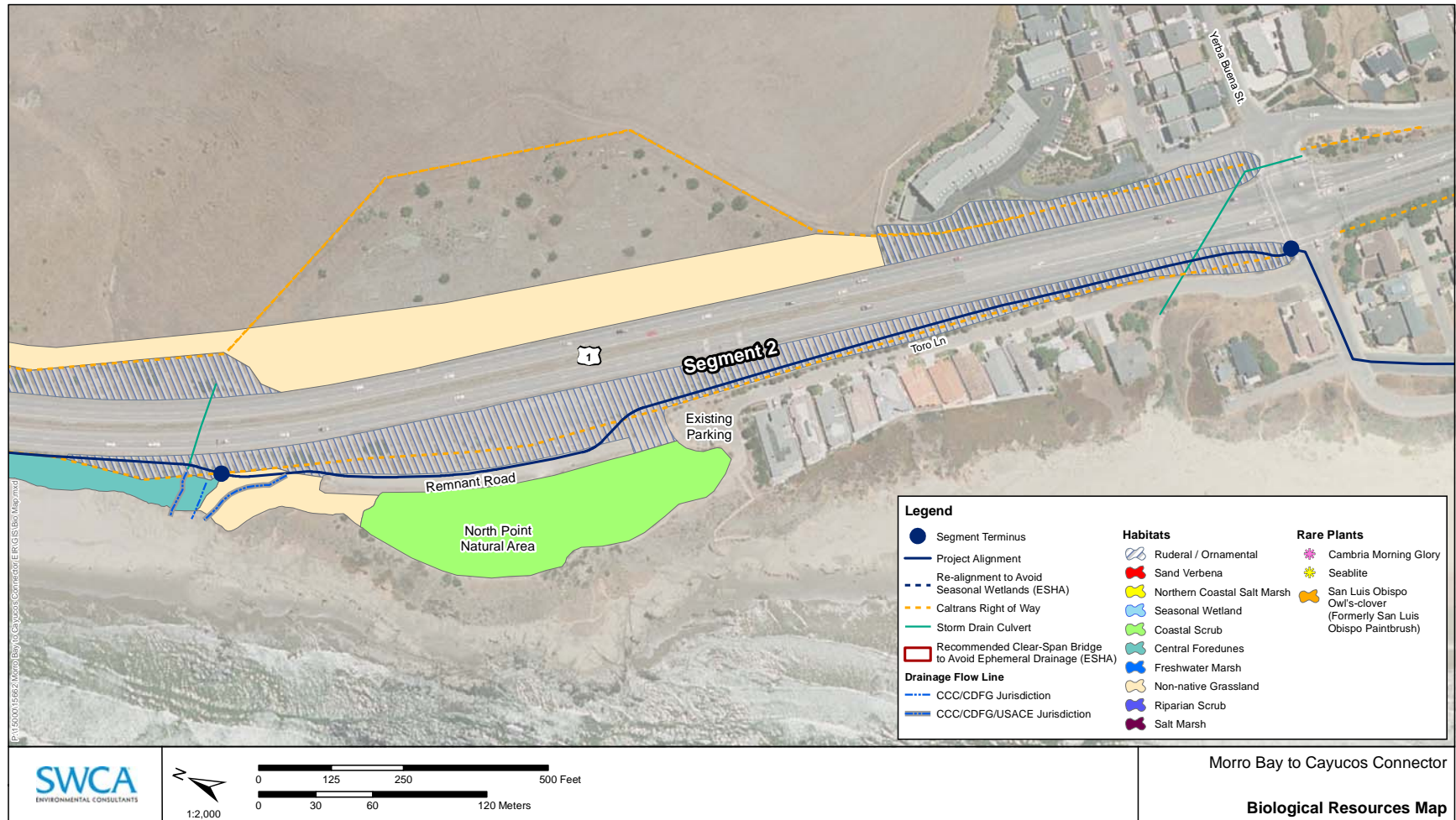


Figure 4.3-2. Segment 3 Biological Resources Map

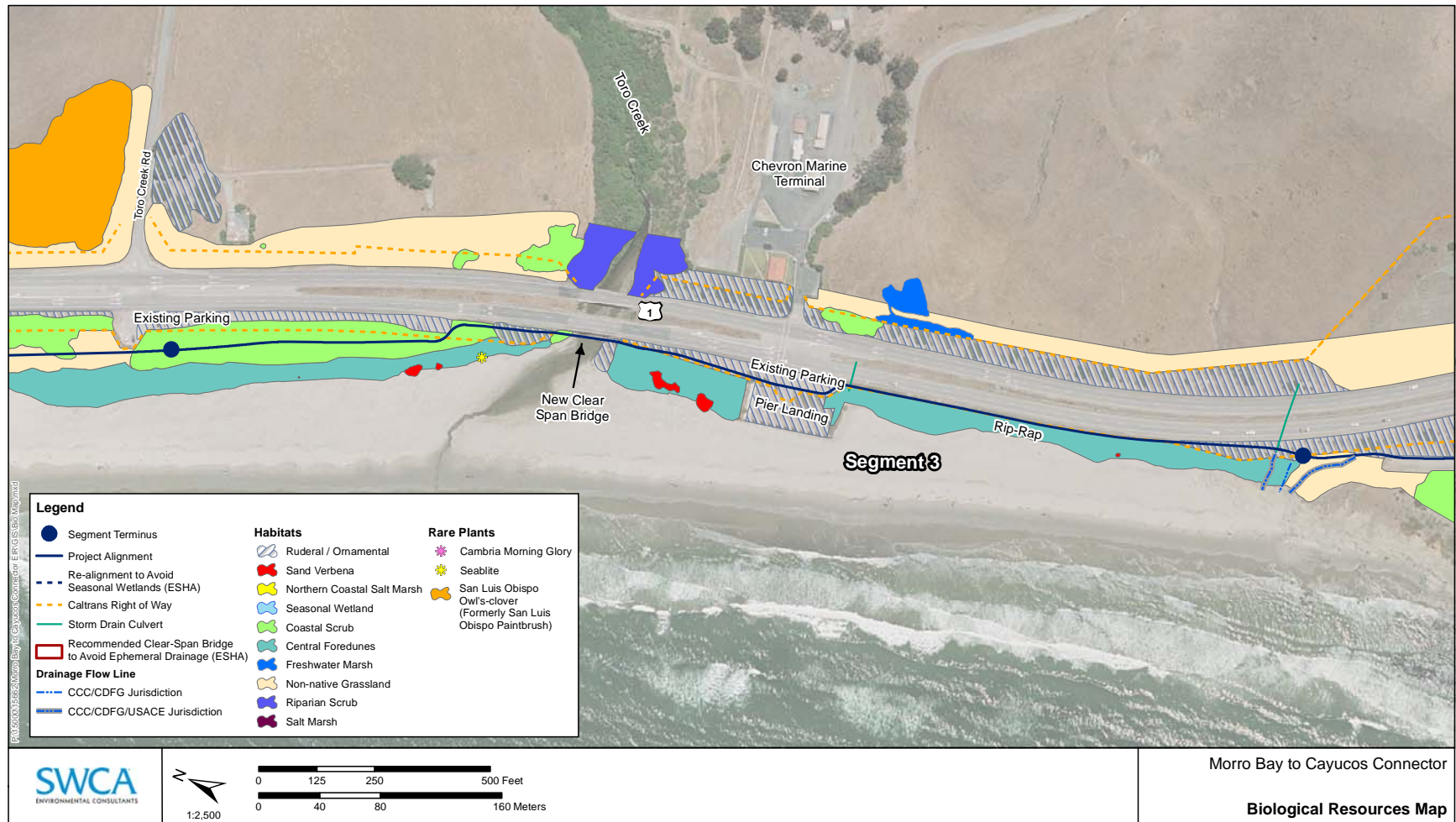
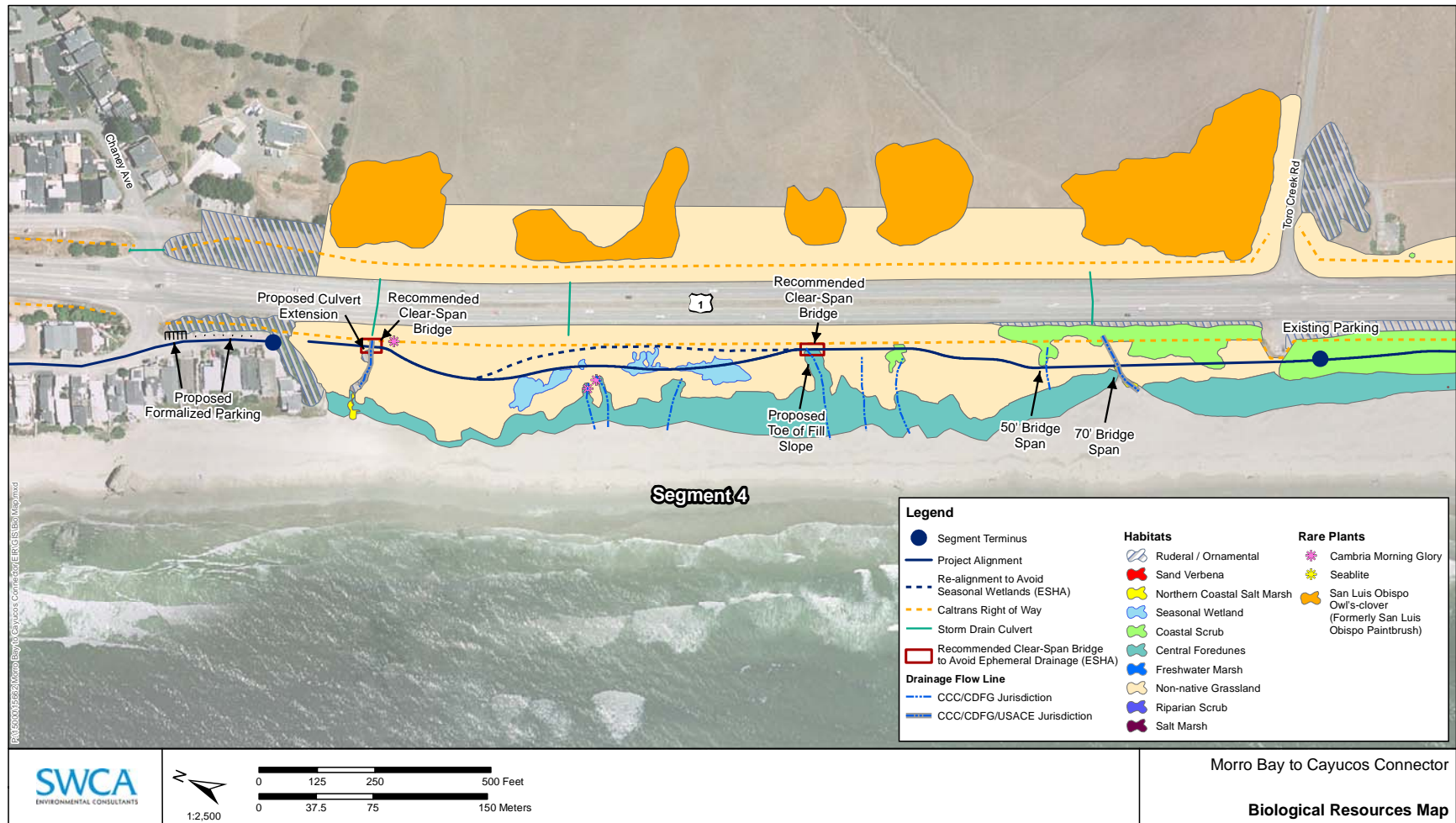


Figure 4.3-3. Segment 4 Biological Resources Map





### *Seasonal Wetlands*

Three seasonal wetlands were observed within the non-native annual grassland at the northern end of Segment 4 (refer to Figure 4.3-3). These wetland features were indicative of shallow depressions (approximate 15 centimeters deep) in clay soil that appear to hold water for a short duration. The depressions support dense to sporadic cover of armed coyote thistle (*Eryngium armatum*) and common grasses. Armed coyote thistle is listed as a “facultative wet” species in the *National List of Plant Species that Occur in Wetlands* (Reed 1988). The California Coastal Commission would likely consider these depressions to be coastal wetlands and, therefore, also ESHAs. Impacts to these wetlands would be subject to review by California Coastal Commission and CDFG. Due to the lack of connectivity to waters of the U.S., the depressions would not fall within USACE jurisdiction.

### *Special Communities*

CDFG maintains a list of special community types that ranks natural communities by their rarity or threat. CNDDDB identifies these communities as “special communities” and applies a Global and State ranking to them. Lead and trustee agencies may request that impacts to these communities be addressed in environmental documents. Central foredunes, coastal and valley and freshwater marsh, and northern coastal salt marsh occur in the project corridor and are included in the special communities list. These communities are considered to be ESHAs under the California Coastal Act.

### Special-status Plant Species

Based on the CNDDDB records search and SWCA’s knowledge of the area, 56 special-status plant species were evaluated for potential occurrence in the project corridor. The existing conditions in the project corridor provide suitable conditions for 21 of the evaluated plant species. SWCA biologists determined that the project corridor does not support suitable conditions for the remaining plant species. Table D-1 in Appendix D provides SWCA’s rationale for determining whether or not the project corridor provides suitable conditions for a particular species. Red sand verbena (*Abronia maritima*), Cambria morning-glory (*Calystegia subacaulis* ssp. *episcopalis*), San Luis Obispo owl’s clover (*Castilleja densiflora* ssp. *obispoensis*), and California seablite (*Suaeda californica*) have known occurrences in the project corridor and warrant special considerations during project design and implementation. Detailed discussions of these species are provided in Appendix D. Impacts to these species and recommended mitigation measures are presented in this section.

### Special-status Animal Species

The CNDDDB records search identified 37 special-status wildlife species that have known occurrences in the reviewed quadrangles. The existing conditions in the project corridor provide suitable conditions for 20 of the listed wildlife species (refer to Appendix D). Tidewater goby (*Eucyclogobius newberryi*), South-central California coast steelhead (*Oncorhynchus mykiss irideus*), California red-legged frog (*Rana draytonii*), western snowy plover (*Charadrius alexandrinus nivosus*), and coast horned lizard (*Phrynosoma coronatum*) have known occurrences in the project corridor and warrant special considerations during project design and implementation. Detailed discussions of these species are provided in Appendix D. Impacts to these species and recommended mitigation measures are presented in this section.

## **4.3.2 Regulatory Setting**

### **4.3.2.1 Federal Policies and Regulations**

#### Section 404 of the Clean Water Act of 1977

Pursuant to Section 404 of the Clean Water Act (33 USC 1344), the USACE is responsible for the issuance of permits for the placement of dredged or fill material into “waters of the U.S.” As defined by USACE at 33 CFR 328.3(a)(parts 1-6), the following summarizes Waters of the U.S.:

“Those waters that are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; tributaries and impoundments to such waters; all interstate waters including interstate wetlands; and territorial seas.”

Waters of the U.S. are typically identified by the presence of an OHWM and connectivity to traditional navigable waters or other jurisdictional features. If a project would result in dredge or fill of USACE jurisdictional waters, the project would be subject to USACE review under Section 404 of the Clean Water Act. Based on the site characteristics, three of the bluff drainages and Toro Creek are likely waters of the United States. In addition, areas below the mean high tide line are waters of the U.S. Activities resulting in dredge or fill of these features would be subject to Section 404 of the Clean Water Act.

#### Section 401 of the Clean Water Act of 1977

Section 401 of the Clean Water Act and its provisions ensure that federally permitted activities comply with the federal Clean Water Act and state water quality laws. Section 401 is implemented through a review process that is conducted by the Regional Water Quality Control Board (RWQCB), and is triggered by the Section 404 permitting process. The RWQCB certifies via the 401 process that a proposed project complies with applicable effluent limitations, water quality standards, and other conditions of California law. Evaluating the effects of the proposed project on both water quality and quantity falls under the jurisdiction of the RWQCB. Proposed project activities that have the potential to result in impacts to water quality and quantity would require certification by the RWQCB.

#### Federal Endangered Species Act of 1973

The Federal Endangered Species Act provides legislation to protect federally listed plant and animal species. Impacts to listed species resulting from the implementation of a project would require the responsible agency or individual to formally consult with the USFWS or National Marine Fisheries Service (NOAA Fisheries) to determine the extent of impact to a particular species. If USFWS or NOAA Fisheries determine that impacts to a species would likely occur, alternatives and measures to avoid or reduce impacts must be identified. USFWS and NOAA Fisheries also regulate activities conducted in federal critical habitat, which are geographic units designated as areas that support primary habitat constituent elements for listed species.

#### Migratory Bird Treaty Act of 1918

The Migratory Bird Treaty Act (MBTA) of 1918 protects all migratory birds, including their eggs, nests, and feathers. The MBTA was originally drafted to put an end to the commercial trade in bird feathers, popular in the latter part of the 1800's. The MBTA is enforced by the USFWS, and potential impacts to species protected under the MBTA are evaluated by the USFWS in

consultation with other federal agencies. Several migratory bird species were present in the project corridor. If ground disturbing activities were implemented during the nesting bird season, pre-disturbance nesting bird surveys would need to be conducted to avoid impacts to migratory birds.

#### **4.3.2.2 State Policies and Regulations**

##### California Endangered Species Act

The California Endangered Species Act (CESA) ensures legal protection for plants listed as rare or endangered, and species of wildlife formally listed as endangered or threatened. The state law also lists California Special Concern species based on limited distribution, declining populations, diminishing habitat, or unusual scientific, recreational, or educational value. Under state law, the CDFG is empowered to review projects for their potential to impact state-listed species and California Special Concern species, and their habitats.

##### Section 1602 of the Fish and Game Code

The CDFG is responsible for conserving, protecting, and managing California's fish, wildlife, and native plant resources. To meet this responsibility, the law requires any person, state or local government agency, or public utility proposing a project that may impact a river, stream, or lake to notify the CDFG before beginning the project. If the CDFG determines that the proposed project may adversely affect existing fish and wildlife resources, a Lake or Streambed Alteration Agreement is required. A Streambed Alteration Agreement lists the CDFG conditions of approval relative to the proposed project, and serves as an agreement between an applicant and the CDFG for a term of not more than five years for the performance of activities subject to this section. A Streambed Alteration Agreement from the CDFG would be required prior to any direct or indirect impact to streambeds, banks, channels or associated riparian resources.

##### California Coastal Act

The California Coastal Act was enacted in 1976 to provide long-term protection of California's coastal resources. The Act's coastal resources management policies are based on recommendations contained in the California Coastal Plan. One such policy includes:

“Protection, enhancement and restoration of environmentally sensitive habitats, including intertidal and nearshore waters, wetlands, bays and estuaries, riparian habitat, certain wood and grasslands, streams, lakes, and habitat for rare or endangered plants or animals.”

The California Coastal Commission must evaluate proposed impacts to wetlands. For wetland delineations in the Coastal Zone, the California Coastal Commission utilizes a single-parameter definition (in addition to the USACE three parameter methodology). Delineations performed using the California Coastal Commission definition generally results in larger wetland areas than a corresponding USACE delineation of the same site. This is due to the difference in identifying criteria between methods. Several of the drainages and the observed seasonal wetlands observed in the project corridor constitute two parameter wetlands based on the presence of wetland vegetation and hydrology. Impacts to these features would be subject to review by the California Coastal Commission and must conform to Coastal Act/Local Coastal Plan requirements.



### Other Sections of the Fish and Game Code

“Fully Protected” species may not be taken or possessed without a permit from the Fish and Game Commission and/or the CDFG. Information on these species can be found within section 3511 (birds), section 4700 (mammals), section 5050 (reptiles and amphibians), and section 5515 (fish) of the Fish and Game Code.

### **4.3.3 Thresholds of Significance**

The significance of potential biological impacts are based on thresholds identified within Appendix G of the CEQA Guidelines, which provides the following thresholds for determining impact significance with respect to biological resources. Biological impacts would be considered significant if the proposed project would:

- a. Substantially affect a rare or endangered species;
- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community;
- c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act;
- d. Interfere substantially with the movement of any resident or migratory species of wildlife or with established native resident or migratory wildlife corridors;
- e. Conflict with any local policies or ordinances protecting biological resources;
- 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;
- g. Reduce the long term viability of native plant, fish, or wildlife populations;
- h. Reduce species diversity or numbers of species; and,
- i. Introduce invasive plant or animal species.

### **4.3.4 Impact Assessment and Methodology**

To gather insight on which biological resources occur in the project vicinity, a search of the CNDDDB (2009) was conducted. The CNDDDB search included the following U.S. Geological Survey (USGS) 7.5-minute quadrangles: Morro Bay North, Morro Bay South, Cayucos, San Luis Obispo, Atascadero, Templeton, York Mountain, and Cypress Mountain. Since the results of the literature review are regional, they were reviewed to evaluate the potential for sensitive resources to occur within or near the project corridor. A species' potential to occur in the project corridor was assessed by comparing the species' known habitat associations with the soils, vegetative composition, elevation, and topography of the project corridor. The California Native Plant Society's (CNPS) *Inventory of Rare and Endangered Vascular Plants of California* (CNPS 2008) and *Online Inventory of Rare and Endangered Plants* (CNPS 2008) were also reviewed to provide information on rare plants that were expected to occur in the area. Appendix D includes detailed evaluations of the reviewed species and a rational for expecting the presence or absence of the species in the project corridor.

In addition to the literature review, SWCA Biologists Travis Belt, Bob Sloan, and Geoff Hoetker conducted biological surveys on March 11, March 17, and April 25, 2005, and May 22 and July 2, 2009. The surveyors focused on characterizing the natural resources in and adjacent to the project site, identifying the presence/absence of special-status species, and quantifying potential project related impacts to biological resources. Plant communities and habitat types were classified according to the *Preliminary Description of Terrestrial Natural Communities of California* (Holland 1986) and the *CDFG List of California Terrestrial Natural Communities Recognized by the Natural Diversity Data Base* (CDFG 2007). Plant species observed were identified based on *The Jepson Manual: Higher Plants of California* (Hickman 1993) and *Vascular Plants of San Luis Obispo County* (Hoover 1970).

This impact assessment is based on details presented in the project description and the Preliminary Design Report (Firma 2008) and identifies potential impacts associated with construction and future uses of Segments 2, 3, and 4 of the proposed bikeway. Identified impacts represent a reasonable worst case scenario. Potential impacts were expected to occur where proposed activities would result in temporary or permanent modification of sensitive communities or habitats occupied by special-status species. Impacts to biological resources were evaluated by determining the sensitivity, significance, or rarity of each resource that would be adversely affected by the proposed project. Thresholds of significance were applied to determine if the impact constitutes a significant impact. The significance threshold may be different for each resource and is based on the resource's rarity or sensitivity and the level of impact that would result. Where potential project-related impacts to sensitive resources were identified, measures for avoiding or minimizing adverse effects to these resources are recommended.

To allow impacts to be quantified a potential area of disturbance was identified. The assumed project disturbance area includes the permanent disturbance of the proposed 12-foot wide bikeway and an additional 5 feet of disturbance on each side, for a total width of disturbance of 22 feet. This area was reduced in areas along Highway 1 where there is limited width and the barrier would be in place.

It is assumed that the stockpile/staging areas would be located in previously disturbed areas including the surface of the remnant road, the Pier Landing and/or the "unimproved roads" that exist along the Highway 1 shoulder. Construction equipment may need to access the project site from the west, requiring the use of heavy equipment on the beach. This analysis assumes that the Pier Landing would be the only access point. From this point a 16-foot wide short-term construction access would travel south approximately 560 feet to access portions of Segment 3 that are directly adjacent to the foredunes. From the same access point, a 16 foot wide path would travel north approximately 320 feet before terminating at the south bank of Toro Creek.

### **4.3.5 Project-Specific Impacts and Mitigation Measures**

#### **4.3.5.1 Environmentally Sensitive Habitat Areas**

The project corridor contains state and federal jurisdictional waters, steelhead critical habitat (Toro Creek), Central foredunes, three seasonal wetlands, eleven coastal drainages, tidal waters, coastal and valley and freshwater marsh, and northern coastal salt marsh. Under land use ordinances and coastal plan policies, these communities are considered to be ESHAs. In addition, the Central foredunes, coastal and valley and freshwater marsh, and northern coastal salt marsh are listed as special communities in CNDDDB.

## Construction-Related Disturbance of ESHA

The proposed project would avoid the tidal waters, coastal and valley and freshwater marsh, the northern coastal salt marsh, and nine of the 13 drainages. It would result in temporary impacts to central foredunes. Permanent impacts to two of the drainages, the seasonal wetlands, and central foredunes would also occur. Impacts to these resources would result from specific activities; therefore, are evaluated under the appropriate headings below. All of these resources are located within close proximity to the proposed work area and would be subject to direct and indirect disturbances from grading, trampling, sedimentation and erosion or other disturbances. The close proximity of the ESHAs creates a constrained work area that must be clearly identified in the field.

**BIO Impact 1      The proposed project is located within close proximity to several ESHAs and other sensitive resources. Work activities could result in direct or indirect disturbances to the ESHAs.**

*BIO/mm-1      Prior to issuance of construction permits/notices to proceed, the Department of General Services shall designate a qualified environmental monitor for all measures requiring environmental mitigation to ensure compliance with Conditions of Approval and EIR mitigation measures. The monitor shall be responsible for: (1) ensuring that procedures for verifying compliance with environmental mitigations are followed; (2) lines of communication and reporting methods; (3) daily and weekly compliance reporting; (4) construction crew training regarding environmentally sensitive areas; (5) authority to stop work; and (6) action to be taken in the event of non-compliance. Monitoring shall be at a frequency and duration determined by the affected natural resource agencies (e.g., USACE, CDFG, RWQCB, California Coastal Commission, USFWS, and the County).*

*BIO/mm-2      At the time of application for construction permits all grading plans shall clearly show the location of project delineation fencing that excludes adjacent ESHAs from disturbance. With exception to the portions of Segment 3 that require beach access, the project delineation fencing shall provide no more than a 22-foot wide work area throughout the length of Segments 3 and 4. In the portions of Segment 3 that require beach access, the project delineation fencing may allow for an additional 16 feet (as necessary) immediately adjacent to the proposed path alignment. The grading plans shall clearly show all staging areas, which shall avoid ESHAs.*

*BIO/mm-3      At the time of application for permits, the plans shall clearly show the placement of environmental interpretive signs along the bikeway. The signs shall inform bikeway users of the ecology of bluff habitat, central foredune habitat, beach habitat, and plant and wildlife species that utilize these areas. Signs shall be placed at the northern terminus of Segment 2, at the Pier Landing and at the northern terminus of Segment 4.*

*BIO/mm-4      Prior to the initiation of construction, the monitoring biologist shall conduct an environmental awareness training for all construction personnel. The environmental awareness training shall include discussions of the ESHAs, and sensitive plant and animal species identified within the project corridor. Topics of discussion shall include: description of the species' habitats;*

*general provisions and protections afforded by the Endangered Species Act; measures implemented to protect special-status species; review of the project boundaries and special conditions; the monitor's role in project activities; lines of communications; and procedures to be implemented in the event a special-status species is observed in the work area.*

**BIO/mm-5** *Prior to the initiation of construction, the applicant's contractors and the monitoring biologist shall coordinate the placement of project delineation fencing throughout the work areas. The monitoring biologist shall field fit the placement of the project delineation fencing to minimize impacts to ESHAs and other sensitive resources. The project delineation fencing shall remain in place and functional throughout the duration of the project. During construction, no project related work activities shall occur outside of the delineated work area.*

#### Residual Impact

Implementation of this measure would reduce short-term construction impacts to a *less than significant* level.

#### Sedimentation and Erosion Impacts to Environmentally Sensitive Habitat Areas

During construction, grading operations would require the removal of vegetation, disturbance of soil layers, and the creation of soil stockpiles. This would expose soils to erosion by rainfall and runoff as storm water leaves the project site. The adverse effects of erosion and sediment transport include deposition of sediment within the local drainages, which may increase sediment loading on to the beach and sensitive habitats.

Construction activities could also affect water quality due to the potential for pollutants to be discharged to adjacent soils and surface water bodies. Construction of the proposed project would involve the use, fueling, and storage of heavy equipment onsite. Soil and associated building material including asphalt and concrete has the potential to enter Toro Creek and the drainage channels, cause an increase in suspended sediments, sedimentation of aquatic habitat, and introduce compounds that could potentially be toxic to aquatic organisms.

Implementation of the proposed project would result in disturbance exceeding one acre; therefore, a Stormwater Pollution Prevention Plan (SWPPP) would be required. The SWPPP would identify the minimum required Best Management Practices (BMP) to be implemented during construction. BMP examples would include: erosion control barriers such as silt fences, hay bales, drain inlet protection, and gravel bags; preservation of existing vegetation to the maximum extent feasible and; stabilization of disturbed areas with vegetation or hard surface treatments upon completion of construction in any specific area.

**BIO Impact 2** **Vegetation removal, grading, and construction activities could result in indirect impacts including erosion and down-gradient sedimentation and pollutant discharges (e.g., sediment, oil, fuel, materials) into ESHAs.**

**BIO/mm-6** *During construction, to avoid erosion and downstream sedimentation, no work within or immediately adjacent to the ephemeral drainages or Toro Creek shall occur during the rainy season (October 15 through April 15).*

- BIO/mm-7 During construction, equipment access and construction shall be conducted from the banks or upland areas rather than from within drainages. No equipment or fill material shall be staged in or adjacent to any of the site drainages, unless authorized by the appropriate permits.*
- BIO/mm-8 At the time of application for grading permits, all applicable plans shall clearly show stockpile and staging areas. Stockpiles and staging areas shall not be placed in areas that have potential to experience significant runoff during the rainy season. All project-related spills of hazardous materials within or adjacent to project sites shall be cleaned up immediately. Spill prevention and cleanup materials shall be on-site at all times during construction. Cleaning and refueling of equipment and vehicles shall occur only within designated staging areas. The staging areas shall conform to standard BMPs applicable to attaining zero discharge of storm water runoff. No maintenance, cleaning or fueling of equipment shall occur within wetland or riparian areas, or within 50 feet of such areas. At a minimum, all equipment and vehicles shall be checked and maintained on a daily basis to ensure proper operation and to avoid potential leaks or spills.*
- BIO/mm-9 Prior to issuance of construction permits, the applicant shall submit a detailed sediment and erosion control plan for approval, which shall address both temporary and permanent measures to control erosion and reduce sedimentation. Erosion and soil protection shall be provided on all cut and fill slopes. Revegetation shall be facilitated by mulching, hydro-seeding or other methods, and shall be initiated as soon as possible after completion of grading, and prior to the onset of the rainy season (October 15). Permanent revegetation and landscaping shall emphasize native shrubs, and trees, to improve the probability of slope and soil stabilization without adverse impacts to slope stability due to irrigation infiltration and long-term root development. All plans shall show that sedimentation and erosion control measures are installed prior to any other ground disturbing work.*
- BIO/mm-10 Prior to issuance of construction permits, the applicant shall prepare and submit a Notice of Intent and SWPPP to the RWQCB. A copy of the SWPPP shall be submitted to the County of San Luis Obispo for approval to show that sedimentation and erosion control measures are installed prior to any other ground disturbing work.*

#### Residual Impact

With implementation of the above mitigation measures, sedimentation and erosion impacts to ESHA would be considered *less than significant*.

#### Jurisdictional Waters

Based on the definition of USACE jurisdictional areas, Toro Creek and four of the ephemeral drainages are likely waters of the U.S. and California. The proposed project includes installing a culvert extension in one of the jurisdictional drainages (refer to Figure 4.3-3). This drainage is located near the terminus of Segment 4 and is connected to the foothills east of Highway 1 via an existing culvert that travels under the highway. The existing culvert drains a “wetted” ditch adjacent to the north bound lane of Highway 1. At the location of the proposed culvert

extension, the drainage bed is armed with concrete rock slope protection (RSP) and lacks any significant vegetation. The drainage dissipates on the beach approximately 100 feet downstream of the proposed culvert extension. This area supports a small patch of northern coastal salt marsh vegetation. Installation of the culvert extension would require a 404 permit from USACE and a 1602 permit from CDFG.

The affected ephemeral drainage is considered an ESHA under the Local Coastal Plan. Section 23.07.170 requires a proposed development to avoid impacts to ESHAs. If complete avoidance is not feasible, the impacts must be minimized. The Local Coastal Plan further states that new development within or adjacent to the ESHA shall not significantly disrupt the resource and damage to the ESHA shall be restored as a condition of approval for the development.

The proposed project includes constructing a free-span bridge over Toro Creek and two of the four ephemeral drainages that exhibit characteristics of USACE jurisdiction. These free-span bridges would rest on abutments located outside of the creek banks and drainage banks. In addition, the proposed locations of the bridges lack riparian vegetation. Based on the proposed bridge designs and lack of riparian vegetation, impacts to USACE or CDFG jurisdictional waters resulting from construction of the three free-span bridges would be less than significant.

**BIO Impact 3      The proposed project includes installing a culvert extension in Waters of the U.S. and California, which would result in approximately 0.002 acre (87 square feet) of direct impacts to the jurisdictional feature.**

*BIO/mm-11      At the time of application for grading permits, all applicable plans shall clearly show the placement of a clear span bridge over the ephemeral drainage. The clear span bridge shall rest on abutments located outside of the drainage banks and the construction of the bridge shall avoid the placement of fill in the drainage. Bridge design shall comply with measures in the Aesthetics Resource section.*

#### Residual Impact

With implementation of the above mitigation measures, direct impacts to jurisdictional areas would be avoided. Residual impacts would be considered *less than significant*. No additional mitigation is required.

#### Toro Creek and Steelhead Critical Habitat

Toro Creek is NMFS designated critical habitat for the South-central California coast steelhead Evolutionarily Significant Units (ESU). The proposed project includes constructing a free-span bridge over the mouth of Toro Creek. The proposed bridge would be located directly adjacent to the existing Highway 1 bridge and rest on piers located outside the creek banks. At the time of the surveys, the mouth of Toro Creek supported a narrow (4 to 8 feet) channel with approximately six inches of standing water. There was no aquatic vegetation in the channel and the banks did not support riparian vegetation. It is assumed that the proposed bridge over Toro Creek would be prefabricated off-site and lifted in place from Highway 1. This method of installation would not require any false work, equipment, or crew access in the creek channel. Installation of the bridge would occur during the summer months when the water levels in the lower portion of Toro Creek are at a seasonal low. Since the free span bridge would be lifted into place access to the creek channel would not be necessary, dewatering the creek would not be required. The following five project attributes to determine if installing the proposed bridge would adversely affect steelhead in Toro Creek:



1. Would the project alter aquatic habitat in Toro Creek?
2. Would the project require capture and relocation of steelhead?
3. Would the project result in the loss of aquatic insects?
4. Would the project disturb streamside vegetation?
5. Would the project alter water quality?

Detailed discussions of these five questions are included in Appendix D. Based on preliminary design plans, the proposed construction methods, and the site existing conditions, construction of the proposed bridge over Toro Creek would not significantly impact steelhead or steelhead habitat in the creek. However, construction of the bridge could result in inadvertent deposition of sediment, materials, tools, or hazardous materials into the creek bed. In addition, the proposed bridge would increase the amount of shade at the creek mouth. Increased shade in this portion of the creek is an insignificant impact; therefore, mitigation for increased shade is not proposed.

**BIO Impact 4      Inadvertent depositions of sediment, materials, tools, or hazardous materials into the creek bed could occur during installation of the proposed bridge over Toro Creek.**

*Implement BIO/mm-1 through BIO/mm-10.*

#### Residual Impact

With implementation of the above mitigation measures, indirect impacts to steelhead habitat would be *less than significant*.

#### Central Foredunes

##### *Direct Impacts*

Permanent and temporary impacts to central foredunes would occur in Segment 3, near the Pier Landing. Construction of the proposed bikeway would convert approximately 0.30 acre of central foredunes to asphalt (bikeway) or gravel (shoulders), resulting in the permanent loss of the affected area. The planned five foot disturbance area adjacent to the shoulders and the assumed equipment access paths would temporarily impact 0.87 acre of central foredune habitat. The habitat is somewhat disturbed already due to passive recreational use of the area and encroachment of ice-plant, but does include red-sand verbena, a sensitive plant species. Impacts to central foredune habitat would be potentially significant.

**BIO Impact 5      The proposed project would result in 0.30 acre of permanent impacts and 0.87 acre of temporary impacts to central foredunes.**

*BIO/mm-12      At the time of application for grading permits, the applicant shall prepare and submit a Dune Habitat Restoration Plan (HRP) for review and approval by the CDFG and Department of Planning and Building. The HRP shall be prepared by a qualified biologist and/or botanist and shall detail the methods for restoring or enhancing 1.47 acres (1:1 for temporary impacts and 2:1 for permanent impacts) of central foredune habitat within the project corridor.*

*The goal of the HRP would be to restore temporary and mitigate permanent impacts to central foredunes, so that project impacts do not significantly disrupt the habitat. The HRP shall focus on restoring and enhancing central foredune habitat by removing invasive species (iceplant and sea rocket) and planting the appropriate native species (beach saltbush, red sand verbenas, beach bur, and suffrutescent wall flower). At a minimum, the HRP should include the following elements:*

- a. Identification of locations, amounts, size and types of plants to be replanted, as well as any other necessary components (e.g., temporary irrigation, amendments, etc.) to insure successful reestablishment.*
- b. Provide for a native plant salvage effort prior to ground disturbing activities. Salvaged plants shall include but not be limited to red-sand verbenas and beach saltbush;*
- c. Provide for driftwood salvage and replacement efforts to minimize loss of avian nesting substrates;*
- d. Quantification of impact and mitigation areas.*
- e. A program schedule and success criteria for a five year monitoring and reporting program that is structured to ensure the success of the HRP.*
- f. Provide for the in-kind replacement of any red sand verbenas that are removed or damaged at a 3:1 ratio.*

*BIO/mm-13 Prior to initiation of construction, the applicant shall retain a qualified biologist/botanist to supervise the implementation of the HRP. The qualified biologist/botanist should supervise plant salvage, site preparation, implementation timing, species utilized, planting installation, maintenance, monitoring, and reporting of the restoration efforts. The qualified biologist/botanist shall prepare and submit four annual reports and one final monitoring report to the County for review and approval. The annual and final monitoring reports should include discussions of the restoration activities, project photographs, and an assessment of the restoration efforts attainment of the success criteria.*

#### **Residual Impact**

With implementation of the above mitigation measures, direct impacts to central foredune habitat would be *less than significant*.

#### **Indirect Impacts**

As proposed, approximately 1,300 linear feet of Segment 3 would be located directly adjacent to central foredune habitat. In this stretch of Segment 3, the current bikeway design includes a retaining wall and open rail fence on portions of the western edge of the bikeway. The retaining wall would vary in height but not exceed the surface of the bikeway. The open rail fence would sit atop the retaining wall and extend 54 inches above the surface of the bikeway. The retaining

wall and open rail fence would not be continuous throughout the section of Segment 3 that is adjacent to the central foredune habitat. These features would only be present in areas where the bikeway needs support from the retaining wall; and where there is a potential for users to veer off the path and over the retaining wall. As proposed there is no rail or wall, in areas where the proposed path would be at or close to grade of the central foredunes.

In these areas, it appears that walkers are already having some impact on the foredune habitat as they leave the existing main trail to access the beach. This condition may be exacerbated as bikeway users could possibly step or ride off the bikeway and directly into the central foredune habitat. Conversely, there is some possibility that the proposed project, because the trail would be so well-defined, may result in reduced trampling. Overtime, however, it is likely that regular users would create informal or unimproved access to the beach in these locations. This undirected egress on to the foredunes would contribute to trampling and subsequent erosion of the dune habitat.

**BIO Impact 6      The proposed project would allow undirected egress into central foredune habitat, which would result in long term trampling and erosion of dunes.**

*Implement BIO/mm-1 through BIO/mm-5.*

*BIO/mm-14      At the time of application for grading permits, the project plans shall clearly show habitat protection fencing extending parallel to the bikeway from the northern end of the riprap (where fencing on the west side of the bikeway is currently proposed to end) to the Toro Creek bridge. To minimize visual impacts of the fencing it shall be no more than 18" high wood post or steel rod, and cable. The intent of the fence would be to deter bikeway users from trampling the foredune habitat while accessing the beach from the bikeway. One opening shall be allowed at the Pier Landing to maintain existing access.*

#### Residual Impact

With implementation of the above mitigation measures, long-term impacts to central foredune habitat would be *less than significant*.

#### Ephemeral drainages

The ephemeral drainages on the site are connected to the mean high tide line, contain saturated soils or flowing water during the rainy season, and support sporadic occurrences of wetland vegetation; therefore, are considered ESHAs under the coastal policies. Construction of the proposed project would require filling the head of an ephemeral drainage located approximately 1,100 feet south of the terminus of Segment 4 and installing a clear span bridge over a second drainage. Section 23.07.170 of the coastal plan requires a proposed development to avoid impacts to ESHAs. If complete avoidance is not feasible, the impacts must be minimized and restored.

These drainages do not have an OHWM nor do they connect to the foothills east of Highway 1; it appears these drainages convey stormwater from the immediate area. The ephemeral drainages support ruderal vegetation, annual grasses and coyote brush. This vegetation is serving to minimize further erosion and provide shelter habitat for common wildlife species. Installation of fill material in the affected ephemeral drainage would disrupt the hydrology of the

drainage. Installation of the fill material and the clear span bridge would result in the loss of the existing vegetation within the drainages and expose the soils to further erosion.

**BIO Impact 7      The proposed project would fill approximately 0.003 acre (131 square feet) of the head of an ephemeral drainage and install a clear span bridge over a second drainage resulting in the removal of vegetation that is minimizing erosion and provides shelter habitat for common wildlife species.**

*Implement BIO/mm-6, BIO/mm-9, and BIO/mm-10.*

*BIO/mm-15      At the time of application for grading permits, all applicable plans shall clearly show the placement of a clear span bridge over the ephemeral drainage. The clear span bridge shall rest on abutments located outside of the drainage banks and the construction of the bridge shall avoid the placement of fill in the drainage.*

*If complete avoidance of the ephemeral drainage is not feasible, the General Services Agency shall prepare and implement a detailed sediment and erosion control plan as discussed in BIO/mm-9.*

#### Residual Impact

With implementation of the above mitigation measure, direct impacts to the ephemeral drainages would be *less than significant*.

#### Seasonal Wetlands

Three seasonal wetlands exist in the annual grassland located near the northern terminus of Segment 4 (refer to Figure 4.3-3). The seasonal wetlands appear to hold water for a short duration, support dense to sporadic cover of a facultative wet species, and lacks connectivity to traditional navigable waters. These wetlands are shallow depressions that capture and pond rainwater and surface flows during the rain season. Based on the one parameter wetland criteria for state wetlands, the three seasonal wetlands are likely coastal wetlands under California Coastal Commission jurisdiction. According to Sections 23.07.170-178 of the CZLUO, the natural ecological functioning and productivity of wetlands shall be protected, preserved and where feasible, restored. As proposed, the alignment of Segment 4 would travel through the wetlands, which would disrupt their hydrology. Disrupting the hydrology of the wetland could result in the loss of the resource.

**BIO Impact 8      The proposed project would directly disturb 0.28 acres of seasonal wetlands, potentially disrupting the hydrology of the resources.**

*BIO/mm-16      At the time of application for construction permits, the plans shall clearly show the avoidance of the seasonal wetlands. In order to avoid the wetlands, the proposed alignment shall be relocated approximately fifty feet to the east towards the Highway 1 right-of-way. Figure 4.3-3 includes an alternative alignment that would avoid the seasonal wetlands.*

## Residual Impact

With implementation of the above mitigation measures, direct impacts to the ephemeral drainages would be *less than significant*.

### 4.3.5.2 Special-status Species

#### Special-status Plants

The central foredune and annual grassland communities support a variety of special-status plant species. Several occurrences of Cambria morning-glory and San Luis Obispo owl's clover are known to exist in the annual grasslands. The central foredune habitat is known to support red sand verbena and California seablite. The proposed project would avoid the known rare plant occurrences; however, installation of the temporary beach access could impact red sand verbena. Several red sand verbena are located adjacent to Segment 3 in the vicinity of the Pier Landing. This area has been identified for equipment access to facilitate the construction of Segment 3. Construction of the temporary beach access could impact the red sand verbena.

#### **BIO Impact 9 Construction of the temporary beach access could impact red sand verbena.**

*BIO/mm-17 Prior to commencement of site grading, the temporary beach access shall be clearly delineated with construction fencing. The biological monitor directing placement of the project delineation fencing shall ensure that the temporary beach access routes avoid the red sand verbena and any other special-status resource that may exist. If complete avoidance of the red sand verbena is not feasible, the monitor shall salvage the individuals that would be impacted. The salvaged individuals shall be utilized in the Central foredune Habitat Restoration Plan, as discussed in BIO/mm-12 and 13.*

## Residual Impact

With implementation of the above mitigation measure, impacts to rare plants would be *less than significant*.

#### Special-status Wildlife

Based on the existing conditions and documented special-status species occurrences, the proposed project area may support California red-legged frog, south-central California steelhead, tidewater goby, nesting bird species (including western snowy plover), and coast horned lizard. The proposed project would avoid impacts to the aquatic portions and riparian vegetation of Toro creek; therefore, California red-legged frog, south-central California steelhead, and tidewater goby would not be impacted. However, project activities could impact nesting bird species, western snowy plover, and coast horned lizard. Impacts to these resources are discussed below.

#### *Nesting Birds*

The various habitats occurring in the project corridor provides suitable nesting habitat for a variety of bird species. Shore birds may utilize the central foredune habitat for nesting; common passerines may use the non-native annual grassland or the coastal bluff scrub for nesting. The Monterey cypress along Segment 2, may also provide nesting habitat. If construction occurs

between March and September, the available nesting habitats would be impacted by grading and equipment access. If bird species are nesting within or adjacent to the effected area during construction, the individuals could be directly or indirectly impacted. Direct impacts may include loss of active nests during vegetation removal. Noise or other disturbances may cause an individual to abandon a nest resulting in an indirect impact.

**BIO Impact 10 Construction activities conducted during the nesting season (March through September) could directly or indirectly impact nesting birds.**

*BIO/mm-18 If commencement of construction begins between March and September, prior to installation of the project delineation fencing and the commencement of site grading, the environmental monitor shall conduct pre-construction nesting bird surveys. If nesting activity is identified, the following measures shall be implemented:*

- a. If active nest of common passerine or shorebird species' are observed in the work area or within 100 feet of the work area, construction activities shall be modified and or delayed as necessary to avoid direct take or indirect disturbance of the nests, eggs, or young;*
- b. If active nest sites of raptors or other special-status species are observed within the work area or 300 feet of the work area, the environmental monitor shall establish a suitable buffer around the nest site. Construction activities in the buffer zone shall be prohibited until the young have fledged the nest and achieved independence.*
- c. Active raptor or special-status species nests should be documented by a qualified biologist and a letter report should be submitted to the County, USFWS, and CDFG, documenting project compliance with the MBTA and applicable project mitigation measures.*

*Western Snowy Plover*

The central foredune and sandy beach areas provide nesting and foraging habitat for the federally threatened western snowy plover. CNDDDB documents several occurrences of nesting snowy plover in the immediate vicinity of Toro Creek. These occurrences were documented in 2003. Project activities conducted during the snowy plover nesting season (March through September) could disrupt the nesting behavior of the species. Site grading and equipment access on the beach and foredunes could result in direct take of nests or indirectly disturb nesting individuals. In addition, removal of rocks, drift wood or other beach debris could result in the loss of nesting substrates for the species.

**BIO Impact 11 Construction activities conducted during the nesting season (March through September) could directly or indirectly impact nesting western snowy plover.**

*Implement BIO/mm-4.*

*BIO/mm-19 Avoid ground disturbing activities conducted within 300 feet of the central foredune and sandy beach habitats during the snowy plover nesting season to the extent feasible. If work activities must occur during the nesting season the following measures should be taken:*



1. *Prior to installation of the project delineation fencing and the commencement of site grading, a qualified biologist shall conduct a series of pre-construction nesting bird surveys for western snowy plover. Surveys shall be conducted every other day for two weeks prior to any project related disturbances.*
2. *Surveys for snowy plovers shall include walking through all potential nesting and foraging habitat within 300 feet of the site on each survey day. The survey area shall include all available snowy plover nesting habitat within 300 feet of anticipated project activities.*
3. *The number of snowy plover individuals observed and their activities (e.g. nesting, foraging, resting, etc) shall be documented. All documented occurrences would be reported to USFWS and documented on the CNDDDB.*
4. *If nesting activity is identified, all project activities within 300 feet of the nest shall be delayed until the nesting activity has ceased.*
5. *During construction, the environmental monitor shall conduct snowy plover surveys twice a week (preferably two to three days apart).*

#### Residual Impact

With implementation of the above mitigation measures, direct and indirect impacts to western snowy plover would be *less than significant*.

As proposed, approximately 1,300 linear feet of Segment 3 would be located directly adjacent to central foredune habitat. In this area, bikeway users would be allowed to step or ride off the bikeway and directly into the central foredune habitat. This undirected egress on to the foredunes would result in long-term trampling of snowy plover habitat and potentially snowy plover nests.

**BIO Impact 12    The proposed project would allow undirected egress into western snowy plover nesting habitat, potentially impacting nests and nesting behavior over the long-term.**

*Implement BIO/mm-3 and BIO/mm-14.*

#### Residual Impact

Disturbance of the foredune habitat currently exists as visitors access the beach from the NPNA, Pier Landing or other locations. With implementation of the above mitigation measures, long-term impacts resulting from this project to western snowy plover nesting habitat would be *less than significant*.

#### *Coast horned lizard*

The central foredune community provides suitable habitat for coast horned lizard and other common reptiles. CNDDDB documents a coast horned lizard occurrence within 2,000 feet of the project area. Grading activities could result in direct take of coast horned lizard and other

reptiles. Direct take may include being struck by equipment, entrapped in stockpiled materials or trenches, or trampled or collected by construction personnel.

**BIO Impact 13    The proposed project could result in direct take of coast horned lizard.**

*BIO/mm-20        Prior to site grading, the environmental monitor shall conduct a survey for coast horned lizard and other reptiles. The surveyor shall utilize hand search methods in areas of disturbance where coast horned-lizards are expected to be found (e.g., under shrubs, other vegetation, or debris). Any lizards located during this survey should be safely removed from the construction area and placed in suitable habitat.*

**Residual Impact**

With implementation of the above mitigation measures, long-term impacts resulting from this project to coast horned lizard would be *less than significant*.

### **4.3.6 Cumulative Impacts**

The proposed project would result in permanent and temporary impacts to ESHAs, including central foredunes, jurisdictional waters, ephemeral drainages, seasonal wetlands, and special status plants and wildlife. These resources fall under the jurisdiction of various state and federal resource agencies. Cumulatively, the project would result in an increased demand for public access and associated parking, which has the potential to affect natural resources and habitats. The project would also include restoration of approximately 0.4 acre of native habitat at the site of the remnant road. The potential impacts to the sensitive species and habitat types discussed in this section, when considered in context with the potential for losses of similar habitats due to the construction of future projects within the County, constitute a cumulative impact to these biological resources.

**BIO Impact 14    The impacts to sensitive species and habitats resulting from development of the proposed project would result in the direct loss of biological resources, and would contribute to the cumulative degradation of biological resources of the area, resulting in a potentially significant cumulative impact.**

*Implement BIO/mm-1 through BIO/mm-20.*

**Residual Impact**

Implementation of these measures would reduce project specific and cumulative impacts to a *less than significant level*.

## 4.4 CULTURAL RESOURCES

This section discusses existing cultural resources within the project corridor and identifies potential impacts to those resources which could result from the proposed project. It focuses on Segments 2, 3, and 4, as that is where physical improvements are proposed. The section is based heavily on existing published cultural resources reports, the 2006 Environmental Constraints Analysis (ECA) prepared for this project, and the conclusions and recommendations contained in the Extended Phase I (XPI) Study (SWCA 2010), which was specifically prepared for this Environmental Impact Report (EIR). Because archaeological resources can be damaged or destroyed through uncontrolled public disclosure of information, specific resource locations are not disclosed in the EIR. The XPI Study and other relevant cultural resources reports with specific technical information are available for review by qualified persons at the County of Department of Planning and Building.

### 4.4.1 Existing Conditions

#### 4.4.1.1 Pre-Historic (Archaeological) Resources

The project corridor is within the territory historically occupied by the Obispeño Chumash, the northernmost of the Chumash Hoken speaking peoples of California. Pre-historic marriage patterns and post mission settlement patterns have also identified Salinan people living in the northern portions of San Luis Obispo County. Archaeological evidence has revealed that the ancestors of the Obispeño settled in San Luis Obispo County over 9,500 years ago.

#### Results of 2006 Environmental Constraints Analysis

The Phase I surface survey performed for the ECA did not identify any resources west of Highway 1, south of Toro Creek. It did note a high likelihood that resources would be encountered north of Toro Creek, between the creek and Studio Drive. The same survey concluded that significant cultural resources would likely be encountered during construction of the project on the Marine Terminal, east of Highway 1 between the Caltrans cutslope and Ocean Boulevard, as portions of this area are likely connected to one of two previously identified significant prehistoric sites on the Marine Terminal property (CA-SLO-181 and CA-SLO-879).

Because Phase I surveys are relatively limited in scope and the potential for encountering significant resources was high within the corridor, the 2006 ECA concluded that additional subsurface survey work, specifically an XPI survey, should be conducted in order to better assess the significance of the resources in the project corridor, and determine what mitigation may be appropriate.

It should be noted that subsequent cultural resource investigations in the vicinity of the two sites determined that CA-SLO-181 is within the boundaries of CA-SLO-879. As a result, CA-SLO-181 has been subsumed by CA-SLO-879 and is addressed as a single resource (e.g., the “site”) in this EIR and the XPI.

#### CA-SLO-879

CA-SLO-879 was first recorded in 1979. The site at that time was considered likely to be a large and important site. Subsequent investigations expanded and refined the boundaries of the site to include three nearby prehistoric archaeological sites: CA-SLO-181, CA-SLO-1187,

and CA-SLO-1378. What is now referred to as CA-SLO-879 consists of extensive shell midden deposits, flaked stone tools, shell beads, ground stone artifacts, bedrock milling stations, fire affected rock, and human remains. A previous investigation noted the presence of six human burials. Radiocarbon dating has indicated that the site dates to between 700 and 1500 A.D.

Subsurface investigations within the site have revealed areas with intact cultural deposits and areas of heavy disturbance caused by various activities associated with the Marine Terminal and Highway 1. They also suggest that the site contains considerable depth, especially in the areas adjacent to Toro Creek. As a result of the extensive breadth and depth of resources within CA-SLO-879, the site has been recommended eligible for listing in the National Register of Historic Places (NRHP) and is considered to have the potential to yield important information regarding local cultural chronology, ethnographic boundary delineation, and economic and technological development.

#### 2010 Extended Phase I (XPI) Survey

Although intact cultural resources deposits have been recovered from CA-SLO-879 during previous cultural resource investigations and the site has already been recommended eligible for listing in the NRHP, at the time the EIR was prepared, no study had adequately defined the boundaries of CA-SLO-879 through subsurface examination. Therefore the goal of the XPI was to determine whether the proposed project's area of disturbance contains (1) intact archaeological deposits affiliated with the CA-SLO-879; and/or (2) elements contributing to the NRHP recommendation.

In order to investigate the potential archaeological deposits within the project corridor, a series of 26 Shovel Test Units (STU) were excavated. These excavations occurred within the project corridor on the western and eastern sides of Highway 1 (the eastern excavations were performed because the alignment east of Highway 1 is a project alternative), adjacent to and within the previously defined boundaries of CA-SLO-879. Each STU was manually excavated in 10-centimeter (cm) levels to a minimum 30-cm (approximately 1 foot) depth below surface in native soils and to a maximum depth of 80 cm (approximately 2.5 feet).

The excavations revealed evidence of intact archaeological deposits affiliated with CA-SLO-879 within the proposed project's area of disturbance, and on the eastside of Highway 1. Based on this result, it appears that the previously mapped western boundary of CA-SLO-879 may have been located too far to the east. This is due at least in part to the lack of subsurface work which had been performed west of Highway 1, but may also be due to the fact that the number of resources identified west of the highway are substantially less than those on the east side of Highway 1.

#### **4.4.1.2 Historic Resources**

Based on the 2006 ECA, there are no resources in the project corridor listed on the NRHP or the inventory of California Historical Landmarks. As discussed in the XPI Study, a report prepared in 2004 (Price) indicated that the Marine Terminal, while it does have local importance to the history of oil development on the Central Coast, generally lacks the integrity necessary for consideration as a historic resource.

#### **4.4.1.3 Paleontological Resources**

The project corridor is mostly located on alluvium, and sand dune deposits, which are generally too young to contain significant paleontological resources. Bedrock may be encountered in the North Point Natural Area (NPNA), but it is part of the Franciscan Formation (U.S. Geological Survey (USGS) Map of California, San Luis Obispo Edition 1958), where paleontological resources are not expected to be encountered. Segments 2 and 3 would be located above marine terrace deposits that could contain paleontological resources.

#### **4.4.2 Regulatory Setting**

##### **4.4.2.1 Federal Policies and Regulations**

Authorized under the National Historic Preservation Act (NHPA) of 1966, the NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect our historic and archeological resources. Properties listed in the NRHP include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture. The NRHP is administered by the National Park Service, which is part of the U.S. Department of the Interior.

##### **4.4.2.2 State Policies and Regulations**

###### Office of Historic Preservation

The Office of Historic Preservation (OHP) is the governmental agency primarily responsible for the statewide administration of the historic preservation program in California. The Mission of the OHP and the State Historical Resources Commission, in partnership with the people of California and governmental agencies, is to “preserve and enhance California's irreplaceable historic heritage as a matter of public interest so that its vital legacy of cultural, educational, recreational, aesthetic, economic, social, and environmental benefits will be maintained and enriched for present and future generations.”

The Central Coast Information Center (CCIC) under contract to the State Office of Historic Preservation helps implement the California Historical Resources Information System (CHRIS). It integrates information on new resources and known resources into the CHRIS, supplies information on resources and surveys to government and supplies lists of consultants qualified to do historic preservation fieldwork within the area. The California Archaeological Site Inventory is the collection of Site Records, which has been acquired and managed by the Information Centers and the OHP since 1975.

###### Senate Bill 18 Consultation

Senate Bill 18 (SB 18) was signed into law in September 2004 (effective January 2005), and requires local governments (city and county) to consult with California Native American tribes to aid in the protection of traditional tribal cultural places through local land use planning. The State Tribal Consultation Guidelines (November 2005) states that the intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places. The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level land use decisions are made by a local government.

Local governments are required to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. Applicable planning decisions include the adoption and amendment of general plans and specific plans. The proposed project is not a general plan or specific plan amendment, but significant consultation with Native American tribes was conducted (refer to Appendix A).

In response to the Notice of Preparation (NOP) for the EIR, the Native American Heritage Commission (NAHC) identified 23 Native American groups or individuals who may have knowledge of cultural resources in the project area. Letters were sent to each representative, and three responses were received. Representatives indicated that resources were likely to be encountered during construction. They also requested that both the cultural resources investigation and the proposed project be implemented in a non-invasive manner, and that Native American Monitors should be on-site during the XPI investigation and construction of the project (qualified persons can refer to the XPI Study for more information).

#### **4.4.2.3 Local Policies and Regulations**

The County of San Luis Obispo Coastal Zone Land Use Ordinance (CZLUO) includes ordinance requirements for the protection of known cultural resources, and implementation of mitigation measures to minimize potential impacts to known and unknown resources. In addition to General Plan and ordinance requirements, *Coastal Plan Policies* (refer to Appendix B) include policies for the protection of cultural resources consistent with the requirements of the California Coastal Act (1976).

#### **4.4.3 Thresholds of Significance**

CEQA guides lead agencies to protect and preserve resources with cultural, historic, scientific, or educational value. Appendix G of the CEQA Guidelines puts forth the following questions to be used in determining a project's impact on cultural resources. Would the project:

- a. Cause a substantial adverse change in the significance of a historical resource?
- b. Cause a substantial adverse change in the significance of an archaeological resource?
- c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- d. Disturb any human remains, including those interred outside of formal cemeteries?

Generally, intact cultural and historic deposits are considered significant. Severely disturbed or mixed deposits often are not considered significant but may have educational value. Human remains and associated goods are accorded special consideration, even when fragmentary and are considered significant.

#### **4.4.4 Impact Assessment Methodology**

The impact assessment below is based on the results of the previously prepared cultural resources survey, the conclusions and recommendations made in the 2006 ECA, and the recommendations in the XPI Study – all of which have been prepared by qualified cultural resources consultants.



Development and implementation of the XPI included conducting a supplemental cultural resources records search for the project area and a 1-mile radius at the CHRIS CCIC, located at University of California, Santa Barbara. In addition, the following sources of information, along with official maps and records were consulted:

- NRHP – Listed Properties (2006)
- California Register of Historical Resources (2006)
- California Inventory of Historical Resources (1976)
- California State Historical Landmarks (1996 and updates)
- California Points of Historical Interest (1992 and updates)
- Office of Historic Preservation Historic Property Directory and Determinations of Eligibility (2006)
- NAHC Sacred Lands File

Review of all relevant cultural resource records revealed that while numerous surveys had been prepared for the site now referred to as CA-SLO-879, no subsurface work had been performed directly within the potential area of disturbance for either the proposed project or eastern alignment. After review of all available information, an XPI proposal was developed.

The XPI included using a series of STUs to investigate CA-SLO-879 within the proposed area of disturbance for the proposed project and the eastern alignment. The XPI was implemented during March 2010. The investigation included determining the presence or absence of archaeological deposits, delineating resource boundaries, and determining the integrity of encountered deposits. At the conclusion of field work, the XPI Study was prepared. The study included a description of all artifacts and their relationship to CA-SLO-879, and recommended mitigation measures. The description and mitigation measures were used to prepare the sections below.

#### **4.4.5 Project Specific Impacts and Mitigation Measures**

##### **4.4.5.1 Prehistoric Resources**

Results of the XPI indicate that the proposed project would be located within the western portion of a known cultural resources site. The resources identified during the investigation were limited, and found at between 20 and 30 centimeters (approximately 9 to 13 inches) below the surface. The proposed bikeway would require an approximately 6-inch excavation to allow for an adequate foundation for the paved bikeway. Excavations would be considerably deeper at the proposed Toro Creek bridge, where piers would be required.

Because the depth of excavation for the bikeway is relatively shallow and the number of specific resources identified within the alignment of the proposed project is low, the potential that significant resources would be encountered during construction is relatively low. However, the proposed project would traverse a known cultural resources site eligible for the NRHP; and construction of the bridge piers would require more substantial disturbance. It has also been noted that the amount of historical disturbance within the project corridor has varied considerably and therefore confirming the precise location and integrity of resources has been challenging despite multiple subsurface surveys. Because of these factors, impacts resulting from the proposed project are considered potentially significant.

Typically recommended mitigation for a potential impact such as this would include either (1) monitoring during construction (if the potential for encountering resources was very low), or (2) Phase III data collection and recovery (if the project is likely to disturb significant resources, and avoidance is infeasible). In this case the recommended mitigation includes preparation of a Phase II cultural resources investigation. These investigations are structured as to be useful in determining a site's boundaries and integrity. For this project, a Phase II investigation would further refine results of the XPI, so that resources could be avoided to the extent feasible, prior to construction. Based on the previous investigations it is unlikely, but if during implementation of the Phase II it becomes apparent that resources on the western side of Highway 1 are more substantial than was indicated during the XPI study, the County would instead be required to perform a more intensive "Phase III data collection and recovery" investigation prior to construction. These measures are all described below.

**CR Impact 1      The proposed project would potentially disturb intact subsurface cultural resources associated with a known cultural resources site, resulting in a significant impact.**

*CR/mm-1      Prior to submittal of application for construction permits, the General Services Agency shall perform a Phase II cultural resources investigation. The investigation shall be developed and implemented by a qualified archaeologist approved by the Environmental Coordinator. It shall, at minimum, confirm the western boundary of the cultural resources site and the integrity of the resource as they relate to the proposed area of disturbance. The results of the Phase II investigation, along with recommendations for either avoidance, monitoring (refer to CR/mm-5, 6, and 7 below), and/or further testing (refer to CR/mm-3 through 7) shall be identified in a technical report.*

*CR/mm-2      Upon submittal of application for construction permits, the General Services Agency shall provide verification that a Phase II cultural resources investigation has been completed and that the final bikeway alignment has been modified, as necessary, to address recommendations in the Phase II technical report.*

*Or;*

*CR/mm-3      Prior to issuance of construction permits, the General Services Agency shall submit to the Environmental Coordinator for review and approval, a detailed research design for a Phase III (data recovery) archaeological investigation. The Phase III program shall be prepared by a subsurface qualified archaeologist approved by the Environmental Coordinator. The consulting archaeologist responsible for the Phase III program shall be provided with a copy of the previous archaeological investigations. The Phase III program shall include at least the following:*

- a. standard archaeological data recovery practices;*
- b. recommendation of sample size adequate to mitigate for impacts to archaeological site, including basis and justification of the recommended sample size.*

- c. *identification of location of sample sites/test units;*
- d. *detailed description of sampling techniques and material recovery procedures (e.g. how sample is to be excavated, how the material will be screened, screen size, how material will be collected);*
- e. *disposition of collected materials;*
- f. *proposed analysis of results of data recovery and collected materials, including timeline of final analysis results;*
- g. *list of personnel involved in sampling and analysis.*

*Once approved, these measures shall be shown on all applicable plans and implemented during construction.*

*CR/mm-4 Prior to issuance of construction permit, the applicant shall submit to the Environmental Coordinator, a letter from the consulting archaeologist indicating that all necessary field work as identified in the Phase III program has been completed.*

*CR/mm-5 Prior to issuance of construction permit, the applicant shall submit a monitoring plan, prepared by a subsurface-qualified archaeologist, for the review and approval by the Environmental Coordinator. The monitoring plan shall include at a minimum:*

- a. *List of personnel involved in the monitoring activities;*
- b. *Description of how the monitoring shall occur;*
- c. *Description of frequency of monitoring (e.g. full-time, part time, spot checking);*
- d. *Description of what resources are expected to be encountered;*
- e. *Description of circumstances that would result in the halting of work at the project site (e.g. What is considered "significant" archaeological resources?);*
- f. *Description of procedures for halting work on the site and notification procedures;*
- g. *Description of monitoring reporting procedures.*

*CR/mm-6 During all ground disturbing construction activities, the applicant shall retain a qualified archaeologist (approved by the Environmental Coordinator) and Native American to monitor all earth disturbing activities, per the approved monitoring plan. If any significant archaeological resources or human remains are found during monitoring, work shall stop within the immediate vicinity (precise area to be determined by the archaeologist in the field) of the resource until such time as the resource can be evaluated by an*

*archaeologist and any other appropriate individuals. The applicant shall implement the mitigation as required by the Environmental Coordinator.*

**CR/mm-7**      *Upon completion of all monitoring/mitigation activities, and prior to final inspection (whichever occurs first), the consulting archaeologist shall submit a report to the Environmental Coordinator summarizing all monitoring/mitigation activities and confirming that all recommended mitigation measures have been met. If the analysis included in the Phase III program is not complete by the time final inspection or occupancy will occur, the applicant shall provide to the Environmental Coordinator, proof of obligation to complete the required analysis.*

#### Residual Impact

After completing CR/mm-1 and 2, the applicant would be responsible for implementing either CR/mm-5 through 7, or CR/mm-3 through 7. Implementation of these measures would allow for avoidance of cultural resources through minor modifications to the bikeway alignment and/or mitigation of impacts through implementation of a Phase III recovery plan. These measures have been prepared so that the additional subsurface testing shall be performed prior to submittal of applications for construction, so that avoidance measures can be incorporated into the project prior to completion of final construction drawings. These measures would reduce impacts to a *less than significant* level. No additional mitigation is required.

#### **4.4.5.2 Historical Resources**

Due to the lack of potentially historic structures within the project corridor and limited area and depth of disturbance required for the project, it is unlikely that significant historical resources would be encountered as a result of earthwork associated with the project. Impacts to historic resources would be *less than significant*. No mitigation measures are required.

#### **4.4.5.3 Paleontological Resources**

The proposed project would be located on alluvium or other formations that are not known to contain significant paleontological resources. In addition, because construction of the project would generally require excavations of only six inches, disturbance of the underlying bedrock to any significant degree is unlikely. Impacts to paleontological resources would be *less than significant*. No mitigation is required.

#### **4.4.6 Cumulative Impacts**

Implementation of the proposed project would potentially contribute to the cumulative degradation of significant archaeological resources in the County. The destruction of archaeological resources has a significant cumulative impact as they are inherently important to the descendants of native peoples and make the study of prehistoric and historic life unavailable for study by scientists. Given the prevalence of cultural resource sites in San Luis Obispo, and the number of construction activities that involve disturbance of archaeologically sensitive areas that are not regulated, it is likely that significant prehistoric and historic resources are often not identified and are permanently lost. For the proposed project, impacts to known potential subsurface prehistoric archaeological resources would be avoided or mitigated by implementation of data recovery and monitoring. Based on implementation of mitigation measures recommended in this EIR, potential cumulative impacts resulting from the proposed project are considered *less than significant*. No additional mitigation is required.

## 4.5 GEOLOGY, SOILS, AND DRAINAGE

This section discusses existing geologic and soils related conditions and the natural and manmade drainage conditions within the project corridor. It focuses on Segments 2, 3 and 4, as that is where improvements are proposed. The section is based on existing published geologic and soils data and the Geologic Bluff and Geotechnical Feasibility Evaluation (geotechnical report), prepared by Earth Systems Pacific (2008). This section identifies potential geologic impacts including the potential of the project to be affected by bluff retreat and local geologic conditions. Direct and indirect impacts to the existing drainage system are also included. This section also considers erosion and sedimentation impacts resulting from the proposed project, but relies on mitigation measures developed in the Biological Resources section, to the extent feasible.

### 4.5.1 Existing Conditions

#### 4.5.1.1 Geologic Setting

Based on U.S. Geologic Survey (USGS) maps (Jennings 1958), the proposed project is located on coastal bluffs between the Santa Lucia Range and the Pacific Ocean. Bedrock underlying the project site is predominately Quaternary non-marine terrace deposits. Portions of the North Point Natural Area (NPNA) overlie the Franciscan formation.

The proposed project would not require substantial excavation below the surface therefore disturbance of bedrock would be minimal. Disturbance of bedrock would occur at a small portion of the project located within the NPNA because bedrock is close to the surface and at Toro Creek where relatively deep bridge foundations (piers, outside of banks) may be necessary.

The project site is not in the County's Geologic Study Area. Based on the County's Geographic Information Systems (GIS) database, the nearest potentially active fault is located approximately 0.25 mile to the northeast. Landslide and rockfall conditions do not exist at the project site given the relatively flat topographic conditions of the project area.

#### Soil Conditions

There are three soil types present in the area (refer to Figure 4.5-1) where the proposed project would result in ground disturbance. These soils are described below.

##### *Cropley Clays, 2 to 9 % Slopes (Soil Unit 128)*

This very deep, moderately drained, gently sloping to moderately sloping soil is found on alluvial fans and plains. It is formed in alluvium weathered from sedimentary rocks. Typically the surface layer is dark gray, very dark gray, and light brownish gray clay approximately 36 inches thick. When the soil is dry, large cracks extend to a depth of 40 inches or more. Permeability of the unit is slow, and the available water capacity is high. Surface water runoff is slow to medium, and the hazard of water erosion is slight to moderate. The Cropley clay has a high shrink-swell potential.

##### *Diablo and Cibo Clay, 9 to 15% Slopes (Soil Unit 130)*

This soil is deep and well drained. It formed in residual material weathered from sandstone, shale, or mudstone. Some areas have a clay loam or silty clay surface layer. Permeability of

the Diablo soil is slow, and the available water capacity is moderate to very high. Surface runoff is medium, and the water erosion hazard is moderate. This soil has a high shrink-swell potential and is subject to slippage when wet.

The Cibo soil is moderately deep and well drained. It formed in residual material weathered from sandstone or shale. Permeability of the Cibo soil is slow, and the available water capacity is very low to moderate. Surface runoff is medium, and the hazard of water erosion is moderate. This soil has a high shrink-swell potential and is subject to slippage when wet.

#### *Xerothents, Escarpment (Soil Unit 223)*

This soil unit consists of moderately to steep, relatively smooth descending slopes at the end of terraces. Areas are long and narrow in shape; some areas are characterized with deep gullies. When the soil surface is bare, runoff is rapid leading to high erosion hazard potential.

#### Liquefaction

Liquefaction is the rapid transformation of saturated, loose, fine-grained sediment (such as silt and sand) to a fluid-like state, often caused by an earthquake. During the shaking the soil loses its bearing strength and it may spread laterally, undergo settlement, and/or form fissures. Liquefaction can result in substantial damage to property, roads, and infrastructure, including bikeways.

The geotechnical report prepared for the project included a feasibility evaluation and identification of issues which could affect bridge abutments. That report noted that a surface analysis of the specific abutment location was not possible due to the amount of existing rip-rap located on the banks and under the bridge at this location. However, based on the review of adjacent soil conditions and the proximity to Toro Creek, the soils adjacent to Toro Creek appear to be susceptible to liquefaction and lateral spreading.

#### Bluff Retreat

The bluff adjacent to the proposed bikeway was described by Earth Systems as “a gently westerly sloping wave cut terrace that is capped predominately by marine terrace deposits.” In some places dune sand has been blown onto the bluff face and blufftop, causing an accretion, but for the stretch of the proposed project from the NPNA to the south end of Studio Drive, bluff retreat has been dominant. Aerial photos from 1963 and 2005 were used to identify retreat and accretion rates. Bluff retreat along the portion of the coast from Toro Creek through the Pier Landing south to the NPNA was not assessed due to extensive grading, topographic modification, bulkheads, and rip-rap that exists in this area. Bluff retreat and accretion is shown in Figure 4.5-2. The proposed bikeway location is approximate on the figure.

The maximum bluff retreat at the site was measured at 62 feet, or 17.7 inches per year. The maximum accretion onsite was 58 feet, or 16.8 inches per year. Dune sand bluff accretion was not considered in the overall bluff retreat rate due to its low resistance to sea wave erosion. As visible in Figure 4.5-2, retreat has been highly variable throughout the bluff retreat study area.

Bluff retreat at the NPNA has been significant. But given the bluffs height above the ocean at this point, it would appear that stormwater erosion has been the dominant force behind the retreat in this area.



Figure 4.5-1. Geology and Soils Map

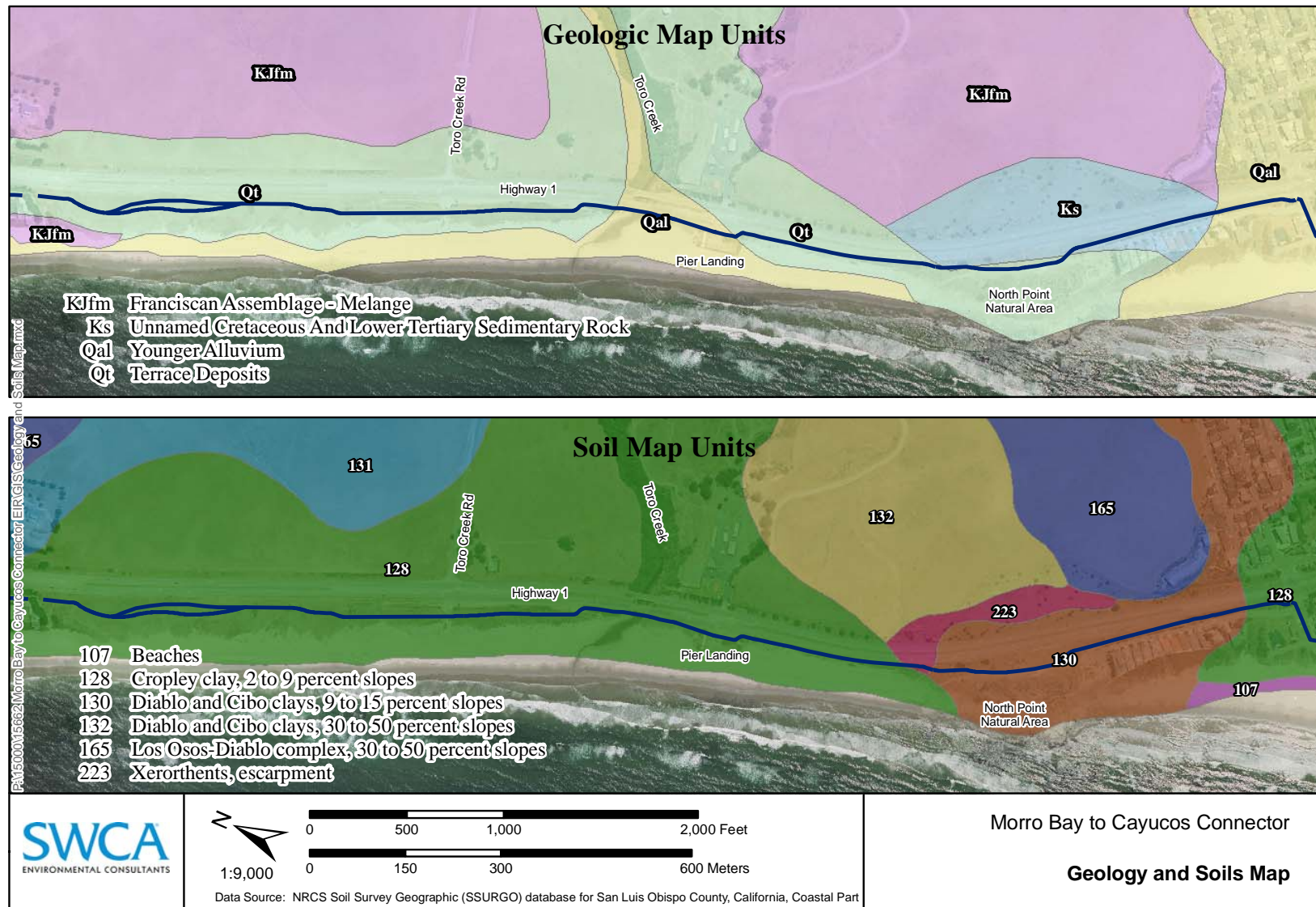
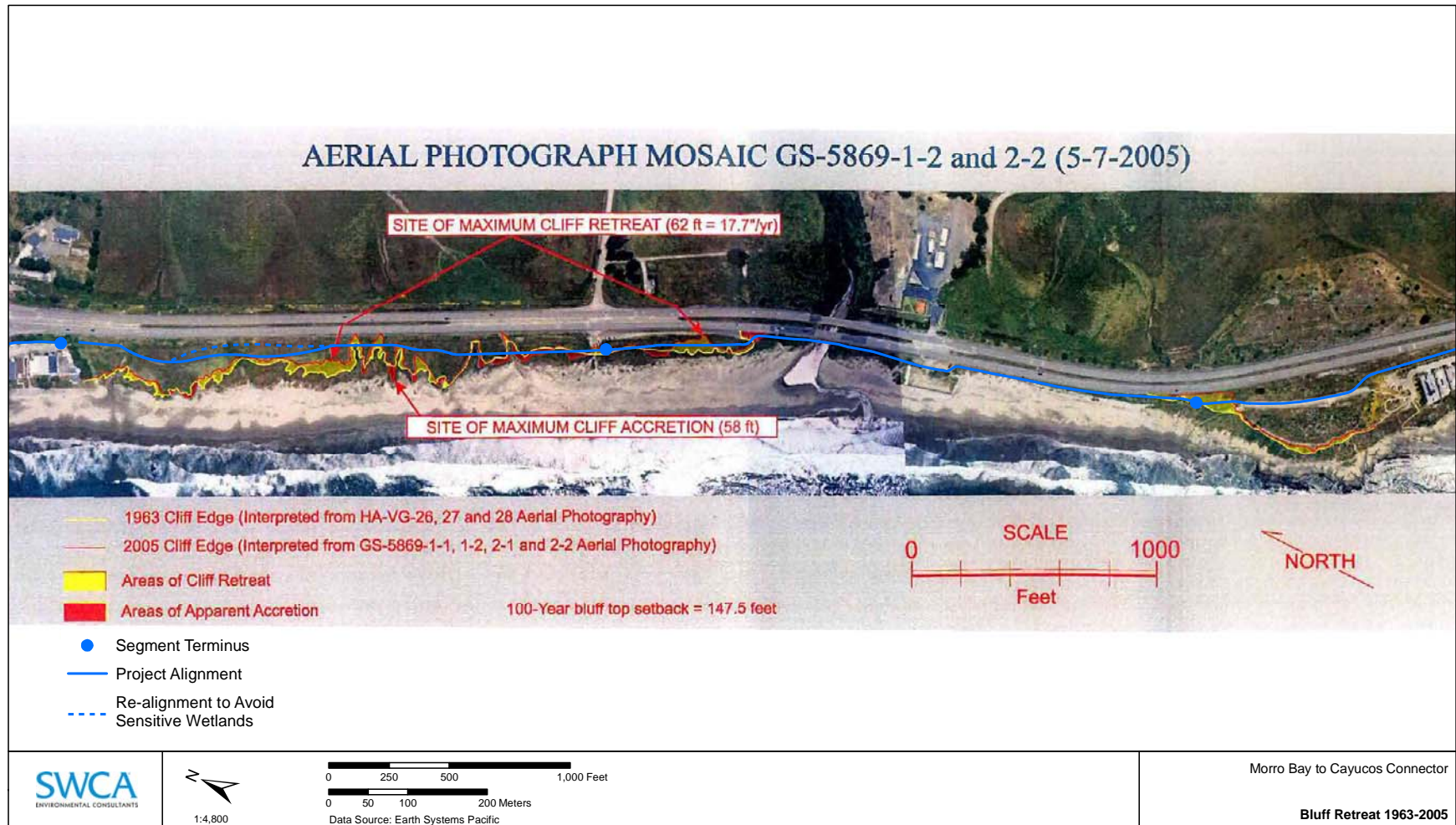


Figure 4.5-2. Bluff Retreat Map





## Drainage

Toro Creek is the most significant drainage feature in the project area. In plan view the bridge across Toro Creek is within the 100-year flood plain associated with Toro Creek; however proposed project improvements would not require disturbance within the mapped floodplain.

There are numerous ephemeral drainage swales observed throughout the project corridor. Some of the swales begin west of Highway 1 and each only drains a small area of the terrace. Other swales accept stormwater discharge from storm drains (culverts) passing under Highway 1. The inlets for four are located east of Highway 1 in the right-of-way (ROW), and one inlet is located in the median between the north and southbound lanes. Based on the sizes of the culverts and topography east of Highway 1, they most likely convey Highway 1 stormwater runoff and do not convey significant volumes of stormwater from the valley. Much of the Marine Terminal property appears to drain to Toro Creek, although some small, shallow isolated basins were identified during field visits. These are shown on the Biological Resources figures 4-3.1 through 4-3.3. The drainage swales outlet directly into the Pacific Ocean.

There are three significant drainage features within the project corridor at the north end of the NPNA. These drainages are shown in Figure 4.5-3. The solid blue line indicates the approximate location of Segment 2 in this area. These drainage swales are relatively deeply incised and because of this, pipelines that run perpendicular to the bluff are exposed and hanging unsupported at these areas. These drainages and the same exposed pipeline also appear in aerial photos of the area taken in 1972 ([www.californiacoastline.org](http://www.californiacoastline.org)). The northernmost of these swales is the discharge point for a storm drain, while the other two appear to be the result of stormwater runoff concentrated by the remnant road. The southernmost of these swales is the most deeply incised and at its upper end, runs parallel to the existing ROW fence.

**Figure 4.5-3 Incised Drainages at North Point Natural Area (in dashed blue)**



## 4.5.2 Regulatory Setting

### 4.5.2.1 Federal and State Regulations

Water quality protection is regulated by the Federal National Pollutant Discharge Elimination System (NPDES) Program established by the Clean Water Act. The U.S. Environmental Protection Agency (EPA) establishes stormwater permit requirements based on compliance with a NPDES permit. Discharges of stormwater associated with construction activity that results in a disturbance of one acre or more of total land area requires a NPDES General Permit for Discharges of Stormwater Associated with Construction Activity. This permit requires developers to implement best management practices (BMP) to prevent the discharge of sediment-laden or otherwise contaminated water off site. The site-specific plan to implement BMPs is called the Stormwater Pollution Prevention Plan (SWPPP). The plan must include a description of soil stabilization and sediment load control methods that would be implemented to minimize erosion and sediment loading during construction of the project. The SWPPP also includes descriptions of post-construction BMPs. The State of California administers stormwater permits through the State Water Resources Control Board (SWRCB) and its local Regional Water Quality Control Board (RWQCB) (Central Coast Region). A SWPPP would be required for the proposed project.

### 4.5.2.2 Local Regulations

#### County of San Luis Obispo Estero Area Plan

Shoreline development standards in the Estero Area Plan include the following (Areawide Standard I-4):

**Bluff Setbacks.** The bluff setback is to be determined by the engineering geology analysis required in I.1.a. above adequate to withstand bluff erosion and wave action for a period of 100 years. In no case shall bluff setbacks be less than 25 feet. Alteration or additions to existing development that is non-conforming with respect to bluff setbacks that equals or exceeds 50 percent of the size of the existing structure, on a cumulative basis beginning July 10, 2008, shall not be authorized unless the entire structure is brought into conformance with this setback requirement and all other policies and standards of the Local Coastal Plan. On parcels with legally established shoreline protective devices, the setback distance may account for the additional stability provided by the permitted seawall, based on its existing design, condition, and routine repair and maintenance that maintain the seawall's approved design life. Expansion and/or other alteration to the seawall shall not be factored into setback calculations.

#### County of San Luis Obispo Coastal Zone Land Use Ordinance Sections

Specific Coastal Zone Land Use Ordinance (CZLUO) sections pertaining to Geology, Soils, and Drainage are described below. The project would be required to comply with these sections.

**Blufftop Setbacks** – Section 23.04.118 of the CZLUO requires that new development or expansion of existing uses on blufftops be designed and set back from the bluff edge a distance sufficient to assure stability and structural integrity and to withstand bluff erosion and wave action for a period of 75 years without construction of shoreline protection structures that would in the opinion of the Planning Director require substantial alterations to the natural landforms along bluffs and cliffs. A site stability evaluation report shall be prepared and submitted by a certified engineering geologist based upon an on-site evaluation that indicates that the bluff setback is adequate to allow for bluff erosion over the 75 year period according to County

established standards. This language is superseded by the Estero Area Plan, Shoreline Development standard.

**Grading Standards** – Sections 23.05.022 through 23.05.039 of the CZLUO establish standards for grading and excavation activities to minimize hazards to life and property; protect against erosion and the sedimentation of watercourses; and protect the safety, use, and stability of public rights-of-way and drainage channels. Additional standards for grading within a Sensitive Resource Area are in Sections 23.07.160 et seq.

**Erosion and Sedimentation Control Plan** – Section 23.05.036 of the CZLUO addresses to minimize these impacts. When required, the plan is prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts.

**Drainage Control** – Section 23.05.040 et. seq., of the CZLUO Land Use Ordinance contains the County's standards for the control of drainage and drainage facilities to minimize the harmful effects of storm water runoff and to protect neighboring and downstream properties from drainage problems resulting from new development. These standards include:

- Requirements pertaining to the design and construction of drainage systems;
- Requirements pertaining to the maintenance of offsite natural drainage patterns;
- Requirements pertaining to location of development in the coastal area; and,
- Restrictions on development in areas subject to flood hazards.

#### City of Morro Bay Standards

The City of Morro Bay also has standards regulating drainage within the City limits. Compliance with these standards is necessary for portions of the proposed project within the City limits. City standards focus on areas located within or near the 100-year flood plain. Chapter 17.84 of the Municipal Code and the City's Flood Management Policy Handbook recommend that a site-specific hydrologic study be performed for any development within the 100-year flood plain in order to assess the development's effect on drainage within the flood plain. In regards to issues associated with geology and soils, it appears that compliance with County CZLUO standards would result in compliance with City of Morro Bay standards as well.

### **4.5.3 Thresholds of Significance**

The thresholds of significance are based on the criteria set forth in Appendix G of the CEQA Guidelines. According to that criteria, a project would result in a significant geology, soils or drainage-related impact if it would:

- a. Expose people or structures to potential substantial adverse effects, including risk of loss, injury, or death involving earthquake rupture, strong seismic ground shaking, seismic related ground failure including liquefaction, and landslides;
- b. Result in substantial soil erosion or the loss of topsoil;
- c. Be located on a geologic unit or soil that is unstable that could potentially result in landslide, lateral spreading, subsidence, liquefaction or collapse;
- d. Be located on expansive soil creating substantial risks to life or property;

- e. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site;
- f. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems to control;
- g. Place building structures within a 100-year floodplain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

#### **4.5.4 Impact Assessment and Methodology**

Potential geologic, soils and drainage impacts were evaluated based upon a review of the geotechnical report prepared for the project, the County's GIS database of local geologic and soils conditions, the 2006 Environmental Constraints Analysis and field review of the project site. The geotechnical report included a review of potential bluff retreat rates and identified geotechnical hazards associated with the proposed bridge abutments. As noted in the regulatory setting section, prior to construction, the project proponent would need to prepare and submit numerous reports, including a design-level geotechnical report, and an erosion control plan/SWPPP. Although already required by ordinance, preparation of these plans is sometimes recommended as mitigation to ensure that specific issues identified during preparation of the EIR are included in the plans.

#### **4.5.5 Project-Specific Impacts and Mitigation Measures**

##### **4.5.5.1 Faulting and Seismicity**

No active faults cross the project area but the project site is subject to seismic activity due to its proximity to numerous faults, including potentially active local faults which are less than 2 miles from the project area, and the San Andreas fault, located approximately 40 miles from the project site.

Seismic activity could induce liquefaction, resulting in uneven settlement of the bikeway or cracking of the pavement. Based on the geotechnical report, liquefaction resulting from an earthquake could induce settlement and lateral spreading of soils and even failure of the bridge abutments. The proposed project does not include habitable structures and failures of the majority of the bikeway would necessarily expose persons to injury; however bridge or retaining wall failures could. Any failure could also indirectly accelerate localized erosion and sedimentation

**GSD Impact 1    The proposed project improvements would be subject to damage or failure may become unstable when a seismic event results in liquefaction of the underlying soils.**

*GSD/mm-1    Prior to initiation of construction a design-level geotechnical report for the proposed project, including the bridge abutments, shall be prepared. The report shall address erosion, liquefaction, lateral spreading, rockfall, and seismic settlement potential along the creek banks, and be prepared in accordance with local and state regulations.*

### Residual Impact

The potential exists that a major seismic event coupled with other events such as high groundwater conditions and/or storm events will impact the project improvements; however, implementation of GSD/mm-1 would reduce potential impacts to a *less than significant* level. No additional mitigation is necessary.

### Secondary Impact

A geotechnical feasibility report has been previously prepared for the project. While it did not include subsurface investigation, it did suggest that the project could feasibly be constructed with standard engineering techniques. It is unlikely that compliance with GSD/mm-1 would increase the area of disturbance require construction techniques not described in the report or this EIR. Secondary impacts would be *less than significant*. No mitigation is required.

## 4.5.5.2 Soil Conditions

### Soil Erosion

Construction activities would increase the amount of exposed soils and create small slopes subject to erosion. Erosion would be accelerated where soils are directly exposed to concentrated stormwater runoff such as at culverts and existing drainage swales. Removal of the remnant road would expose a large area of previously “capped” soil to stormwater and erosion could result.

**GSD Impact 2    Construction activities, including soil disturbance, removal of the remnant road, and removal of vegetation would cause erosion and down-gradient sedimentation, resulting in a potentially significant impact.**

*Implement BIO/mm-6 through BIO/mm-10.*

### Residual Impact

Implementation of these measures, which include preparation of a sedimentation and erosion control plan, would reduce potential erosion and sedimentation impacts to a less than significant level. No additional mitigation is necessary.

### Expansive Soils

Expansive soils tend to swell, or expand, with seasonal increases in soil moisture, and shrink, or contract, as the soils become drier during the summer months. The expansion-contraction cycle can create a risk to the proposed improvements. Expansive soils are required by ordinance to be addressed in design-level geotechnical reports. There is no indication that additional measures would be required. Impacts associated with expansive soils are *less than significant*.

### Bluff Retreat and Project Longevity

The bluff retreat study prepared for the proposed project identified a bluff retreat rate of approximately 17.7 inches, or one and a half feet per year. To comply with the CZLUO 75-year retreat requirement, the bikeway would need to be setback approximately 111 feet. Table 4.5-1 shows the anticipate retreat rate over time.



**Table 4.5-1. Estimated Bluff Retreat Over Time**

<b>Years after Construction</b>	<b>Bluff Retreat (feet)</b>
25	37
50	74
75	111
100	148

Based on Figure 4.5-2 the bluff edge has already receded nearly to the Highway 1 ROW in many places. These areas correspond to the incised drainages. As a result portions of Segments 2, 3, and 4 would be constructed beyond the existing bluff edge. North of Toro Creek, the majority of Segment 3 would be located at or beyond the bluff edge. Segment 4, not including drainage swale areas, is located at the bluff edge to approximately 200 feet east of the bluff edge. As a result substantial portions of Segment 3 and portions of Segment 4 of the bikeway would be subject to damage due to bluff retreat in less than 75 years. In areas of the proposed alignment adjacent to drainages, retreat due to ongoing erosion of the drainage swales could threaten the bikeway in less than 25 years.

Because of this relatively high rate of bluff retreat in this area, portions of Highway 1 would also be potentially subjected to damage due to bluff retreat in less than 25 years. Based on conversations with the California Department of Transportation (Caltrans), there are currently no plans to increase shoreline protection or relocate Highway 1 (Giuliani 2009); therefore it cannot be assumed that the proposed project would benefit from any future activities associated with protection of Highway 1.

**GSD Impact 3      Bluff retreat would potentially undermine the Class I bikeway between Toro Creek and Studio Drive within 25 years or less, resulting in an unavoidable significant impact.**

*GSD/mm-2      North of Toro Creek, the proposed Class I bikeway shall be setback from the bluff edge and as close to the Highway 1 ROW as is feasible.*

#### Residual Impact

In some cases bluff top trail improvements are considered “sacrificial structures” because they are not habitable and could be rebuilt further away from the bluff edge as retreat progresses. In this case the proposed bikeway improvements could be considered sacrificial (and the bridges removed); however, because of the limited area between the project and Highway 1, the bikeway could not be rebuilt inland far enough to protect it for any significant length of time, unless it was rebuilt on the eastside of Highway 1.

The proposed mitigation measure would provide an additional 25 to 50 years of protection for the bikeway in the northern portion of Segment 4 by moving the bikeway an average of 20 to 75 feet east. Even with implementation of GSD/mm-3 and some uncertainties inherent with bluff retreat estimates, the bluff retreat would potentially undermine much of the bikeway and require shore protection in considerably less than 75 years. As additional mitigation, shoreline protection or bluff armoring would potentially permanently protect the bikeway; however County Parks has indicated that they would not pursue shoreline protection as it is generally inconsistent with County policies. The proposed project, after implementation of GSD/mm4 would remain potentially inconsistent with CZLUO Section 23.04.118 and Estero Area Plan Shoreline Development standards. Impacts would be *significant and unavoidable*.

### Secondary Impacts

The bikeway alignment between Toro Creek and Studio Drive was proposed because it followed an existing volunteer trail along the bluff. Shifting the alignment east could result in increased biological resource impacts; however based on the figures in the Biological Resources section, there are no occurrences of sensitive botanical species between the proposed Segment 4 and the ROW. Implementation of existing Biological Resources mitigation measures would be adequate to reduce secondary impacts associated with moving Segment 4 inland to a *less than significant* level.

### Drainage

There are no proposed drainage improvements for Segment 2. Existing drainage features in the area of Segment 2 include two storm drains. One has an inlet on the eastside of Highway 1 and an outlet south of Toro Lane. This storm drain appears to be deep enough that construction of Segment 2 would not disturb it. The other storm drain has an inlet on the eastside of Highway 1 and an outfall on the west side. Based on figures in the design report, the outfall appears to be located below or directly adjacent to the proposed bikeway retaining wall.

Segment 2 includes retaining walls, in some cases on both sides of the bikeway. These walls along with the bikeway, which would be impervious, could channel runoff which currently percolates, sheetflows over the bluff edge, or flows into existing drainage swales. Removal of the remnant road, which is an impervious surface and revegetating it, would further alter drainage patterns; although this component of the project would increase pervious surfaces by 0.4 acres, allowing more stormwater to infiltrate the soil rather than running off.

No specific drainage improvements are proposed for Segment 3. The barrier system which would be constructed where the bikeway was directly adjacent to the southbound travel lanes of Highway would potentially concentrate stormwater. This would not be the case near the rip-rapped area as the lanes drain to the center median at this location. Further north, the barrier is slightly separated from the pavement. In these places, runoff from Highway 1 could be captured by the barrier, concentrated, and discharged at the end of the barrier system. There is one existing storm drain just north of the NPNA that appears to outfall directly adjacent to the bikeway at the connection between Segment 2 and Segment 3.

There are four drainage improvements proposed along Segment 4. One includes extending an existing culvert located approximately 150 feet south of Studio Drive. The culvert extension would also include filling a portion of the existing drainage to allow for construction of the bikeway over the culvert. In two other places, bridges have been proposed to avoid filling the

existing drainage swales. The bridges would span the drainages completely. In a fourth location (the northernmost portion of Segment 4) an existing drainage would be partially filled to allow for construction of the bikeway. Mitigation in the Biological Resources section of this EIR would require all four drainages to be “bridged” completely, thereby avoiding these changes to the local drainage conditions. Much of the northern portion of Segment 4 would be located along the relatively flat and wide bluff. While it would bisect the bluff, the eight foot wide bikeway is narrow enough compared to the bluff that the increased impervious surface would not significantly affect runoff patterns.

It appears that the abutments (piers) for the proposed bridge over Toro Creek would avoid the 100 year floodplain entirely on the south side of Toro Creek. In addition, the deck of the bridge is proposed to be at or above the level of the existing Highway 1 bridge. However, any constriction of floodwaters under the bridge or fill within the floodplain could affect local floodlevels and potentially the Highway 1 travel lanes.

**GSD Impact 4    Construction of the bikeway, retaining walls, and the barrier system, and removal of the remnant road would alter local drainage patterns potentially increasing erosion and sedimentation from Yerba Buena St to Studio Drive (Segments 2 through 4) by increasing impervious surfaces, capturing and concentrating stormwater, and filling drainage swales.**

*Implement GSD/mm-2 and BIO/mm-9.*

**GSD/mm-3**    *Prior to issuance of permits, a drainage plan shall be submitted for review and approval by the Departments Public Works and Caltrans. The drainage plan shall be coordinated with the sedimentation and erosion control plan, be consistent with CZLUO 22.050.036 and 040, and specifically shall address:*

- 1. The two existing storm drains that appear to outfall adjacent to or underneath the proposed improvements to ensure that the function of the storm drains is not compromised by the bikeway and that the outfall would not compromise the integrity of the retaining walls.*
- 2. The potential for retaining walls and the barrier to capture and concentrate stormwater runoff. Any improvements shall be coordinated with any existing drainage improvements along Toro Lane and Highway 1 so that these facilities can continue to function as designed.*
- 3. Using the restoration of the remnant road to reduce stormwater runoff from the NPNA.*

**GSD/mm-4**    *Prior to issuance of permits, the General Services Agency shall prepare a hydraulic analysis which verifies that the bikeway improvements, including the proposed bridge over Toro Creek, will not affect flood levels in a way that negatively impacts use of Highway 1. The report will identify existing flood levels and wave run-up conditions and identify changes to these levels that may result from construction of the new bridge over Toro Creek. Measures to reduce any impacts should include:*

1. *Minimizing fill within the floodplain;*
2. *Design suggestions which allow for the unrestricted flow of Toro Creek floodwaters;*
3. *Maintenance requirements, which can be coordinated with Caltrans to minimize the capture and trapping of debris under the bridges.*

#### Residual Impacts

The analysis in this EIR assumes that the proposed new bridge deck would be either at or slightly above the grade of the existing southbound Highway 1 bridge and outside of the top of the creek bank, which would avoid the floodplain entirely south of Toro Creek and make it more likely that the General Services Agency could feasibly comply with GSD/mm-5 without substantial modifications to the project. Implementation of these measures would reduce drainage impacts to a *less than significant* level. No additional mitigation is required.

#### 4.5.6 Cumulative Impacts

Potential impacts related to geologic, soils, and seismic hazards are generally site-specific, and mitigation measures are applied to each project to minimize the potential for significant geologic impacts. In this case however, another project, the proposed Marine Terminal decommissioning along with the proposed project would potentially have a cumulative geology and soils impact. A component of the decommissioning would include removal of the Pier Landing bulkhead, which is currently acting as shoreline protection. Once it is removed the “new” bluff edge would be nearly adjacent to the Highway 101 ROW and the proposed bikeway. Because this represents a significant change to the morphology of the shoreline, it is unknown how quickly bluff erosion at this point would affect the bikeway; however given the relatively rapid retreat in other adjacent areas, it is likely that the bikeway would be impacted in well under 75 years.

It is possible that removal of the bulkhead would also place Highway 1 in danger of bluff retreat and that alternate shoreline protection of some form would be proposed/required to preserve Highway 1. The proposed project would not accelerate or decelerate bluff retreat, and from that perspective it would result in cumulative impacts that are *less than significant*. However, along with the removal of the Pier Landing bulkhead, the proposed project *presents potential inconsistencies* with local and State policies that seek to limit bluff retreat impacts on property and the potential need for shoreline protection.

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## **4.6 HAZARDS AND HAZARDOUS MATERIALS**

This section describes existing and potential sources of environmental hazards and hazardous materials associated with the proposed project. The information referenced in this section was gathered from the Chevron Marine Terminal EIR (County of San Luis Obispo 2006), technical memos and reports provided by the Chevron Corporation, and the 2006 Environmental Constraints Analysis (ECA) previously prepared for this project. Because no subsurface disturbance is proposed for Segments 1 and 5, this section focuses on Segments 2 through 4. Information on the potential for naturally-occurring asbestos hazards is included in the Air Quality section of this Environmental Impact Report (EIR).

### **4.6.1 Existing Conditions**

#### **4.6.1.1 Hazardous Material Definition**

As defined in Chapter 6.95 of Division 20 of the California Health and Safety Code, Section 25501(k), a hazardous material is "...any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment."

#### **4.6.1.2 Hazard Versus Risk**

Worker safety and public health are potentially at risk whenever hazardous materials are used or exposed. It is often helpful to distinguish between the "hazard" associated with these materials and the "risk" they pose to human health or the environment. A hazardous material has the potential to cause damage upon accident or incidental exposure. According to the California Office of Emergency Services (OES), the risk of an event is determined by a combination of the probability of exposure to hazardous materials and the severity of consequences should exposure occur. The likelihood of exposure to a hazardous material coupled with its inherent hazardous properties determines the degree of risk to public health or the environment. To be of high risk, exposure to a hazardous material must be both likely and have negative consequences.

#### **4.6.1.3 Site Conditions**

Land uses within and adjacent to the project site are generally not those typically associated with hazardous materials, with the exception of the marine terminal property. The southern end of the project area, Segments 1, is located in predominately lower density residential areas. Segment 5, the northern most segment, is also located within predominately residential and recreational areas, although there is potentially subsurface contamination associated with a former service station at the corner of Old Creek Road and Ocean Boulevard (County of San Luis Obispo 2008). Numerous underground utilities and pipelines exist within the project area. These pipelines include stormdrains, water lines and petroleum lines. They have been identified on the Preliminary Design Report (this report is on file with the County of San Luis Obispo).

Segments 3 and 4 of the proposed project would be located primarily on the Marine Terminal property, which is known to have relatively extensive contamination. The contamination and ongoing remediation activities are described below.

### Marine Terminal Contamination

The following discussion is based primarily on information in the Contaminated Materials Management Plan (CMMP) prepared for a proposed Marine Terminal decommissioning project (Padre 2009).

The Marine Terminal was active from 1929 to 1999. Based on the long history of petroleum-related activities at the site, there is the potential that soils with residual levels of hydrocarbons could be found north of Toro Creek as well, on the east or west side of Highway 1; however given the distance of the areas north of the creek from the pipelines and structures of the Marine Terminal, the extent and level of contamination would likely be considerably lower than that which is the focus of the remediation efforts (Snelling 2009).

Numerous site assessments have been conducted at the Marine Terminal, including the beach areas, to define and characterize the extent of petroleum hydrocarbon-bearing soils. The area of known contamination is shown in Figure 4.6-1 and can be generally described as extending from Toro Creek on the north, to just south of the southern end of the Chevron Marine Terminal pier Landing (Pier Landing). A portion of the contamination lies beneath the Pier Landing, and it extends approximately 300 feet east of Highway 1. Two areas of contamination exist west of Highway 1 – one area immediately south of Toro Creek and one area corresponding roughly with the Pier Landing bulkhead. The depth to contaminated soils at the area south of Toro Creek area reportedly ranges from nine to 12 feet in depth with an average thickness of two to three feet. The depths of petroleum hydrocarbon-containing soil at the Pier Landing bulkhead area range from 13 to 20 feet and have an average thickness of five to seven feet.

Areas of petroleum hydrocarbon-containing soil and groundwater exist at the Marine Terminal east of Highway 1 as well. Chevron has submitted project plans to the California Regional Water Quality Control Board (RWQCB) and the County of San Luis Obispo for removal of the source areas of petroleum contamination on the eastside of Highway 1 through excavation and free product recovery at three separate areas within the contaminated area. The County of San Luis Obispo has prepared and certified an environmental impact report for the project. The project is described in the *Current Remediation Actions* section below.

### *Current Remediation Actions*

A remediation project is currently underway at the Marine Terminal. The following description of the project was provided by Chevron for use in this EIR:

“Chevron is currently implementing a remediation project at the Estero Marine Terminal pursuant to a Clean-up or Abatement Order issued by the California Regional Water Quality Control Board – Central Coast Region. The source removal project includes excavations to remove separate-phase petroleum hydrocarbons present on shallow ground water at three areas within the Shore Plant area of the Estero Marine Terminal with the objective of improving ground water quality at the project site. To achieve this objective, Chevron is excavating petroleum hydrocarbon-containing soil from three excavation areas, and transporting the soil off-site for treatment or disposal at an approved facility. Additionally, Chevron will remove free product and MTBE and contaminated



ground water from the resulting excavations, store the water and petroleum product temporarily on-site in portable storage tanks, separate free product for recycling, and treat ground water utilizing oil/water separation and granular activated carbon filtration. The existing wastewater ocean outfall system will be utilized to dispose the treated water. The first of the three excavations was completed in November 2009. The remaining two excavations are scheduled for completion in 2010". (Snelling 2009)

### *Potential Future Decommissioning/Remediation Actions*

Chevron has recently submitted materials to the California State Land Commission describing potential future decommissioning activities at the Marine Terminal, although no application has been formally filed at the time this EIR was prepared. The decommissioning work would take place in two phases. Phase 1 (Winter 2010/2011) would include removal of onshore, beach and surfzone pipelines and associated facilities. In some cases lines would be completely removed and disposed of. Due to physical constraints such as Highway 1 and the hazards associated with working in the surfzone, some lines would instead be filled with a concrete slurry and abandoned in place.

Decommissioning Phase 2 (Summer 2011) would potentially include removal of the offshore pipelines from their offshore to terminus to as far into the surf zone as conditions allow. It would also potentially include the removal of the Pier Landing. The fencing and existing concrete pad would be removed, as would the wooden pilings and planking. Approximately 5,000 cubic yards of sand and soil would be excavated from inside the bulkhead prior to removal. The area would be recontoured to match the surrounding topography.

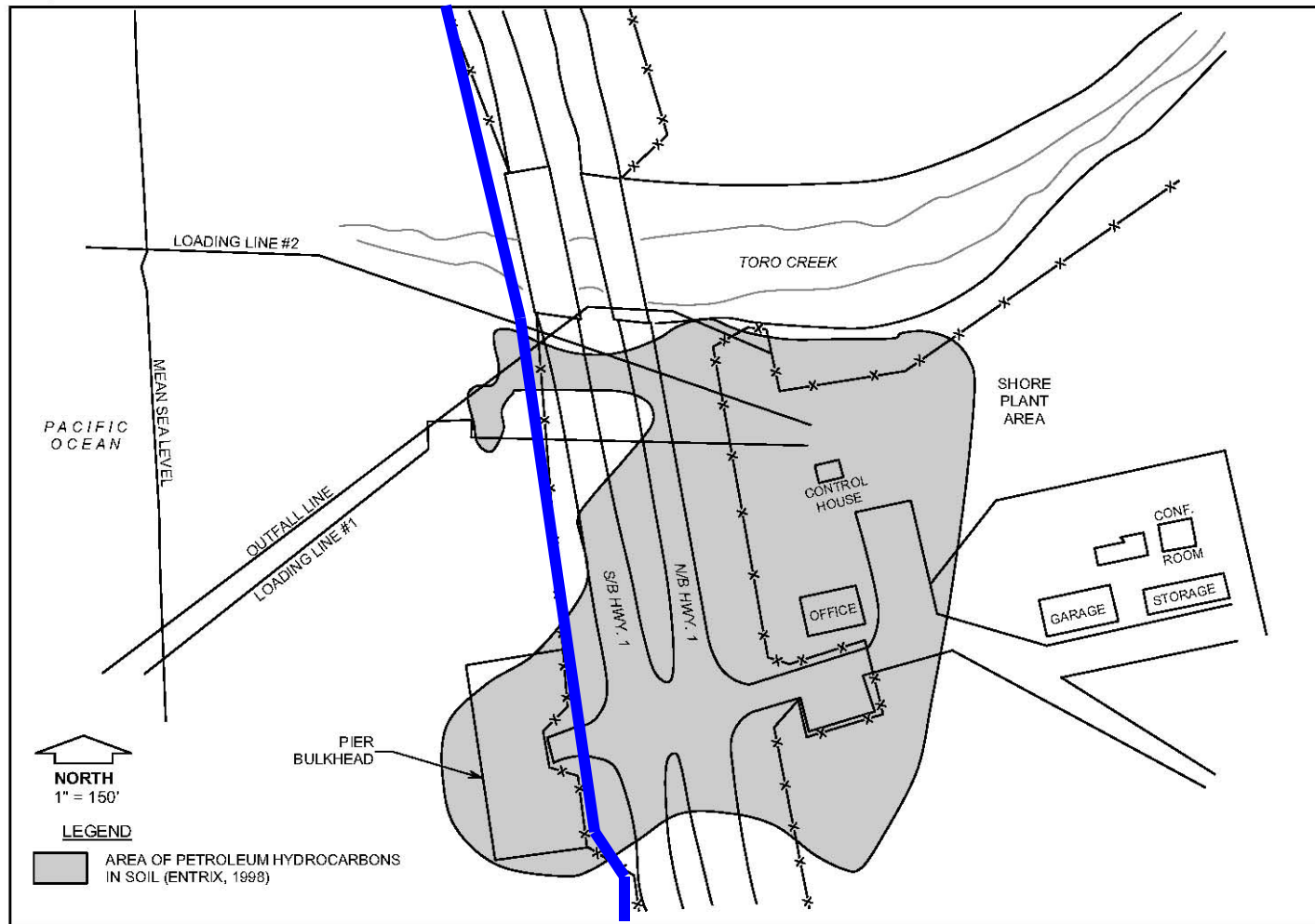
Because of the historical uses and known contamination at the Marine Terminal, a CMMP has been prepared for the decommissioning activities. The CMMP presents an overview of the procedures and protocols that would be implemented during decommissioning activities to safely and appropriately recover, handle, characterize, store, transport, and dispose of any contaminated materials encountered during the decommissioning.

### Tsunami

A tsunami is an ocean wave generated by vertical displacement of the sea floor during an earthquake, a large-scale submarine slope failure, or volcanic eruption. The tsunami hazard for San Luis Obispo County is reported in the *County Safety Element* (1999), and the *Tsunami Emergency Response Plan* (San Luis Obispo County OES October 2005). The hazard of tsunamis within the Morro Bay and Cayucos coastline approximately was reported as being greatest for elevations within 9.5 and 24.2 feet above sea level. The *Tsunami Emergency Response Plan* notes that "recent run-up and inundation modeling and mapping, done by the University of Southern California (USC) under contract to State OES, indicates a general potential maximum inundation elevation of 40 feet above mean sea level. However, undersea geology or bathymetry and local natural or manmade structures may alter this estimate and the county has decided to utilize an inundation of 50 feet above mean sea level for emergency planning purposes."

**Figure 4.6-1. Areas of Petroleum Contaminated Soil (Segment 3 in Blue)**

June 2009  
Project No. 0502-0431



**padre**  
associates, inc.  
ENGINEERS, GEOLOGISTS &  
ENVIRONMENTAL SCIENTISTS

Chevron Estero Marine Terminal  
Tanker Berth Facilities Decommissioning Project

AREA OF PETROLEUM HYDROCARBONS-CONTAINING SOIL

## **4.6.2 Regulatory Setting**

Hazards and hazardous material management is subject to multiple laws, policies, and regulations at all levels of government. The agencies responsible for enforcing applicable laws and regulations develop and enforce standards for the handling and clean-up of specific materials determined to pose a risk to human health or the environment. The enforcing agency at the local level for the proposed project area is San Luis Obispo County Public Health Department, Division of Environmental Health. Enforcement agencies at the State level include two branches of the California Environmental Protection Agency (CalEPA), the Department of Toxic Substances Control (DTSC), and the RWQCB.

### **4.6.2.1 Federal Policies and Regulations**

The Environmental Protection Agency (EPA) is the Federal agency responsible for enforcement and implementation of Federal laws and regulations pertaining to hazardous materials; in addition, the EPA provides oversight and supervision for some site investigation/remediation projects. For disposal of certain hazardous wastes, the EPA has developed land disposal restrictions and treatment standards.

### **4.6.2.2 State Policies and Regulations**

#### Central Coast Regional Water Quality Control Board

The project site is located within the jurisdiction of the Central Coast RWQCB. The RWQCB is authorized by the California Porter-Cologne Water Quality Act of 1969 ("the Porter-Cologne Act"), to implement water quality protection laws. When the quality of the groundwater or the surface waters of the State is threatened, the RWQCB has the authority to require investigations and remedial actions. In addition, the Central Coast RWQCB is the State regulatory agency that oversees the local Leaking Underground Fuel Tank (LUFT) program, which was established to regulate underground fuel tanks. Under the LUFT program, local implementing agencies are required to permit, inspect, and oversee monitoring programs to detect leakage of hazardous materials. The RWQCB has been involved with the regulation of the Marine Terminal Remediation activities.

#### California Environmental Protection Agency, Department of Toxic Substances Control

In California, the DTSC, a branch of CalEPA, works in conjunction with, or in lieu of, the EPA to enforce and implement specific hazardous materials laws and regulations. California has enacted its own legislation pertaining to the management of hazardous materials.

#### Hazardous Waste Control Act

The Hazardous Waste Control Act created the state hazardous waste management program, which is similar to, but more stringent than, the federal Resource Conservation and Recovery Act program. The act is implemented by regulations contained in Title 26 of the California Code of Regulations, which describes required aspects for the proper management of hazardous waste.

#### Emergency Services Act

Under the Emergency Services Act, the state developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an important part of the plan,

which is administered by the California OES. The office coordinates the responses of other agencies, including EPA, the California Highway Patrol, regional water quality control boards, air quality management districts, and county disaster response offices.

#### **4.6.2.3 Local Policies and Regulations**

##### San Luis Obispo County Office of Emergency Services

The County OES is an emergency management agency with responsibilities that include coordination of emergency and disaster preparedness planning, response, and recovery with and between local, state, and federal agencies. The County OES is committed to serving the public before, during and after times of emergency and disaster by promoting effective coordination between agencies, and encouraging emergency preparedness of the public and organizations involved in emergency response.

##### San Luis Obispo County Public Health Department, Division of Environmental Health

Pursuant to State law and local ordinance, the County's Environmental Health Services conducts inspections to ensure proper handling, storage, and disposal of hazardous materials and proper remediation of contaminated sites. In addition, the Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act, [i.e., Chapter 6.95 of Division 20 of the California Health and Safety Code]) requires that any business that handles or stores hazardous materials prepare a Hazardous Materials Business Plan. Under this law, businesses are required to submit inventories of on site hazardous materials and wastes and the locations where these materials are stored and handled. This information is collected and certified by San Luis Obispo County Environmental Health Department for emergency response purposes.

#### **4.6.3 Thresholds of Significance**

Appendix G of the CEQA *Guidelines* states that a project would normally have significant impact if it would create a potential health hazard or involve use, production, or disposal of materials that pose a hazard to people, animal, or plant populations in the area affected. For the purposes of this analysis, an impact would be considered significant if the project would:

- a. Create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials;
- b. Create a significant hazard to the public or the environment reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment;
- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or planned school; or,
- d. Be located in a site which is included on a list of hazardous materials sites compiled by local, state or federal agencies and, as a result, will create a significant hazard to the public or the environment.
- e. Substantially increase hazards due to a design feature or incompatible uses.
- f. Expose people or structures to injury or loss of life from tsunamis.

#### 4.6.4 Impact Assessment and Methodology

The EIR impact analysis focuses on potential health risks associated with the proposed project, particularly from surrounding land uses where there is a potential to encounter hazardous materials. Methodology for assessing the proposed project includes a review of existing resources, including the Chevron Estero Marine Terminal EIR, additional technical reports provided by Chevron, and a review of a list of known potential sources of contamination prepared as part of the ECA. Significant impacts would result if the project would increase the likelihood that hazardous materials or conditions would be encountered or created during project implementation due to existing conditions such as leaking underground storage tanks, or the characteristics of the proposed project.

#### 4.6.5 Project-Specific Impacts and Mitigation Measures

Potential hazards and/or hazardous materials identified in this chapter occur in and around the project site. Those identified are associated with potentially contaminated surface or subsurface soils. In some locations the proposed project would require disturbance of soils known to be contaminated by hydrocarbons.

##### 4.6.5.1 Marine Terminal Contamination

Given the area of contamination shown in Figure 4.6-1, and the depths of contamination provided by Chevron, it appears that hydrocarbon contaminated soils would be encountered during construction of the bikeway improvements. This is particularly true of Segment 3 where the project would cross the Pier Landing and at the proposed Toro Creek bridge. Excavations for the bridge foundations would likely reach at least nine feet below the surface, where contamination is known to exist, especially if piers or caissons were used. Excavations in the area of the Pier Landing would be less than the known depth of contamination 13 feet, however given the extent of contamination in general, and uncertainties associated with defining subsurface features, encountering contaminated materials in this area can not be ruled out completely. The same is true for areas north of Toro Creek.

**HAZ Impact 1     Hydrocarbon-contaminated soils would potentially be encountered during construction of bikeway improvements within the Marine Terminal property, resulting in a release of hazardous materials into the environment.**

*HAZ/ mm-1     Prior to initiation of construction, the General Services Agency shall submit to Environmental Health Services and Regional Water Quality Control Board for approval, a CMMP. The plan shall be implemented throughout construction of bikeway improvements that occur within the Marine Terminal (Chevron property).*

*The CMMP shall at minimum present an overview of the procedures and protocols that will be utilized during the project to safely and appropriately recover, handle, characterize, store, transport, and dispose of any contaminated materials encountered during construction of the project. In the event that petroleum hydrocarbon-containing soil is encountered during excavation activities, the contaminated soil shall be excavated to the extent necessary to safely construct the project.*

*HAZ/mm-2 Prior to final inspection, the General Services Agency shall provide verification that the approved CMMP was implemented in accordance with RWQCB and Environmental Health rules and regulation.*

#### Residual Impact

With implementation of HAZ/mm-1 and 2, impacts would be *less than significant*. No additional mitigation measures are required.

#### **4.6.5.2 Underground Pipelines**

Numerous pipelines exist within the project area. Pipelines and utilities have been identified on the design report plans. Final construction plans would also be required to show all utilities. In general, because excavations for the bikeway would be relatively shallow, it is unlikely that underground utilities would be disturbed. Compliance with construction and engineering standards, which require identification of utilities and pipelines on project plans and in the field, would reduce potential impacts to a *less than significant level*. No additional mitigation is required.

#### **4.6.5.3 Tsunamis**

The County's Tsunami Emergency Response Plan notes that areas potentially susceptible to tsunami hazards include coastal areas less than 50 feet in elevation above mean sea level. That area includes nearly all of Segments 1 through 5, with the exception of portions of Toro Lane and the North Point Natural Area (NPNA). As described in the Tsunami Emergency Response Plan, in the event of tsunami watch, warning or the occurrence of an actual tsunami along the San Luis Obispo County Coastline the Sheriff's Department Watch Commander will be contacted with information from the State OES.

Depending on the level of the incident and the potential danger to the public, immediate notification of people in the affected area may be needed. Notification may be accomplished by methods such as using coastal warning sirens, emergency vehicle public address systems, door-to-door contacts and, if necessary, by activating the Emergency Alert System (EAS). These existing procedures, which would be implemented through the OES, would adequately reduce the potential exposure of bikeway users to a tsunami hazard. Impacts would be *less than significant*. No additional mitigation measures are required.

#### **4.6.6 Cumulative Impacts**

Potential hazards in this EIR are location-specific to the extent that they may result in significant impacts on the localized environment, but they are not "cumulative" in the sense normally applied in CEQA documents. Further, the impacts identified in this section are associated with relatively short-term construction activities and the ongoing clean-up of contamination and decommissioning of the Marine Terminal will reduce potential exposure to hazards during construction. The mitigation measures that have been identified for the proposed project would apply cumulatively as well. Cumulative impacts would be *less than significant*. No additional mitigation is required.

## 4.7 TRANSPORTATION AND CIRCULATION

This section documents the transportation-related impacts associated with implementation of the proposed project. This section was prepared based largely on the previously prepared 2006 Environmental Constraints Analysis (ECA). Additional information was gathered by SWCA through field observation, review of the County of San Luis Obispo and City of Morro Bay Circulation Elements, and the San Luis Obispo County Bikeways Plan.

### 4.7.1 Existing Conditions

The project is located within a portion of the City of Morro Bay as well as the unincorporated community of Cayucos within the County of San Luis Obispo. It generally lies in an approximately 5-mile long corridor stretching from the south side of Cloisters Park in the City of Morro Bay to the site of the future Norma Rose Park in the community of Cayucos. Travel in the area is characterized by high seasonal peaks, as the entire coastal region is a major attraction for tourists during the summer months. Because the City of San Luis Obispo continues to serve as the major employment center, travel demands are heavily concentrated through the project area and along Highway 1 between Cambria and San Luis Obispo.

#### 4.7.1.1 Local Street Network

The circulation system relevant to the project area is comprised of regional highways, arterials, collectors, and local streets. Table 4.7-1 summarizes the roads in the circulation system, their classifications, and the agency responsible for maintaining them.

**Table 4.7-1. Circulation Network**

Road Name	Classification	Jurisdiction
Highway 1	Principal Arterial	Caltrans
Azure Street	Local	City of Morro Bay
Sandalwood Avenue	Collector	City of Morro Bay
Beachcomber Drive	Collector	City of Morro Bay
Yerba Buena Street	Local	City of Morro Bay
Toro Lane	Local	City of Morro Bay
Main Street	Arterial	City of Morro Bay
Toro Creek Road	Local	County of San Luis Obispo
Studio Drive	Collector	County of San Luis Obispo
Chaney Avenue	Local	County of San Luis Obispo
Ocean Boulevard	Collector	County of San Luis Obispo
Old Creek Road	Collector	County of San Luis Obispo



The road classifications are generally defined as follows:

- Principal Arterial Streets – interstate thoroughfares connecting major population centers; carry high traffic volumes of long trip lengths.
- Arterial Streets – continuation of intercommunity links within urban areas providing high level of service.
- Collector Streets – channel traffic from local streets to arterials; penetrate identifiable neighborhoods.
- Local Streets – directly serve residential uses and businesses; channel traffic to collector and arterial streets; handle only limited traffic.

The project corridor is served by two signalized intersections that include crosswalks, at the intersection of Highway 1 and Yerba Buena Street in the City of Morro Bay (southern end of Segment 2) and the intersection of Highway 1 and Old Creek Road in Cayucos (Segment 5). The proposed project would cross Highway 1 at the signalized intersection at Old Creek Road because this location is considered to be the safest crossing based on the existing street signal and crosswalks.

The San Luis Obispo County Circulation Element estimates a marginal level of service along Highway 1 in the future; however, no serious capacity deficiencies are predicted. The other streets in the project area operate at acceptable levels. The Morro Bay Circulation Element reports that “traffic volumes on most streets in Morro Bay are well within their design capacities.” Intersection traffic controls in Morro Bay are also satisfactory for present volume levels, except for a few locations which are not located within the project area.

#### **4.7.1.2 Local Pedestrian and Bicycle Network**

The County Bikeways Plan states that as of 2001 the County Bikeways Ordinance includes 82 miles of Class I and Class II bikeways, and the County also has 33.9 miles of Class III bikeways installed. The current bicycle network in and around the project corridor includes a mix of Class I, II, and III bikeways. These bikeway classes have been defined by the California Department of Transportation (Caltrans) in the California Highway Design Manual – Bikeway Planning and Design and are described in Table 1-1.

The project area includes numerous existing bike and recreational facilities, including bikeways, parking and staging areas, coastal access points, and state and county parks. Segment 1 would begin at the Class I bikeway at Cloisters Park and utilize approximately 1.2 miles of an existing recreational bicycle route designated along Beachcomber Drive and Sandalwood Avenue (San Luis Obispo Council of Governments [SLOCOG] 2010). The Class I bikeway at Cloisters Park currently continues south towards downtown Morro Bay.

Segment 5 would utilize an additional 1.5 miles of existing Class III bikeways on Studio Drive and Ocean Boulevard. From that point riders could access additional existing Class I and III bikeways to downtown Cayucos.

### 4.7.1.3 Parking

Currently 10 parking areas exist along the project corridor that may be utilized to serve the project. Six of them contain formally-designated parking spaces with striped stalls. The other four are informal parking areas that have been used extensively in the past because they provide parking close to popular coastal access points. The available parking areas are listed in Table 4.7-2, and shown in Figure 4.7-1, below.

**Table 4.7-2. Project Location Project Areas**

<b>Parking Area</b>	<b>Location</b>	<b>Lot Type</b>	<b>Approx. Number of Parking Spaces</b>
Cloisters Park	Segment 1	Formal	30
Sandalwood and Azure Street	Segment 1	Formal	45
Morro Strand State Park Day Use	Segment 1	Formal	9
North Point Natural Area	Segment 2	Formal	9
Chevron Facility Pier Landing	Segment 3	Informal	8
Toro Creek Road	Segment 4	Informal	25
Studio Drive South	Segment 5	Informal	12
Studio Drive North	Segment 5	Formal	30
Chaney Avenue	Segment 5	Informal	6
Norma Rose Park	Segment 5	Informal	20
<b>TOTAL</b>			<b>190</b>

Statistics kept by the California Department of Parks and Recreation (State Parks) regarding usage and parking at the Morro Strand State Park since 1996 show total average annual attendance of approximately 165,222 per year. Of that, there were approximately 123,884 free day users and 41,338 paid overnight users on average every year. Table 4.7-3 depicts the State Parks use statistics for the Morro Strand State Park from 1996 through 2009. These numbers are estimates, converted from camping figures or day use numbers extrapolated by a car count.

**Table 4.7-3. Morro Strand State Park Calendar Year Attendance**

<b>Year</b>	<b>Free Day Use</b>	<b>Overnight</b>	<b>Total Attendance</b>
1996	89,798	33,837	123,635
1997	94,487	38,757	133,244
1998	91,923	35,714	127,637
1999	94,152	36,944	131,097
2000	95,641	35,082	130,723
2001	120,025	44,049	164,074
2002	128,806	39,430	168,236
2003	129,422	41,438	170,860
2004	231,586	64,124	295,710
2005	117,671	49,331	167,002
2006	138,321	39,110	177,431
2007	93,501	41,182	134,683
2008	94,436	42,046	136,482
2009	214,613	37,693	252,306
<b>TOTAL ATTENDANCE</b>	<b>1,734,382</b>	<b>578,738</b>	<b>2,313,120</b>
<b>AVERAGE ATTENDANCE</b>	<b>123,884</b>	<b>41,338</b>	<b>165,222</b>

Over the course of a year, estimated daily usage is approximately 453 users per day, of which approximately 339 (two-thirds) are free day users, and 113 (one-third) are overnight users. Presumably, usage on weekends and holidays is much higher than on weekdays. There are 76 campsites at the Morro Strand State Park.

Similar estimates compiled by the City of Morro Bay for use and parking at Cloisters Park report that between January 1, 2007, and December 31, 2009, the following activities took place at the park: 10 special event days, with an estimated total of 626 participants; Good Dogma classes, held on roughly 20 days per year with 15 students per day for a total of 300 students/vehicles per year; and Kidz Love Soccer classes, on roughly 32 days per year with an average of 20 students per day for a total of 640 students/vehicles per year. Total car impacts at Cloisters Park for reserved dates and classes from January 1, 2007, through December 31, 2009, were 2,506 cars over a period of 156 days, or an average of 16 cars per day. The approximate number of formal parking spaces at Cloisters Park is 30; therefore, needs of the park events appear to be currently met. However, usage on special event days and during reserved classes would presumably be higher than non-event days.

A survey of the usage, types of users observed and available capacity of the parking areas described above was conducted on various days by SWCA from September 2009 through November 2009. The results of this field observation have been recorded in Table 4.7-4, below. Those dates and times on which usage of the parking area met or exceeded 75% of total parking capacity at a specific location have been shaded. Due to the timing of the Environmental Impact Report (EIR) surveys could not be conducted during summer months when usage may be highest.

High capacity usage at the North Point Natural Area (NPNA) was observed over the Labor Day holiday weekend. However, combined formal parking at Cloisters Park, the Azure Street lot, the Morro Strand State Park Day Use Parking Lot, and at the NPNA appear to be operating below capacity, in general. The only available parking to serve Segments 3 and 4 are the small informal parking areas located along Highway 1 at the Chevron Marine Terminal pier landing (Pier Landing), across from the end of Toro Creek Road, and at the south end of Studio Drive. The Pier Landing area experienced high levels of usage over holiday and non-holiday weekends.

The parking areas on both ends of Studio Drive experienced usage of 75% of total capacity or more during Labor Day weekend or various non-holiday weekends and weekdays over the survey period. Informal parking on Chaney Avenue provides approximately six additional spots, and approximately 20 spaces are available at the Norma Rose Park; however, these parking areas are located east of Highway 1, further away from the coast, and are less accessible.

Five formalized handicapped parking spots are also currently located along the project corridor: two spaces at the Cloisters Park Area, two spaces at the intersection of Sandalwood and Azure Streets, and one spot at the NPNA lot.

**Table 4.7-4. Parking Usage and Capacity (September 2009 – November 2009)**

Parking Area	Date	Time	# of Vehicles	Estimated Capacity	Comments
Cloisters Park	Sept. 5, 2009	8:47 am	2	30	park users
	Sept. 6, 2009	10:54 am	8		park users
	Sept. 7, 2009	9:46 am	3		park users
Sandalwood and Azure Street	Sept. 5, 2009	8:45 am	10	45	beach users
	Sept. 6, 2009	10:52 am	9		beach users
	Sept. 7, 2009	9:44 am	3		beach users
Morro Strand SP Day Use Parking Lot	Sept. 5, 2009	8:42 am	5	9	surfers
	Sept. 7, 2009	9:41 am	5		surfers
North Point Natural Area	Sept. 5, 2009	7:28 am	1	9	day use
	Sept. 6, 2009	10:39 am	10		Labor Day
	Sept. 7, 2009	9:40 am	9		Labor Day
Pier Landing	Sept. 5, 2009	7:26 am	4	8	dog walkers, fishermen
	Sept. 6, 2009	10:50 am	5		dog walkers
	Sept. 7, 2009	8:29 am	4		dog walkers

**Table 4.7-4. Parking Usage and Capacity (September 2009 – November 2009)**

Parking Area	Date	Time	# of Vehicles	Estimated Capacity	Comments
Pier Landing	Sept. 7, 2009	9:37 am	8	8	dog walkers
	Sept. 19, 2009	4:36 pm	6		dog walkers, fishermen
	Sept. 20, 2009	1:16 pm	4		dog walkers, fishermen
Toro Creek Road	Sept. 5, 2009	7:26 am	4	25	dog walkers, fishermen
	Sept. 6, 2009	10:43 am	17		dog walkers
	Sept. 7, 2009	8:29 am	0		N/A
	Sept. 7, 2009	9:37 am	11		dog walkers
	Sept. 19, 2009	4:36 pm	4		dog walkers, beach users
	Sept. 20, 2009	1:16 pm	14		dog walkers, beach users
	Oct. 3, 2009	12:50 pm	4		day use
	Oct. 4, 2009	8:01 am	3		day use
	Oct. 30, 2009	8:24 am	5		day use
	Nov. 15, 2009	11:08 am	2		day use
Studio Drive South	Sept. 5, 2009	7:25 am	4	12	resident overflow parking
	Sept. 6, 2009	10:48 am	6		beach users, dog walkers
	Sept. 7, 2009	8:30 am	9		surfers, along chain link fence
	Sept. 7, 2009	9:30 am	10		surfers, along chain link fence
	Sept. 19, 2009	4:36 pm	8		east side of Studio full
	Sept. 20, 2009	4:34 pm	4		dog walkers, foggy conditions
	Sept. 21, 2009	1:17 pm	10		beach users, dog walkers
	Oct. 3, 2009	12:49 pm	7		beach users
	Oct. 4, 2009	8:00 am	4		beach users
	Oct. 17, 2009	8:20 am	5		beach users
	Oct. 17, 2009	6:01 pm	11		beach users
	Oct. 23, 2009	8:50 am	9		surfers, good surf
	Oct. 31, 2009	8:23 am	5		dog walkers
	Nov. 15, 2009	11:09 am	9		surfers, good surf
Studio Drive North	Sept. 5, 2009	7:23 am	4	30	surfers
	Sept. 6, 2009	10:45 am	13		surfers, beach users
	Sept. 7, 2009	9:34 am	5		surfers
	Nov. 15, 2009	11:06 am	25		surfers, beach users

\* Dates on which usage of the parking area met or exceeded 75% of the total capacity have been shaded.

Source: SWCA field observation (September 5, 2009 – November 15, 2009)

Figure 4.7-1. Parking Areas



#### 4.7.1.4 Safety

As background to the recent bikeways planning process, the County Engineering Department staff compiled a summary of all reported traffic collisions involving bicycles on County roads from 1988 to 2004. The information gathered is summarized in Table 4.7-5 and shows that the vast majority of accidents resulted in injury to the cyclist, with five resulting in fatalities. The data also indicates that almost 70% of the accidents were determined to be caused by the fault of the cyclist.

**Table 4.7-5. County Bikeways Plan Bicycle-Related Accident Statistics, 1988-2004**

Year	Type of Accident			Total	Party at Fault		
	Fatal	Injury	Property Damage Only		Cyclist	Motorist	Other
2004	0	14	1	15	10	3	2
2003	0	9	0	9	4	4	1
2002	0	13	2	15	8	6	1
2001	0	14	1	15	5	7	3
2000	0	10	1	11	4	5	2
1999	0	10	1	11	8	1	2
1998	1	13	2	16	8	6	2
1997	0	14	2	16	12	4	0
1996	0	16	0	16	9	6	1
1995	1	21	1	23	17	4	2
1994	0	25	1	26	17	7	2
1993	0	27	2	29	24	5	0
1992	0	34	0	34	28	5	1
1991	0	17	0	17	13	4	0
1990	2	19	1	22	20	2	0
1989	1	22	1	24	21	3	0
1988	0	23	1	24	15	9	0
<b>Totals</b>	<b>5</b> 1.55%	<b>301</b> 93.19%	<b>17</b> 5.26%	<b>323</b> 100%	<b>223</b> 69.04%	<b>81</b> 25.08%	<b>19</b> 5.88%

Source: San Luis Obispo County Bikeways Plan, 2005, page 6



The accident data shown in Table 4.7-6, below, was provided by Caltrans and shows all vehicle accidents at Highway 1 intersections along the project corridor from the years 2000-2004. One fatality resulted from the accidents shown below. A breakdown of the accidents that involved bicycles was not available; however, because 30 of the 34 accidents shown below were multi-vehicle accidents, the number of accidents potentially involving bicycles is most likely limited to no more than four. Over 90% of the recorded accidents took place at the two lighted intersections along the proposed route. This is potentially explained by the higher traffic volume at these intersections, the potential for motorists running red lights, or tourist traffic on Highway 1 that is unfamiliar with the local street network.

**Table 4.7-6. Caltrans Accident Data at Project Location, 2000-2004**

Intersection	Segment	Accidents 2000-2004
Highway 1 at Yerba Buena St.	Segments 1 and 2	18
Highway 1 at Toro Creek Rd.	Segment 4	0
Highway 1 at Chaney Ave.	Segment 5	3
Highway 1 at Old Creek Rd.	Segment 5	13

Currently cyclists riding from Morro Bay to Cayucos share the road with automobiles. Class III bikeways such as those on Studio Drive also require cyclists to share the road with motorists. The posted speed limit along Studio Drive and similar residential zones through which the proposed project passes is 25 miles per hour. Traffic in these areas is predominantly made up of people who live or vacation in the beachside houses. Motorists in these residential areas are traveling at relatively slow speeds, may be more familiar with the area, and have fewer distractions. However, testimony made during preparation of the 2006 Environmental Constraints Analysis and at the EIR scoping meeting, indicates that some residents, particularly on Studio Drive have concerns regarding existing traffic safety on Studio Drive. They have indicated that those visiting Studio Drive to take advantage of coastal access sites are less aware of pedestrian and cyclists in the area.

The proposed project (i.e., Segment 5) would cross Highway 1 at the Old Creek Road intersection. According to the Caltrans *Highway Design Manual*, signalized intersections are the second safest way for bicycles to cross a state highway. The safest is through grade-separated crossings, such as bridges or tunnels. The crossing at Old Creek Road was selected because that intersection included a lighted traffic signal and crosswalks, making it one of the safest selections. Nevertheless, many of the intersections along the proposed route are very wide because they provide access to frontage roads such as Toro Lane and Main Street in Morro Bay, and Ocean Boulevard and Studio Drive in Cayucos. These wide intersections require cyclists to navigate three intersections in succession.

A number of non-signalized intersections also exist along the project corridor. These include the intersection of Highway 1 and Toro Creek Road, and the Studio Drive/Chaney Avenue crossing. No traffic accidents were recorded at the Highway 1/Toro Creek Road intersection from 2000 to 2004.

Figure 4.7-2. Existing Bikeways



## 4.7.2 Regulatory Setting

Transportation system requirements for unincorporated areas of the County are subject to the policies and plans of San Luis Obispo County Department of Public Works. They outline policies and standards regarding use of public roads in the Circulation Element of the County's General Plan. The policies and standards provide guidance in defining whether proposed projects are consistent with established roadway capacity levels and intersection levels of service (LOS), and where transportation improvement projects are needed to address new development.

The applicable County regulations and standards for future development of the path can be found in the County Circulation Element of the General Plan, SLOCOG Regional Transportation Plan, Local Coastal Plan (Estero Area Plan), Coastal Zone Land Use Ordinance, and Caltrans Standard Specifications. Morro Bay objectives, policies and programs for development are located in the city's Circulation Element of the General Plan.

### 4.7.2.1 Caltrans Highway Design Manual

A portion of the project is within the Caltrans Highway 1 right-of-way. The Caltrans *Highway Design Manual – Bikeway Planning and Design* outlines specific recommendations that should be used in developing Class I bike path projects adjacent to State Highways. These have been incorporated into the project and include:

- A minimum 0.6 m (2 feet) wide graded area shall be provided adjacent to the pavement.
- The minimum paved width for a two-way bike path shall be 2.4 m (8 feet). The minimum paved width for a one-way bike path shall be 1.5 m (5 feet).
- Where motor vehicle cross traffic and bicycle traffic is heavy, grade separations are desirable to eliminate intersection conflicts. Where grade separations are not feasible, assignment of right of way by traffic signals should be considered.
- Bike paths closer than 1.5 m (5 feet) from the edge of the shoulder shall include a physical barrier to prevent bicyclists from encroaching onto the highway. Bike paths within the clear recovery zone of freeways shall include a physical barrier separation.
- Increasing the minimum paved width of the bikeway to more than 2.4 m (8 feet) if heavy volumes are expected.

### 4.7.2.2 Estero Area Plan

The following policies from the Estero Area Plan are relevant to the proposed project path project:

1. Maximize public access to and along the coast by:
  - Developing all feasible vertical and lateral pedestrian access to and along the shoreline, consistent with public access goals and policies of this plan;
  - Developing a coastal trail from Los Osos to Cayucos, consistent with the County Trails Plan, and a bicycle path connecting Morro Bay and Cayucos.
  - Developing all other feasible pedestrian circulation systems in the coastal zone, consistent with other public access goals and policies of this plan;

- Providing a regional bikeway system; and
  - Providing conspicuous signs for all public access.
2. Offer incentives to encourage walking and bicycling.
  3. Provide safe, convenient access to transit, shopping areas, schools, and recreation for pedestrians and bicyclists. Link bicycle and pedestrian routes between residential areas, schools, and commercial areas.

#### **4.7.2.3 City of Morro Bay General Plan Circulation Element**

Segments 1 and 2, and portions of Segment 3 are within the City of Morro Bay Relevant Policies and Programs in the City General Plan, Circulation Element that apply to the proposed project are listed below.

**Policy C-4:** Pedestrian access to recreational areas and schools should be provided.

**Program C-4.1:** Walkways, pathways and boardwalks shall be constructed in accordance with the policies and programs established in the Local Coastal Plan. The following walkways are included in this coastal access system:

1. Walkways between Sandalwood Avenue and the beach over the “Cloister” parcel.
2. Pathways and bike trails through Morro Bay State Park from Main Street to South Bay Boulevard.
3. Other pathways designated in the Local Coastal Plan.

**Policy C-5:** Pedestrian crossings of streets shall be designed to minimize hazards to the pedestrian.

**Program C-5.1:** The City should provide crosswalk stripes at intersections where pedestrian traffic is heavy.

**Policy C-9:** The City will implement the Bikeway System Plan within legal and fiscal constraints while recognizing competing needs.

**Program C-9.1:** Bike paths or lanes designated on the Bikeway Plan should be provided within or adjacent to any new development or major reconstruction as a condition to the development approval. Class I separated bikeways will only be implemented where adequate right-of-way exists, such as within Morro Bay State Park and within Planned Unit Developments.

**Program C-9.5:** The standards for the development of bikeways shall generally be consistent with the criteria established in the California *Highway Design Manual*, *Bikeway Planning and Design*.

**Program C-9.6:** Bikeway markings and signage should be clear, visible and easy to understand.

**Program C-9.7:** In all bikeway designs, efforts should be made to reduce conflicts between bicycles and pedestrians as well as between bicycles and motor vehicles.

**Program C-9.8:** Existing bikeways which may present some problems for the bicyclist as currently designed should be redesigned pursuant to State Bikeway Design Criteria, as funding becomes available.

**Program C-9.9:** The following bikeway system projects should be implemented:

1. A safe bike path through North Morro Bay should be provided. This could either be along North Main Street as a Class 2 bikeway, or as another alternate route as a Class 3 bikeway.

### 4.7.3 Thresholds of Significance

The significance of potential transportation and circulation impacts are based on thresholds identified within Appendix G of the *CEQA Guidelines*. According to the *CEQA Guidelines*, transportation impacts are considered significant if the proposed project will:

- a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections);
- b. Exceed, either individually or cumulatively, a level of service (LOS) standard established by the County Public Works Department for designated roads or highways (i.e., LOS D for urban County roads and LOS C for State Highways) ;
- c. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses;
- d. Result in inadequate emergency access;
- e. Result in inadequate parking capacity; or,
- f. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts or bicycle racks).

### 4.7.4 Impact Assessment and Methodology

The impact assessment is based on existing traffic, parking and safety data, and anticipated increased use of transportation facilities as a result of the proposed project. A significant increase in area traffic is not anticipated as a result of the proposed project, and existing levels of service were qualified based on applicable county and city plans and reports. Neighborhood, pedestrian and bicycle related impacts were assessed by qualifying the existing and estimated trip generation for the proposed project, identifying neighborhood areas and facilities currently affected by visitor use, and determining the need for additional facilities or services. Safety impacts and any need for additional safety controls were determined through analysis of estimated increases in traffic and accident data provided by Caltrans and SWCA staff's local knowledge of the area.

## 4.7.5 Project-Specific Impacts and Mitigation Measures

### 4.7.5.1 Intersection and Roadway Capacity

The proposed project would provide a relatively unique recreational experience on the Central Coast. The Class I bikeway along the marine terrace would afford sweeping views of the Pacific Ocean, bluffs, the Coast Range, and Morro Rock. The project would also connect other existing bikeways, allowing cyclists to travel between the City of Morro Bay and Cayucos on designated bikeways, in some cases completely separated from traffic. These opportunities, the Class I bikeway, in particular, would likely have great appeal to both local residents and tourists.

Despite the fact that the project is a bikeway, traffic within the project area is likely to increase somewhat because some of the bikeway users would arrive by automobile, park, and then use the bikeways. Increases would be greatest during weekends in the summer months when locals and tourists are more likely to seek recreational activities at the beach. The Air Quality section of this EIR estimated that the project may generate up to 50 or even 100 new trips per day. Considering this is a maximum and that these would be made throughout the day, the actual increase resulting from this project may be imperceptible as there are already a high number of trips made to various local beaches during these times (452 visits to Morro Strand State Beach, for example). The majority of the trips generated by the proposed project are also not likely to be made during morning and evening peak periods when residents are commuting to and from work.

The proposed project would also encourage using bicycles rather than automobiles as it would provide a connection between Cayucos and Morro Bay that doesn't require cyclists to ride on Highway 1. Even without this potential beneficial impact, the proposed project would not generate enough traffic to impact local roads and intersections that are all currently and anticipated to operate at acceptable levels. Impacts would be *less than significant*. No mitigation is required.

### 4.7.5.2 Short-term Highway 1 Lane Closure

Construction of Segment 3 is expected to result in the periodic closure of one southbound lane of Highway 1. The southbound lane(s) of Highway 1 may also need to be closed during construction of the proposed bridge over Toro Creek. These closures will likely slow traffic along Highway 1 and cause congestion during the period of construction.

**TC Impact 1      Implementation of the proposed project would result in periodic lane closures along Highway 1 during construction, resulting in a potentially significant impact.**

*TC/mm-1      No less than 60 days prior to construction, the General Services Agency shall notify Caltrans of the proposed construction schedule. Construction activities affecting Highway shall be performed in accordance with all regulations or restrictions imposed on the project by Caltrans.*

Residual Impact

With implementation of mitigation, this impact would be *less than significant*.



#### 4.7.5.3 Bicycle and Pedestrian Traffic

Implementation of the proposed project would result in a beneficial impact to pedestrian and bicycle circulation in the community. State and local policies encourage public access to the coast, as well as the use of alternate modes of transportation. As trails are improved and connected, pedestrians and bicyclists would continue to utilize the Morro Bay and County trail systems for recreation and commuting purposes. The proposed project would connect existing bikeways in Morro Bay and Cayucos, as well as provide a Class I bikeway along Highway, separate from highway traffic. The project would result in *no impacts*. No mitigation is required.

#### 4.7.5.4 Parking

##### Parking Congestion

There are currently ten existing formal or informal parking lots along the proposed project alignment, including formal lots at Cloisters Park, the intersection of Sandalwood Avenue and Azure Street, at the North Point Natural Area, and the north end of Studio Drive. Surveys over a three month period showed that at least five of these parking areas experienced usage of at least 75% of their total capacity, the majority of which occurred on weekends or holidays. Parking areas where 75% usage was observed include those located at the North Point Natural Area, the Chevron Pier Landing, Toro Creek Road, Studio Drive South and Studio Drive North.

Although high use was observed at the North Point Natural Area lot, it is one of four lots (Cloisters Park, State Park Day Use, Azure Street, and North Point Natural Area) which would provide parking along Segment 1 and the start of Segment 2. Bikeway users who would want to begin their ride on the Class I bikeway, Segment 2, would park at either North Point or the Day Use lot, or along local roads, if necessary.

Parking at the Studio Drive North (Segment 5) and Studio Drive South (Segment 4 and 5) area generally approach full capacity on weekends and holidays. Any increase in use resulting from the proposed project would potentially create parking demands that exceed supply if the large parking area at the Norma Rose Park is not effectively utilized. Neighborhood streets along Studio Drive and Ocean Boulevard would potentially see an increase in curbside parking as well.

During holiday weekends, demand may exceed supply at these locations based on analysis of current usage of the parking areas which would also be utilized by the proposed project. This impact would be temporary, and limited to peak holiday and travel weekends (i.e. fourth of July, Labor Day, etc.).

**TC Impact 2      Implementation of the proposed project would result in parking demand exceeding proposed supply, as well as an increase in neighborhood curbside parking in areas where existing parking may be insufficient to meet user needs, resulting in a potentially significant impact.**

*TC/mm-2      Prior to initiation of construction, the General Services Agency shall prepare a Signage and Striping Plan in consultation with the County Public Works Department, the County Bicycle Advisory Committee, the Cayucos Advisory Committee, and the City of Morro Bay. The Signage and Striping Plan shall include, but not be limited to:*



- *Methods for ensuring all ten identified parking areas supporting the proposed project are utilized to the maximum extent feasible;*
- *A plan for educating motorists on the presence of cyclists and pedestrians in the area, and related car safety measures;*
- *Designs for providing for bicycle and car interaction along the proposed route that would minimize conflicts through the use of striping, signage, lighting, bollards, etc.;*
- *Examples of the signage, striping, lighting, designs, etc. for safe bicycle and car interaction;*
- *Methods for encouraging users to stay on designated trails; and*
- *Methods for ensuring all bikeway users are directed and encouraged to use lighted intersections to cross Highway 1*

#### Residual Impact

Even with implementation of this measure impacts would be likely during peak holiday and weekend times. However, these impacts already exist to a degree and the proposed projects contribution may not be perceptible. With mitigation and in the context of existing high coastal access parking demand this impact would be considered *less than significant*.

#### Disturbance of Parking Areas

The Environmental Constraints Analysis identified a potential issue resulting from a portion of the western alignment of Segment 3 in or near the Caltrans right-of-way. Because there is little space available between the bluff edge and Highway 1, construction in this area could conflict with historical use of the Pier Landing and Toro Creek Road informal parking areas and coastal access points. However, Segment 3 has been designed to prevent any loss of parking in these areas (Refer to Figure 2.5). Impacts would be *less than significant*. No mitigation measures are required.

The proposed project includes the formalization of the Studio Drive South parking area, which currently contains approximately 12 informal parking spaces. Thirteen spaces would be formally striped and identified as part of the proposed project. This process would likely involve closure of the parking area for a short period of time. This impact would be short-term, and *less than significant*. No mitigation is required.

#### **4.7.5.5 Safety**

##### Increased Cyclist and Pedestrian Use of Local Roads

The proposed Class I bikeway would separate bicycle and pedestrian users from the high-speed motorized traffic on Highway 1. In some places, due to the proximity of the bikeway to the travel lanes of Highway 1, it would be necessary to construct a barrier and safety railing (refer to Chapter 2). The barrier system reflects Caltrans standard design parameters in regards to the height, size and components of the barrier and is considered adequate to ensure the safety of cyclists and motorists by Caltrans where it is not possible to achieve substantial horizontal separation between the two uses.

The proposed project is expected to result in an increase in bicycle and pedestrian traffic along the project corridor, including an increase in use within those existing neighborhoods where Class III paths already exist. The increased traffic in established neighborhoods could create potentially dangerous driving conditions in residential areas serving as a passageway for bicycle and pedestrian traffic, as bicyclists can be hard to see in the context of street parking, signage, and/or landscaping. While the increased trips would not significantly reduce the level of service on these local roads residents may notice the increased level of bike and pedestrian traffic. Local streets likely affected by the increase in visitor traffic include Sandalwood Avenue, Beachcomber Drive, Toro Lane, Studio Drive and Ocean Boulevard.

**TC Impact 3      The proposed project would increase cyclist and pedestrian use of surface streets, and require them to navigate streets with fairly dense housing, substantial on-street parking, narrow streets, and limited visibility.**

*Implement to TC/mm-2.*

Residual Impact

With implementation of mitigation measure TC/mm-2, this impact would be *less than significant*.

#### Highway 1 Crossing

The proposed project will increase bicyclist and pedestrian traffic crossings at the intersection of Highway 1 and Old Creek Road, which could lead to increased conflicts between motorists and cyclists. The intersection already acts as a pedestrian and bike path crossing, and crosswalks and a traffic signal at this intersection are currently utilized to provide the safest crossing possible, short of a grade-separated route. There is a limited history of bicycle-related accidents at this intersection. However, increased traffic, particularly from less experienced cyclists and tourists, could lead to reduced safety at this location. The project may also result in an increase in Highway 1 crossings at other unmarked, unsignalized locations. Crossings at unmarked locations may be limited along segments within five feet of Highway 1 where 54-inch high barriers are proposed to separate the bikeway from the highway pavement.

**TC Impact 4      Implementation of the proposed project would result in increased bicycle and pedestrian traffic the Highway 1/Old Creek Road intersection, and at undesignated locations along Highway 1.**

*Implement TC/mm-2.*

Residual Impact

With implementation of mitigation, this impact would be considered *less than significant*.

#### **4.7.5.6 Policy Consistency**

Transportation and circulation policies relevant to the proposed project exist in local and state documents. These documents generally encourage the development of alternative transportation as a means to reduce traffic congestion and increase safety, among other things. The policy documents reviewed as part of this EIR section include the Caltrans Highway Design Manual, the Morro Bay Circulation Element, and the County's Estero Area Plan and Bikeways Plan. The proposed project is *consistent* with these plans.

### 4.7.6 Cumulative Impacts

Population and tourism in the areas surrounding the proposed project are expected to slowly and steadily increase in the future, resulting in a corresponding steady increase in parking demands and safety conflicts along the proposed project corridor. Traffic along Highway 1 and other roads in the surrounding street network would increase along with beach tourism and bikeway usage. The proposed project would contribute cumulatively to the temporary parking impacts on peak holiday and travel weekends in the future.

**TC Impact 5      Implementation of the proposed project would contribute to cumulative impacts associated with population and tourism growth in the area, resulting in increased traffic congestion, parking demand, and motorist and cyclist interaction safety issues.**

*Implement TC/mm-1 and 2.*

Residual Impact

With implementation of mitigation, this cumulative impact would be *less than significant*.

## **4.8 LAND USE**

This section of the Environmental Impact Report (EIR) addresses existing and designated land uses in the project area, identifies applicable local plans and policies, and identifies potential land use impacts, including those that would result from inconsistencies with applicable policies. Appendix B includes a table listing applicable policies and potential inconsistencies. In cases where an inconsistency would result in a specific environmental impact, that impact is addressed in the applicable section of Chapter 4. For example, bluff setback standards are shown in Table 4.8-2 below, but potential impacts are addressed in the Geology, Soils and Drainage section.

### **4.8.1 Existing Conditions**

#### **4.8.1.1 Land Uses and Designations**

Segments of the project corridor pass through various City of Morro Bay and County of San Luis Obispo (County) land use designations. These land use designations and combining designations are summarized in Table 4.8-1 and shown in Figures 4.8-1 and 4.8-2.

##### Segment 1 –Cloisters Park to Yerba Buena Street

This segment is located within the City of Morro Bay and begins in Cloisters Park, which includes ocean views, a wetland area, walking paths to the beach, a children's play area, picnic tables, benches, barbecues, and parking facilities. This area is designated in Mixed Use Area G, which supports a range of land use opportunities emphasizing coastal development, recreational, and limited, low intensity residential uses, consistent with the Coastal Act. The segment then passes through several established beachfront neighborhoods with the majority of the properties oriented to maximize views of the Pacific Ocean. Parking and beach access is available at the south end of Sandalwood Avenue and within a parking lot accessible from Beachcomber Drive. The Park overlay applies to the area between the proposed project and the Pacific Ocean, which recognizes that public parks exist or are proposed in this area. An Environmentally Sensitive Habitat Area (ESHA) has been designated between Cloisters Park and the Pacific Ocean.

##### Segment 2 – Yerba Buena Street to North End of North Point Natural Area

This segment is predominantly located within the Highway 1 Right-of-Way (ROW), and runs adjacent to the City of Morro Bay's Moderate Density Residential designation along Toro Lane and the Open Space/Recreation designation through the North Point Natural Area (NPNA). The NPNA provides 10 parking spaces, access to the beach, and additional views of the Pacific Ocean. Through this parking area and continuing north, Segment 2 runs just east of the bluffs, with unrestricted views of the beach and the Pacific Ocean.

##### Segment 3 – North End of the North Point Natural Area to the North Side of Toro Creek

This segment extends from the NPNA past Toro Creek, where the Morro Bay city limits end. Segment 3 is located in Morro Bay's Open Space/Recreation designation and a small Industrial Coastal Development category associated with the Marine Terminal. This area includes limited uses associated with the Marine Terminal which is in the process of being decommissioned. There is existing informal parking and beach access at the Pier Landing and land uses in this area are generally limited to passive recreation activities associated with use of the adjacent

beach area. Segment 3 would then enter the County's Recreation designation. A number of County Sensitive Resource Areas and the Flood Hazard combining designations also exist in this area in association with the Toro Creek stream corridor and coastline. Adjacent land uses east of Highway 1 are predominantly open space and/or grazing, and lie within the County Agriculture designation.

#### Segment 4 – North Side of Toro Creek to the South End of Studio Drive

Segment 4 extends from the north side of Toro Creek to the south end of Studio Drive in Cayucos. The entire segment is located on the marine terrace between Highway 1 and the sand dunes and beach, in the County's Recreation land use category with a Sensitive Resource Area (SRA) Combining Designation. Recreational uses in this area include those typically associated with beaches, including picnicking, surfing, walking, sightseeing, etc., and informal parking exists across the terminus of Toro Creek Road. Adjacent land uses east of Highway 1 include open space and/or grazing, and lie within the County's Agriculture designation.

#### Segment 5 – South End of Studio Drive to Norma Rose Park

Segment 5 extends from the south end of Studio Drive to dual termination points at either the site of Norma Rose Park on the east side of Highway 1 along Ocean Boulevard, or the coastal access and parking lot at the north end of Studio Drive. The split in the alignment occurs at the intersection of Old Creek Road and Highway 1. The designated land use along Studio Drive is Residential Single Family, and property in this area is mainly beachfront residential until it reaches the north end of Studio Drive where there is a parking area and beach access. This area is designated by the County as Recreation.

The alignment that crosses Highway 1 at Old Creek Road and follows Ocean Boulevard includes residential and limited commercial areas along Ocean Boulevard in the Commercial Retail, Residential Multi Family and Residential Single Family designations. Segment 5 would terminate at the future site of Norma Rose Park, which is designated Recreation and currently undeveloped.

**Table 4.8-1. Land Use Designations**

Segment	Designations/Overlays	Local Jurisdiction
1	<ul style="list-style-type: none"> <li>▪ Mixed Use (G)</li> <li>▪ Moderate Density Residential</li> <li>▪ Park Overlay</li> </ul>	City of Morro Bay
2	<ul style="list-style-type: none"> <li>▪ Moderate Density Residential</li> <li>▪ Open Space/Recreation</li> </ul>	City of Morro Bay
3	<ul style="list-style-type: none"> <li>▪ Open Space/Recreation</li> <li>▪ Industrial Coastal Development</li> </ul>	City of Morro Bay
	<ul style="list-style-type: none"> <li>▪ Recreation</li> <li>▪ Sensitive Resource Area Overlay (ESHA, Critical Viewshed)</li> <li>▪ Flood Hazard Overlay</li> </ul>	County of San Luis Obispo

**Table 4.8-1. Land Use Designations**

<b>Segment</b>	<b>Designations/Overlays</b>	<b>Local Jurisdiction</b>
4	<ul style="list-style-type: none"> <li>▪ Recreation</li> <li>▪ Sensitive Resource Area Overlay</li> <li>▪ Flood Hazard Overlay</li> </ul>	County of San Luis Obispo
5	<ul style="list-style-type: none"> <li>▪ Residential Single Family</li> <li>▪ Commercial Retail</li> <li>▪ Residential Multi Family</li> <li>▪ Rural Lands</li> <li>▪ Recreation</li> <li>▪ Flood Hazard Combining Designation</li> </ul>	County of San Luis Obispo

Source: Morro Bay General Plan and Land Use Map, revised February 1997; County of San Luis Obispo Interactive GIS Mapping System, <http://www.sloplanning-maps.org/ed.asp?bhcp=1>, accessed December 31, 2009.

## 4.8.2 Regulatory Setting

The proposed project consists of an approximately 4-mile long corridor between, or just east of, Highway 1 and the coastline from the northern portion of Morro Bay to Cayucos. The entire length of the proposed project is located in the California Coastal Zone, and segments of the connector path pass through the City of Morro Bay as well as the County of San Luis Obispo jurisdictions. Development of the project would require compliance with the California Coastal Act and Local Coastal Plans, as well as various local plans and policies regulating the areas surrounding the project location. Portions of the project corridor include Morro Strand State Park and may also be subject to provisions of the California Parks and Recreation Morro Strand and Atascadero State Beach General Plan. Applicable plans, with which the project must demonstrate consistency, are listed and discussed below.

### 4.8.2.1 California Coastal Act of 1976

The California Coastal Act (CCA) (Public Resources Code §30000 et seq.) is intended to “protect, maintain, and, where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources.” By state law, the coastal zone is established by the California Coastal Commission, which has authority to permit, restrict, or prohibit certain development within the zone. The CCA mandates protection of public access, recreational opportunities, and marine and land resources. This umbrella legislation mandates local governments to prepare a land use plan and schedule of implementing actions to carry out the policies of the CCA within local jurisdictions.

Figure 4.8-1. Land Use Category Map

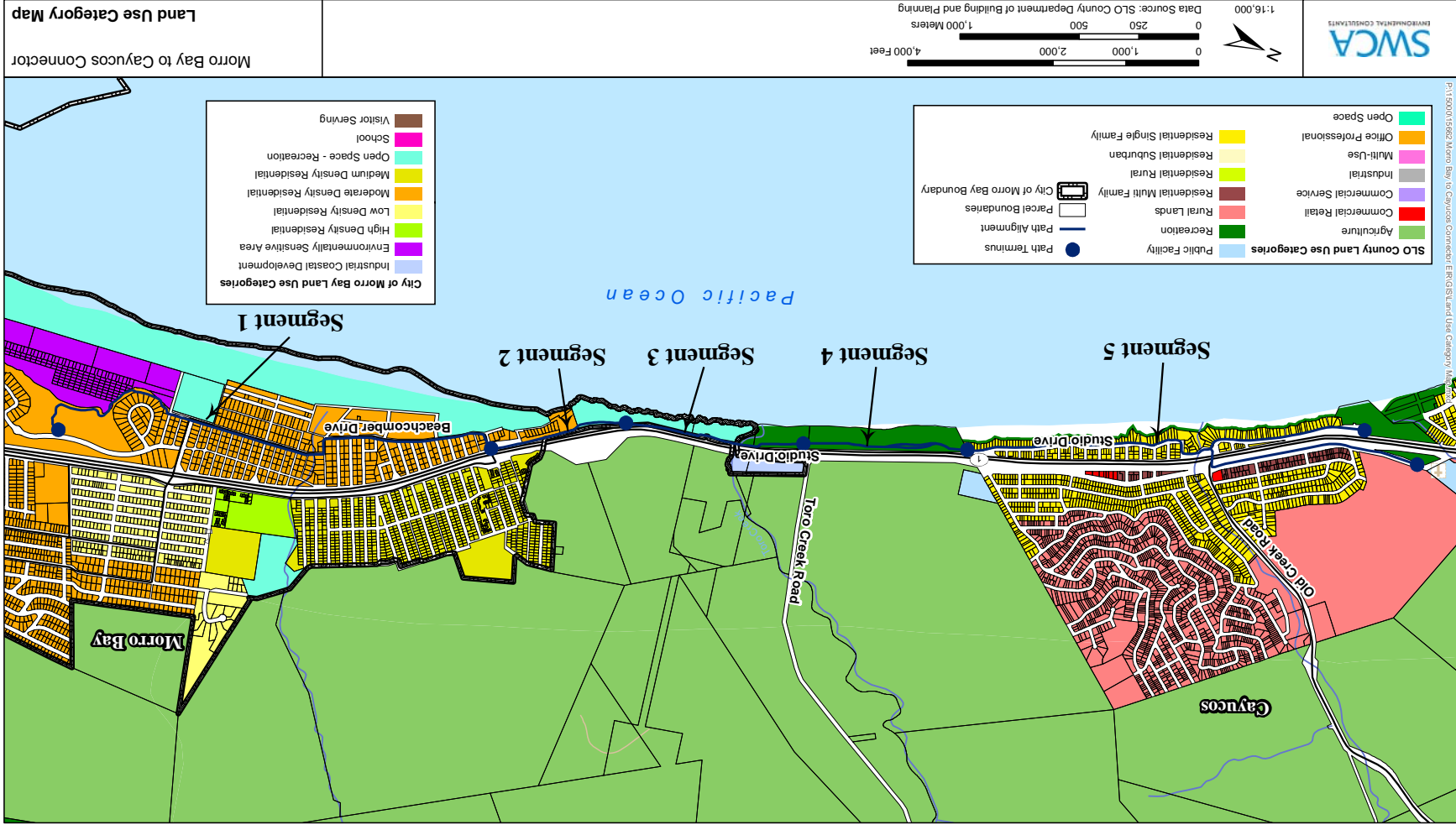
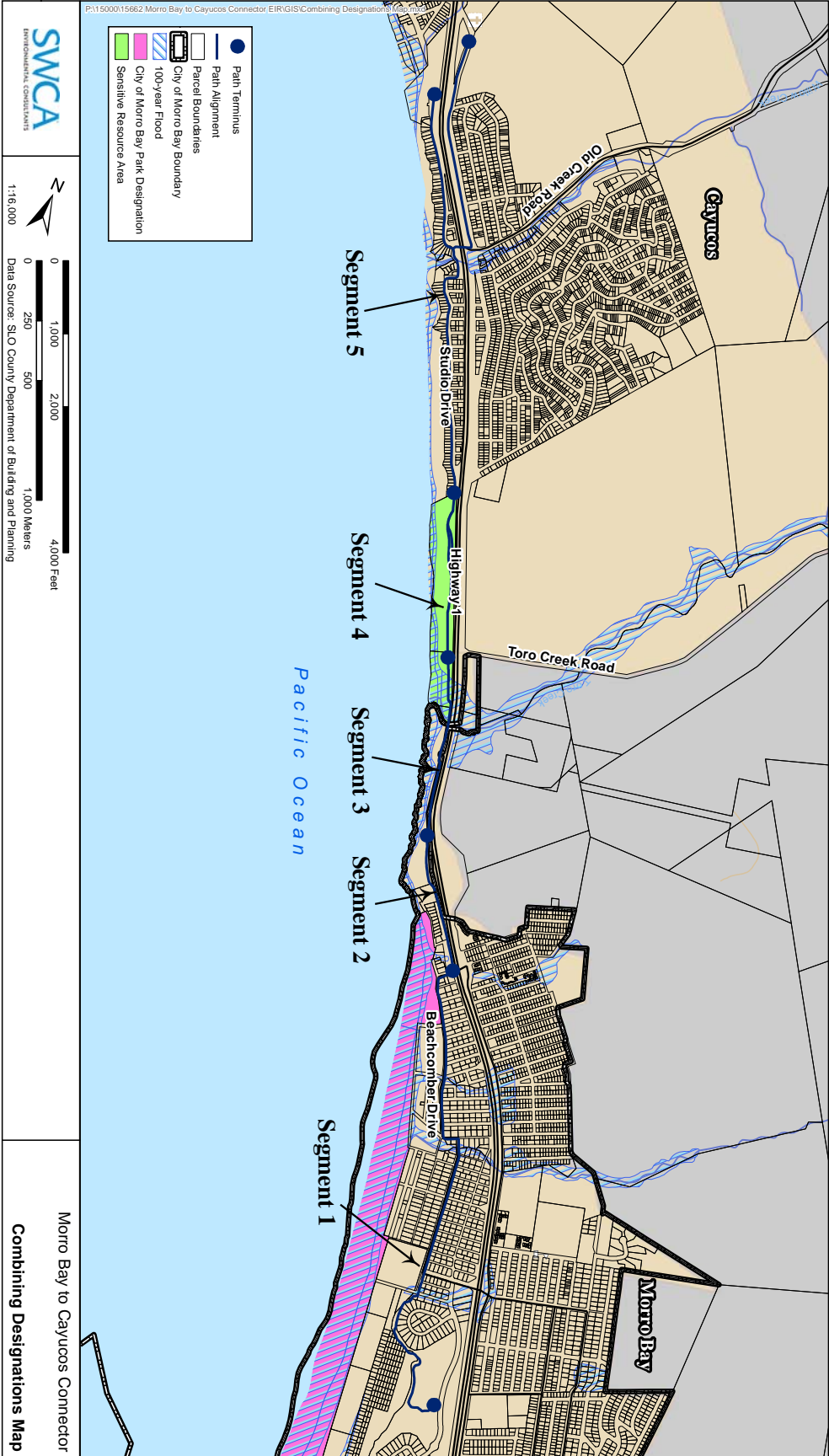




Figure 4.8-2. Combining Designations/Overlay Districts Map



#### **4.8.2.2 County of San Luis Obispo Coastal Zone Land Use Ordinance (CZLUO) Combining Designations and Associated Development Restrictions**

Combining designations are used to identify and highlight areas of the County having natural or manmade features that are sensitive, hazardous, fragile, of cultural or educational value, or of economic value as extractable natural resources. The purpose of combining designation standards is to require project design that will give careful consideration to the land features, structures, and activities identified by the combining designations. These standards provide for more detailed project review where necessary to support public safety or proper use of public resources, or to satisfy the requirements of the California Coastal Act and the Local Coastal Plan, the certified Land Use Plan of the San Luis Obispo County Local Coastal Program. Identified combining designations within the project corridor are described below. Applicable combining designations have been included within each individual resource section.

#### **4.8.2.3 Estero Area Plan**

The project corridor is located within the Estero Planning Area. The plan provides goals to guide the general direction for the Estero Planning Area over a 20 year planning period. They were developed by the public, primarily the community of Cayucos, and seek to provide maximum public access, and protect existing public access, to the coast, the shoreline, the bay, and public recreation areas, consistent with the need to protect natural and agricultural resources and private property rights. This goal is implemented by the policies, programs and standards found in the following Area Plan chapters: Population and Economy, Public Facilities, Services and Resources, Land Use Programs and Policies, Circulation Element, Policies and Programs for Special Features, and Coastal Access. The land use policies and programs are implemented through application of the CZLUO.

#### **4.8.2.4 County of San Luis Obispo General Plan, Parks and Recreation Element**

The purpose of the Parks and Recreation Element is to (1) provide policy guidance regarding the provision of park and recreation services, (2) document the County's existing park and recreation resources, including those resources that are outside of the County's management, and (3) facilitate the evaluation of park and recreation needs during the land use decision process. The Element establishes goals, policies, and implementation measures for management, renovation, and expansion of existing, and development of new, parks and recreation facilities in order to meet existing and projected needs and to assure an equitable distribution of parks throughout the county. The proposed project is identified in the document.

#### **4.8.2.5 San Luis Obispo County Bikeways Plan**

The County of San Luis Obispo has developed the Bikeways Plan in order to identify needed bikeway routes, accessory facilities such as bike parking, coordination with other modes of transportation, promotional and educational programs, and potential funding sources for these facilities and programs. The first plan was completed in the early 1990s and it has been updated completely several times since then. The plan recognizes and encourages a favorable quality of life through further enhanced use of bicycle transportation, which can lead to better air quality, reduced traffic, parking congestion and noise levels, and increased mental and physical health of those who ride. The Bikeways Plan shares many of the goals of the County General Plan – Circulation Element, the APCD's Clean Air Plan, and Council of Government's Regional Transportation Plan, the local surrounding cities' Bikeways Plans as well as surrounding unincorporated communities' circulation and planning studies. Together, these documents form an important resource as the base condition for bicycle transportation planning in San Luis Obispo County.

#### **4.8.2.6 California Coastal Conservancy**

The California Coastal Conservancy is charged with preserving, protecting and restoring the resources of the California coast. The Conservancy is a problem-solving agency, focused on the completion of projects that solve problems (including needed project planning) rather than planning (for the purpose of adopting public policy). However, the Conservancy adopted its Standards and Recommendations for Accessway Location and Development to ensure a consistent approach was used for access and construction along the coastline.

#### **4.8.2.7 City of Morro Bay Zoning Ordinance**

The Morro Bay Zoning Ordinance sets forth regulations for areas within the Morro Bay city limits. The Zoning Ordinance regulates land uses, building height, setbacks, provisions of open space, and other factors that relate to development on individual properties. Under state law, cities and counties have broad latitude in establishing zoning standards and procedure. One key requirement, however, is that zoning regulations be consistent with the general plan. The Morro Bay Zoning Ordinance provides for a total of 18 primary districts, plus 13 overlay districts. The proposed project currently extends through several zones and overlay districts, including the Single Family Residential District with a Special Building Site and Yard Standards overlay, and Open Area 1. The Zoning Ordinance has been codified through Ordinance 540, enacted May 27, 2008.

#### **4.8.2.8 Morro Strand and Atascadero State Beach General Plan**

Various levels of regulation within the California Department of Parks and Recreation (CDPR) guide the management of natural resources within the state. These mandates are outlined in the California Code of Regulations, and the Departmental Operations Manual. These directives are also outlined in the Morro Strand and Atascadero State Beach General Plan, which includes policies relevant to resource management at the Morro Strand State Beach, which lies adjacent to the proposed project.

### **4.8.3 Thresholds of Significance**

The significance of impacts on land use was determined by applying criteria listed in Appendix G of the CEQA *Guidelines*. For the purpose of this EIR, a project will have a significant effect on the environment if it would:

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

#### **4.8.4 Impact Assessment and Methodology**

The impact assessment in the Land Use section is conducted qualitatively. The potential impacts resulting from implementation of the proposed project were analyzed against the proposed policies whose purpose it is to avoid or minimize those impacts, using the thresholds above.

#### **4.8.5 Impacts and Mitigation Measures**

##### **4.8.5.1 Physically Divide an Established Community**

The proposed project would not divide either the City of Morro Bay or the community of Cayucos in any way; rather, it would serve as an alternative transportation connection between and throughout those communities resulting in a beneficial impact to community connectivity. The project is consistent with various regional transportation and coastal plans encouraging public coastal access and alternative transportation methods. Impacts would be *less than significant*. No mitigation is required.

##### **4.8.5.2 Conflict with any Applicable Land Use Plan, Policy or Regulation**

As described in the Environmental Setting chapter and shown in Appendix B, the proposed project is generally consistent with area-wide land use policies and plans. However there are a number of policy inconsistencies that would result in significant environmental impacts. These impacts are more fully addressed in the individual resource sections of this EIR. Table 4.8-2 below includes a list of policies with which the proposed project is inconsistent and refers the reader to the specific sections of the EIR where the environmental impacts resulting of those inconsistencies have been addressed. There are no additional impacts resulting from plan or policy conflicts that have not been addressed in other sections and would need to be addressed in the Land Use section.

##### **4.8.5.3 Conflict with any Applicable Habitat Conservation Plan or Natural Community Conservation Plan?**

There are no applicable Habitat Conservation Plans or Natural Community Conservation Plans that regulate lands within the project corridor. Therefore, the proposed project would not conflict with the regulations of any such plans. There is *no impact*. No mitigation is required.

#### **4.8.6 Cumulative Impacts**

Potential cumulative land use impacts would be avoided or minimized through implementation of the design standards and procedures incorporated into the proposed project. Cumulative impacts related to other impact areas (e.g., biological resources, air quality, etc.) are analyzed and discussed in the relevant impact sections of this EIR.

Table 4.8-2. Consistency with Plans and Policies

Plan	Policy	Inconsistency / Impact	Refer To Impact
County of SLO Coastal Plan Policies	<b>Visual and Scenic Resources, Policy 1: Protection of Visual and Scenic Resources.</b> Unique and attractive features of the landscape, including but not limited to unusual landforms, scenic vistas and sensitive habitats are to be preserved protected, and in visually degraded areas restored where feasible.	The proposed project would require construction of a safety barrier along portions of the southbound lanes of Highway 1 between the highway and the ocean. It would result in significant unavoidable impacts to scenic vistas and degrade existing visual qualities.	AR Impact 1 and 2
	<b>Visual and Scenic Resources, Policy 2: Site Selection for New Development.</b> Permitted development shall be sited so as to protect views to and along the ocean and scenic coastal areas. Wherever possible, site selection for new development is to emphasize locations not visible from major public view corridors. In particular, new development should utilize slope created "pockets" to shield development and minimize visual intrusion.	See above.	AR Impact 1 and 2
County of SLO General Plan, Estero Area Plan	<b>Highway 1 - Cayucos Critical Viewshed.</b> The Highway 1 - Cayucos Critical Viewshed is established to protect views of this scenic coastal area. All applicable standards in the Coastal Zone Land Use Ordinance apply within this area (e.g., those in Chapter 23.04). Development not exempt pursuant to CZLUO 23.04.210(a) shall be considered a conditional use.	See above.	AR Impact 1 and 2
	<b>Bluff Setbacks.</b> The bluff setback is to be determined by the engineering geology analysis required in I.1.a. above adequate to withstand bluff erosion and wave action for a period of 100 years. In no case shall bluff setbacks be less than 25 feet.	The proposed project would be subject damage from bluff erosion in less than 100 years. In some places it is infeasible to provide a 25 foot setback from the edge of bluff due to location of Highway 1.	GSD Impact 3
County of SLO General Plan, Safety Element	<b>Water Hazards, Policy S-23 Coastal Bluffs:</b> Development shall not be permitted near the top of eroding coastal bluffs.	The proposed project would be located near the edge (within 25 feet in some places) of eroding bluffs along Segments 2, 3, and 4.	GSD Impact 3
City of Morro Bay Land Use Plan	<b>Hazards, Policy 9.14:</b> All development along bluffs shall be adequately set back to ensure protection of the development for its economic life and development shall not require alteration of the existing bluff land form or beach.	The proposed project would be subject to damage due to bluff erosion in less than 25 years in some places. At this time, the economic life of the project has not been proposed but is likely anticipated to be greater than 25 years.	GSD Impact 3

**Table 4.8-2. Consistency with Plans and Policies**

Plan	Policy	Inconsistency / Impact	Refer To Impact
City of Morro Bay Land Use Plan	<b>Environmentally Sensitive Habitat Areas, Policy 11.14:</b> A minimum buffer zone along all streams shall be required as follows: a minimum buffer strip of 100 feet in rural areas. The buffer may be adjusted downward only to a point where the designated use can be accommodated but in no case shall the buffer be reduced to less than 50 feet for rural areas. Adjustments to the minimum buffer must protect the biological productivity and water quality of the streams.	To meet the project objectives, the proposed project must cross Toro Creek; therefore a 50 foot buffer cannot be maintained. Biological Resources mitigation has been proposed to protect biological productivity and water quality.	BIO Impact 1,2, and 4

# CHAPTER 5

## ALTERNATIVES ANALYSIS

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### 5.1 INTRODUCTION

The California Environmental Quality Act (CEQA), §15126.6(a), requires an Environmental Impact Report (EIR) to “describe a reasonable range of alternatives to a project, or to the location of a project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives”. This chapter discusses a range of alternatives to the proposed project, including alternative locations, alternative designs, and a No Project Alternative. The CEQA *Guidelines* provide direction for the discussion of alternatives to the proposed project. This section requires:

- Description of “...a range of reasonable alternatives to the project, or to the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” [15126.6(a)]
- A setting forth of alternatives that “...shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project”. [15126.6(f)]
- Discussion of the "No Project" alternative, and “...If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives”. [15126.6(e)(2)]
- Discussion and analysis of alternative locations “...that would avoid or substantially lessen any of the significant effects of the project”; only these need to be considered for inclusion in the EIR. [15126.6(f)(2)(A)]
- “Prior to approval of the proposed subsequent project, the lead agency shall incorporate all feasible mitigation measures or feasible alternatives appropriate to the project as set forth in the Master EIR and provide notice in the manner required by §15087. [15177 (d)]

Given the CEQA mandates listed above, this section (1) describes the range of reasonable alternatives to the project; (2) examines and evaluates resource issue areas where significant adverse environmental effects have been identified and compares the impacts of the alternatives to those of the proposed project; and, (3) identifies the Environmentally Superior Alternative.

### 5.2 ALTERNATIVES SELECTION

In defining feasibility of alternatives the CEQA *Guidelines* state: “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise



have access to the alternative site”. Through the scoping process, if an alternative was found to be infeasible, as defined above, then it was dropped from further consideration. In addition, CEQA states that alternatives should “...attain most of the basic objectives of the project...”

### **5.2.1 Project Objectives**

The basic objectives of the proposed project that were used in the screening of project alternatives are taken from Chapter 2 and include the following:

- Provide continuous off-highway connectivity from the City of Morro Bay to the community of Cayucos;
- Provide a safe and scenic bicycle/pedestrian route; and
- Maximize user’s contact with the coastline while avoiding environmental impacts

### **5.2.2 Significant Impacts Resulting from the Proposed Project**

The alternatives evaluated include those that would avoid or reduce, to the maximum extent feasible, the identified unavoidable impacts that cannot be mitigated to insignificance, and avoid or reduce other significant impacts. A complete list of impacts is included in the Executive Summary. Significant unavoidable impacts resulting from the proposed project include:

- Aesthetic Resources. Impacts associated with the Highway 1/bikeway barrier system necessary to construct Segment 3.

The proposed project’s most intensive significant but mitigable impacts and/or those with intensive mitigation requirements include:

- Biological Resources. Impacts to ESHA, including wetlands, foredune habitat, Toro Creek aquatic habitat, sensitive plant and animal species.
- Geology, Soils and Drainage. Bluff retreat could affect the bikeway in less than 75 years.
- Cultural Resources. Impacts to intact cultural resources on the Marine Terminal property.
- Geology, Soils, and Drainage. Drainage impacts in the North Point Natural Area.

## **5.3 ALTERNATIVES CONSIDERED**

The project objectives include providing off highway connectivity between the City of Morro Bay and Cayucos. Due to the limited space between Highway 1 and the beach, feasible alternatives to the proposed project do not exist within this narrow area. Alternatives on the eastside of Highway 1 are also limited due to the topography near Segment 2 at the Highway 1 cutslope and the desire to have the bikeway efficiently connect the two locations while not intruding into private property. Four potential alternatives to the proposed project are described below.

### 5.3.1 No Project Alternative

This alternative is required to be considered by CEQA, and would not include construction of any new bikeways. There would be no off-highway connection for bicycles or pedestrians between the City of Morro Bay and the community of Cayucos. Cyclists would need to continue to share the road with vehicles on Highway 1 between Yerba Buena Street in the City of Morro Bay and Studio Drive or Chaney Street in the community of Cayucos. Pedestrian connections would only be possible through use of Morro Strand State Beach. This alternative would not include any new signage, striping, or construction of any kind.

### 5.3.2 Eastern Alignment Alternative

The Eastern Alignment has been described and evaluated at a project-specific level in Appendix F. Appendix F includes a quantification of impacts that would result from the Eastern Alignment Alternative and includes recommended mitigation measures as well. For specific setting information regarding the Eastern Alignment, the reader may rely on the discussions in Chapter 4. The Eastern Alignment Alternative has been summarized briefly below and shown in Figure 5-1. Impacts have also been summarized in this Chapter to allow for comparison of impacts to the proposed project.

The Eastern Alignment Alternative would include the proposed project's Segment 1 (from Cloisters park to Yerba Buena Street), but then the bikeway would cross to the east side of Highway 1 at Yerba Buena Street. The bikeway would follow Main Street to Zanzibar Street, where a proposed Class I bikeway would begin. The Class I bikeway would continue north along the bottom of the large cutslope within the Highway 1 ROW. Once north of the cutslope, the bikeway would be located east but adjacent to the Highway 1 ROW, cross Toro Creek on a proposed bridge, and connect to an existing Class III bikeway on Ocean Boulevard. From there, the bikeway would continue on to the site of Norma Rose Park and eventually downtown Cayucos. Part of this alternative would also include a spur that would allow riders to cross Highway 1 at Old Creek Road and access the coast and the community of Cayucos.

Construction would include earthwork to build the bikeway, the bridge over Toro Creek, and retaining walls along the cutslope. The quantity of earthwork would be similar to that required for the proposed project. This alternative would not include parking improvements at Studio Drive or removal and restoration of the remnant road. This alternative would require some striping and signage.

### 5.3.3 East/West Alignment Alternative

The East/West Alignment Alternative recognizes that a Class I bikeway in the project area would play a role as a transportation (commuter) facility but would also be very appealing as a recreational facility. Both residents and tourists are likely to be drawn to a Class I bikeway in this location. This alternative also reflects that the project development team generally agreed that a bikeway on the west side of Highway 1 would be more affective at "maximizing users contact with the coastline" (e.g., it would provide a superior recreational experience).

The East/West Alignment Alternative would include Segments 1, 2, and portions of Segment 3 from the Eastern Alignment Alternative. This alternative would then cross west over Highway 1 at Toro Creek Road using a proposed signaled bicycle crossing, where it would include Segments 4 and 5 of the proposed project. The signaled bicycle crossing would include striping across Highway 1 and a traffic signal that cyclists could activate to stop traffic on

Highway 1 and allow cyclists and pedestrians to cross. This alternative is shown conceptually in Figure 5-2.

Because it includes segments from both the Eastern Alignment Alternative and the proposed project, the East/West Alternative would require similar construction techniques and earthwork. Earthwork would be required for construction of the bikeway and the bridge at Toro Creek, and retaining walls would be necessary at the cutslope. The Studio Drive parking improvements would also be included with this alternative.

#### **5.3.4 Right of Way Alignment Alternative**

The Right of Way (ROW) Alternative would be identical to Segments 1, 2, and 4 of the Eastern Alignment Alternative; however, it would shift the alignment of Eastern Alignment Segment 3 west so that it is located entirely within the Highway 1 ROW throughout the Marine Terminal property. This alternative assumes that the bikeway would be coordinated with potential future improvements to the northbound Highway 1 bridge over Toro Creek so that the project would not require a new separate bridge. Once it reaches the southern end of Ocean Boulevard, it would continue on the existing Class III bikeway. Although it is within the highway right of way, Segment 3 of the Right of Way Alternative would be a Class I bikeway, completely separated from the northbound traffic lanes of Highway 1.

Construction elements of this alternative would be similar to that described for the Eastern Alignment Alternative. Earthwork would be required for the bikeway, for retaining walls at the cutslope. Additional small retaining walls may also be necessary along a portion of the bikeway in the ROW north of Toro Creek Road. With the exception of the cutslope area, it appears that there would be enough space in the ROW so that additional safety barriers between Highway 1 and the bikeway would not be required. It should also be noted that in their response to the Notice of Preparation (NOP) (refer to Appendix A) for this EIR and during development of the 2006 Environmental Constraints Analysis (ECA), the California Department of Transportation (Caltrans) indicated that any bikeway alignment should avoid the Highway 1 ROW to the maximum extent feasible.

Figure 5-1. Eastern Alignment Site Plan





Figure 5-2. East/West Alignment Site Plan



## 5.4 ALTERNATIVES IMPACTS ANALYSIS

The level of analysis for each of the four alternatives varies due to the amount of information available for each. The Eastern Alignment has been previously analyzed at a project specific level (refer to Appendix F) as opposed to the qualitative analysis required by CEQA. Impacts for this alternative are also summarized below. The No Project and Right of Way Alignment Alternatives impacts are analyzed qualitatively below. The East/West Alignment would generally be a combination of the portions of the Eastern Alignment Alternative and the proposed project and therefore the impacts described below for that alternative have generally already been quantified in either Chapter 4 or Appendix F. Table 5-1 includes a matrix comparing the impacts of each alternative and the proposed project.

### 5.4.1 No Project Alternative

No bikeway-related construction signage or striping improvements would be made with this alternative, and therefore no impacts would result.

#### Aesthetic Resources

No improvements would be made; therefore the No Project Alternative would not impact aesthetic resources. It avoids the significant and unavoidable aesthetic resource impacts resulting from the proposed project.

#### Air Quality

This alternative would not require earthwork or generate additional vehicle trips. It would not result in construction or operational air quality impacts.

#### Biological Resources

Biological resources would not be directly impacted by the No Project Alternative, although continued use of the existing volunteer trails, the marine terrace and sandy beach by residents and tourists would have some impact on sensitive habitat and species. Bluff retreat would also reduce habitats associated with the terrace area over time.

#### Cultural Resources

Because this alternative would not include any ground disturbance, this alternative would not result in direct impacts cultural resources.

#### Geology, Soils and Drainage

This alternative would not change the existing geologic, soils, or drainage conditions. Bluff retreat would continue however, eventually eliminating the existing volunteer trails along the terrace.

#### Hazards and Hazardous Materials

Hazardous materials exist approximately seven to nine feet below portions of the Pier Landing. The No Project Alternative would not require ground disturbance of any kind and therefore would not result in any increased exposure to those materials. Bluff retreat and erosion may eventually expose portions of the contaminated soils if remediation does not occur.

### Transportation and Circulation

Parking capacity is an existing concern to residents in some neighborhoods and would continue to be so even with the No Project Alternative, particularly during weekends and holidays. Unsafe crossings of Highway 1 would still occur, although less often than if there were a designated bikeway in the corridor.

### Consistency With Project Objectives

This alternative does not meet any of the three project objectives.

## **5.4.2 Eastern Alignment Alternative**

This alternative would also connect Cloisters Park and the site of Norma Rose Park, although between Yerba Buena Street in the City of Morro Bay and Ocean Boulevard in the community of Cayucos it would be located on the eastside of Highway 1 (refer to Figure 5-1). It would generally have fewer impacts when compared to the proposed project. Impacts would be significant and mitigable, or less than significant.

### Aesthetic Resources

The Eastern Alignment Alternative would generally have fewer aesthetic resource impacts than the proposed project since it is located east of the highway and the highest quality views are to the west. In general the bikeway segments would be unobtrusive; although impacts along Segment 2 where the barrier and fence would be required would be significant and require mitigation. This alternative would avoid the significant and unavoidable aesthetic impacts resulting from the proposed project.

### Air Quality

This alternative would result in construction and operational air quality impacts similar to the proposed project, although they would be slightly reduced because it does not include earthwork associated with removal of the remnant road. Short-term construction emissions would not exceed San Luis Obispo Air Pollution Control District (SLOAPCD) thresholds of significance, and operational emissions would be less than significant as well. This alternative, as with the proposed project, would encourage use of alternative transportation, potentially reducing vehicle trips and vehicle miles travelled.

### Biological Resources

Biological resources impacts would be reduced for the Eastern Alignment Alternative compared to the proposed project. This alternative would result in fewer impacts to ESHA, but would impact San Luis Obispo Owl's Clover (Segment 3) and aquatic resources at Toro Creek. It would avoid wetland impacts. Impacts to sensitive wildlife species would be mitigable to a less than significant level.

### Cultural Resources

This alternative would have potentially more significant impacts than the proposed project as the bikeway would be located within a known cultural resources site eligible for the National Register of Historic Places. Based on cultural resources investigations performed for the EIR, avoidance of these resources is infeasible east of Highway 1. Impacts would be significant but mitigable.



### Geology, Soils and Drainage

The Eastern Alignment Alternative would have fewer impacts compared to the proposed project. Because it is located on the eastside of Highway 1, the bikeway would not be susceptible to damage from bluff retreat and would avoid any significant disturbance of the existing natural or Highway 1 drainage system. Impacts could result from construction-related erosion and sedimentation. This alternative may expose bikeway users to rockfall hazards associated with the cutslope (Segment 2). Impacts would likely be mitigable to a level of insignificance through adherence to existing regulations and construction standards.

### Hazards and Hazardous Materials

The Eastern Alignment Alternative would have impacts similar to the proposed project due to the location of contaminated soils on the Marine Terminal property (Segment 3). Contaminated soils could be exposed or encountered during construction of the bikeway and the Toro Creek bridge in particular. Impacts would be mitigated to a level of insignificance through preparation of a Contaminated Materials Management Plan prior to construction.

### Transportation and Circulation

Impacts resulting from the Eastern Alignment Alternative would be similar to or slightly greater than the proposed project as there are fewer parking facilities east of Highway 1. Some additional parking may exist along Ocean Boulevard. This alternative may result in increased crossings of Highway 1 at unsignalized locations as bikeway users seek to cross Highway 1 to reach the marine terrace and beach. Despite this, impacts would be less than significant with the mitigation described in this EIR.

### Consistency With Project Objectives

This alternative would meet two project objectives as well as the proposed project – providing continuous off-highway connectivity and a safe and scenic bicycle and pedestrian route. It would not maximize the users contact with the coastline as well as the proposed project.

## **5.4.3 East/West Alignment Alternative**

The East/West Alignment Alternative would incorporate Segments 1,2 and portions of 3 of the Eastern Alignment Alternative and Segments 4 and 5 of the proposed project (refer to Figure 5-2). It would require the installation of a new signalized crossing of Highway 1 at Toro Creek Road. This alternative would avoid the most significant aesthetic resource impact. However it would result in significant Transportation and Circulation impacts (i.e. pedestrian and cyclist safety) at the Toro Creek Road crossing, significant impacts to biological resources, and be susceptible to bluff retreat.

### Aesthetic Resources

Because this alternative would avoid the area of rip-rap west of the Highway 1, it would avoid the significant and unavoidable aesthetic impact resulting from the proposed project. This alternative would require retaining walls along the cutslope (Segment 2) and the bridge over Toro Creek and other drainages which would potentially degrade the visual quality of the area and require the same level of mitigation as the proposed project.

### Air Quality

The East/West Alignment Alternative would result in construction and operational air quality impacts similar to the proposed project. Construction and operational emissions would be below SLOAPCD thresholds of significance.

### Biological Resources

The East/West Alignment Alternative would result in impacts to riparian vegetation at Toro Creek and disturb ESHA on the marine terrace west of Highway 1. It would avoid the freshwater marsh and sensitive plant (Owl's Clover) on the eastside of the Highway, but would impact foredune habitat, and snowy plover habitat. Impacts would be similar to the proposed project.

### Cultural Resources

This alternative would have potentially greater impacts than the proposed project and impacts similar to the Eastern Alignment, as it would be located in an area where cultural resources are known to exist east of the Highway. Avoidance of the resources is infeasible.

### Geology, Soils and Drainage

This alternative would have impacts similar to the proposed project although it would avoid the significant drainage issues north of the North Point Natural Area. The bikeway would be susceptible to damage from bluff retreat north of the Toro Creek crossing (Segment 4) in less than 75 years and would require a number of bridges to avoid existing natural and manmade drainage features.

### Hazards and Hazardous Materials

The East/West Alignment Alternative would have impacts similar to the proposed project due to the location of contaminated soils on the Marine Terminal property (Segments 3 and 4). It would result in impacts from rockfall as well (Segment 2). Impacts would be less than significant with mitigation.

### Transportation and Circulation

This alternative would result in parking capacity impacts during peak periods, similar to the proposed project. The Highway 1 crossing at Toro Creek road represents a safety impact unique to this alternative. While it would provide a new signalized crossing for bicycles and pedestrians, traffic in this area is moving at high speed and motorists may be distracted by views to the west. In addition, the bikeway may attract inexperienced users. During project development, Caltrans has indicated that another signalized crossing of Highway 1 was not a preferred option as it would affect safety and efficient travel along this stretch of Highway 1.

### Consistency With Project Objectives

The East/West Alignment Alternative would meet project objectives which include providing continuous off-highway connectivity and maximizing the user's contact with the coastline as well as the proposed project. It would not be considered as safe as the proposed project due to the additional Highway 1 crossing at Toro Creek Road.

#### 5.4.4 Right of Way Alternative

The Right of Way Alternative would resemble the Eastern Alignment Alternative with the exception of Segment 3. The alignment of Segment 3 would be entirely within the Highway 1 ROW east of Highway 1 between Yerba Buena Street in the City of Morro Bay, to Ocean Boulevard in the community of Cayucos. This alternative would have fewer impacts than the proposed project. Impacts would be significant and mitigable, or less than significant.

##### Aesthetic Resources

The Right of Way Alternative would generally have fewer aesthetic resource impacts than the proposed project as it would avoid the barrier necessary westside of Highway 1 along the rip-rap portion of the project corridor. It would require a barrier along the cutslope. This alternative would also require the removal of some of the Monterey cypress that currently somewhat shield structures on the Marine Terminal (Segment 3). This alternative avoids the significant and unavoidable aesthetic impacts resulting from the proposed project.

The Right of Way Alternative would be noticeable and affect the existing visual setting due to its proximity to Highway 1, although given that the most significant aesthetic resources exist to the west, and the limited earthwork that would be required north of the cutslope, impacts would be less than significant with mitigation.

##### Air Quality

Earthwork would be required for construction of the bikeway, retaining walls would still be necessary along the cutslope (Segment 2), and some earthwork would be required at the Toro Creek bridge (Segment 3). This alternative would result in construction and operational air quality impacts similar to the proposed project. Emissions would be below SLOAPCD thresholds, and less than significant with mitigation.

##### Biological Resources

The Right of Way Alternative would result in fewer biological resources impacts compared to the proposed project. This alternative would result in fewer impacts to Environmentally Sensitive Habitat and avoid impacts to San Luis Obispo Owl's Clover, but would impact the small freshwater marsh on the south end of the Marine Terminal and any bridge project that incorporated the bikeway, whether part of this project or a future Caltrans bridge replacement project, would potentially impact the aquatic environment at Toro Creek. Although, impacts would be less than significant with mitigation.

##### Cultural Resources

This alternative would have potentially more significant impacts than the proposed project due to the portions which would be located east of Highway 1 on the Marine Terminal. According to the XPI, avoidance of significant resources would be infeasible. Impacts would be mitigable, however.

##### Geology, Soils and Drainage

The Right of Way Alternative would have fewer geologic impacts compared to the proposed project. The bikeway would not be susceptible to damage from bluff retreat. This alternative may disturb the existing Highway 1 drainage system (culvert inlets) located in the ROW

(Segment 3), although impacts would likely be mitigable to a level of insignificance through adherence to existing regulations and construction standards.

#### Hazards and Hazardous Materials

The Right of Way Alternative would have impacts similar to the proposed project due to the location of contaminated soils on the Marine Terminal property. Impacts would be less than significant with mitigation developed in this EIR.

#### Transportation and Circulation

The Right of Way Alternative would not benefit from the parking at the south end of Studio Drive. It may result in more crossings of Highway 1 due to bikeway users that want to cross Highway 1 south of the signalized crossing at Old Creek Road to reach the coast. Overall, the Right of Way Alternative would result in the same number and type of impacts (parking capacity during peak periods, unsafe Highway crossings) as the proposed project. Impacts would be less than significant with mitigation.

#### Consistency with Project Objectives

This alternative would meet the project objectives concerning continuous off-highway connectivity and a safe and scenic route; although it would be closer to Highway 1 for a longer period of time, and therefore may be less safe than the proposed project. It would not maximize the users contact with the coastline as well as the proposed project.

**Table 5-1. Alternatives Impact Summary**

Environmental Resource		Proposed Project	Eastern Alignment	East/West Alignment	ROW Alignment	No Project
Aesthetic Resources	Scenic Vistas					
	Visual Quality					
Air Quality						
Biological Resources	ESHA					
	Sensitive Wildlife					
	Sensitive Plants					
Cultural Resources						
Geology Soils, and Drainage	Bluff Retreat					
	Drainage					
Hazards/Hazardous Materials						
Transportation and Circulation	Safety					
	Parking					
	Significant and unavoidable impacts despite application of mitigation measures					
	Significant impacts mitigated through project-specific measures					
	Significant impacts mitigated through application of standard measures or ordinance compliance					
	Impacts are less than significant; no mitigation required					

## 5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the alternatives section of an EIR to describe a reasonable range of alternatives to the project that avoid or substantially lessen any of the significant effects identified in the EIR analysis while still attaining most of the basic project objectives. The alternative that most effectively reduces impacts while meeting project objectives should be considered the “environmentally superior alternative.” In the event that the No Project Alternative is considered the environmentally superior alternative, the EIR is also supposed to identify an environmentally superior alternative among the other alternatives. In this EIR the No Project Alternative results in the fewest environmental impacts, although it does not meet any of the project objectives.

The Eastern Alignment Alternative would avoid the significant and unavoidable aesthetic resource impact, and geologic impacts associated with bluff retreat. It would result in fewer impacts to ESHA than the proposed project. It would result in impacts to the Toro Creek aquatic environment and sensitive plant species, similar to the proposed project. The Eastern Alignment would impact cultural resources and would require intensive mitigation and monitoring. This alternative would meet the project objectives by providing an off-highway route, a safe route, and it would provide users contact with the coastline (but not to the level of the proposed project).

The East/West Alignment Alternative would also avoid the significant unavoidable aesthetic resource impact. However, it would only partially avoid the bluff retreat impacts. This alignment would potentially impact aquatic environment resources associated with Toro Creek east of Highway 1, and the ESHAs north of the creek on the marine terrace. This alternative would impact sensitive wildlife (western snowy plover, steelhead trout) and plant species. Impacts to biological resources would be similar to the proposed project. Cultural resource impacts would be greater than the proposed project due to resources east of Highway 1. This alternative would require significant mitigation and monitoring. The East/West Alignment Alternative would be the least safe as it would potentially require three Highway 1 crossings at Yerba Buena Street, Toro Creek Road, and Old Creek Road. This alternative meets two project objectives and along with the No Project Alternative, is least able to address the safety objective.

The Right of Way alignment would result in fewer environmental impacts compared to the proposed project. It would avoid the most significant aesthetic resource and bluff retreat impacts associated with the proposed project. It would avoid nearly all ESHA impacts and impacts to sensitive plant species. The Right of Way Alternative would impact the freshwater marsh south of Toro Creek. Cultural resource impacts would be greater than the proposed project and similar to the Eastern Alignment. This alternative would require significant mitigation and monitoring. Parking and safety impacts would be similar to the proposed project. This alternative would meet the objectives, although its proximity to automobiles on Highway 1 may distract from the user’s contact with the coastline more than the proposed project.

Based on the analysis in this Chapter and Table 5-1 the proposed project and the East/West Alignment Alternative would result in the most environmental impacts, including significant unavoidable impacts. Both the Eastern Alignment Alternative and the Right of Way Alignment Alternative avoid potential significant and unavoidable impacts, while still meeting the project objectives. And of those two, the Right of Way Alternative would also avoid impacts to sensitive plant species, and would therefore result in the fewest biological resource impacts. The Right of Way Alternative should be considered the Environmentally Superior Alternative.

# CHAPTER 6

## ENVIRONMENTAL ANALYSIS

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### 6.1 GROWTH INDUCING IMPACTS

The growth inducing impacts section of the Environmental Impact Report (EIR) addresses the effects the proposed project may have on surrounding facilities and activities by assessing the ways in which a project could encourage population or economic growth, increase employment opportunities or employment growth in support of an industry, or the construction of new housing or service facilities, either directly or indirectly.

California Environmental Quality Act (CEQA) *Guidelines* state that in the preparation of an EIR, growth inducing impacts that need to be addressed are such that "...foster economic or population growth, or the construction of additional housing...remove obstacles to population growth...encourage and facilitate other activities that could significantly affect the environment either individually or cumulatively" (Section 15126.2 (d)). An example given is the expansion of a wastewater treatment plant allowing for increased construction in service areas.

The proposed project is identified in local government and the Coastal Commission's existing planning documents. It is proposed to meet an existing deficiency in the alternative transportation system between the City of Morro Bay and the community of Cayucos and expand recreational opportunities in these areas. The project would not create new jobs or require additional housing. Given its relatively small scale and limited function, the proposed project would not be considered growth-inducing. Impacts would be *less than significant*.

### 6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the CEQA *Guidelines* states that use of nonrenewable resources during the initial and continued phases of a proposed project may be irreversible if a large commitment of these resources makes their removal, indirect removal, or non-use thereafter unlikely. This section of the EIR evaluates whether the project would result in the irretrievable commitment of resources, or would cause irreversible changes in the environment.

Non-renewable resources, such as natural gas, petroleum products, asphalt, steel, copper and other metals, and sand and gravel are considered to be commodities which are available in a finite supply. The demand for all such resources is expected to increase regardless of whether or not the project is developed. Increases in population will directly result in the need for resources. And they would likely be committed to other projects in the region intended to meet this anticipated growth. The project is of limited scale and therefore its contribution to this loss is limited.

As discussed in the Aesthetic Resources section, the proposed project would result in significant changes to scenic resources and the visual quality of the project corridor along portions of Segment 3. Despite attempts to mitigate visual impacts in the EIR, the barrier system would permanently alter the visual quality during its useful life.



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# CHAPTER 7

## MITIGATION MONITORING PROGRAM

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### 7.1 STATUTORY REQUIREMENT

When a Lead Agency makes findings on significant environmental effects identified in an EIR, the agency must also adopt a “reporting or monitoring program for the changes to the project which it has adopted or made a condition of approval in order to mitigate or avoid significant effects on the environment” (Public Resources Code §21081.6(a) and CEQA *Guidelines* §15091(d) and §15097). The Mitigation Monitoring Program (MMP) is implemented to ensure that the mitigation measures and project revisions identified in the EIR are implemented. Therefore, the MMP must include all changes in the proposed project either adopted by the project proponent or made conditions of approval by the Lead or Responsible Agency.

### 7.2 ADMINISTRATION OF THE MITIGATION MONITORING PROGRAM

The County of San Luis Obispo is the Lead Agency responsible for the adoption of the MMP. According to CEQA *Guidelines* §15097(a), a public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation. However, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that the implementation of the measure occurs in accordance with the program.

### 7.3 MITIGATION MEASURES AND MONITORING PROGRAM

Table 7-1 on the following pages is structured to enable quick reference to mitigation measures and the associated monitoring program based on the environmental resource. The numbering of mitigation measures correlates with numbering of measures founding the analysis chapter of this EIR (refer to Chapter 4).

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
<b>AESTHETIC RESOURCES</b>					
AR/mm-1	<p>Prior to initiation of construction the General Services Agency shall provide the specific barrier plan to the Department of Planning and Building, Caltrans, and the City of Morro Bay for review and approval. The plan shall:</p> <ul style="list-style-type: none"> <li>▪ recommend the shortest barrier and railing combination allowed by Caltrans;</li> <li>▪ soften the appearance of the barrier through use of “sandy beach” or similar muted-color concrete;</li> <li>▪ minimize vertical elements (supports) and the use of embellishment (finials, etc.); and</li> <li>▪ reduce the reflectivity of the vertical railing elements through treatment of the materials.</li> </ul>	Submit barrier plan to Department of Planning and Building, Caltrans, City of Morro Bay	General Services Agency	Provide verification of plan approval	Prior to initiation of construction
AR/mm-2	Prior to initiation of construction the General Services Agency shall submit a plan detailing proposed signage type and location, retaining wall design, and bridge design to the Department of Planning and Building and the City of Morro Bay for review and approval. Signage shall be no	Submit signage plan to Department of Planning and Building, Caltrans, City of Morro Bay	General Services Agency	Provide verification of plan approval	Prior to initiation of construction

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
	higher than 42 inches, minimized and focused at existing developed area (i.e. North Point Natural Area, the south end of Studio Drive, etc.). Retaining walls shall be colored “sandy beach” or a similar muted color, and/or textured concrete to minimize their contrast with the surrounding landscape. Bridge railing shall be the lowest allowed considering safety requirements, and shall be a muted color.				
<b>AIR QUALITY</b>					
AQ/mm-1	<p>Prior to initiation of construction, the General Services Agency shall:</p> <p>a. Conduct a geologic analysis to ensure the presence/absence of serpentine rock onsite. The geologic analysis shall identify if naturally occurring asbestos is contained within the serpentine rock onsite; and, if found, the applicant must comply with all requirements outlined in the Asbestos Airborne Toxic Control Measures (ATCM). In addition, the applicants shall work with the SLOAPCD to prepare a SLOAPCD-approved Asbestos Health and Safety Program and an Asbestos Dust Control Plan prior to development plan approval.</p>	Ensure presence/absence of NOA onsite and develop Asbestos Dust Control Plan, as applicable.	General Services Agency	Provide verification of plan approval	Prior to initiation of construction

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
<b>BIOLOGICAL RESOURCES</b>					
BIO/mm-1	Prior to issuance of construction permits/notices to proceed, the Department of General Services shall designate a qualified environmental monitor for all measures requiring environmental mitigation to ensure compliance with Conditions of Approval and EIR mitigation measures. The monitor shall be responsible for: (1) ensuring that procedures for verifying compliance with environmental mitigations are followed; (2) lines of communication and reporting methods; (3) daily and weekly compliance reporting; (4) construction crew training regarding environmentally sensitive areas; (5) authority to stop work; and (6) action to be taken in the event of non-compliance. Monitoring shall be at a frequency and duration determined by the affected natural resource agencies (e.g., USACE, CDFG, RWQCB, California Coastal Commission, USFWS, and the County).	Designate qualified Environmental Monitor.	General Services Agency	Designate monitor	Prior to initiation of construction
BIO/mm-2	At the time of application for construction permits all grading plans shall clearly show the location of project delineation fencing that excludes adjacent ESHAs from disturbance. With exception to the portions of Segment 3 that require beach access, the project delineation fencing shall provide no more than a 22-foot wide work area throughout the length of Segments 3 and 4. In the portions of Segment 3 that require beach access, the project delineation fencing may allow for an additional 16 feet (as necessary) immediately adjacent to the proposed path alignment. The	Show the location of project delineation fencing that excludes adjacent ESHAs from disturbance.	General Services Agency	Submit plans with fencing	At time of application for construction permits.

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
	grading plans shall clearly show all staging areas, which shall avoid ESHAs.				
BIO/mm-3	At the time of application for permits, the plans shall clearly show the placement of environmental interpretive signs along the bikeway. The signs shall inform bikeway users of the ecology of bluff habitat, central foredune habitat, beach habitat, and plant and wildlife species that utilize these areas. Signs shall be placed at the northern terminus of Segment 2, at the Pier Landing and at the northern terminus of Segment 4.	Show the placement of environmental interpretive signs along the bikeway on plans.	General Services Agency	Show signage placement on plans.	At the time of application for permits.
BIO/mm-4	Prior to the initiation of construction, the monitoring biologist shall conduct an environmental awareness training for all construction personnel. The environmental awareness training shall include discussions of the ESHAs, and sensitive plant and animal species identified within the project corridor. Topics of discussion shall include: description of the species' habitats; general provisions and protections afforded by the Endangered Species Act; measures implemented to protect special-status species; review of the project boundaries and special conditions; the monitor's role in project activities; lines of communications; and procedures to be implemented in the event a special-status species is observed in the work area.	Conduct an environmental awareness training for all construction personnel	General Services Agency	Conduct training.	Prior to the initiation of construction.
BIO/mm-5	Prior to the initiation of construction, the applicant's contractors and the monitoring biologist shall coordinate the placement of	Coordinate the placement of project	General Services Agency	Coordinate fence placement.	Prior to the initiation of construction.

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
	project delineation fencing throughout the work areas. The monitoring biologist shall field fit the placement of the project delineation fencing to minimize impacts to ESHAs and other sensitive resources. The project delineation fencing shall remain in place and functional throughout the duration of the project. During construction, no project related work activities shall occur outside of the delineated work area.	delineation fencing throughout the work areas			
BIO/mm-6	During construction, to avoid erosion and downstream sedimentation, no work within or immediately adjacent to the ephemeral drainages or Toro Creek shall occur during the rainy season (October 15 through April 15).	Avoid work within or immediately adjacent to the ephemeral drainages or Toro Creek during the rainy season (October 15 through April 15).	General Services Agency	Avoid work in drainages during rainy season	During construction.
BIO/mm-7	During construction, equipment access and construction shall be conducted from the banks or upland areas rather than from within drainages. No equipment or fill material shall be staged in or adjacent to any of the site drainages, unless authorized by the appropriate permits.	Avoid conducting work within drainages.	General Services Agency	Conduct work from banks or upland areas.	During construction.
BIO/mm-8	At the time of application for grading permits, all applicable plans shall clearly show stockpile and staging areas. Stockpiles and staging areas shall not be placed in areas that have potential to experience significant runoff during the rainy season. All project-related spills of hazardous materials within or adjacent to project sites shall be cleaned up immediately. Spill prevention and cleanup materials shall be	Show stockpile and staging areas on plans.	General Services Agency	Show areas on plans.	At the time of application for grading permits.



**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
	on-site at all times during construction. Cleaning and refueling of equipment and vehicles shall occur only within designated staging areas. The staging areas shall conform to standard BMPs applicable to attaining zero discharge of storm water runoff. No maintenance, cleaning or fueling of equipment shall occur within wetland or riparian areas, or within 50 feet of such areas. At a minimum, all equipment and vehicles shall be checked and maintained on a daily basis to ensure proper operation and to avoid potential leaks or spills.				
BIO/mm-9	Prior to issuance of construction permits, the applicant shall submit a detailed sediment and erosion control plan for approval, which shall address both temporary and permanent measures to control erosion and reduce sedimentation. Erosion and soil protection shall be provided on all cut and fill slopes. Revegetation shall be facilitated by mulching, hydro-seeding or other methods, and shall be initiated as soon as possible after completion of grading, and prior to the onset of the rainy season (October 15). Permanent revegetation and landscaping shall emphasize native shrubs, and trees, to improve the probability of slope and soil stabilization without adverse impacts to slope stability due to irrigation infiltration and long-term root development. All plans shall show that sedimentation and erosion control measures are installed prior to any other ground disturbing work.	Submit a detailed sediment and erosion control plan	General Services Agency	Submit plans.	Prior to issuance of construction permits.

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
BIO/mm-10	Prior to issuance of construction permits, the applicant shall prepare and submit a Notice of Intent and SWPPP to the RWQCB. A copy of the SWPPP shall be submitted to the County of San Luis Obispo for approval to show that sedimentation and erosion control measures are installed prior to any other ground disturbing work.	Prepare and submit a Notice of Intent and SWPPP to the RWQCB	General Services Agency	Submit SWPPP.	Prior to issuance of construction permits.
BIO/mm-11	At the time of application for grading permits, all applicable plans shall clearly show the placement of a clear span bridge over the ephemeral drainage. The clear span bridge shall rest on abutments located outside of the drainage banks and the construction of the bridge shall avoid the placement of fill in the drainage. Bridge design shall comply with measures in the Aesthetics Resource section.	Plans shall clearly show the placement of a clear span bridge over the ephemeral drainage	General Services Agency	Show clearspan bridges on plans.	At the time of application for grading permits.
BIO/mm-12	At the time of application for grading permits, the applicant shall prepare and submit a Dune Habitat Restoration Plan (HRP) for review and approval by the CDFG and Department of Planning and Building. The HRP shall be prepared by a qualified biologist and/or botanist and shall detail the methods for restoring or enhancing 1.47 acres (1:1 for temporary impacts and 2:1 for permanent impacts) of central foredune habitat within the project corridor. The goal of the HRP would be to restore temporary and mitigate permanent impacts to central foredunes, so that project impacts do not significantly disrupt the habitat. The HRP shall focus on restoring and enhancing central foredune habitat by	Prepare and submit a Dune Habitat Restoration Plan (HRP) for review and approval by the CDFG and Department of Planning and Building.	General Services Agency.	Submit HRP.	At the time of application for grading permits

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
	<p>removing invasive species (iceplant and sea rocket) and planting the appropriate native species (beach saltbush, red sand verbena, beach bur, and suffrutescent wall flower). At a minimum, the HRP should include the following elements:</p> <ul style="list-style-type: none"> <li>a. Identification of locations, amounts, size and types of plants to be replanted, as well as any other necessary components (e.g., temporary irrigation, amendments, etc.) to insure successful reestablishment.</li> <li>b. Provide for a native plant salvage effort prior to ground disturbing activities. Salvaged plants shall include but not be limited to red-sand verbena and beach saltbush;</li> <li>c. Provide for driftwood salvage and replacement efforts to minimize loss of avian nesting substrates;</li> <li>d. Quantification of impact and mitigation areas.</li> <li>e. A program schedule and success criteria for a five year monitoring and reporting program that is structured to ensure the success of the HRP.</li> <li>f. Provide for the in-kind replacement of any red sand verbena that are removed or</li> </ul>				

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
	damaged at a 3:1 ratio.				
BIO/mm-13	Prior to initiation of construction, the applicant shall retain a qualified biologist/botanist to supervise the implementation of the HRP. The qualified biologist/botanist should supervise plant salvage, site preparation, implementation timing, species utilized, planting installation, maintenance, monitoring, and reporting of the restoration efforts. The qualified biologist/botanist shall prepare and submit four annual reports and one final monitoring report to the County for review and approval. The annual and final monitoring reports should include discussions of the restoration activities, project photographs, and an assessment of the restoration efforts attainment of the success criteria.	Retain a qualified biologist/botanist to supervise the implementation of the HRP.	General Services Agency	Retain biologist.	Prior to initiation of construction.
BIO/mm-14	At the time of application for grading permits, the project plans shall clearly show habitat protection fencing extending parallel to the bikeway from the northern end of the riprap (where fencing on the west side of the bikeway is currently proposed to end) to the Toro Creek bridge. To minimize visual impacts of the fencing it shall be no more than 18" high wood post or steel rod, and cable. The intent of the fence would be to deter bikeway users from trampling the foredune habitat while accessing the beach from the bikeway. One opening shall be allowed at the Pier Landing to maintain existing access.	Show habitat protection fencing extending parallel to the bikeway from the northern end of the riprap (where fencing on the west side of the bikeway is currently proposed to end) to the Toro Creek bridge on plans.	General Services Agency	Show fencing on plans.	At the time of application for grading permits, the project plans.

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
BIO/mm-15	<p>At the time of application for grading permits, all applicable plans shall clearly show the placement of a clear span bridge over the ephemeral drainage. The clear span bridge shall rest on abutments located outside of the drainage banks and the construction of the bridge shall avoid the placement of fill in the drainage.</p> <p>If complete avoidance of the ephemeral drainage is not feasible, the General Services Agency shall prepare and implement a detailed sediment and erosion control plan as discussed in BIO/mm-9.</p>	Plans shall clearly show the placement of a clear span bridge over the ephemeral drainage.	General Services Agency	Show clearspan bridge over drainage	At the time of application for grading permits.
BIO/mm-16	At the time of application for construction permits, the plans shall clearly show the avoidance of the seasonal wetlands. In order to avoid the wetlands, the proposed alignment shall be relocated approximately fifty feet to the east towards the Highway 1 right-of-way. Figure 4-3.3 includes an alternative alignment that would avoid the seasonal wetlands.	Plans shall clearly show the avoidance of the seasonal wetlands.	General Services Agency	Show seasonal wetland avoidance.	At the time of application for construction permits.
BIO/mm-17	Prior to commencement of site grading, the temporary beach access shall be clearly delineated with construction fencing. The biological monitor directing placement of the project delineation fencing shall ensure that the temporary beach access routes avoid the red sand verbena and any other special-status resource that may exist. If complete avoidance of the red sand verbena is not feasible, the monitor shall salvage the individuals that would be impacted. The salvaged individuals shall be	Temporary beach access shall be clearly delineated with construction fencing.	General Services Agency	Delineate temporary beach access.	Prior to commencement of site grading.

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
	utilized in the Central foredune Habitat Restoration Plan, as discussed in BIO/mm-12 and 13.				
BIO/mm-18	<p>If commencement of construction begins between March and September, prior to installation of the project delineation fencing and the commencement of site grading, the environmental monitor shall conduct pre-construction nesting bird surveys. If nesting activity is identified, the following measures shall be implemented:</p> <ul style="list-style-type: none"> <li>a. If active nest of common passerine or shorebird species' are observed in the work area or within 100 feet of the work area, construction activities shall be modified and or delayed as necessary to avoid direct take or indirect disturbance of the nests, eggs, or young;</li> <li>b. If active nest sites of raptors or other special-status species are observed within the work area or 300 feet of the work area, the environmental monitor shall establish a suitable buffer around the nest site. Construction activities in the buffer zone shall be prohibited until the young have fledged the nest and achieved independence.</li> <li>c. Active raptor or special-status species nests should be documented by a qualified biologist and a letter report should be submitted to the County,</li> </ul>	The environmental monitor shall conduct pre-construction nesting bird surveys.	General Services Agency	Conduct surveys.	Between March and September.

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
	USFWS, and CDFG, documenting project compliance with the MBTA and applicable project mitigation measures.				
BIO/mm-19	<p>Avoid ground disturbing activities conducted within 300 feet of the central foredune and sandy beach habitats during the snowy plover nesting season to the extent feasible. If work activities must occur during the nesting season the following measures should be taken:</p> <ul style="list-style-type: none"> <li>a. Prior to installation of the project delineation fencing and the commencement of site grading, a qualified biologist shall conduct a series of pre-construction nesting bird surveys for western snowy plover. Surveys shall be conducted every other day for two weeks prior to any project related disturbances.</li> <li>b. Surveys for snowy plovers shall include walking through all potential nesting and foraging habitat within 300 feet of the site on each survey day. The survey area shall include all available snowy plover nesting habitat within 300 feet of anticipated project activities.</li> <li>c. The number of snowy plover individuals observed and their activities (e.g. nesting, foraging, resting, etc) shall be documented. All documented occurrences would be reported to USFWS and documented on the CNDDDB.</li> </ul>	Avoid ground disturbing activities conducted within 300 feet of the central foredune and sandy beach habitats during the snowy plover nesting season to the extent feasible.	General Services Agency	Avoid foredune and sandy beach habitat.	During the snowy plover nesting season.



**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
	<p>d. If nesting activity is identified, all project activities within 300 feet of the nest shall be delayed until the nesting activity has ceased.</p> <p>e. During construction, the environmental monitor shall conduct snowy plover surveys twice a week (preferably two to three days apart).</p>				
BIO/mm-20	Prior to site grading, the environmental monitor shall conduct a survey for coast horned lizard and other reptiles. The surveyor shall utilize hand search methods in areas of disturbance where coast horned-lizards are expected to be found (e.g., under shrubs, other vegetation, or debris). Any lizards located during this survey should be safely removed from the construction area and placed in suitable habitat.	Conduct a survey for coast horned lizard and other reptiles and safely remove any identified away from construction area.	General Services Agency	Conduct surveys and move reptiles.	Prior to site grading.
<b>CULTURAL RESOURCES</b>					
CR/mm-1	Prior to submittal of application for construction permits, the General Services Agency shall perform a Phase II cultural resources investigation. The investigation shall be developed and implemented by a qualified archaeologist approved by the Environmental Coordinator. It shall, at minimum, confirm the western boundary of the cultural resources site and the integrity of the resource as they relate to the proposed area of disturbance. The results of the Phase II investigation, along with recommendations for either avoidance, monitoring (refer to CR/mm-5, 6, and 7 below),	Perform a Phase II cultural resources investigation.	General Services Agency.	Submit technical report.	Prior to submittal of application for construction permits.

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
	and/or further testing (refer to CR/mm-3 through 7) shall be identified in a technical report.				
CR/mm-2	Upon submittal of application for construction permits, the General Services Agency shall provide verification that a Phase II cultural resources investigation has been completed and that the final bikeway alignment has been modified, as necessary, to address recommendations in the Phase II technical report.	Provide verification that a Phase II cultural resources investigation has been completed.	General Services Agency	Submit construction plans and memo from qualified cultural resources specialist.	Upon submittal of application for construction permits.
CR/mm-3	<p>Prior to issuance of construction permits, the General Services Agency shall submit to the Environmental Coordinator for review and approval, a detailed research design for a Phase III (data recovery) archaeological investigation. The Phase III program shall be prepared by a subsurface qualified archaeologist approved by the Environmental Coordinator. The consulting archaeologist responsible for the Phase III program shall be provided with a copy of the previous archaeological investigations. The Phase III program shall include at least the following:</p> <ul style="list-style-type: none"> <li>a. standard archaeological data recovery practices;</li> <li>b. recommendation of sample size adequate to mitigate for impacts to archaeological site, including basis and justification of the recommended sample size.</li> </ul>	Submit to the Environmental Coordinator for review and approval, a detailed research design for a Phase III (data recovery) archaeological investigation	General Services Agency	Submit design for review and approval.	Prior to issuance of construction permits.

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
	<p>c. identification of location of sample sites/test units;</p> <p>d. detailed description of sampling techniques and material recovery procedures (e.g. how sample is to be excavated, how the material will be screened, screen size, how material will be collected);</p> <p>e. disposition of collected materials;</p> <p>f. proposed analysis of results of data recovery and collected materials, including timeline of final analysis results;</p> <p>g. list of personnel involved in sampling and analysis.</p> <p>Once approved, these measures shall be shown on all applicable plans and implemented during construction.</p>				
CR/mm-4	Prior to issuance of construction permit, the applicant shall submit to the Environmental Coordinator, a letter from the consulting archaeologist indicating that all necessary field work as identified in the Phase III program has been completed.	Submit a letter from the consulting archaeologist indicating that all necessary field work as identified in the Phase III program has been completed.	General Services Agency	Submit letter.	Prior to issuance of construction permit.
CR/mm-5	Prior to issuance of construction permit, the applicant shall submit a monitoring plan, prepared by a subsurface-qualified	Submit a monitoring plan, prepared by a subsurface-qualified	General Services Agency	Submit plan.	<i>Prior to issuance of construction permit</i>

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
	<p>archaeologist, for the review and approval by the Environmental Coordinator. The monitoring plan shall include at a minimum:</p> <ul style="list-style-type: none"> <li>a. List of personnel involved in the monitoring activities;</li> <li>b. Description of how the monitoring shall occur;</li> <li>c. Description of frequency of monitoring (e.g. full-time, part time, spot checking);</li> <li>d. Description of what resources are expected to be encountered;</li> <li>e. Description of circumstances that would result in the halting of work at the project site (e.g. What is considered "significant" archaeological resources?);</li> <li>f. Description of procedures for halting work on the site and notification procedures;</li> <li>g. Description of monitoring reporting procedures.</li> </ul>	archaeologist.			
CR/mm-6	During all ground disturbing construction activities, the applicant shall retain a qualified archaeologist (approved by the Environmental Coordinator) and Native American to monitor all earth disturbing activities, per the approved monitoring plan. If any significant archaeological resources or human remains are found during monitoring, work shall stop	Retain a qualified archaeologist (approved by the Environmental Coordinator) and Native American to monitor all earth	General Services Agency	Proof of retainment.	<i>During all ground disturbing construction activities,</i>

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
	within the immediate vicinity (precise area to be determined by the archaeologist in the field) of the resource until such time as the resource can be evaluated by an archaeologist and any other appropriate individuals. The applicant shall implement the mitigation as required by the Environmental Coordinator.	disturbing activities, per the approved monitoring plan.			
CR/mm-7	Upon completion of all monitoring/mitigation activities, and prior to final inspection (whichever occurs first), the consulting archaeologist shall submit a report to the Environmental Coordinator summarizing all monitoring/mitigation activities and confirming that all recommended mitigation measures have been met. If the analysis included in the Phase III program is not complete by the time final inspection or occupancy will occur, the applicant shall provide to the Environmental Coordinator, proof of obligation to complete the required analysis.	Submit a report to the Environmental Coordinator summarizing all monitoring/mitigation activities and confirming that all recommended mitigation measures have been met.	General Services Agency	Submit report.	Upon completion of all monitoring activities, and prior to final inspection (whichever occurs first).
<b>GEOLOGY, SOILS, AND DRAINAGE</b>					
GSD/mm-1	Prior to initiation of construction a design-level geotechnical report for the proposed project, including the bridge abutments, shall be prepared. The report shall address erosion, liquefaction, lateral spreading, rockfall, and seismic settlement potential along the creek banks, and be prepared in accordance with local and state regulations.	Prepare design-level geotechnical report for the proposed	General Services Agency	Complete report.	Prior to initiation of construction.
GSD/mm-2	North of Toro Creek, the proposed Class I bikeway shall be setback from the bluff edge	The bikeway shall be setback from the bluff	General Services	Modify plans to	Prior to application

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
	and as close to the Highway 1 ROW as is feasible.	edge and as close to the Highway 1 ROW as is feasible.	Agency	setback bikeway.	for permits.
GSD/mm-3	<p>Prior to issuance of permits, a drainage plan shall be submitted for review and approval by the Departments Public Works and Caltrans. The drainage plan shall be coordinated with the sedimentation and erosion control plan and specifically shall address:</p> <ul style="list-style-type: none"> <li>▪ The two existing storm drains that appear to outfall adjacent to or underneath the proposed improvements to ensure that the function of the storm drains is not compromised by the bikeway and that the outfall would not compromise the integrity of the retaining walls.</li> <li>▪ The potential for retaining walls and the barrier to capture and concentrate stormwater runoff. Any improvements shall be coordinated with any existing drainage improvements along Toro Lane and Highway 1 so that these facilities can continue to function as designed.</li> <li>▪ Using the restoration of the remnant road to reduce stormwater runoff from the North Point Natural Area.</li> </ul>	Submit a drainage plan for review and approval by the Departments Public Works and Caltrans.	General Services Agency	Submit plan.	Prior to issuance of permits.
GSD/mm-4	Prior to issuance of permits, the General Services Agency shall prepare a hydraulic analysis which verifies that the bikeway improvements, including the proposed bridge over Toro Creek, will not affect flood levels in a	Prepare a hydraulic analysis which verifies that the bikeway	General Services Agency	Prepare hydraulic analysis.	Prior to issuance of permits.

**Table7-1. Mitigation Monitoring and Reporting Program**

<b>Mitigation Measure</b>	<b>Requirements of Measure</b>	<b>Applicant Responsibilities</b>	<b>Party Responsible for Verification</b>	<b>Method of Verification</b>	<b>Verification Timing</b>
	way that negatively impacts use of Highway 1.	improvements, including the proposed bridge over Toro Creek, will not affect flood levels in a way that negatively impacts use of Highway 1.			
<b>HAZARDS AND HAZARDOUS MATERIALS</b>					
HAZ/mm-1	Prior to initiation of construction, the General Services Agency shall submit to Environmental Health Services and Regional Water Quality Control Board for approval, a Contaminated Materials Management Plan (CMMP). The plan shall be implemented throughout construction of bikeway improvements that occur within the Marine Terminal (Chevron property).	Submit a Contaminated Materials Management Plan (CMMP) submit to Environmental Health Services and Regional Water Quality Control Board for approval.	General Services Agency	Submit CMMP.	Prior to initiation of construction.
<b>TRANSPORTATION AND CIRCULATION</b>					
TC/mm-1	No less than 60 days prior to construction, the General Services Agency shall notify Caltrans of the proposed construction schedule. Construction activities affecting Highway shall be performed in accordance with all regulations or restrictions imposed on the project by Caltrans.	Notify Caltrans of the proposed construction schedule	General Services Agency	Notify Caltrans.	No less than 60 days prior to construction.
TC/mm-2	Prior to initiation of construction, the General Services Agency shall prepare a Signage and Striping Plan in consultation with the County Public Works Department, the County Bicycle Advisory Committee, the Cayucos Advisory	Prepare a Signage and Striping Plan in consultation with the County Public Works Department, the	General Services Agency	Prepare Signage and Striping Plan.	Prior to initiation of construction.



**Table7-1. Mitigation Monitoring and Reporting Program**

Mitigation Measure	Requirements of Measure	Applicant Responsibilities	Party Responsible for Verification	Method of Verification	Verification Timing
	<p>Committee, and the City of Morro Bay. The Signage and Striping Plan shall include, but not be limited to:</p> <ul style="list-style-type: none"> <li>▪ Methods for ensuring all ten identified parking areas supporting the proposed project are utilized to the maximum extent feasible;</li> <li>▪ A plan for educating motorists on the presence of cyclists and pedestrians in the area, and related car safety measures;</li> <li>▪ Designs for providing for bicycle and car interaction along the proposed route that would minimize conflicts through the use of striping, signage, lighting, bollards, etc.;</li> <li>▪ Examples of the signage, striping, lighting, designs, etc. for safe bicycle and car interaction;</li> <li>▪ Methods for encouraging users to stay on designated trails; and</li> <li>▪ Methods for ensuring all bikeway users are directed and encouraged to use lighted intersections to cross Highway 1</li> </ul>	<p>County Bicycle Advisory Committee, the Cayucos Advisory Committee, and the City of Morro Bay.</p>			

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# **CHAPTER 8**

## **REFERENCES AND REPORT PREPARATION**

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### **8.1 REFERENCES**

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#### **8.1.4 Cultural Resources**

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#### **8.1.6 Hazards and Hazardous Materials**

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## 8.2 LIST OF PREPARERS

This EIR has been prepared by SWCA Environmental Consultants, in association with the County of San Luis Obispo. SWCA Project Director for the EIR was Shawna Scott, Planning Program Manager. The following is a list of individuals responsible for preparation of the EIR.

Responsibilities	EIR Preparer
Executive Summary Project Description Air Quality Geology, Soils, and Drainage Hazards and Hazardous Materials Alternatives Environmental Analysis	Keith Miller, Project Manager/Senior Planner, SWCA
Environmental Setting Transportation and Circulation	Emily Creel, Assistant Planner, SWCA
Aesthetic Resources	Allen Stutz, GIS Analyst, SWCA Keith Miller, Senior Planner, SWCA
Biological Resources	Travis Belt, Associate Biologist, SWCA Robert Sloan, Senior Biologist, SWCA
Cultural Resources	John Dietler, Ph.D, Principal Investigator, SWCA Leroy Laurie, Cultural Resources Specialist, SWCA
Introduction Mitigation Monitoring Program Document Editing and Compilation	Jaimie Jones, Technical Editor, SWCA



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**Appendix A.**  
**Notice of Preparation and Comment Letters**  
**SB 18 Letters Sent**





# NOTICE OF PREPARATION – DRAFT ENVIRONMENTAL IMPACT REPORT

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING

976 OSOS STREET • ROOM 200 • SAN LUIS OBISPO • CALIFORNIA 93408 • (805) 781-5600

*Promoting the Wise Use of Land • Helping to Build Great Communities*

**DATE:** July 31, 2009

**FROM:** Jeff Oliveira, Environmental Specialist  
Department of Planning and Building  
976 Osos St., Room 300  
San Luis Obispo, CA 93408-2040

**PROJECT TITLE:** Morro Bay to Cayucos Connector Trail

**PROJECT APPLICANT:** County of San Luis Obispo Parks and Recreation Division

**RESPONSES DUE BY:** August 31, 2009

The County of San Luis Obispo will be the Lead Agency and will prepare an Environmental Impact Report for the above-referenced project. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the Environmental Impact Report prepared by our agency when considering your permit or other approval for the project.

PLEASE provide us the following information at your earliest convenience, but not later than the 30-day comment period, which began with your agency's receipt of the Notice of Preparation (NOP).

1. NAME OF CONTACT PERSON. (Please include address, e-mail and telephone number)
2. PERMIT(S) or APPROVAL(S) AUTHORITY. Please provide a summary description of these and send a copy of the relevant sections of legislation, regulatory guidance, etc.
3. ENVIRONMENTAL INFORMATION. What environmental information must be addressed in the Environmental Impact Report to enable your agency to use this documentation as a basis for your permit issuance or approval?
4. PERMIT STIPULATIONS/CONDITIONS. Please provide a list and description of standard stipulations (conditions) that your agency will apply to features of this project. Are there other conditions that have a high likelihood of application to a permit or approval for this project? If so, please list and describe.
5. ALTERNATIVES. What alternatives does your agency recommend be analyzed in equivalent level of detail with those listed above?
6. REASONABLY FORESEEABLE PROJECTS, PROGRAMS or PLANS. Please name any future project, programs or plans that you think may have an overlapping influence with the project as proposed.

7. **RELEVANT INFORMATION.** Please provide references for any available, appropriate documentation you believe may be useful to the county in preparing the Environmental Impact Report. Reference to and/or inclusion of such documents in an electronic format would be appreciated.
8. **FURTHER COMMENTS.** Please provide any further comments or information that will help the county to scope the document and determine the appropriate level of environmental assessment.

The project description, location, and the probable environmental effects are contained in the attached materials.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, **but not later than 30 days after receipt of this notice.**

Please send your response to Jeff Oliveira, Environmental Specialist at the address shown above. As requested above, we will need the name for a contact person in your agency.

**Special Notice:** The County of San Luis Obispo would like to invite you, and all interested parties, to a scoping meeting organized for the purpose of introducing this project to the public. Along with a detailed project presentation, the purpose of the scoping meeting will be to solicit constructive comments on the issues to be analyzed in the EIR and to highlight the opportunities for public participation in the EIR and permitting process. The details of the meeting are as follows:

- **When:** Monday, August 10, 2009. 7:00 pm.
- **Where:** Cayucos Veterans Memorial Hall  
10 Cayucos Drive, Cayucos, CA.

Signature



Project Manager

Telephone: (805) 781-4167

Email: joliveira@co.slo.ca.us

*Reference: California Administrative Code, Title 14, Section 15082*

#### **Attachments**

Morro Bay to Cayucos Connector Trail Project Description

Initial Study Checklist for the Morro Bay to Cayucos Connector Trail Project

# **MORRO BAY TO CAYUCOS CONNECTOR TRAIL**

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## **PROJECT DESCRIPTION**

### **PROJECT SUMMARY**

The Morro Bay to Cayucos Connector (project) would complete an important segment in the non-motorized transportation network along Highway 1. The project would be a dedicated Class I bicycle path and pedestrian corridor, completely separated from vehicular traffic, from the intersection of Yerba Buena Street and Highway 1 in the City of Morro Bay, to the southern end of Studio Drive in the unincorporated community of Cayucos. Currently, arterial roads in the area include designated Class II or III bikeways, which require cyclists to share the road with automobiles. The project applicant is the County of San Luis Obispo General Services Agency, County Parks.

### **PROJECT LOCATION**

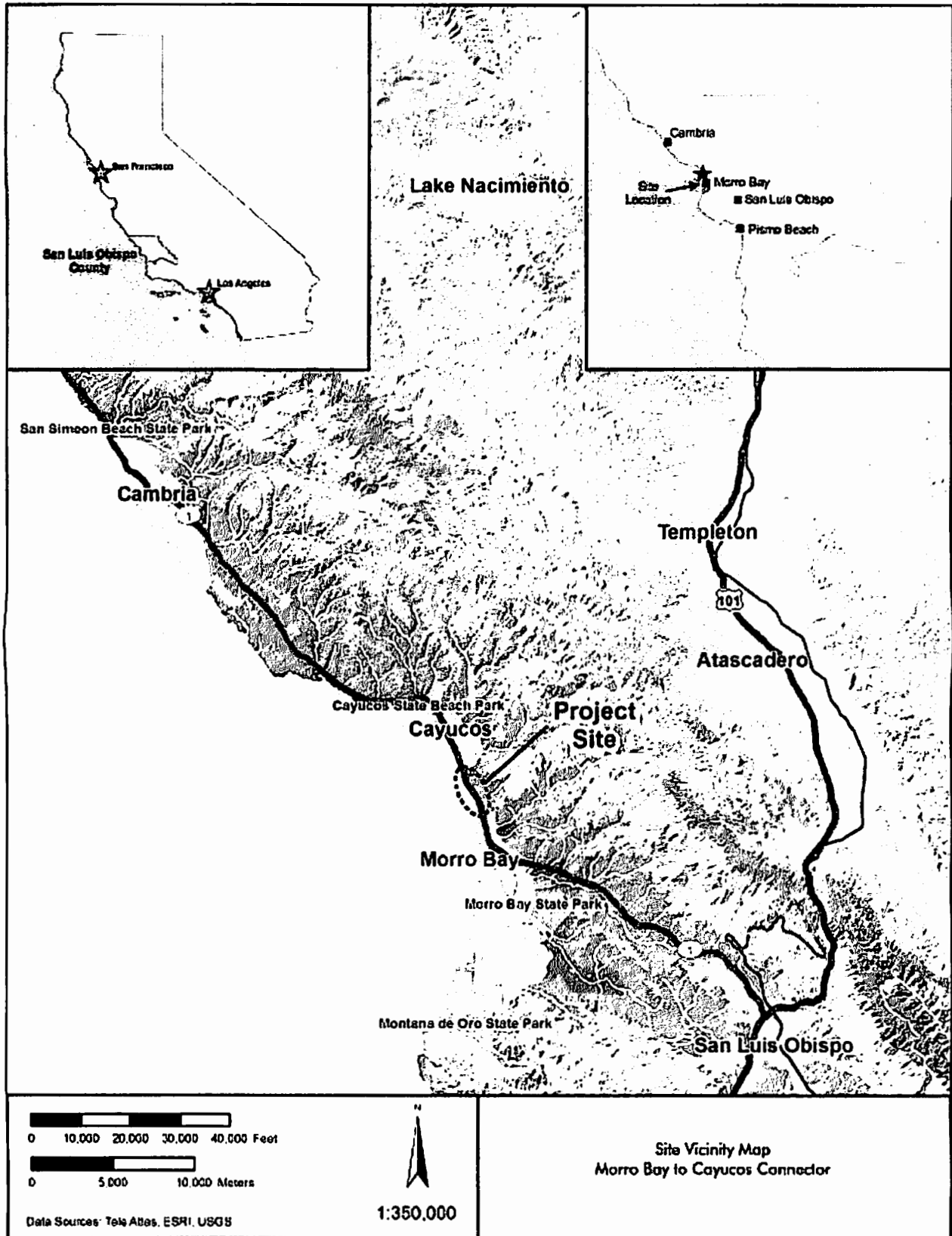
The project would be located in the County of San Luis Obispo west of Highway 1, between the highway and the Pacific Ocean (refer to Figures 1 and 2). The project would be located within an approximately 1.25 mile long corridor, extending from the northern portion of the City of Morro Bay at the Yerba Buena Street/Highway 1 intersection to the south end of Studio Drive in the unincorporated community of Cayucos. The project would be located along formally designated coastal access points at the North Point Natural Area (NPNA) and the south end of Studio Drive, and informal coastal access areas, such as the Chevron Marine Terminal pier landing (pier landing), across from Toro Creek Road (refer to Figure 2).

The proposed project would provide a connection between existing designated bikeways to the north and south. The southern end of the proposed project would connect to the bikeway along Beachcomber Drive (refer to Figure 2). This bikeway eventually continues to downtown Morro Bay. The northern end of the proposed project would connect to a bikeway on Studio Drive. From Studio Drive users could cross Highway 1 at Old Creek Road, a signalized intersection, to the bikeway on Ocean Boulevard. The Ocean Boulevard bikeway eventually connects to a bikeway that begins at the Cayucos Cemetery and the future Norma Rose Park site, and continues to downtown Cayucos.

### **PROJECT BACKGROUND**

The proposed project has been in development since 2004. At that time, a project development team was created and included representatives from the following groups and agencies:

- San Luis Obispo Council of Governments (SLOCOG)
- California Coastal Conservancy
- California Department of Transportation (Caltrans)
- California Department of Parks and Recreation (State Parks)
- City of Morro Bay
- County of San Luis Obispo (Planning and Building, and Public Works Departments)
- San Luis Obispo Bike Club
- San Luis Obispo Bicycle Coalition



**Figure 1. Site Vicinity Map**



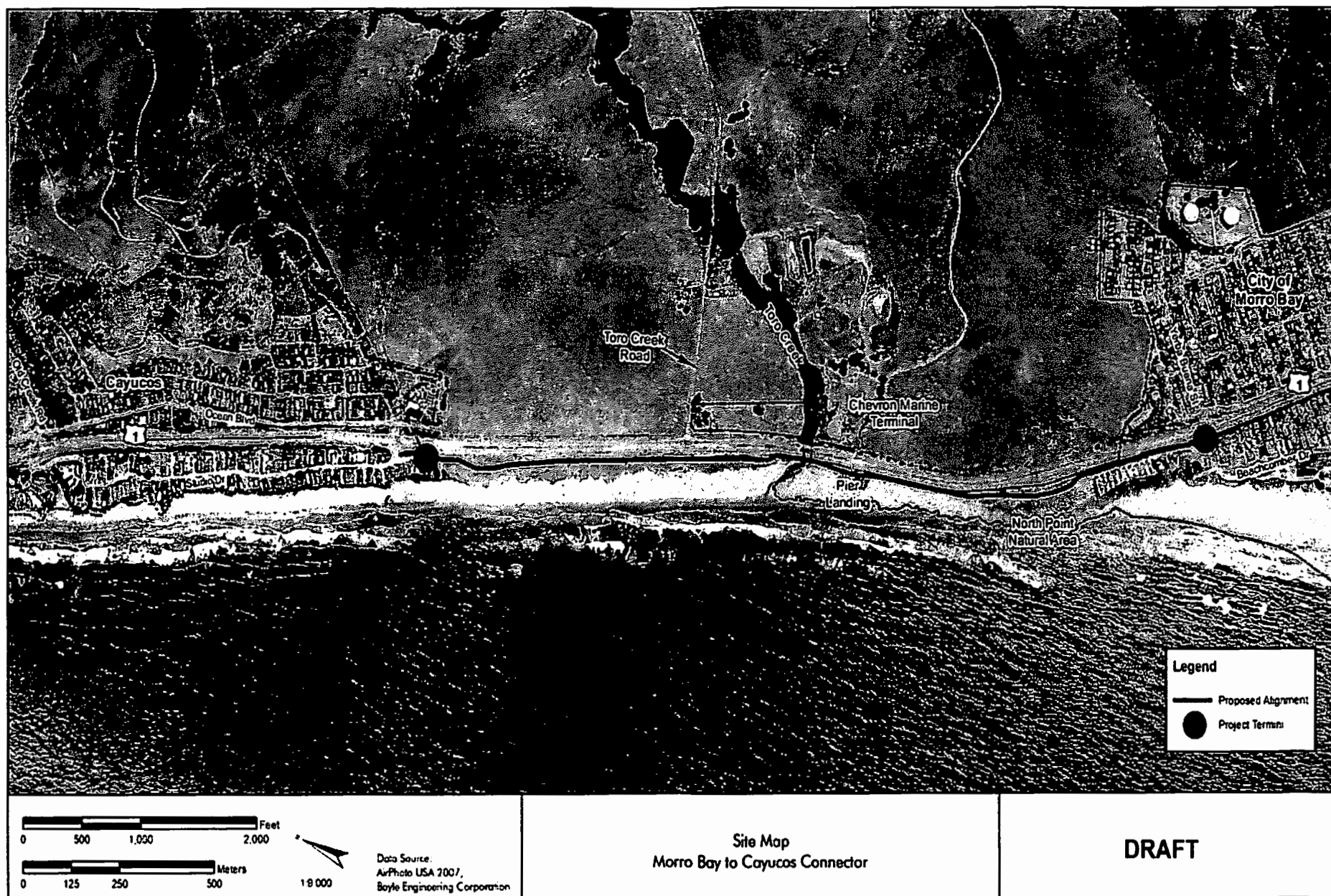


Figure 2. Project Site Map



The team reviewed and commented on project development, including the preparation of the preliminary design, and an Environmental Constraints Analysis (ECA). The Draft ECA was completed in March 2006 by Morro Group. At that time, County Parks met with staff from various agencies including Caltrans, State Parks, the California Coastal Commission, County of San Luis Obispo, and the City of Morro Bay. County parks also met with local advisory groups to discuss the project and the relative effects of identified constraints. These groups included the Cayucos Citizens Advisory Council, City of Morro Bay Public Works Advisory Board, City of Morro Bay Recreation & Parks Commission, and the San Luis Obispo County Parks & Recreation Commission. These groups all provided comments on the project and the ECA.

Based on comments received and recommendations in the ECA, County Parks retained Earth Systems Pacific in 2008 to prepare additional background technical data, including a bluff retreat study and geotechnical feasibility report. A Preliminary Design Report, incorporating all of the available information to date was prepared by Firma in 2008. The design report includes both a western and an eastern project alignment. Based on input received from the City of Morro Bay advisory agencies and the County's Parks and Recreation Commission County Parks has decided to pursue the western alignment as the preferred alternative.

## PROPOSED PROJECT

The proposed project begins from the south at the State Parks staging area, near the intersection of Yerba Buena Street/Highway 1 in the City of Morro Bay, and extends northerly to Norma Rose Park. It includes construction of the bikeway and other associated improvements. The Caltrans *Highway Design Manual* provides a description of bikeways, and those descriptions are also utilized in the EIR. They include:

- *Class I Bikeway:* Provides a completely separated right of way for the exclusive use of bicycles and pedestrians with cross flow minimized (e.g., the Bob Jones Bikeway in Avila Beach);
- *Class II Bikeway:* Provides a striped lane for one-way bike travel on a street or highway (e.g., Highway 1 between Cayucos and Morro Bay); and
- *Class III Bikeway:* Provides for shared use with pedestrian or motor vehicle traffic (e.g., surface streets such as Ocean Boulevard and Beachcomber Lane)

The proposed project would incorporate the following general design criteria:

- The Class I Bikeway would be eight-feet wide (two four-foot travel lanes) plus two-foot shoulders on each side.
- Bridge segments would be 12 feet wide, inside railing to inside railing.
- Segments within five feet of the Highway 1 edge of pavement would include a 32-inch concrete barrier and 22-inch railing/fence (total height of 54 inches) separating the bikeway from the highway pavement, unless adequate vertical separation exists.
- At-grade segments of the bikeway would be composed of asphalt paving over six inches of compacted aggregate base.

Due to the relatively long project corridor and linear nature of the project, the bikeway component of the proposed project is broken into three segments for discussion. These segments correspond to Figures 3a through 3c. It should be noted that these segments do not correspond to the segments in the ECA or the Preliminary Design Report as they only relate to the western alignment and the project has changed since development of the ECA.

The following is a discussion of the individual segments that make up the proposed trail alignment. Although segment sections could be subject modification, the alignment would still remain the same.

### **Segment 1: Yerba Buena Street to North Point Natural Area**

Segment 1 would be approximately 1,800 feet long and extend from the intersection of Yerba Buena Street and Highway 1, continuing north parallel to Toro Lane and Highway 1, and terminating just north of the North Point Natural Area (NPNA). Users would access Segment 1 from Yerba Buena Street, just east of Toro Lane (refer to Figure 3a).

Segment 1 would begin within the Highway 1 right-of-way (ROW). Given the relatively narrow width of the ROW and steeper slopes adjacent to Highway 1, retaining walls would be required on both sides of the bikeway, in some places (refer to Figure 4, cross-sections F and G). Retaining wall height and fill depth would reach a maximum of approximately five feet. The bikeway would be located parallel to Toro Lane for approximately 1,200 feet until just north of the NPNA parking lot where it would turn west, leaving the Highway 1 ROW. Segment 1 would then parallel partially paved, abandoned section of road (i.e. remnant road) within the NPNA for approximately 600 feet. The bikeway would be constructed at grade along the remnant road.

### **Segment 2: North End of the NPNA to South Side of Toro Creek**

Segment 2 would be approximately 1,600 feet long and extend from the north end of the remnant road in the NPNA to the south side of Toro Creek (refer to Figure 3b). North of the remnant road in the NPNA, the topography is such that retaining walls would be required to construct the bikeway. Due to the narrow width of bluff north of the NPNA, the bikeway would re-enter the Highway 1 ROW, this time adjacent to the edge of pavement. Retaining walls approximately one to three feet high would be required for approximately 800 feet on the western edge of the bikeway, and the proximity to Highway 1 would require that concrete barriers be located on the eastern edge of the segment, for a length of approximately 850 feet (refer to Figure 4, cross-sections B,C, and D). Existing chain link fencing would be removed along this portion of the segment and additional chain link fencing would be added to the top of the barrier for safety. Segment 2 would then approach the informal parking area at the pier landing.

Starting just south of the pier landing and for the next 450 feet north, the bikeway would be constructed at grade. It would pass through the northern end of the pier landing parking area, requiring removal of some of the existing fencing. Where conflicts could occur between motorists and bikeway users, a concrete or steel guard railing would be installed, for a length of approximately 200 feet. Design of the barrier and fencing in this location would be accommodate pedestrian access from the parking area to the beach. Segment 2 terminates approximately 150 feet south of Toro Creek.

### **Segment 3: South Side of Toro Creek to the South End of Studio Drive**

Segment 3 would be approximately 3,300 feet long and extend from 150 feet south of Toro Creek to the south end of Studio Drive (refer to Figure 3c). It would begin within the Highway 1 ROW and would require retaining walls on both sides as it approaches Toro Creek from the south. The bikeway would require a new bridge across Toro Creek. The bridge would be a freestanding 120-foot span with a six-inch thick, 12-foot wide surface, and two four-foot deep steel girders resting on concrete piers outside of creek banks. The side rails would be wire fabric approximately 54 inches tall. The bridge deck would be at or slightly below the grade of Highway 1.

After crossing the creek, the bikeway would require retaining walls for an additional 200 feet, at which point it would reach another informal parking area. Barrier placement and fencing that would allow for continued access from the parking area, across the bikeway to the beach is proposed. From this point north to Studio Drive the bikeway would be located outside of the Highway 1 ROW.

The remainder of Segment 3 would be constructed at grade, and given the relatively flat topography, minimal earthwork would be required. However, there are a number of well-developed drainages that would require culvert extensions and, in some cases, bridges. Two additional bridges are proposed: a 50-foot span and a 70-foot span (refer to Figure 3c). These bridges would be 12 feet wide, with 54-inch railings and constructed to span the entire drainage. The project would partially fill one drainage area to allow for culvert extension. Across from Toro Creek Road, west of Highway 1, there is also an additional unpaved parking area, and another barrier and fencing system allowing for continued pedestrian access to the bluffs and beach would be installed at that point. Approximately 100 feet south of Studio Drive, this segment would split into two five-foot wide bikeways, separating northbound and southbound users. Segment 3 would terminate approximately 250 feet north of the south end of Studio Drive.

### **Other Proposed Improvements**

#### **Demolition of Remnant Road**

The proposed project would include demolition and removal of the remnant road in the NPNA (refer to Figure 3a). The road is approximately 560 feet long and 40 feet wide. The total disturbance area would be approximately 22,000 square feet. The disturbed area would be revegetated with native species.

#### **Parking Spaces**

The proposed project would formalize the parking area located at the south end of Studio Drive and would include parking available at Norma Rose Park. Parking spaces would be formally striped and identified. No other parking improvements are proposed.

#### **Signage and Striping**

Some striping would be required to 1) formalize the Studio Drive parking area and 2) identify the bikeway on Studio Drive from the parking area south to the start of the Class I section. Proposed signage would include 42-inch tall wood posts to periodically direct bikeway users. Signs would be necessary for the Class III segments. Directional signs would also be necessary.

## **Earthwork and Construction Techniques**

The proposed project would not require significant quantities of earthwork, although topographic constraints associated with Segments 1 and 2 would require retaining walls and fill. Total earthwork associated with Segment 1 would be approximately 900 cubic yards, based on Figure 4 cross sections F and G. Removal of the remnant road would require approximately 1,660 cubic yards of earthwork (560 feet long by 40 feet wide, two feet deep). Segment 2 would also require retaining walls, although the depth of cut and fill would be less than three feet. The majority of Segment 3 would be constructed at grade, although some fill has been proposed to accommodate culvert extensions. Total earthwork for the proposed project would be less than 5,000 cubic yards and occur over a relatively long period (two months) due to anticipated intensive biological resources mitigation and geographic constraints. The proposed project would require approximately 42,000 square feet of asphalt (6,600 feet long by eight feet wide). The permanent area of disturbance associated with the bikeway would be approximately 80,000 square feet (6,600 feet long by 12 feet wide).

The project site is constrained by Highway 1 and the Pacific Ocean. Construction staging areas have not been identified at this time. It is likely that staging for construction of Segment 1 would occur in the NPNA parking lot and on the remnant road. Other staging areas may include the pier landing parking area. Avoiding the beach west of Highway 1 between the NPNA and the pier is unlikely. At minimum, one lane of southbound Highway 1 would be closed periodically during construction of Segment 2. The southbound lane(s) of Highway 1 may also need to be closed during construction of the proposed bridge over Toro Creek. Construction equipment may need to access the project site from the west, requiring the use of heavy equipment on the beach.

## **PROJECT OBJECTIVES**

The project objectives include:

1. Provide continuous off-highway connectivity from the City of Morro Bay to the community of Cayucos;
2. Provide a safe and scenic bicycle/pedestrian route; and
3. Maximize user's contact with the coastline while avoiding environmental impacts

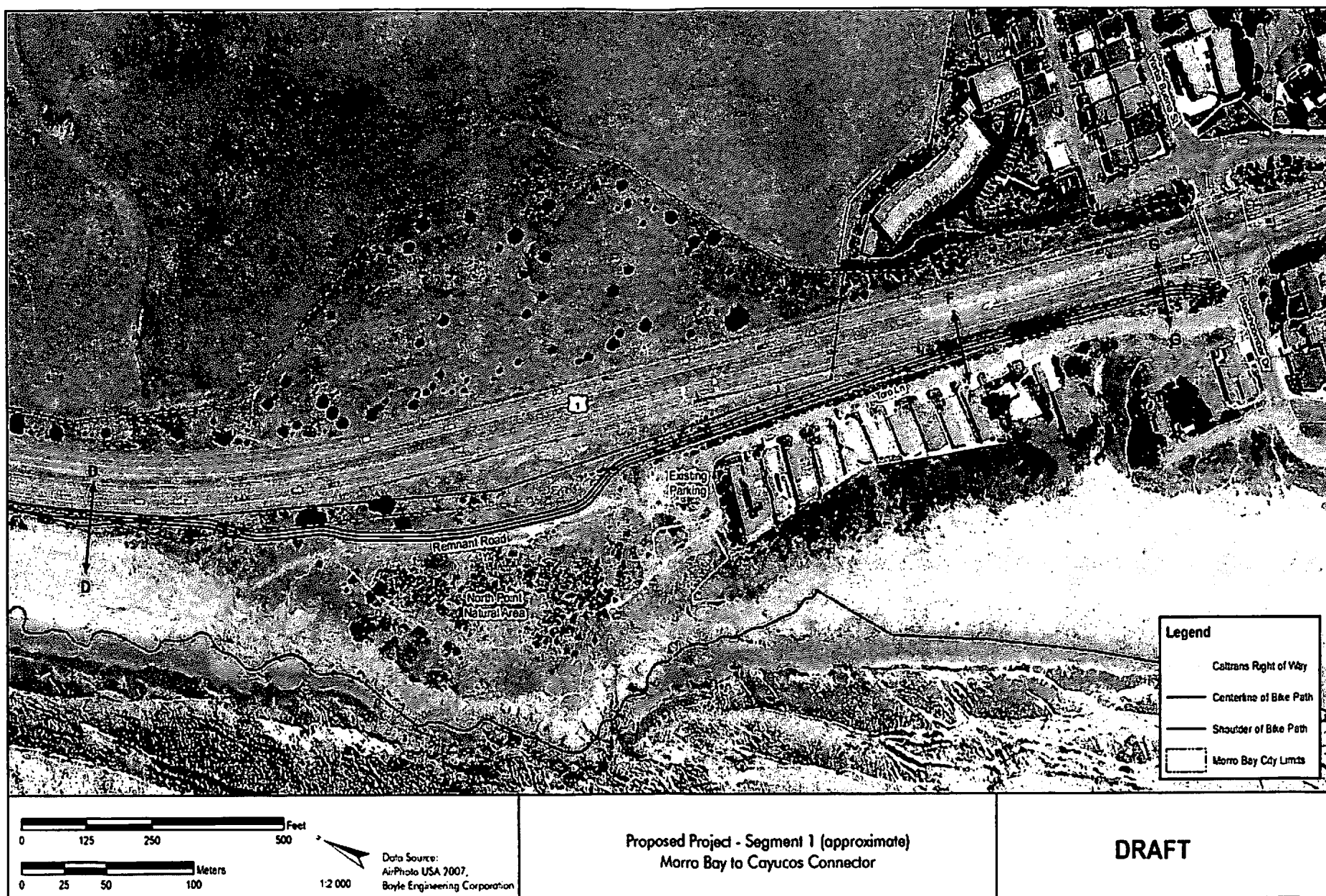


Figure 3a. Proposed Project – Segment 1





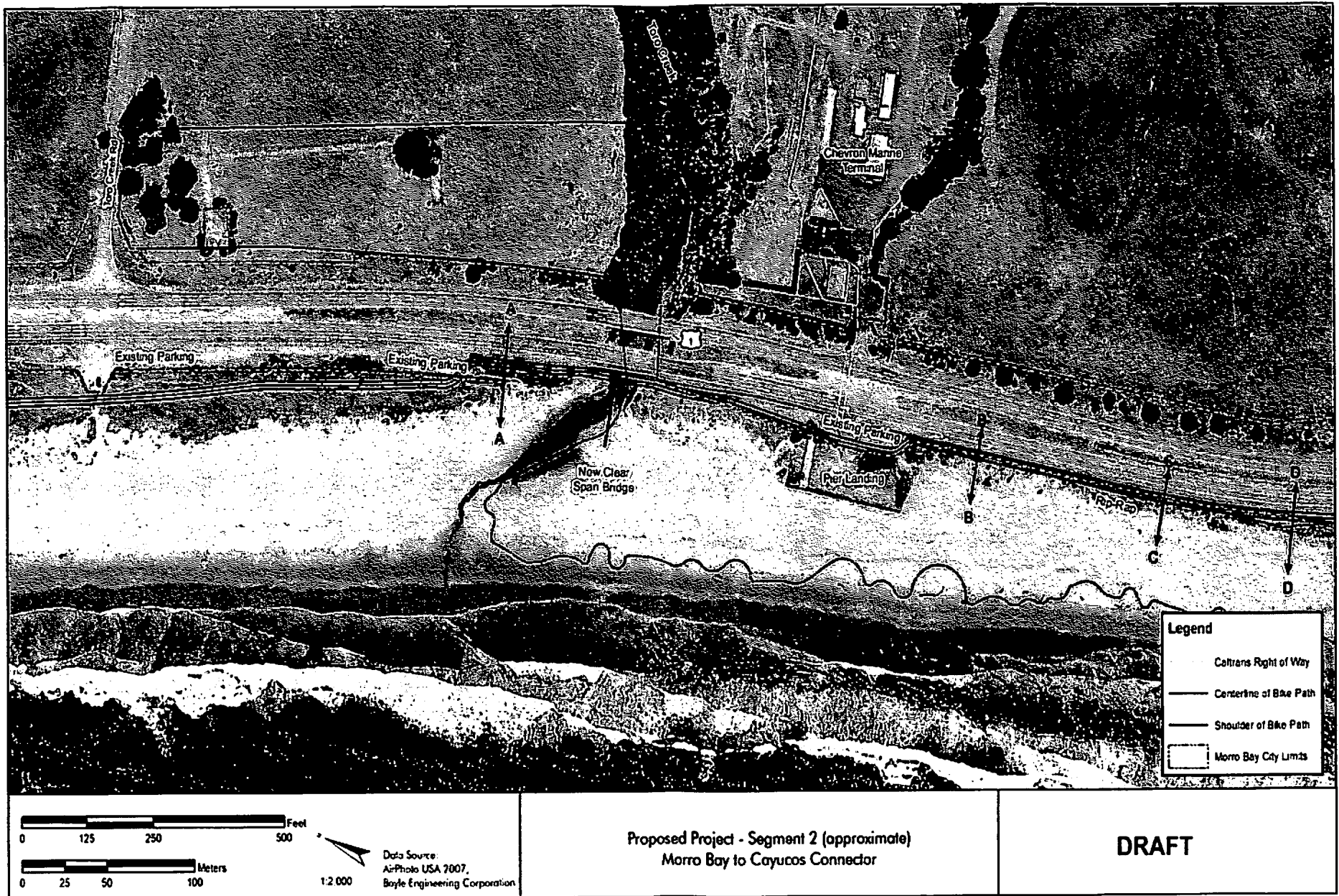


Figure 3b. Proposed Project – Segment 2



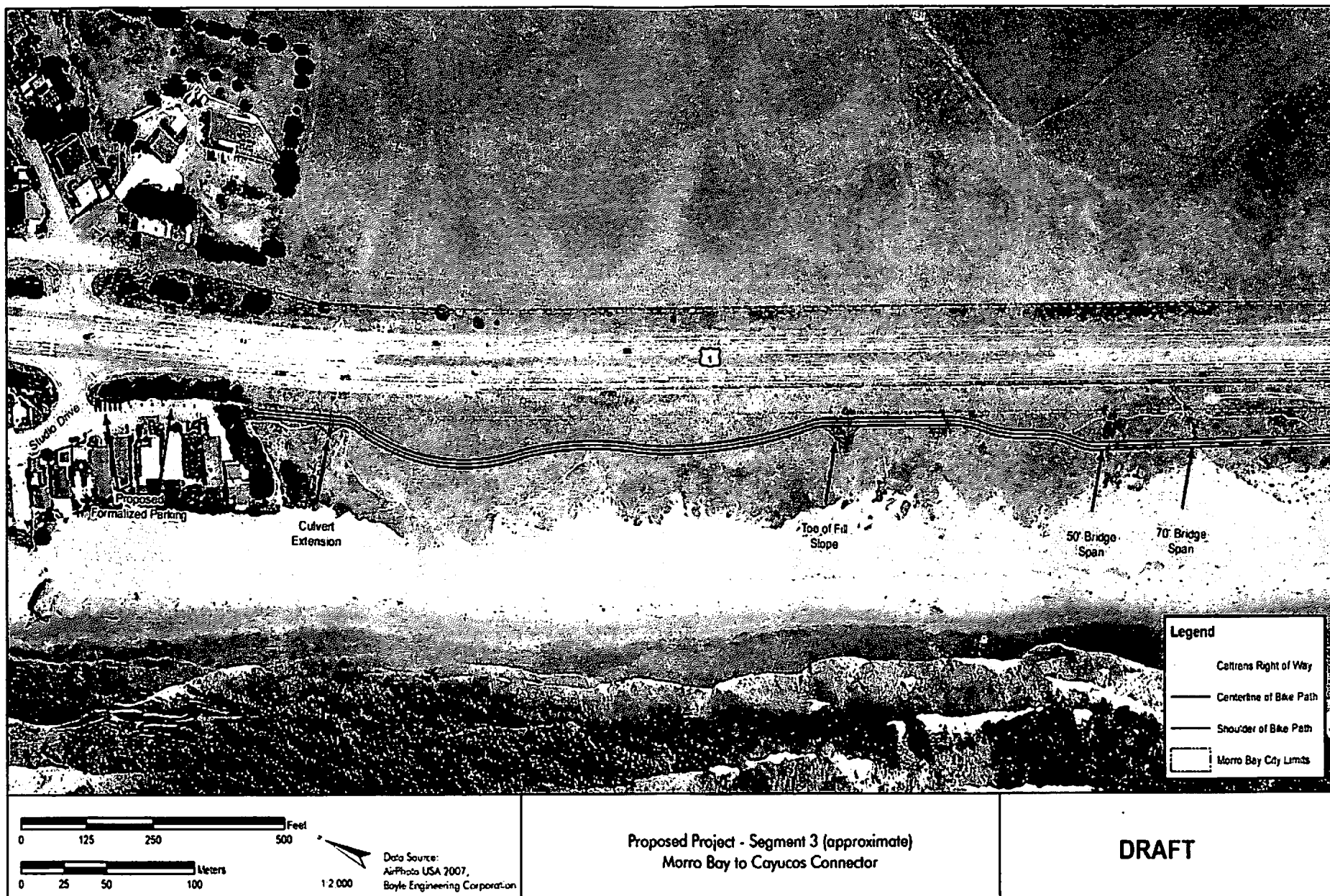


Figure 3c. Proposed Project - Segment 3



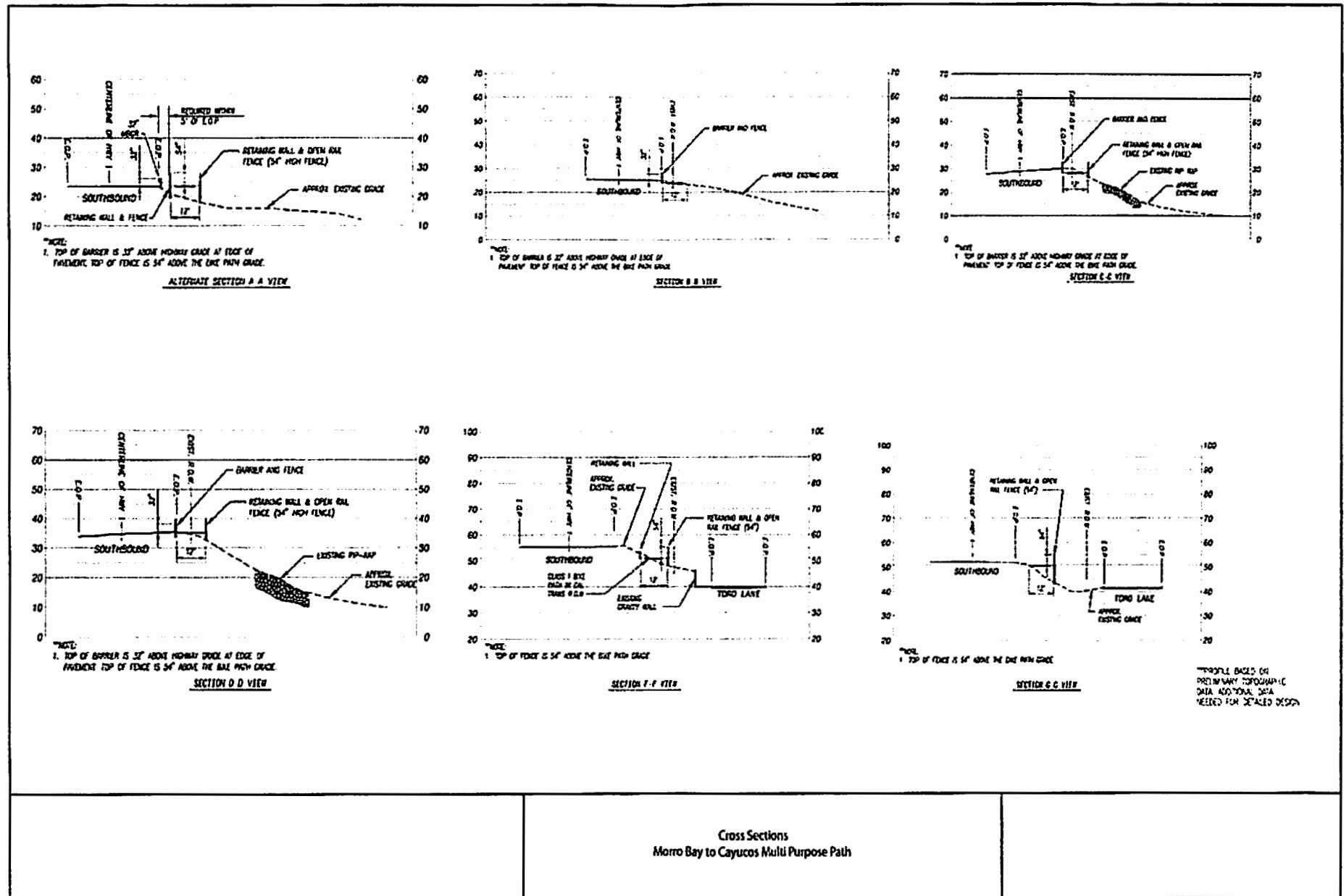


Figure 4. Cross Sections





## REQUIRED PERMITS

Table 1 shows the permits and responsible agencies for the proposed project. A coastal development permit would be required from the California Coastal Commission as well as the County of San Luis Obispo and the City of Morro Bay, because a portion of the project is located in Coastal Original Jurisdiction.

**Table 1. Responsible Agencies and Associated Permits**

<b>Permit</b>	<b>Responsible Agency</b>
Coastal Development Permit	County of San Luis Obispo Department of Planning and Building
Conditional Use Permit Coastal Development Permit Building Permits	City of Morro Bay Community Development Department
Coastal Development Permit	California Coastal Commission
Section 401, Stormwater Pollution Prevention Plan	Regional Water Quality Control Board
Section 404	Army Corps of Engineers
Section 1603 Streambed Alteration Agreement	California Department of Fish and Game
Encroachment Permit	California Department of Transportation

## PROJECT TIMING

Due to anticipated funding mechanisms, the project would also need to go through National Environmental Policy Act (NEPA) review prior to construction. It is estimated that the environmental review and permitting process may take two to three years, at which time, if funding is available, construction of the proposed project would begin.

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## Initial Study Summary – Environmental Checklist

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING

976 OSOS STREET • ROOM 200 • SAN LUIS OBISPO • CALIFORNIA 93408 • (805) 781-5600

*Promoting the Wise Use of Land • Helping to Build Great Communities*

(ver 3.3) Juna Form

**Project Title & No.** Morro Bay to Cayucos Connector Conditional Use Permit  
/Coastal Development Permitted 08-252

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:** The proposed project could have a "Potentially Significant Impact" for at least one of the environmental factors checked below. Please refer to the attached pages for discussion on mitigation measures or project revisions to either reduce these impacts to less than significant levels or require further study.

- |  |   |  |
|--|---|--|
| <input checked="" type="checkbox"/> Aesthetics           | <input checked="" type="checkbox"/> Geology and Soils           | <input type="checkbox"/> Recreation                            |
| <input type="checkbox"/> Agricultural Resources          | <input checked="" type="checkbox"/> Hazards/Hazardous Materials | <input checked="" type="checkbox"/> Transportation/Circulation |
| <input checked="" type="checkbox"/> Air Quality          | <input type="checkbox"/> Noise                                  | <input type="checkbox"/> Wastewater                            |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Population/Housing                     | <input type="checkbox"/> Water                                 |
| <input checked="" type="checkbox"/> Cultural Resources   | <input type="checkbox"/> Public Services/Utilities              | <input checked="" type="checkbox"/> Land Use                   |

**DETERMINATION:** (To be completed by the Lead Agency)

On the basis of this initial evaluation, the Environmental Coordinator finds that:

- ☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ 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.
- ☒ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact 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.
- ☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) 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.

Prepared by (Print)

Signature

Date

Ellen Carroll,  
Environmental Coordinator

**Project Environmental Analysis**

The County's environmental review process incorporates all of the requirements for completing the Initial Study as required by the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The Initial Study includes staff's on-site inspection of the project site and surroundings and a detailed review of the information in the file for the project. In addition, available background information is reviewed for each project. Relevant information regarding soil types and characteristics, geologic information, significant vegetation and/or wildlife resources, water availability, wastewater disposal services, existing land uses and surrounding land use categories and other information relevant to the environmental review process are evaluated for each project. Exhibit A includes the references used, as well as the agencies or groups that were contacted as a part of the Initial Study. The Environmental Division uses the checklist to summarize the results of the research accomplished during the initial environmental review of the project.

Persons, agencies or organizations interested in obtaining more information regarding the environmental review process for a project should contact the County of San Luis Obispo Environmental Division, Rm. 200, County Government Center, San Luis Obispo, CA, 93408-2040 or call (805) 781-5600.

**A. PROJECT**

**DESCRIPTION:** Request by General Services for a Coastal Development Permit to allow for the construction of a Class I bikeway and related improvements. The project is located on the west side of Highway 1, from Yerba Buena Street in the City of Morro Bay, to Studio Drive in the community of Cayucos. The bikeway would be approximately 1.25 miles long and located in the City of Morro bay and the Estero planning area. See Attachment A for more information.

**ASSESSOR PARCEL NUMBER(S):** 073-092-021; 073-075-012 and 013; 065-022-006 and 007; 065-082-020 and 021

SUPERVISORIAL DISTRICT # 2

**B. EXISTING SETTING**

**PLANNING AREA:** Estero, Rural

**LAND USE CATEGORY:** Recreation, Agriculture, Residential Single Family,

**COMBINING DESIGNATION(S):** Sensitive Resource Area (Rec Land Use Area), Costal Zone Boundary

**EXISTING USES:** Agricultural uses, undeveloped single-family residence(s)

**TOPOGRAPHY:** Gently sloping to moderately sloping

**VEGETATION:** Grasses , coastal scrub

**PARCEL SIZE:** Not applicable

**SURROUNDING LAND USE CATEGORIES AND USES:**

*North:* Residential Single Family; residential

*East:* Agriculture; industrial uses

*South:* City of Morro Bay ; residential

*West:* Recreation/City; undeveloped

### C. ENVIRONMENTAL ANALYSIS

During the Initial Study process, several issues were identified as having potentially significant environmental effects (see following Initial Study). Those potentially significant items associated with the proposed uses can be minimized to less than significant levels.

#### COUNTY OF SAN LUIS OBISPO INITIAL STUDY CHECKLIST

1.	<b>AESTHETICS - Will the project:</b>	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a)	<i>Create an aesthetically incompatible site open to public view?</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	<i>Introduce a use within a scenic view open to public view?</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c)	<i>Change the visual character of an area?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d)	<i>Create glare or night lighting, which may affect surrounding areas?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	<i>Impact unique geological or physical features?</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f)	<i>Other:_____</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Setting.** The proposed pedestrian and bicycle connector trail would be located along the west side of Highway 1, adjacent to the Pacific Ocean, between the City of Morro Bay and the community of Cayucos. In addition, the EIR will also evaluate an alternative trail alignment along the eastern side of Highway 1. The project area is a popular destination for visitors, in part due to its scenic variety, access to the ocean and beaches, and views of the natural environment. The diverse geologic features that characterize the project corridor include forms of volcanic rock (most notable is the Morro formation in the southern portion of the project area near Morro Bay and the notable Morro Rock), alluvial material washed down from the Santa Lucia Range to the east of the project corridor into fertile valleys, and sand dunes. The community of Cayucos is located in the northern portion of the project corridor along Highway 1 (which is the area's primary scenic view corridor). The City of Morro Bay is located to the south of the project corridor, with a small portion of the southerly end of the connector path in City jurisdiction.

**Impact.** The proposed bikeway would incorporate the following general design criteria:

- Bikeway would be 8-feet wide (two 4-foot travel lanes) plus 2 foot shoulders on each side.
- Bridge segments would be 12-feet wide, inside railing to inside railing.
- Segments within 5-feet of the Highway 1 edge of pavement would include a 32-inch concrete barrier and 22-inch railing/fence separating the bikeway from the highway pavement, unless adequate vertical separation exists.

Retaining walls will be required in some places, although the heights would be limited to less than five feet. No lighting is proposed.

A constraints analysis previously prepared for this project identified potential impacts that could result from the project. It notes that bridge structures have a high potential to affect views from Highway 1, especially to the ocean. Proposed retaining walls and safety fencing could affect views of Morro Rock

and the ocean. Walls would also be visible to those on the beach looking east.

**Mitigation/Conclusion.** Visual impacts will be evaluated in the EIR to be prepared for this project. Photo-simulations will be prepared to identify specific locations where the project may impact existing views or be inconsistent with coastal policies protecting visual resources.

## 2. AGRICULTURAL RESOURCES

- Will the project:

	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) <i>Convert prime agricultural land to non-agricultural use?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) <i>Impair agricultural use of other property or result in conversion to other uses?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) <i>Conflict with existing zoning or Williamson Act program?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) <i>Other:</i> _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Setting. Project Elements.** The following area-specific elements relate to the property's importance for agricultural production:

Land Use Category: Agriculture, Recreation

Historic/Existing Commercial Crops: None

State Classification: Not prime farmland, Farmland of Statewide Importance, Prime Farmland if irrigated

In Agricultural Preserve? No

Under Williamson Act contract? No

The soil type(s) and characteristics on the subject property include:

Cropley clay (2 - 9 % slope). This gently sloping clayey soil is considered very poorly drained. The soil has moderate erodibility and high shrink-swell characteristics, as well as having potential septic system constraints due to: slow percolation. The soil is considered Class III without irrigation and Class II when irrigated.

Diablo and Cibo clays (9 - 15 % slope).

Diablo. This gently to moderately sloping clayey soil is considered very poorly drained. The soil has moderate erodibility and high shrink-swell characteristics, as well as having potential septic system constraints due to: slow percolation. The soil is considered Class III without irrigation and Class III when irrigated.

Cibo. This gently to moderately sloping clayey soil is considered very poorly drained. The soil has moderate erodibility and high shrink-swell characteristics, as well as having potential septic system constraints due to: shallow depth to bedrock, slow percolation. The soil is considered Class III without irrigation and Class III when irrigated.

Diablo and Cibo clays (15 - 30 % slope).

Diablo. This moderately sloping clayey soil is considered very poorly drained. The soil has moderate erodibility and high shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, slow percolation. The soil is considered Class IV without irrigation and Class is not rated when irrigated.

Cibo. This moderately sloping clayey soil is considered very poorly drained. The soil has moderate erodibility and high shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, shallow depth to bedrock, slow percolation. The soil is considered Class IV without irrigation and Class is not rated when irrigated.

Diablo and Cibo clays (30 - 50 % slope).

Diablo. This steeply sloping clayey soil is considered very poorly drained. The soil has moderate erodibility and high shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, slow percolation. The soil is considered Class VI without irrigation and Class is not rated when irrigated.

Cibo. This steeply sloping clayey soil is considered very poorly drained. The soil has moderate erodibility and high shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, shallow depth to bedrock, slow percolation. The soil is considered Class VI without irrigation and Class is not rated when irrigated.

Los Osos-Diablo complex (30 - 50% slope).

Los Osos. This steeply sloping loamy claypan soil is considered not well drained. The soil has moderate erodibility and moderate shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, shallow depth to bedrock, slow percolation. The soil is considered Class VI without irrigation and Class is not rated when irrigated.

Diablo. This steeply sloping loamy claypan soil is considered very poorly drained. The soil has moderate erodibility and high shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, slow percolation. The soil is considered Class VI without irrigation and Class is not rated when irrigated.

Xerorthents, Escarpment. This moderately steep to very steeply sloping soil has unrated drainage characteristics. The soil has unrated erodibility and unrated shrink-swell characteristics, as well as having unrated septic system constraints. The soil is considered Class VII without irrigation and the Class is not rated when irrigated.

**Impact.** A portion of the project would be located on Class II soils. However, the property is zoned Recreation and there are currently no agricultural activities ongoing. The project site is a narrow strip of bluff adjacent to the Pacific Ocean and separated from other nearby agricultural areas by Highway 1. No significant impacts to agricultural resources are anticipated.

**Mitigation/Conclusion.** No mitigation measures are necessary.

3. AIR QUALITY - <i>Will the project:</i>		Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a)	<i>Violate any state or federal ambient air quality standard, or exceed air quality emission thresholds as established by County Air Pollution Control District?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>3. AIR QUALITY - Will the project:</b>	<b>Potentially Significant</b>	<b>Impact can &amp; will be mitigated</b>	<b>Insignificant Impact</b>	<b>Not Applicable</b>
<b>b) Expose any sensitive receptor to substantial air pollutant concentrations?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>c) Create or subject individuals to objectionable odors?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>d) Be inconsistent with the District's Clean Air Plan?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>e) Other: _____</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Setting.** The Air Pollution Control District (APCD) has developed the 2003 CEQA Air Quality Handbook to evaluate project specific impacts and help determine if air quality mitigation measures are needed, or if potentially significant impacts could result. To evaluate long-term emissions, cumulative effects, and establish countywide programs to reach acceptable air quality levels, a Clean Air Plan has been adopted (prepared by APCD).

The proposed project is within close proximity to serpentine rock and/or soil formation, which has the potential to contain naturally occurring asbestos. The project proposes to disturb soils that have been given a wind erodibility rating of 4 and 6, which is considered "moderate" and "moderately high." Due to the soil's wind erodibility rating, combined with the amount of disturbance anticipated during construction, substantial dust is expected during this period of development.

**Impact.** The project proposes to disturb approximately 2 acres in total, and given the relatively minimal cut and fill required, total earthwork would be considerably less than 5,000 cubic yards. This will result in the creation of construction dust, as well as short- and long-term vehicle emissions. Based on Table 1-1 of the CEQA Air Quality Handbook, the project will result in less than 10 lbs./day of pollutants, which is below thresholds warranting any mitigation. The project is consistent with the general level of development anticipated and projected in the Clean Air Plan and would also provide an off highway, non-motorized link between Morro Bay and Cayucos, potentially increasing bicycle and pedestrian activity and reducing air emissions associated with vehicle use.

The California Air Resources Board (CARB), the California Environmental Protection Agency, and other governmental agencies with jurisdiction are in the process of developing guidelines and thresholds to address a project's cumulative contribution to greenhouse gas (GHG). Over the last few years, a series of related legislative acts have been made relating to this issue.

There are seven greenhouse gases, as follows, and are in order of their global warming potential: Carbon dioxide, Methane, Nitrous oxide, Chlorofluorocarbons, Hydrofluorocarbons, Perfluorocarbons, and Sulfur hexafluoride.

The proposed trail project is considered to be an alternative transportation project that has the potential to reduce the need for vehicle trips between the City of Morro Bay and the community of Cayucos, creating an overall reduction in GHG production. Impacts related to GHG and climate change are considered less than significant.

The proposed trail project is directly adjacent to Highway 1, which generates a large amount of vehicle trips. The "Air Quality and Land Use Handbook: A Community Health Perspective", prepared by the California Environmental Protection Agency and California Air Resources Board, has identified that human exposure to the diesel emissions and related air pollution within such high traffic areas



can be unhealthy, especially for children (e.g., variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children, cancer). The project is not considered a “sensitive use” as defined by the California Air Resources Board (which are schools, residences, day care centers, playgrounds, or medical facilities), and would not facilitate long term exposure to emissions and therefore is not considered a significant health risk.

In addition, the project site is located in an area containing potentially naturally occurring asbestos, serpentine or ultramafic rock. The State Air Resources Board considers asbestos a toxic air contaminant. If asbestos is present within the soil underlying the project site, future grading and site disturbance activities would release the asbestos into the air, resulting in a potentially significant air quality impact.

**Mitigation/Conclusion.** Prior to grading or site disturbance, the County shall retain a qualified individual to conduct a geologic investigation for naturally-occurring asbestos. If asbestos is present, the applicant would comply with Asbestos Air Toxin Control Measures for Construction, Grading, Quarrying, and Surface Mining Operations. These requirements include, but are not limited to implementation of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program.

To minimize dust impacts, the applicant is required to implement APCD fugitive dust mitigation measures including reducing the amount of disturbed area where possible, the use of water trucks or sprinkler systems to water down airborne dust, daily spraying of dirt stock-pile areas, paving of applicable surfaces as soon as possible after grading, laying of building pads as soon as possible.

4. BIOLOGICAL RESOURCES - <i>Will the project:</i>	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) <i>Result in a loss of unique or special status species or their habitats?</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) <i>Reduce the extent, diversity or quality of native or other important vegetation?</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) <i>Impact wetland or riparian habitat?</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) <i>Introduce barriers to movement of resident or migratory fish or wildlife species, or factors, which could hinder the normal activities of wildlife?</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) <i>Other:</i> _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Setting.** The project area is located along coastal bluffs, vegetated mainly by grasslands on terraces traversed by a series of coastal drainages that convey seasonal runoff. Below the bluffs are areas with sand dune habitats and sandy beach.

The Natural Diversity Database identified the following species potentially existing within approximately one mile of the proposed project:

Vegetation:

San Luis serpentine dudleya (*Dudleya abramsii ssp. bettinae*) has been found about 0.47 mile to the east. This perennial herb is found on serpentinite soils in chaparral; coastal scrub;

valley and foothill grassland areas between the 20 and 180-meter elevations (65 to 590 feet). The typical blooming period is May-July. San Luis serpentine dudleya is considered rare by CNPS (List 1B, RED 3-2-3).

Blochman's dudleya (*Dudleya blochmaniae* ssp. *blochmaniae*) has been found about 0.88 mile to the south. This California endemic perennial herb is found in valley grassland, coastal sage scrub and rocky areas often with clay or serpentinite substrates. It blooms from April to June. Blochman's dudleya is considered rare by the CNPS (List 1B, RED 2-3-3). The Cal Flora Occurrence Database catalogs 7 historical occurrences of this species within the county, with the majority located in the Chorro Valley.

California seablite (*Suaeda californica*) has been found onsite (southern tip of corridor). This evergreen shrub is generally found growing along margins of marsh and swamp (coastal salt) areas at elevations up to 5 meters (16 feet). It is a California endemic which has a blooming period of July-October. California seablite is considered federally endangered and extremely rare by the CNPS (List 1B, RED 3-3-3).

Jones's layia (*Layia jonesii*) has been found on the entire site. This annual herb is found on serpentine or clay soils in chaparral and valley grassland habitats at elevations between 5 and 400 meters (15 to 1,315 feet). Within San Luis Obispo County, this species is known to range primarily from the Cayucos area south to San Luis Obispo. It is a California endemic, with blooming generally occurring in March to May. Jones's layia is federally listed as a Species of Concern, and CNPS considers this species rare (List 1B, RED 3-2-3). The Cal Flora Occurrence Database catalogs 31 historical occurrences of this species within San Luis Obispo County.

#### Wildlife:

California red-legged frog (*Rana aurora draytonii*) has been found onsite (southeastern corner of corridor); about 0.22, 0.40, and 0.95 mile to the south; and about 0.27, 0.90, and 0.55 mile to the east. California red-legged frog is considered federally threatened. This species typically inhabits shorelines with extensive vegetation. The frog requires 11 to 20 weeks of permanent water for larval development.

Coast horned lizard (*Phrynosoma coronatum* {frontale population}) has been found about 0.95 mile to the south.

The Monarch butterfly (*Danaus plexippus*) has been found about 0.24 mile to the east, and about 0.73 and 0.96 mile to the south. This species is considered a "threatened phenomenon" by the State and "rare" under CEQA Guidelines Section 15380 because of declining availability of winter roosting habitat. Monarchs from west of the Rocky Mountains spend the winter along the California coast. Overwintering sites typically occur in dense, wind-protected tree groves with eucalyptus (*Eucalyptus* spp.), Monterey pine (*Pinus radiata*), and/or Monterey cypress (*Cupressus macrocarpa*) near the coast from northern Mendocino to Baja California (CNDDDB, 2004).

Sandy beach tiger beetle (*Cincindela hirticollis grandidi*) has been found onsite (northern part) and about 0.17 mile to the south.

Southwestern pond turtle (*Emys* (or *Clemmys*) *marmorata pallida*) has been found about 0.23 and 0.95 mile to the east; and about 0.42 mile to the south; and about 0.50 and 0.97 mile to the north. Southwestern pond turtle is a federal and California Species of Special Concern. This is an aquatic turtle that uses upland habitat seasonally. They occur in ponds, streams, lakes, ditches, and marshes. The species prefers slow-water aquatic habitat with available basking sites nearby. Hatchlings require shallow water habitat with relatively dense submergent vegetation for foraging.

South/Central Coast Steelhead Trout (*Oncorhynchus mykiss*) has been found onsite (Toro Creek).

South/Central Coast Steelhead Trout is considered federally threatened and a California species of Special Concern. This species require cool, deep pools for holding through the summer, prior to spawning in the winter. Generally they are found in shallow areas, with cobble or boulder bottoms at the tails of pools. This species is threatened by water quality degradation (e.g., siltation, urban and agricultural pollutants), loss of riparian vegetation, and low instream flows resulting from water diversion, ground water pumping and periodic drought.

Tidewater goby (*Eucyclogobius newberryi*) has been found onsite (Toro Creek) and about 0.50 and 0.90 mile to the north. They are considered federally endangered and a California Species of Special Concern. This species is found in brackish water habitats along the California coast. Microhabitats include shallow lagoons and lower stream reaches. The goby needs fairly still but not stagnant water with high oxygen levels. Suitable habitat within these streams range from the mouths to approximately 1.5 to 2.0 miles upstream. Tidewater goby is threatened by various factors including water quality degradation and low instream flows caused by water diversions and periodic drought.

Western snowy plover (*Charadrius alexandrinus nivosus*) has been found onsite (around Toro Creek extending about 0.20 mile to the north and south along corridor) and about 0.05 mile to the southwest. Western snowy plover is considered federally threatened and a California Species of Special Concern. The species inhabits sand beaches, salt pond levees, and shores of large alkali lakes. The plover needs sandy, gravelly, or friable soils for nesting.

#### Habitat:

California red-legged frog habitat (*Rana aurora draytonii*) has been found along the entire site. California red-legged frog is considered federally threatened. This species typically inhabits shorelines with extensive vegetation. The frog requires 11 to 20 weeks of permanent water for larval development.

South/Central Coast Steelhead Trout habitat (*Oncorhynchus mykiss*) has been found onsite (Toro Creek). South/Central Coast Steelhead Trout is considered federally threatened and a California species of Special Concern. This species require cool, deep pools for holding through the summer, prior to spawning in the winter. Generally they are found in shallow areas, with cobble or boulder bottoms at the tails of pools. This species is threatened by water quality degradation (e.g., siltation, urban and agricultural pollutants), loss of riparian vegetation, and low instream flows resulting from water diversion, ground water pumping and periodic drought.

Western snowy plover habitat (*Charadrius alexandrinus nivosus*) has been found onsite and directly west of the central part of the corridor, and about 0.05 mile to the southwest. Western snowy plover is considered federally threatened and a California Species of Special Concern. The species inhabits sand beaches, salt pond levees, and shores of large alkali lakes. The plover needs sandy, gravelly, or friable soils for nesting.

An environmental constraints analysis has been prepared for this project and noted the presence of numerous sensitive species and habitats, including:

#### Vegetation:

Five sensitive plant species were observed onsite during the Sprung 2005 plant surveys performed for the constraints analysis. These include red-sand verbena, Cambria morning-glory, Obispo Indian paintbrush, Monterey cypress and California seablite. It should be noted that the timing of the spring surveys was not appropriate for all species identified during CNDDB searches.

**Wildlife:**

Sensitive wildlife species was not observed during surveys, however they are known to exist onsite as a result of previous survey efforts and are assumed present.

**Habitat:**

The analysis noted the presence of sensitive habitats including central foredunes, central coast riparian scrub, riparian corridors at Toro and Willow Creeks, and wetlands. It also noted the presence of critical habitat for the south-central California coast steelhead, California red-legged frog, and western snowy plover.

**Impact.** The project may result in short-term and/or long-term impacts to sensitive plant and animal species such as California seablite, California red-legged frog, south-central California coast steelhead, and the others noted above.. Short-term impacts could result from proposed construction activities (grading, culvert installation, bridge construction over Toro Creek, equipment staging, etc.), and long-term impacts may result from on-going maintenance of the trail and human and domestic animal intrusion into adjacent habitat areas.

**Mitigation/Conclusion.** The EIR to be prepared for this project will include a Biological Resources section. Sensitive species and habitats that could be impacted by the proposed project would be identified and resource agencies would be consulted to identify appropriate mitigation measures. It is expected that the project would result in potentially significant impacts, and require extensive biological resources mitigation. Specifically, the scope of work for the EIR will includes:

1. Review and compile existing project information. A list of sensitive species with potential for occurrence will be compiled based on review of relevant reports, the CNDDDB, and other pertinent literature. Where necessary, appropriate resource agencies, including CDFG and USFWS, will be contacted regarding special-status wildlife species with potential to occur in the project vicinity.
2. Conduct ground-truth field surveys and mapping. Surveys will include updating existing information and mapping data from the Constraints Analysis. The survey efforts will also include a full floristic survey of the project site to determine the presence/absence of sensitive plant species within the project site.
3. comparing the currently proposed project and related disturbance areas with the previously prepared wetlands constraints maps to determine what additional areas need to be considered, mapped, quantified, and analyzed for impacts and mitigation.
4. Prepare the biological resources setting section for the EIR. As part of this task, information gathered during the literature review and subsequent surveys will be described, including major plant communities, wildlife resources, and special-status species of the project site. In addition, a detailed discussion of key federal, state, and local regulations and policies associated with protection of biological resources of the project site will be included;
5. Evaluate project-related impacts. The proposed project will be evaluated with respect to short-term, long-term, and cumulative impacts to biological resources of the proposed project site and surrounding areas.
6. Identify and discuss feasible mitigation measures for proposed project. Mitigation will focus on measures that are reasonably feasible and effective, and will be developed in sufficient detail to allow monitoring for compliance.

<b>5. CULTURAL RESOURCES -</b> <b><i>Will the project:</i></b>	<b>Potentially Significant</b>	<b>Impact can &amp; will be mitigated</b>	<b>Insignificant Impact</b>	<b>Not Applicable</b>
<b>a) <i>Disturb pre-historic resources?</i></b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>b) <i>Disturb historic resources?</i></b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>c) <i>Disturb paleontological resources?</i></b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>d) <i>Other:</i> _____</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Setting.** As discussed in the Phase I surface survey prepared for the constraints analysis (Gibson, 2005), the project corridor is within the territory historically occupied by the Obispeño Chumash, the northernmost of the Chumash Hoken speaking peoples of California. Pre-historic marriage patterns and post mission settlement patterns have also identified Salinan people living in the northern portions of San Luis Obispo County. Archaeological evidence has revealed that the ancestors of the Obispeño settled in San Luis Obispo County over 9,500 years ago.

A surface survey performed for the constraints analysis noted some isolated, disturbed prehistoric materials in the southern portion of the survey area. Scattered materials were also noted on the northern portion of the survey area, although the more significant resources appear to be located on the eastern side of Highway 1.

The project site is mostly located on alluvium, and sand dune deposits, which are generally too young to contain significant paleontological resources.

Portions of the project corridor are located on Lots 31 and 39 of the Rancho Moro Y Cayucos. To the north is the development fronted by Studio Drive, dating back to 1928 (year of the Morro Strand Unit No. 1 Subdivision Map), while to the south is north Morro Bay, well settled since the 1890's. As of April 25, 2005, no properties in the project area were listed in the National Register of Historic Places, the inventory of California Historical Landmarks, or other inventories that were checked.

**Impact.** The resources noted above could be disturbed by the proposed project. It is unclear at this time whether or not known subsurface resources located on the eastern side of the Highway extend to the western side as well. If so, they could be disturbed by the proposed construction activities.

**Mitigation/Conclusion.** Due to the potentially significant impacts to prehistoric cultural resources, the scope of work for the EIR includes an Expanded Phase I (subsurface) testing program to determine the specific size, locations, and significance of existing cultural resources within the project site. Mitigation measures will be developed as necessary. Avoidance of the resources through adjustments to the alignment or by capping the resources with clean fill have been proposed preliminarily as potential mitigation measures, if the resources warrant it.

6. <b>GEOLOGY AND SOILS -</b> <i>Will the project:</i>	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) <i>Result in exposure to or production of unstable earth conditions, such as landslides, earthquakes, liquefaction, ground failure, land subsidence or other similar hazards?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) <i>Be within a California Geological Survey "Alquist-Priolo" Earthquake Fault Zone"?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) <i>Result in soil erosion, topographic changes, loss of topsoil or unstable soil conditions from project-related improvements, such as vegetation removal, grading, excavation, or fill?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) <i>Change rates of soil absorption, or amount or direction of surface runoff?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) <i>Include structures located on expansive soils?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) <i>Change the drainage patterns where substantial on- or off-site sedimentation/ erosion or flooding may occur?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) <i>Involve activities within the 100-year flood zone?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) <i>Be inconsistent with the goals and policies of the County's Safety Element relating to Geologic and Seismic Hazards?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) <i>Preclude the future extraction of valuable mineral resources?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) <i>Other:</i> _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Setting

GEOLOGY - The following relates to the project's geologic aspects or conditions:

Topography: Gently sloping to moderately sloping

Within County's Geologic Study Area?: No

Landslide Risk Potential: Low to high

Liquefaction Potential: Low to moderate

Nearby potentially active faults?: Yes Distance? 0.28 mile to northeast; 0.46 and 0.84 mile to

the east

Area known to contain serpentine or ultramafic rock or soils?: Potentially

Shrink/Swell potential of soil: Negligible

Other notable geologic features? None

A geologic report has been prepared for the proposed project by Earth Systems Pacific (2008). That report identified geotechnical constraints of the project and identified bluff retreat rates. Issues considered in that report include bluff retreat and the geotechnical feasibility of the bridge abutments at Toro Creek. Bluff retreat rates were calculated to average nearly 18 inches per year. The report noted that the bridge at Toro Creek was feasible, but recommended using a pier system rather than a conventional foundation as there are large areas of riprap which may need to be removed in order to facilitate a conventional foundation.

**DRAINAGE** – The following relates to the project's drainage aspects:

Within the 100-year Flood Hazard designation? Yes (Toro Creek area)

Closest creek? Toro Creek      Distance? Onsite

Soil drainage characteristics: Very poorly drained

For areas where drainage is identified as a potential issue, the Land Use Ordinance (LUO Sec. 22.52.080 or CZLUO Sec. 23.05.042) includes a provision to prepare a drainage plan to minimize potential drainage impacts. When required, this plan would need to address measures such as: constructing on-site retention or detention basins, or installing surface water flow dissipaters. This plan would also need to show that the increased surface runoff would have no more impacts than that caused by historic flows.

**SEDIMENTATION AND EROSION** – Soil type, amount of disturbance and slopes are key aspects to analyzing potential sedimentation and erosion issues. The project's soil types and descriptions are listed in the previous Agriculture section under "Setting". As described in the NRCS Soil Survey, the project's soil erodibility is as follows:

Soil erodibility: Low to high

When highly erosive conditions exist, a sedimentation and erosion control plan is required (LUO Sec. 22.52.090, CZLUO Sec. 23.05.036) to minimize these impacts. When required, the plan is prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. Projects involving more than one acre of disturbance are subject to the preparation of a Storm Water Pollution Prevention Plan (SWPPP), which focuses on controlling storm water runoff. The Regional Water Quality Control Board is the local extension who monitors this program.

**Impact.** As proposed, the project will result in the disturbance of approximately 2 acres, although not all at one time. Potential erosion and sedimentation impacts may result during construction of the project. In addition, the project may be affected by retreating bluffs and existing drainages. Based on the geologic report, the project would be affected by retreat within 100 years, or considerably less, in some cases.

**Mitigation/Conclusion.** The geologic report prepared for the project noted that construction of the proposed alignment is feasible and recommended some specific measures for construction, including the recommendation that the bridge abutments include driven piles or similar, rather than conventional foundations so that the removal of existing rip-rap is minimized. The report also notes that subsequent subsurface exploration should be performed prior to construction so that specific engineering design parameters can be established.

The EIR will include a Geology and Soils section to identify geologic impacts, such as bluff retreat, and recommend mitigation measures to address sedimentation and erosion as it pertains to the

crossing of drainages and the impacts related to long term use of the proposed facility. It is expected that standard erosion and sedimentation control techniques would mitigate construction-related impacts to a less than significant level. The California Coastal Commission will also be contacted during preparation of the EIR to determine how bluff setback policies may affect the project.

Specifically the Geology and Soils section of the EIR will include the following:

1. Review and summary of existing geologic information available from the City of Morro Bay and the County of San Luis Obispo;
2. Describe soil profiles and site geology based upon the available geologic literature and the existing report;
3. Describe and identify potential hazards and impacts related to soils, geology, and seismicity, will be evaluated and discussed;
4. Develop mitigation measures designed to reduce, to the degree practicable, the significant adverse geologic/soil impacts associated with implementation of the proposed project.

7. HAZARDS & HAZARDOUS MATERIALS - <i>Will the project:</i>	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) <i>Result in a risk of explosion or release of hazardous substances (e.g. oil, pesticides, chemicals, radiation) or exposure of people to hazardous substances?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) <i>Interfere with an emergency response or evacuation plan?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) <i>Expose people to safety risk associated with airport flight pattern?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) <i>Increase fire hazard risk or expose people or structures to high fire hazard conditions?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) <i>Create any other health hazard or potential hazard?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) <i>Other:</i> _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Setting.** Land uses in the vicinity of the project corridor predominately consist of the Highway 1 corridor, agriculture, energy development, and gas industries associated with the decommissioned Chevron facility, rangeland, and residences. The project introduces recreational users to areas near the Highway 1 corridor and traverses several known hazardous materials sites on the Chevron facility and contains oil pipeline infrastructure located under and adjacent to Toro Creek. Portions of the Chevron site contain contaminated soils and decommissioned underground oil pipelines.

Chevron is currently proposing a project to remediate some of the contamination. The goal of the proposed remediation project is to improve ground water quality by removing separate-phase petroleum hydrocarbons from three designated plume areas at the Shore Plant area of the Estero



Marine Terminal, located immediately north of the City of Morro Bay. According to the County of San Luis Obispo, the clean-up efforts could begin as early as late-summer or early-fall, 2009. The proposed clean-up would take less than one year.

**Impact.** Because the Chevron site has historically been used for oil and gas operations, subsurface petroleum contamination may be present, and could be encountered during project development.

**Mitigation/Conclusion.** The EIR will include a Hazards and Hazardous Materials section that would summarize what is currently known about locations where hazardous material may exist. Regulatory agencies would also be contacted to determine what action plans may be necessary and approved prior to construction. Specifically, the Hazards and Hazardous Materials section will include the following:

1. Consultation with the County Environmental Health Division, Regional Water Quality Control Board, the County Department of Planning and Building, Cal Fire, and reference to the San Luis Obispo County Land Use Ordinance and City of Morro Bay General Plan;
2. Evaluate existing conditions as they relate to hazardous materials on the Chevron property;
3. Evaluate impacts associated with hazardous materials on the Chevron property;
4. Develop mitigation measures to address potential hazardous materials impacts.

8. NOISE - <i>Will the project:</i>	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) <i>Expose people to noise levels that exceed the County Noise Element thresholds?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) <i>Generate increases in the ambient noise levels for adjoining areas?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) <i>Expose people to severe noise or vibration?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) <i>Other:</i> _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Setting.** The project is within close proximity to a transportation noise source – Highway 1, and development within the following distances from the noise source will exceed the County's acceptable exterior noise threshold of 60 dBs for sensitive uses as discussed in the Noise Element of the County General Plan:

- ✓ areas within the 60 dB to 65 dB range - 463 feet from (rail)road centerline, and closer;
- ✓ areas within the 65 dB to 70 dB range - 215 feet from (rail)road centerline, and closer;
- ✓ areas above the 70 dB level - 100 feet from (rail)road centerline, and closer.

However, the proposed project is a recreational and transportation project and users would only be exposed to the noise levels for a short period. The project location is currently used as a coastal access point.

**Impact.** The project is not expected to generate loud noises, nor conflict with the surrounding uses. Based on the temporary and intermittent use of the proposed recreational and alternative transportation project, the trail facility would not expose sensitive receptors to prolonged noise generation. Impacts are considered less than significant.

**Mitigation/Conclusion.** No significant noise impacts are anticipated, and no mitigation measures are necessary.

<b>9. POPULATION/HOUSING -</b> <i>Will the project:</i>	<b>Potentially Significant</b>	<b>Impact can &amp; will be mitigated</b>	<b>Insignificant Impact</b>	<b>Not Applicable</b>
a) <i>Induce substantial growth in an area either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) <i>Displace existing housing or people, requiring construction of replacement housing elsewhere?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) <i>Create the need for substantial new housing in the area?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) <i>Use substantial amount of fuel or energy?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) <i>Other:</i> _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Setting.** In its efforts to provide for affordable housing, the county currently administers the Home Investment Partnerships (HOME) Program and the Community Development Block Grant (CDBG) program, which provides limited financing to projects relating to affordable housing throughout the county.

**Impact.** The project is the proposed development of a recreational trail and will not result in a need for a significant amount of new housing, and will not displace existing housing.

**Mitigation/Conclusion.** No significant population and housing impacts are anticipated, and no mitigation measures are necessary.

<b>10. PUBLIC SERVICES/UTILITIES -</b> <i>Will the project have an effect upon, or result in the need for new or altered public services in any of the following areas:</i>	<b>Potentially Significant</b>	<b>Impact can &amp; will be mitigated</b>	<b>Insignificant Impact</b>	<b>Not Applicable</b>
a) <i>Fire protection?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) <i>Police protection (e.g., Sheriff, CHP)?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) <i>Schools?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) <i>Roads?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) <i>Solid Wastes?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) <i>Other public facilities?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**10. PUBLIC SERVICES/UTILITIES -**  
*Will the project have an effect upon, or result in the need for new or altered public services in any of the following areas:*

Potentially Significant      Impact can & will be mitigated      Insignificant Impact      Not Applicable

g) Other: \_\_\_\_\_ ☐ ☐ ☐ ☐

**Setting.** The project area is served by the following public services/facilities:

Police: County Sheriff

Location: Los Osos (Approximately 7.8 miles to the south)

Fire: Cal Fire (formerly CDF)

Hazard Severity: Moderate

Response Time: 15-20 minutes

Location: Adjacent to northeast corner of corridor

School District: Coast Unified School District.

**Impact.** The proposed project would be located adjacent to the beach and the existing bikelanes on Highway 1, where other recreational activities already exist. The project would provide a safe bicycle route completely separated from Highway 1. The proposed trail would not require the use of any public services or facilities. No significant project-specific impacts to utilities or public services were identified.

**Mitigation/Conclusion.** No impacts have been identified and no mitigation is required.

**11. RECREATION - Will the project:**

Potentially Significant      Impact can & will be mitigated      Insignificant Impact      Not Applicable

a) *Increase the use or demand for parks or other recreation opportunities?* ☐ ☐ ☒ ☐

b) *Affect the access to trails, parks or other recreation opportunities?* ☐ ☐ ☒ ☐

c) Other \_\_\_\_\_ ☐ ☐ ☐ ☐

**Setting.** The County Trails Plan does identify the proposed project. The project would be a portion of the California Coastal Trail and would link other existing or proposed facilities such as Norma Rose Park, the North Point Natural Area, and Morro Strand State Park.

**Impact.** The proposed project is a park and recreational facility and therefore may reduce the need for additional park or recreational resources.

**Mitigation/Conclusion.** The project would have beneficial recreational impacts. No significant recreation impacts are anticipated, and no mitigation measures are necessary.

<b>12. TRANSPORTATION/ CIRCULATION - Will the project:</b>		<b>Potentially Significant</b>	<b>Impact can &amp; will be mitigated</b>	<b>Insignificant Impact</b>	<b>Not Applicable</b>
<b>a)</b>	<b><i>Increase vehicle trips to local or areawide circulation system?</i></b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>b)</b>	<b><i>Reduce existing "Levels of Service" on public roadway(s)?</i></b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>c)</b>	<b><i>Create unsafe conditions on public roadways (e.g., limited access, design features, sight distance, slow vehicles)?</i></b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>d)</b>	<b><i>Provide for adequate emergency access?</i></b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>e)</b>	<b><i>Result in inadequate parking capacity?</i></b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>f)</b>	<b><i>Result in inadequate internal traffic circulation?</i></b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>g)</b>	<b><i>Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., pedestrian access, bus turnouts, bicycle racks, etc.)?</i></b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>h)</b>	<b><i>Result in a change in air traffic patterns that may result in substantial safety risks?</i></b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>i)</b>	<b><i>Other: _____</i></b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Setting.** The circulation system in the vicinity of the project corridor is comprised of regional highways (Highway 1), arterials, collectors, and local streets. The county has established the acceptable Level of Service (LOS) on roads for this area as "C" or better. The existing road network in the area (including the project's access streets, Yerba Buena Street, Highway 1, and Studio Drive) are operating at acceptable levels.

The current bicycle network in and around the project corridor includes a mix of Class I, II, and III bikeways.

There are four existing parking areas that may serve the project. These are located at the North Point Natural Area, at the south end of Studio Drive, and two informal ones near the Chevron Marine Terminal. The proposed project would include striping thirteen existing spaces at the south end of Studio Drive.

**Impact.** The most significant transportation impacts may result from conflicts between existing parking facilities and the proposed trail, the lack of parking and staging areas for cyclists at the northern and southern ends of the trail, and conflicts between project users and automobiles. Particularly at the Highway 1 crossing and at Studio Drive.

**Mitigation/Conclusion.** The EIR Transportation section will include a discussion of the potential demand for parking that may result from the proposed project. The section will also include a

discussion of project safety, with an emphasis on the potential for bikeway users to cross Highway 1 crossing and the Highway 1/project interface. Due to the potential for significant traffic impacts, additional analysis is needed to be performed, and shall include, the following:

1. Review existing conditions. This task would include reviewing all relevant background information such as the Environmental Constraints Analysis, the Estero Area Plan and EIR, and the County Bikeways Plan. This task will also include conducting parking occupancy surveys at the existing parking lots and adjacent residential streets to determine the current peak usage of these facilities.
2. Analyze parking and collision data. Using the survey data collected above, we will estimate the expected parking demand at the staging areas for the proposed trails. Collision data will be collected from Caltrans, the County of San Luis Obispo, and the City of Morro Bay. The data will be reviewed and summarized to determine if there are preexisting locations in the study area with above average collision rates, and if the project would affect these locations. Any collisions involving bicycles or pedestrians will be reviewed in detail.
3. Review proposed designs. This task will include a review of the design plans to ensure that the path conforms to standard design practices.
4. Identify project-related impacts. This task will include an assessment of potential short-term, long-term, residual, and cumulative impacts related to project development.
5. Recommend mitigation measures. This task will consist of developing mitigation measures of the proposed project.

13. WASTEWATER - <i>Will the project:</i>	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) <i>Violate waste discharge requirements or Central Coast Basin Plan criteria for wastewater systems?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) <i>Change the quality of surface or ground water (e.g., nitrogen-loading, day-lighting)?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) <i>Adversely affect community wastewater service provider?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) <i>Other:</i> _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Setting.** No new restroom facilities are planned for this project. The project would not generate wastewater or affect wastewater facilities.

**Mitigation/Conclusion.** No impacts have been identified and no mitigation measures are necessary.

<b>14. WATER - Will the project:</b>	<b>Potentially Significant</b>	<b>Impact can &amp; will be mitigated</b>	<b>Insignificant Impact</b>	<b>Not Applicable</b>
a) <b>Violate any water quality standards?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) <b>Discharge into surface waters or otherwise alter surface water quality (e.g., turbidity, temperature, dissolved oxygen, etc.)?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) <b>Change the quality of groundwater (e.g., saltwater intrusion, nitrogen-loading, etc.)?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) <b>Change the quantity or movement of available surface or ground water?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) <b>Adversely affect community water service provider?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) <b>Other:</b> _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Setting.** The proposed project would not require surface or groundwater, nor would it discharge water.

The topography of the project is gently sloping to moderately sloping. The closest creek from the proposed development is onsite. As described in the NRCS Soil Survey, the soil surface is considered to have low to high erodibility.

Projects involving more than one acre of disturbance are subject to preparing a Storm Water Pollution Prevention Plan (SWPPP) to minimize on-site sedimentation and erosion. When work is done in the rainy season, the County Ordinance requires that temporary sedimentation and erosion control measures be installed during the rainy season.

**Impact.** Regarding surface water quality, as proposed, the project will result in the disturbance of approximately 2 acres, although not at one time. The project could result in increased erosion or sedimentation and would cross multiple drainages, requiring either bridges and/or culvert extensions. The project is within close proximity to Toro Creek and the Pacific Ocean.

**Mitigation/Conclusion.** Water impacts resulting from erosion and/or sedimentation as they affect biological resources, or drainage systems would be discussed in the Geology and Soils, Drainage, or Biological Resources sections of the EIR. The scope of work for those sections includes, but it not limited to:

1. Consultation with the Regional Water Quality Control Board, Environmental Health Division, County Agricultural Commissioner's Office, California Department of Fish & Game, and U.S. Fish & Wildlife Service.
2. Identification of nearby watercourses and their potential to support sensitive aquatic life.
3. Evaluation of project's impacts on surface water quality as it relates to any sensitive resources identified.
4. Identification and discussion of feasible mitigation measures, if any, which could be included in the project to minimize potential impacts related to water quality.

<b>15. LAND USE - Will the project:</b>	<b>Inconsistent</b>	<b>Potentially Inconsistent</b>	<b>Consistent</b>	<b>Not Applicable</b>
a) <i>Be potentially inconsistent with land use, policy/regulation (e.g., general plan [county land use element and ordinance], local coastal plan, specific plan, Clean Air Plan, etc.) adopted to avoid or mitigate for environmental effects?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) <i>Be potentially inconsistent with any habitat or community conservation plan?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) <i>Be potentially inconsistent with adopted agency environmental plans or policies with jurisdiction over the project?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) <i>Be potentially incompatible with surrounding land uses?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) <i>Other:</i> _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Setting/Impact.** Surrounding uses are identified on Page 2 of the Initial Study. The proposed project would be located on public and private land within the city of Morro Bay and the community of Cayucos. The proposed project traverse the jurisdictions of the City of Morro Bay, County of San Luis Obispo, California State Parks (parking areas), and California Coastal Commission. A variety of land uses are present in and near the project area, and several land use categories (e.g., residential, open space, recreation, agriculture) and combining designations (e.g., sensitive resource area, flood hazard) apply to the project site.

The project is not within or adjacent to a Habitat Conservation Plan area

**Mitigation/Conclusion.** The Land Use section of the EIR will include an analysis of existing and proposed land uses, and will identify potential inconsistencies or incompatibilities at both a site-specific and regional level. This section will include an extensive analysis of land use consistency and will therefore integrate with other issue areas such as Aesthetics, Agriculture, and Traffic and Circulation Safety. Drafting of the EIR will include consultation with the jurisdictional agencies listed above and will incorporate a discussion of all applicable agency requirements and measures required by jurisdictional agencies.

**16. MANDATORY FINDINGS OF SIGNIFICANCE - Will the project:**

Potentially Significant

Impact can & will be mitigated

Insignificant Impact

Not Applicable

- |    |  |                                     |                          |                          |                          |
|----|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a) | <b><i>Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</i></b> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) | <b><i>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)</i></b>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) | <b><i>Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</i></b>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

For further information on CEQA or the county's environmental review process, please visit the County's web site at "[www.sloplanning.org](http://www.sloplanning.org)" under "Environmental Information", or the California Environmental Resources Evaluation System at: [http://www.ceres.ca.gov/topic/env\\_law/ceqa/guidelines](http://www.ceres.ca.gov/topic/env_law/ceqa/guidelines) for information about the California Environmental Quality Act.



## **Exhibit A - Initial Study References and Agency Contacts**

The County Planning or Environmental Divisions have contacted various agencies for their comments on the proposed project. With respect to the subject application, the following have been contacted (marked with an ☒) and when a response was made, it is either attached or in the application file:

<b><u>Contacted</u></b>	<b><u>Agency</u></b>	<b><u>Response</u></b>
<input checked="" type="checkbox"/>	County Public Works Department	None yet
<input checked="" type="checkbox"/>	County Environmental Health Division	None yet
<input checked="" type="checkbox"/>	County Agricultural Commissioner's Office	None yet
<input type="checkbox"/>	County Airport Manager	Not Applicable
<input type="checkbox"/>	Airport Land Use Commission	Not Applicable
<input checked="" type="checkbox"/>	Air Pollution Control District	None yet
<input checked="" type="checkbox"/>	County Sheriff's Department	None yet
<input checked="" type="checkbox"/>	Regional Water Quality Control Board	None yet
<input checked="" type="checkbox"/>	CA Coastal Commission	None yet
<input checked="" type="checkbox"/>	CA Department of Fish and Game	None yet
<input checked="" type="checkbox"/>	CA Department of Forestry (Cal Fire)	None yet
<input checked="" type="checkbox"/>	CA Department of Transportation	None yet
<input type="checkbox"/>	Community Service District	Not Applicable
<input checked="" type="checkbox"/>	Other <u>City of Morro Bay</u>	None yet
<input type="checkbox"/>	Other _____	Not Applicable

*\*\* "No comment" or "No concerns"-type responses are usually not attached*

The following checked ("☒") reference materials have been used in the environmental review for the proposed project and are hereby incorporated by reference into the Initial Study. The following information is available at the County Planning and Building Department.

### ☒ Project File for the Subject Application

#### **County documents**

- ☐ Airport Land Use Plans
- ☒ Annual Resource Summary Report
- ☐ Building and Construction Ordinance
- ☐ Coastal Policies
- ☒ Framework for Planning (Coastal & Inland)
- ☒ General Plan (Inland & Coastal), including all maps & elements; more pertinent elements considered include:
  - ☒ Agriculture & Open Space Element
  - ☒ Energy Element
  - ☒ Environment Plan (Conservation, Historic and Esthetic Elements)
  - ☒ Housing Element
  - ☒ Noise Element
  - ☐ Parks & Recreation Element
  - ☒ Safety Element
- ☒ Land Use Ordinance
- ☐ Real Property Division Ordinance
- ☐ Trails Plan
- ☐ Solid Waste Management Plan

- ☐ Area Plan and Update EIR
- ☐ Circulation Study

#### **Other documents**

- ☒ Archaeological Resources Map
- ☒ Area of Critical Concerns Map
- ☒ Areas of Special Biological Importance Map
- ☒ California Natural Species Diversity Database
- ☒ Clean Air Plan
- ☒ Fire Hazard Severity Map
- ☒ Flood Hazard Maps
- ☒ Natural Resources Conservation Service Soil Survey for SLO County
- ☒ Regional Transportation Plan
- ☒ Uniform Fire Code
- ☒ Water Quality Control Plan (Central Coast Basin – Region 3)
- ☒ GIS mapping layers (e.g., habitat, streams, contours, etc.)
- ☐ Other \_\_\_\_\_

In addition, the following project specific information and/or reference materials have been considered as a part of the Initial Study:

***Cultural Resource Investigation.*** Gibson and Associates, 2005.

***Morro Bay to Cayucos Connector Environmental Constraints Analysis.*** Morro Group, December, 2006.

***Geologic Bluff Study and Geotechnical Feasibility Evaluation Morro Bay-Cayucos.*** Earth Systems Pacific, February, 2008.

***Preliminary Design Report, Morro Bay to Cayucos Bicycle and Pedestrian Path.*** FIRMA, June, 2008.

**DEPARTMENT OF TRANSPORTATION**

50 HIGUERA STREET  
SAN LUIS OBISPO, CA 93401-5415  
PHONE (805) 549-3101  
FAX (805) 549-3077  
TDD (805) 549-3259  
<http://www.dot.ca.gov/dist05/>



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September 2, 2009

SLO-001-31.97-33.86

Jeff Oliveira, Environmental Specialist  
San Luis Obispo County  
Department of Planning & Building  
976 Osos Street, Room 300  
San Luis Obispo, CA 93408-2040

Dear Mr. Oliveira:

#### COMMENTS TO MORRO BAY TO CAYUCOS BICYCLE CONNECTER TRAIL

The California Department of Transportation (Caltrans), District 5, has reviewed the above referenced project and appreciates the opportunity to provide comments to the Notice of Preparation (NOP). Caltrans views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California. We recognize bicycle, pedestrian, and transit modes are integral elements of the transportation system and are glad to support projects such as yours. Our comments below are both general and specific in nature, but in short, improvement concepts in the project description are generally consistent with Caltrans' policy that promotes the integration of modes and complete streets.

#### General Comments

The project description identifies existing bicycle and pedestrian facilities within the County's jurisdiction. Any work within the State right-of-way will require an encroachment permit issued from Caltrans. Detailed information such as complete drawings, biological and cultural resource findings, hydraulic calculations, environmental reports, traffic study, etc., may need to be submitted as part of the encroachment permit process. Some Caltrans contact information is provided to assist you in the environmental process.

#### Specific Comments

1. Relative to the State right-of-way, adherence to design standards, environmental laws, and design standards of the Americans with Disabilities Act (ADA) is required. A traffic analysis is needed that is consistent with the purpose and need of the project. It should include such elements as collision history, sight distance, and parking issues. Relative to design variations, bike trail separation from vehicular traffic based on distance from Highway 1 may require the need for positive barrier protection.

2. Regarding hydrology and drainage, Caltrans will need to review the construction plans for the extension of any existing culverts. A hydraulic analysis of existing culverts crossing Highway 1 will be needed to show that the project will not negatively impact the functioning of the culverts. The 25-year storm can be used to check the culverts draining the roadway or median only. The 100-year storm can be used to check draining areas East of the highway. The headwater elevation at the inlet of the culverts must not negatively impact the travel way on the highway. The hydraulic analysis will need to show that the proposed bridge at Toro Creek will not increase the elevation of the 100-year flow such that it negatively impacts the travel way on the highway.
3. **On Page 1**, we would like to see more specific language regarding what is meant by the term "bikeways." Specifically, it is important to know what kind of bicycle facilities the Trail would connect to (see paragraph 3 of the Project Description). Please describe whether the "bikeways" are Class I, II, or III facilities.
4. **On Page 5**, the project description incorrectly lists Highway 1 between Morro Bay and Cayucos as an example of a Class II bicycle facility. At this location, there is no bike lane, only a paved shoulder, which is legal for bicyclists to ride on. This stretch of highway is a Class III facility designated as the Pacific Coast Bicycle Route.
5. **On Page 8** of the project description, we recommend amending the project objectives from "a *safe* and scenic bicycle/pedestrian route" to "an *alternative* and scenic bicycle/pedestrian route." Similarly, you may want to amend "maximizing user's contact with the coastline while *avoiding* environmental impacts" to "*minimizing* environmental impacts."
6. Please describe the intended funding source of the project.
7. As much as possible, the County should consider an alignment that avoids State right-of-way involvement, which would simplify aspects of the project design and approval process. Further, the County will need to assume responsibility for maintenance for any portion of the facility that may ultimately be approved within State right-of-way.

Again, thank you for the opportunity to provide feedback. If you have any questions, or need further clarification on items discussed above, please don't hesitate to call me at (805) 549-3103.

Sincerely,



*Acting for* **LARRY NEWLAND, AICP**  
Caltrans District 5  
Planning Branch Chief South  
Larry\_Newland@dot.ca.gov



**AIR POLLUTION  
CONTROL DISTRICT**  
COUNTY OF SAN LUIS OBISPO

August 31, 2009

Jeff Oliveira  
San Luis Obispo County Department of Planning and Building  
Government Center  
San Luis Obispo, CA 93408

**SUBJECT:** APCD Comments Regarding the Morro Bay to Cayucos Connector Trail NOP  
Project Level. (CUP 08-252)

Dear Mr. Oliveira,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the proposed Morro Bay to Cayucos Trail Connector. The proposed project would complete a segment in the non-motorized transportation network along Highway 1 and would be a dedicated Class I bicycle path and pedestrian corridor, completely separated from vehicular traffic, from the intersection of Yerba Buena Street and Highway 1, to the southern end of Studio Drive in the unincorporated community of Cayucos. This project would provide a connection between existing designated bikeways to the north and the south.

The project would also include the demolition and removal of the remnant road in the North Point Nature Area. The road is approximately 560 feet long and 40 feet wide. The total disturbance area would be approximately 22,000 s.f. The disturbed area would be revegetated with native species.

The proposed project would formalize the existing parking area located at the south end of Studio Drive and would include parking available at Norma Rose Park. The total earthwork proposed for this project will be less than 5,000 cubic yards and would occur over a relatively long period (2 months) due to intensive biological resources mitigation and geographic constraints.

*The following are APCD comments that are pertinent to this project.*

1. Contact Person:

Gary Arcemont  
Air Pollution Control District  
3433 Roberto Court  
San Luis Obispo, CA 93401  
(805) 781-5912

2. Permit(s) or Approval(s) Authority:

Construction Permit Requirements

Based on the information provided, we are unsure of the types of equipment that may be present during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities will require California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit. The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to page A-5 in the District's CEQA Handbook.

- Power screens, conveyors, diesel engines, and/or crushers;
- Portable generators and equipment with engines that are 50 hp or greater;
- Internal Combustion engines;
- Unconfined abrasive blasting operations;
- Concrete batch plants;
- Rock and pavement crushing;
- Tub grinders; and
- Trommel screens.

**To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.**

#### Naturally Occurring Asbestos

The project site is located in a candidate area for Naturally Occurring Asbestos (NOA), which has been identified as a toxic air contaminant by the California Air Resources Board (ARB). Under the ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations, **prior to any grading activities at the site, the project proponent shall ensure that a geologic evaluation is conducted to determine if NOA is present within the area that will be disturbed. If NOA is not present, an exemption request must be filed with the District (see Attachment 1). If NOA is found at the site, the applicant must comply with all requirements outlined in the Asbestos ATCM.** This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD. Please refer to the APCD web page at <http://www.slocleanair.org/business/asbestos.asp> for more information or contact the APCD Enforcement Division at 781-5912.

#### Developmental Burning

Effective February 25, 2000, **the APCD prohibited developmental burning of vegetative material within San Luis Obispo County.** Under certain circumstances where no technically feasible alternatives are available, limited developmental burning under restrictions may be allowed. This requires prior application, payment of fee based on the size of the project, APCD approval, and issuance of a burn permit by the APCD and the local fire department authority. The applicant is required to furnish the APCD with the study of technical feasibility (which includes costs and other constraints) at the time of application. If you have any questions regarding these requirements, contact the APCD Enforcement Division at 781-5912.

#### Demolition Activities

The project referral indicated that there is an existing road on the proposed site that will be demolished. Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos containing material (ACM).

Asbestos containing materials could be encountered during demolition or remodeling of existing buildings. Asbestos can also be found in utility pipes/pipelines (transite pipes or insulation on pipes). **If utility pipelines are scheduled for removal or relocation; or building(s) are removed or renovated this project may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M - asbestos NESHAP).** These requirements include but are not limited to: 1) notification requirements to the District, 2) asbestos survey conducted by a Certified Asbestos Inspector, and, 3) applicable removal and disposal requirements of identified ACM. Please contact the APCD Enforcement Division at 781-5912 for further information.

#### Hydrocarbon Contaminated Soil

**Should hydrocarbon contaminated soil be encountered during construction activities, the APCD must be notified as soon as possible and no later than 48 hours after affected material is discovered to determine if an APCD Permit will be required. In addition, the following measures shall be implemented immediately after contaminated soil is discovered:**

- Covers on storage piles shall be maintained in place at all times in areas not actively involved in soil addition or removal;
- Contaminated soil shall be covered with at least six inches of packed uncontaminated soil or other TPH –non-permeable barrier such as plastic tarp. No headspace shall be allowed where vapors could accumulate;
- Covered piles shall be designed in such a way to eliminate erosion due to wind or water. No openings in the covers are permitted;
- During soil excavation, odors shall not be evident to such a degree as to cause a public nuisance; and,
- Clean soil must be segregated from contaminated soil.

**The notification and permitting determination requirements shall be directed to the APCD Enforcement Division at 781-5912.**

### 3. Environmental Information:

The potential air quality impacts from construction and operational phases of the project should be assessed in the Environmental Impact Report (EIR). The project under development has the potential for impacts to local air emissions, ambient air quality, sensitive receptors, and the implementation of the Clean Air Plan (CAP). A complete air quality analysis should be included in the Draft Environmental Impact Report (DEIR) to adequately evaluate the overall air quality impacts associated with implementation of the proposed project. This analysis should address both short-term (construction) and long-term (operational) emissions impacts (including traditional air pollutants and greenhouse gas emissions). The following is an outline of items that should be included in the analysis:

- a) A description of existing air quality and emissions in the impact area, including the attainment status of the County relative to State and Federal air quality standards and any existing regulatory restrictions to development. The most recent CAP should be consulted for applicable information and the APCD should be consulted to determine if there is more up to date information available.

- b) A detailed quantitative air emissions analysis at the project scale needs to be estimated as part of the DEIR.
- c) A qualitative analysis of the air quality impacts should be conducted. A consistency analysis with the CAP will determine if the emissions resulting from development under the project will be consistent with the emissions projected in the CAP, as described in item 6 of this letter. The qualitative analysis should be based upon criteria such as prevention of urban sprawl and reduced dependence on automobiles. A finding of Class I impacts could be determined qualitatively. The DEIR author should contact the APCD if additional information and guidance is required. All assumptions used should be fully documented in an appendix to the DEIR.
- d) Mitigation measures to reduce air quality impacts from construction and operational phases to a level of insignificance should be specified if APCD thresholds of significance are expected to be exceeded.

If you would like to receive a copy of an example of a recommended format for the qualitative analysis section on air emissions impacts, contact the APCD Planning Division at 781-5912.

4. Permit Stipulations/Conditions:

It is recommended that you refer to the "CEQA Air Quality Handbook" (the Handbook). If you do not have a copy, it can be accessed on the APCD web page ([www.slocleanair.org](http://www.slocleanair.org)) in the Business Assistance section, listed under Regulations, or a hardcopy can be requested by contacting the APCD. The Handbook provides information on mitigating emissions from development (Section 5) which should be referenced in the DEIR.

5. Alternatives:

Any alternatives described in the DEIR should involve the same level of air quality analysis as described in bullet items 3.c and 3.d listed above.

6. Reasonably Foreseeable Projects, Programs or Plans:

This project is compatible with Circulation Management Policies and Programs including:

- Promoting Accessibility in the Transportation System
- Promoting Walking and Bicycling
- Transportation Demand Management

The formation of compact, pedestrian friendly and more economically self-sufficient communities will reduce automobile trip generation rates and trip lengths.

7. Relevant Information:

As mentioned earlier, the Handbook should be referenced in the EIR for determining the significance of impacts and level of mitigation recommended.



8. Further Comments:

Smart/Strategic Growth Support

Enabling residents the opportunity to live, work, and shop within areas that utilize Smart Growth principles reduces the need to drive and minimizes vehicle exhaust emissions which account for over 50% of the County's air pollution. The APCD supports this project as it is consistent with the Smart Growth Principles adopted by the SLO County Board of Supervisors on June 7, 2005 and support many of the land use planning goals in the CAP.

Construction Phase Impacts

Calculation of combustion and fugitive dust emissions from construction activities should include peak daily, quarterly and total construction phase emissions of NO<sub>x</sub>, ROG, diesel PM, greenhouse gases and fugitive PM.

The proximity of sensitive individuals (receptors) to construction site constitutes a special condition and may require a more comprehensive evaluation and if deemed necessary, more aggressive implementation of mitigation measures than described below. Areas where sensitive receptors are most likely to spend time include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling unit(s). Sensitive receptors for a project need to be identified during the CEQA review process and mitigation to minimize DPM impacts need to be defined.

Dust Control Measures

Construction activities can generate fugitive dust, which could be a nuisance to local residents and businesses in close proximity to the proposed construction site. Dust complaints could result in a violation of the APCD's 402 "Nuisance" Rule. Any project with a grading area greater than 4.0 acres exceeds the APCD's PM<sub>10</sub> quarterly threshold.

**This project includes some work that will be near potentially sensitive receptors and shall be conditioned to comply with all applicable Air Pollution Control District regulations pertaining to the control of fugitive dust (PM<sub>10</sub>) as contained in section 6.5 of the Air Quality Handbook. All site grading and demolition plans noted shall list the following regulations:**

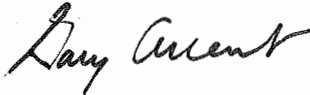
- a. Reduce the amount of the disturbed area where possible,
- b. Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water should be used whenever possible,
- c. All dirt stock pile areas should be sprayed daily as needed,
- d. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil disturbing activities,
- e. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating native grass seed and watered until vegetation is established,
- f. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD,
- g. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used,

- h. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site,
- i. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with CVC Section 23114,
- j. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site, and
- k. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where feasible.

All PM<sub>10</sub> mitigation measures required should be shown on grading and building plans. In addition, the contractor or builder should designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress. **The name and telephone number of such persons shall be provided to the APCD prior to land use clearance for map recordation and finished grading of the area.**

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 781-5912.

Sincerely,



Gary Arcemont  
Air Quality Specialist

GJA/AJM/arr

cc: San Luis Obispo County General Services Agency – Parks Division  
Karen Brooks, Enforcement Division, APCD  
Tim Fuhs, Enforcement Division, APCD  
Gary Willey, Engineering Division, APCD

Attachments:

1. Naturally Occurring Asbestos – Construction & Grading Project Exemption Request Form, Construction & Grading Project Form

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# SAN LUIS OBISPO COUNTY DEPARTMENT OF PUBLIC WORKS

Paavo Ogren, Director

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County Government Center, Room 207 • San Luis Obispo CA 93408 • (805) 781-5252

Fax (805) 781-1229

email address: [pwd@co.slo.ca.us](mailto:pwd@co.slo.ca.us)

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## MEMORANDUM

**Date:** August 4, 2009

**TO:** Jeff Oliveria, Senior Environmental Specialist

**FROM:** Glenn Marshall, Development Services 

**SUBJECT:** Notice of Preparation – Morro Bay to Cayucos Connector Trail, County of San Luis Obispo Parks and Recreation

Thank you for the opportunity to provide information on the Notice of Preparation of an Environmental Impact Report on the subject project. It has been reviewed by several divisions of Public Works, and this represents our consolidated response.

1. Contact person: Glenn Marshall, County Government Center Room 207, San Luis Obispo CA 93408. (805) 781-1596, [gdmarshall@co.slo.ca.us](mailto:gdmarshall@co.slo.ca.us).
2. County Public Works will review required public improvements including streets and utilities, as well as drainage and flood hazard, under the provisions of the Real Property Division Ordinance and the Land Use Ordinance. County Public Works issues encroachment permits under the provisions of the State Streets & Highway Code.
3. For our use, the report must address impacts on traffic and circulation, drainage, flood hazard and encroachment. The Initial Study Checklist, and its Comments section, appear to cover these topics adequately.
4. A list of "Standard Conditions" is available from our office if you need it.
5. I do not have any alternative projects to suggest for evaluation.
6. This department does not have any reasonably foreseeable projects, programs or plans in the area of this proposed development.
7. I do not have any other relevant information to suggest for use in preparation of the EIR.
8. I have no further comments on the Notice of Preparation.
9. Please provide me notification that the Draft EIR is available for review via the web and the related web address where the document may be viewed.

Please contact me at your convenience if I may be of further assistance.





**Chevron Environmental  
Management Company**  
4000 Highway One  
Morro Bay, CA 93442

August 31, 2009

County of San Luis Obispo  
Environmental Division  
County Government Center Room 200  
San Luis Obispo, California 93408

Attention: Mr. Jeff Oliveira

Subject: Morro Bay to Cayucos Connector Trail Notice of Preparation of a Draft  
Environmental Impact Report, dated July 31, 2009

Dear Mr. Oliveira:

Chevron has received your Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) on a County-proposed Morro Bay to Cayucos Connector Trail project, dated July 31, 2009. Chevron is surprised and disappointed to learn that the County of San Luis Obispo is embarking on the preparation of an EIR for a project that will require an easement, of approximately one mile in length, of Chevron property at the former Estero Marine Terminal site without first meeting with us to discuss the project. As you know, Chevron is currently in the process of decommissioning and remediating this site to comply with governmental agency requirements. Some of these activities may interfere or significantly impact the proposed trail alignment across Chevron property. Furthermore, Chevron is currently evaluating potential future land use for the Estero property and is concerned that the proposed trail could interfere with future use of the site. Chevron believes that a more comprehensive approach that includes consultation with the land owner and incorporates future planning for the site is needed. We would like to request a meeting with you and the County Parks Department to discuss these issues before you proceed with an EIR which may conflict with Chevron's plans and result in delays to the County project.

The following information has been prepared in direct response to the NOP letter dated July 31, 2009:

1. **Name of Contact Person.** Please include the following Chevron contacts in all future correspondences regarding this project:

**John Westenberg**

Chevron Environmental Management Co.  
4000 Highway One  
Morro Bay, CA 93442  
(805) 772-2611, ext. 3  
[jwestenberger@chevron.com](mailto:jwestenberger@chevron.com)

**Bill Almas**

Chevron Business and Real Estate Services  
4051 Broad Street, Suite 230  
San Luis Obispo, CA 93401  
(805) 546-6970  
[walmas@chevron.com](mailto:walmas@chevron.com)

2. **Permit or Approval Authority.** Chevron, as landowner for the proposed trail alignment, would need to approve any easement across Chevron owned land.
3. **Environmental Information.** Please ensure that the EIR includes a discussion of Chevron's current decommissioning and remediation plans which are regulated by several governmental agencies, primarily the California Regional Water Quality Control Board (RWQCB), the California State Lands Commission (CSLC), and the County of San Luis Obispo. Chevron's marine terminal decommissioning project is currently under review by the CSLC in accordance with the termination of our State Lands Lease. The RWQCB is the State lead regulatory agency regarding petroleum hydrocarbon containing soil and groundwater at the site.
4. **Permit Stipulations/Conditions.** Chevron requests that the County review and incorporate the RWQCB and CSLC permit conditions for the Estero Marine Terminal site into the EIR analysis for this project.
5. **Alternatives.** Chevron requests that the preferred alternative for this project include measures to prevent conflicts with Chevron's future plans for the former marine terminal and the Estero property in general.
6. **Reasonably Foreseeable Projects, Programs or Plans.** Chevron requests that any cumulative analysis prepared as part of the EIR include an analysis of potentially cumulatively significant impacts from conflicts between the proposed trail project and Chevron's decommissioning plans and future use of the marine terminal property.
7. **Relevant Information.** Please refer to Chevron's proposed Marine Terminal Decommissioning Project Execution Plan (dated June 2009) which presents the proposed decommissioning activities associated with existing pipelines that extend offshore from the marine terminal.

Note that in Section 10 of the Notice of Preparation of a Draft Environmental Impact Report, dated July 31, 2009 checklist that the project will have insignificant impact to public utilities. However, the proposed bike trail is located in the immediate vicinity of a natural gas pipeline. The level of significance of affecting these utilities should be evaluated and may be more than Insignificant.

Section 12 of the Notice of Preparation of a Draft Environmental Impact Report, dated July 31, 2009 checklist notes that the project may result in inadequate parking availability. Two areas identified as "informal" parking areas are located on Chevron property and traffic and road access is a concern to Chevron. Additionally, the impact of the erection of separation barriers between Highway One and the beach may result in increased vehicular hazards to pedestrians.

8. **Further Comments.** As noted above, Chevron requests a meeting with the County to discuss these issues in greater detail.

If you should have any questions and/or require additional information for review purposes, please contact me at (805) 772-2611, ext. 3.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Westenberg", with a stylized flourish at the end.

John Westenberg  
Project Manager

cc: Mr. Bill Almas, Chevron BRES  
Mr. Eric Snelling, Padre Associates, Inc.





August 16, 2009

Jan DiLeo Senior Planner  
County Parks  
1087 Santa Rosa St  
San Luis Obispo, CA 93408

Dear Jan

Re: Morro Bay to Cayucos Connector Trail

On page 1 of the Project Description 3<sup>rd</sup> paragraph “the project would provide a connection between designated bikeways to the north and the south.”

Studio Dr. is not a designated bikeway.

The north end of the project as proposed would connect to a bikeway on Studio Dr. to Old Creek Road. Users would cross Hwy. 1 at Old Creek Road to a bike way on Ocean Blvd. Ocean Boulevard is already a designated class 3 bikeway.

Studio Dr. is a busy residential street with many garages fronting directly into the ROW. It is a crowded street and not a safe street for high volume traffic. Adding a high number of bikers, walkers and hikers moving in both directions on the narrow busy street would only add to the congestion. At present most of the north bound bike traffic moves on the east side of HWY 1. The proposed route would move that bike traffic to the west side onto Studio Dr.

Studio Dr. from Chaney (the northern terminus of the project) to Old creek Rd. has no view shed. You are riding behind houses the whole way. You can only see the ocean between houses. Ocean Blvd. has a lot of open space to the west for viewing the ocean.

Studio Drive is not at this time an approved designated bikeway.

Since it will be necessary designate Studio Dr. from the south end of Cayucos to the Old Creek Road crossing certain information is needed.

Who designates Studio Dr. a bikeway?

What are the legal procedures for establishing a designated bikeway? What are the public publishing dates for the establishing a designated bikeway? Who is given Public notice of such designation? Are all property owners on Studio Dr. given legal notice? When is such public notice given? What is the appeal process? What are the time limits for appeal?

Please provide a legal basis for such designation and the complete procedural process.

The proposed EIR says that it is not to consider impact beyond the end at Studio Dr.

This request is so that the EIR for the project can consider the impact on Studio beyond the limit the project bounds.

If Studio Dr. can not be made a designated bikeway the project is a bridge to nowhere.

Attached is a copy my response to Draft Environmental Impact Report on the Morro Bay to Cayucos Connector Trail

Sincerely

David Dabritz  
3650 Studio Dr.  
Cayucos, CA 93430  
805-995-3874  
[dave.dabritz@gmail.com](mailto:dave.dabritz@gmail.com)

Jeff Oliveira  
Cayucos Advisory Council  
Jim Christiansen  
Art Johnson  
Bud Strauss  
l. Piatek

August 26, 2009

Jeff Oliveira, Environmental Specialist  
Department of Planning and Building  
976 Osos St. Rm. 300  
San Luis Obispo, CA 93408-2040

## Morro Bay to Cayucos Connector Trail

Response to Draft Environmental Impact Report

Narrative to comment page.

This letter will only respond to the EIR proposal for the Bike path between Morro Bay and Studio Dr. in Cayucos. The dumping of the trail onto a non-designated bikeway is addressed in a separate letter.

The path in the section along the bluff from Yerba Buena to north point is along existing paths and roads and has no major change in the land use.

### Section 2.

This section of the bikeway would produce considerable disruption of the existing bluff and its' very structure. It enters the HWY right of way, narrowing the road, or it encroaches on the bluff face.

More rip rap or sea wall will be needed to ensure that the erosion of the cliffs are not further threatened. The encroachment on to the Hwy1 ROW would narrow the roadway where currently there is a class 2 bikeway. Would the current class 2 BW be eliminated? This is a particularly beautiful spot for motorist, stopping along the side of the ROW, and viewing the rock.

The bike lane encroaching on the pier parking lot and reducing parking spaces will endanger the motorist using this spot and may interfere with the smooth flow of traffic on HWY 1. The Cross section schematic is not fully readable in the handout provided. The seawall or rip rap that is needed to support the bluff face may cause changes in wave patterns causing further erosion.

An alternative to this is placing the BW on the east side of the ROW where a cut bank is all that is needed.

### Section 3

Again the BW would require that upper beach encroachment will be harmful and may disturb the historic nesting of the Snowy Plover. A steel bridge by the sea side is a major maintenance problem. Contractors have learned to use pre-stressed concrete beams which require much less maintenance. This is true for all bridges in the project. The bridge with a 54' fence will obstruct the view shed. This is true of all the bridges along the sea word route. The cost of the bridges on the seaward route has to be weighed against the much cheaper route on the landward side of the HWY.

Splitting the BWY at Studio Dr. into two 5' wide paths sounds good but there is not room for 10' of BWY, 9' of parallel parking and the required 24' of roadway. The current ROW is at most 38'.

Parking spaces.

Norma Rose Park is one mile north of the end of segment 3 and not in easy walking distance. There is limited parking now on the south end of Studio Dr. with only parallel parking. This part of Studio Dr. is heavily used by beach goers and surfers

Project Location: The report infers that Studio Dr. is a designated bikeway. This is not the case. Ocean Blvd. is a designated class 3 bikeway. Correction of this error should be clarified.

Environmental impact on the bluff side of HWY 1 encroaches on land that has not been grazed for over 70 years. This land has reverted toward its natural state. Many native plants have returned to this area. The alternative path on the landward side of the hwy has been grazed continually to the present and has fewer native plants.

There is historical use of the dunes and upper beach area of this stretch of beach by nesting Snowy Plovers.

The bridges would be 12' wide inside railing to railing making the bridge at least 14' wide which would take more space then shown in your overall earthwork analysis.

The laying of 40,000 sq. feet of asphalt causes considerable hydrocarbon pollution that would not be present if a concrete pathway were used and would require less maintance.

A bikeway on the land side of the highway would not interrupt traffic on the highway or disrupt the beach with heavy equipment during its' construction.

## Comments on the Initial Study Summary- Environmental Checklist

### Aesthetics

Encroachment into the view shed of this project should weigh heavily to move the BW to the east of the HWY. A 32" barrier and a 22" railing fence brings the obstruction to 54" which is over the 4' constraint limit of the CCC. The bridge out side is 14 feet which is the real width of the obstruction.

### Biological Resources

The seaside alignment should be abandoned in favor of the east side alignment solely on the disruption of biological resources. Many of the constraints can not be mitigated.

Many of the sensitive plants grow on the west side of the HWY but not on the east side which has been grazed continually for over 100 years. The west side has not been grazed for at least 80 years. Some of the animal resources are endangered species and can not be moved and the specific habitat is shrinking. There are considerable seasonal wet lands.

Summer and fall survey should be done as many of the plants are late bloomers or do not sprout in dry years but flourish only in wet years; such as the blue-eyed grass (*Sisyrinchium bellum*)

Historic resources include the Standard Oil (Chevron) pier abutment and the pipe line footings and the pipe lines themselves.

### Geological and soils.

No where does the report address the fact that the soils in this area vary so much from place to place. In some places the hard pan is on the surface and in others it is under more than 5-12 feet of clay loam which is unstable.

### Noise.

The people on Studio will be impacted by increased noise with the bike, walking and hiking traffic from Chaney Dr. to the end of Studio.

### Public Services

There is very little service at present from our police on Studio Dr. and the isolation of the north end would be potentially significant as traffic would increase.

If the alternative of the east side of the HWY is considered the placement of the path along the sewer line from Cayucos to Morro Bay and the pumping plant would be impacted.

### Transportation

There is already a parking problem at the end of Studio Dr. It would increase. Suggesting Norma Rose Park which is 1 mile from the trailhead is not feasible for most people wishing to walk the trail. Connecting this as part of the Pacific Coast Trail brings more foot traffic to the area and increases the conflict between bikers and hikers. What are the numbers of bikers, walkers and hikers who will be using the trail and impact the traffic on Studio Dr? On a busy day we see over 100 bikes pass each way on HWY 1.

I am sorry for the rambling type of comments but I was trying to include as much data and information as possible.

The comments to the planner on the change of status of Studio Dr. to a designated bikeway is covered in another letter but also must be considered as impacting the use of the shoreline route compared to the east side route.

Thank you for your consideration.

Sincerely

David Dabritz  
3650 Studio Dr.  
Cayucos, CA 93430  
805-995-3874  
dave.dabritz@gmail.com

CC: Jan DiLeo, Senior Planner County Parks  
Cayucos Advisory Council Traffic committee  
Jim Christenson  
Art Johnson  
Bud Strauss  
L. Piatek



ENVIRONMENTAL CONSULTANTS

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San Luis Obispo Office  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401  
Tel 805.543.7095 Fax 805.543.2367  
www.swca.com

February 11, 2010

Santa Ynez Tribal Elders Council  
Adelina Alva-Padilla, Chair Woman  
PO Box 365  
Santa Ynez, CA 93460

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Adelina Alva-Padilla:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

As part of the pre-field research, SWCA contacted the Native American Heritage Commission (NAHC) to obtain any information from the Sacred Lands File and a contact list of local Native American representatives. Your name was provided to SWCA by the NAHC. SWCA is requesting any information you may have regarding properties, features, or materials within the project site or the general vicinity that may be of concern to local Native Americans. Attached to this request is a map depicting the project area within non-section land in Township 29S and Range 10E of the Morro Bay North and Cayucos USGS 7.5' quadrangles. Any comments you may have regarding this area would be greatly appreciated.

If you have any questions, please feel free to call me directly at (805) 440-8712, or email at llaurie@swca.com. Thank you for your cooperation.

Sincerely,

A handwritten signature in dark ink that reads "Leroy Laurie". The signature is written in a cursive, flowing style.

Leroy Laurie  
Cultural Resource Specialist



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San Luis Obispo Office  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401  
Tel 805.543.7095 Fax 805.543.2367  
www.swca.com

February 11, 2010

Judith Bomar Grindstaff  
63161 Argyle road  
King City, CA 93930

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Judith Bomar Grindstaff:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

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If you have any questions, please feel free to call me directly at (805) 440-8712, or email at llaurie@swca.com. Thank you for your cooperation.

Sincerely,

A handwritten signature in dark ink that reads "Leroy Laurie". The signature is written in a cursive, flowing style.

Leroy Laurie  
Cultural Resource Specialist





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1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401  
Tel 805.543.7095 Fax 805.543.2367  
www.swca.com

February 11, 2010

San Luis Obispo County Chumash Council  
Chief Mark Steven Vigil  
1030 Richie Road  
Grover Beach, CA 93433

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Mark Vigil:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

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If you have any questions, please feel free to call me directly at (805) 440-8712, or email at [llaurie@swca.com](mailto:llaurie@swca.com). Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Leroy Laurie". The signature is written in a cursive, flowing style.

Leroy Laurie  
Cultural Resource Specialist



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San Luis Obispo Office  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401  
Tel 805.543.7095 Fax 805.543.2367  
www.swca.com

February 11, 2010

Santa Ynez Band of Mission Indians  
Sam Cohen, Tribal Administrator  
P.O. Box 517  
Santa Ynez, CA 93460

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Sam Cohen:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

As part of the pre-field research, SWCA contacted the Native American Heritage Commission (NAHC) to obtain any information from the Sacred Lands File and a contact list of local Native American representatives. Your name was provided to SWCA by the NAHC. SWCA is requesting any information you may have regarding properties, features, or materials within the project site or the general vicinity that may be of concern to local Native Americans. Attached to this request is a map depicting the project area within non-section land in Township 29S and Range 10E of the Morro Bay North and Cayucos USGS 7.5' quadrangles. Any comments you may have regarding this area would be greatly appreciated.

If you have any questions, please feel free to call me directly at (805) 440-8712, or email at [llaurie@swca.com](mailto:llaurie@swca.com). Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Leroy Laurie". The signature is written in a cursive, flowing style.

Leroy Laurie  
Cultural Resource Specialist



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San Luis Obispo Office  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401  
Tel 805.543.7095 Fax 805.543.2367  
www.swca.com

February 11, 2010

Diane Napoleone and Associates  
Diane Napoleone  
1433 Camino Trillado  
Carpenteria, Ca 93013

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Diane Napoleone:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

As part of the pre-field research, SWCA contacted the Native American Heritage Commission (NAHC) to obtain any information from the Sacred Lands File and a contact list of local Native American representatives. Your name was provided to SWCA by the NAHC. SWCA is requesting any information you may have regarding properties, features, or materials within the project site or the general vicinity that may be of concern to local Native Americans. Attached to this request is a map depicting the project area within non-section land in Township 29S and Range 10E of the Morro Bay North and Cayucos USGS 7.5' quadrangles. Any comments you may have regarding this area would be greatly appreciated.

If you have any questions, please feel free to call me directly at (805) 440-8712, or email at [llaurie@swca.com](mailto:llaurie@swca.com). Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Leroy Laurie". The signature is written in a cursive, flowing style.

Leroy Laurie  
Cultural Resource Specialist



February 11, 2010

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San Luis Obispo Office  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401  
Tel 805.543.7095 Fax 805.543.2367  
www.swca.com

Lei Lynn Odom  
1339 24<sup>th</sup> Street  
Oceano, CA 93455

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Lei Lynn Odom:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

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If you have any questions, please feel free to call me directly at (805) 440-8712, or email at llaurie@swca.com. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Leroy Laurie". The signature is written in a cursive, flowing style.

Leroy Laurie  
Cultural Resource Specialist



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1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401  
Tel 805.543.7095 Fax 805.543.2367  
www.swca.com

February 11, 2010

Mr. Frank Arrendondo  
PO Box 161  
Santa Barbara, CA 93102

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Frank Arrendondo:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

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February 11, 2010

Ms. Janet Garcia  
P.O. Box 4464  
Santa Barbara, CA 93140

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Janet Garcia:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

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February 11, 2010

Randy Guzman-Folkes  
655 Los Angeles Avenue, Unit E  
Moorpark, CA 93021

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Randy Guzman-Folkes:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

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February 11, 2010

John W. Burch Traditional Chairperson  
7070 Morro Road #A  
Atascadero, CA 93422

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear John Burch:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

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February 11, 2010

Salinan Nation Cultural Preservation Assoc.  
Robert Duckworth, Environmental Coordinator  
Drawer 2447  
Greenfield, CA 93927

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Robert Duckworth:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

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February 11, 2010

Salinan Nation Cultural Preservation Association  
Jose Freeman, President  
15200 County Road 96B  
Woodland, CA 95695

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Jose Freeman:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

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February 11, 2010

Xolon Salinan Tribe

Donna Haro

110 Jefferson Street

Bay Point, CA 94565

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Donna Haro:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

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February 11, 2010

Salinan Nation Cultural Preservation Association  
Doug Alger, Cultural Resources Coordinator  
PO Box 56  
Lockwood, CA 93932

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Doug Alger:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

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February 11, 2010

Mona Olivas Tucker  
660 Camino Del Rey  
Arroyo Grande, CA 93420

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Mona Tucker:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

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February 11, 2010

Beverly Salazar Folkes  
1931 Shadybrook Drive  
Thousand Oaks, CA 91362

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Beverly Salazar Folkes:

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February 11, 2010

Santa Ynez Bank of Mission Indians  
Vincent Armenta, Chairperson  
P.O. Box 517  
Santa Ynez, CA 93460

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Vincent Armenta:

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February 11, 2010

Julie Lynn Tumamait  
365 North Poli Ave  
Ojai, CA 93023

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Julie Lynn Tumamait:

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February 11, 2010

Matthew Darian Goldman  
495 Menton  
Grover Beach, CA 93433

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Matthew Goldman:

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February 11, 2010

Northern Chumash Tribal Council  
Fred Collins, Spokesperson  
67 South Street  
San Luis Obispo, CA 93401

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Fred Collins:

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February 11, 2010

Salinan Nation Cultural Preservation Association  
Gregg Castro, Administrator  
5225 Roeder Road  
San Jose, CA 95111

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Gregg Castro:

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San Luis Obispo Office  
1422 Monterey Street, Suite C200  
San Luis Obispo, CA 93401  
Tel 805.543.7095 Fax 805.543.2367  
www.swca.com

February 11, 2010

Salinan-Chumash Nation  
Xielolixii  
3901 Q Street, Suite 31B  
Bakersfield, CA 93301

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

To Whom it May Concern:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

As part of the pre-field research, SWCA contacted the Native American Heritage Commission (NAHC) to obtain any information from the Sacred Lands File and a contact list of local Native American representatives. Your name was provided to SWCA by the NAHC. SWCA is requesting any information you may have regarding properties, features, or materials within the project site or the general vicinity that may be of concern to local Native Americans. Attached to this request is a map depicting the project area within non-section land in Township 29S and Range 10E of the Morro Bay North and Cayucos USGS 7.5' quadrangles. Any comments you may have regarding this area would be greatly appreciated.

If you have any questions, please feel free to call me directly at (805) 440-8712, or email at [llaurie@swca.com](mailto:llaurie@swca.com). Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Leroy Laurie". The signature is written in a cursive, flowing style.

Leroy Laurie  
Cultural Resource Specialist



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February 11, 2010

Patti Dunton  
7070 Morro Road #A  
Atascadero, CA 93422

SUBJECT: *Native American Consultation for the Morro Bay to Cayucos Connector Project, San Luis Obispo County, California*

Dear Patti Dunton:

San Luis Obispo County General Services has retained SWCA Environmental Consultants (SWCA) to complete a Cultural Resources Record Search and preliminary Native American consultation in preparation of an Extended Phase I Study for the Morro Bay to Cayucos Connector Project in San Luis Obispo County, California. The project is a completion of the bikeway network between these two locations. It would include signing existing bikeways where cyclists share the street with vehicles, and development of a new dedicated bikeway and pedestrian corridor, completely separated from traffic, where no bikeways exist.

As part of the pre-field research, SWCA contacted the Native American Heritage Commission (NAHC) to obtain any information from the Sacred Lands File and a contact list of local Native American representatives. Your name was provided to SWCA by the NAHC. SWCA is requesting any information you may have regarding properties, features, or materials within the project site or the general vicinity that may be of concern to local Native Americans. Attached to this request is a map depicting the project area within non-section land in Township 29S and Range 10E of the Morro Bay North and Cayucos USGS 7.5' quadrangles. Any comments you may have regarding this area would be greatly appreciated.

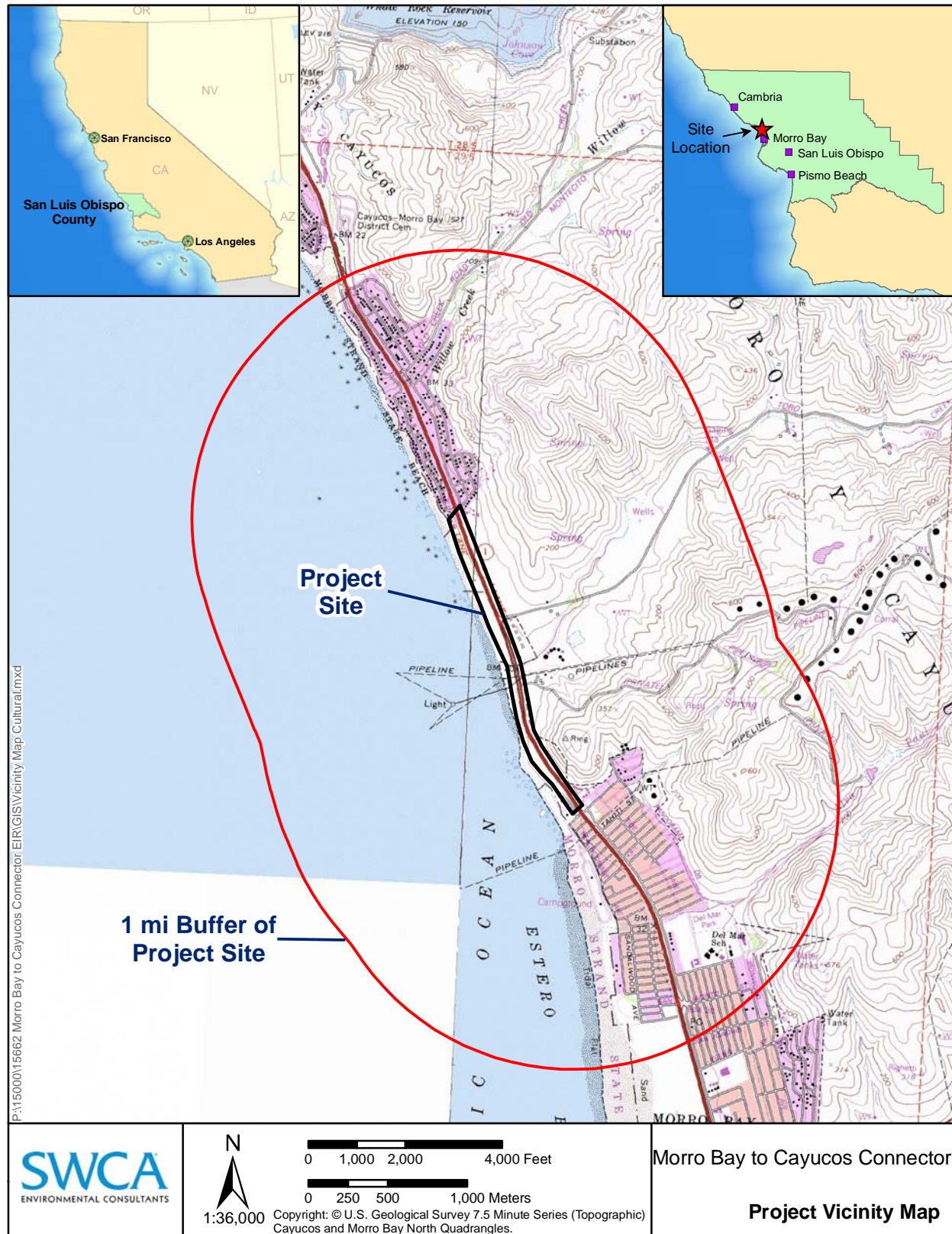
If you have any questions, please feel free to call me directly at (805) 440-8712, or email at llaurie@swca.com. Thank you for your cooperation.

Sincerely,

A handwritten signature in dark ink that reads "Leroy Laurie". The signature is written in a cursive, flowing style.

Leroy Laurie  
Cultural Resource Specialist





**Appendix B.**  
**Plans and Policies Consistency Analysis Table**





## Appendix B. Consistency with Plans and Policies

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
COUNTY OF SAN LUIS OBISPO COASTAL PLAN POLICIES		
<b>Shoreline Access, Policy 1: Protection of Existing Access.</b> Public prescriptive rights may exist in certain areas of the county. Development shall not interfere with the public's right of access to the sea where acquired through historic use or legislative authorization. These rights shall be protected through public acquisition measures or through permit conditions which incorporate access measures into new development.	The intent of the proposed project is to provide public recreational opportunities along the Pacific Ocean. The proposed project identifies and incorporates several informal parking and beach access ways along the project corridor, consistent with this policy.	Consistent
<b>Shoreline Access, Policy 2: New Development.</b> Maximum public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development.	The intent of the proposed project is to provide public recreational opportunities along the Pacific Ocean, consistent with this policy.	Consistent
<b>Shoreline Access, Policy 4: Provision of Support Facilities and Improvements.</b> Facilities necessary for public access shall be provided. This may include parking areas, restroom facilities, picnic tables or other such improvements. The level of these facilities and improvements should be consistent with the existing and proposed intensity and level of access use and provisions for on-going maintenance.	The intent of the proposed project is to provide connectivity between existing Support Facilities, and includes provisions for additional parking where necessary, consistent with this policy.	Consistent
<b>Shoreline Access, Policy 6: Public Safety.</b> The level and intensity of shoreline access is to be consistent with public safety concerns related to bluff stability, trail improvements as well as the provision of adequate facilities such as signs, fences and stairways.	The intent of the proposed project is to provide a safer and more accessible pathway along the Pacific Ocean between Morro Bay and Cayucos separate from Highway 1, and includes designs for a barrier between the bikeway and highway traffic. Proposed mitigation measures also include the preparation of a Signage and Striping Plan in consultation with the County Public Works Department and fences along designated areas.	Consistent
<b>Shoreline Access, Policy 7: Development of Uniform Access Signs.</b> A uniform signing system program should be developed. Such signs would assist the public in locating and recognizing access points. Where agriculture and sensitive habitats are located, signs may be posted indicating the permitted level of access, the restrictions on access and a description of the sensitive habitat resource. Once accessways are accepted by a public agency, they shall be signed and posted to indicate any restrictions or presence of sensitive habitats or hazards.	Based on the mitigation measures related to preparation of a Signage and Striping Plan in consultation with Public Works, the proposed project would be consistent with this policy.	Consistent

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
<b>Shoreline Access, Policy 8: Minimizing Conflicts with Adjacent Uses.</b> Maximum access shall be provided in a manner which minimizes conflicts with adjacent uses.	The intent of the proposed project is to provide public recreational access and opportunities, consistent with this policy.	Consistent
<b>Shoreline Access, Policy 9: Restoration and Enhancement of Shoreline Access Areas.</b> Areas that have been severely degraded through overly intense and unrestricted use should be restored by such techniques as revegetation with native plants, trail consolidation and improvement and through the provision of support facilities such as parking, defined trail and/or beach walk stairway systems, trash receptacles, restrooms, picnic areas, etc. In extremely degraded areas (especially sensitive habitat areas), a recovery period during which public access would be controlled and limited may be necessary. This should be determined through consultation with the property owner and appropriate public agencies to establish the means of controlling public access that is reasonable and cost effective. Any limitation of use shall be evaluated periodically to determine the need for continued limited use.	The intent of the proposed project is to provide consolidation and improvement of trails and support facilities, consistent with this policy. Based on mitigation measures for protection of environmentally sensitive habitat areas and biological resources, the proposed project would be further consistent with this policy.	Consistent
<b>Shoreline Access, Policy 10: Protection of Property Rights and Privacy.</b> The acquisition of rights for access and view purposes and other uses by the public shall be consistent with the protection of the property rights of property owners. Access routes should be selected and designed so as to minimize the public impact on private property.	The project development has been coordinated with Chevron, the largest private property owner within the project corridor. Based on mitigation measures related to signage encouraging users to stay on designated trails and utilize designated beach access ways, the proposed project is consistent with this policy.	Consistent
<b>Recreation and Visitor Serving Facilities, Policy 1: Recreation Opportunities.</b> Coastal recreational and visitor-serving facilities, especially lower-cost facilities, shall be protected, encouraged and where feasible provided by both public and private means.	The intent of the proposed project is to provide public recreational opportunities.	Consistent
<b>Recreation and Visitor Serving Facilities, Policy 2: Priority for Visitor Serving Facilities.</b> Recreational development and commercial visitor-serving facilities shall have priority over non-coastal dependent use, but not over agriculture or coastal dependent industry in accordance with PRC 30222. All uses shall be consistent with protection of significant coastal resources. Provisions for new facilities or expansion of existing facilities within rural areas shall be confined to selected points of attraction.	The intent of the proposed project is to provide public recreational opportunities.	Consistent

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
<b>Recreation and Visitor Serving Facilities, Policy 3: Low Cost Facilities.</b> Larger visitor serving projects shall make provisions for services which are geared to a range of costs, including low cost facilities.	The intent of the proposed project is to provide public recreational opportunities at no cost to the user.	Consistent
<b>Environmentally Sensitive Habitats, Policy 1: Land Uses Within or Adjacent to Environmentally Sensitive Habitats.</b> New development within or adjacent to locations of environmentally sensitive habitats (within 100 feet unless sites further removed would significantly disrupt the habitat) shall not significantly disrupt the resource. Within an existing resource, only those uses dependent on such resources shall be allowed within the area.	Mapped Environmentally Sensitive Habitats on and immediately adjacent to the project include the shoreline along Segments 3 and 4, the Toro Creek stream corridor, and the area between Cloisters Park and the Pacific Ocean in Segment 1. No uses other than signage are proposed in the vicinity of Cloisters Park Environmentally Sensitive Area. Proposed uses within 100 feet of sensitive resource areas within Segments 3 and 4 would include development of a Class I bikeway, culvert extensions, retaining walls, and in some cases bridges. Mitigation measures are proposed to reduce potential impacts to sensitive habitats to less than significant.	Consistent
<b>Environmentally Sensitive Habitats, Policy 2: Permit Requirement.</b> As a condition of permit approval, the applicant is required to demonstrate that there will be no significant impact on sensitive habitats and that proposed development or activities will be consistent with the biological continuance of the habitat. This shall include an evaluation of the site prepared by a qualified professional which provides: a) the maximum feasible mitigation measures (where appropriate), and b) a program for monitoring and evaluating the effectiveness of mitigation measures where appropriate.	Mitigation measures are proposed to reduce potential impacts to sensitive habitats to less than significant. In addition, County Parks or its designee would be required to comply with all County requirements upon application for use and construction permits.	Consistent
<b>Environmentally Sensitive Habitats, Policy 3: Habitat Restoration.</b> The county or Coastal Commission should require the restoration of damaged habitats as a condition of approval when feasible.	Mitigation measures are proposed to reduce potential impacts to habitats to less than significant, including preservation and restoration of wetland habitat and preparation of a Dune Habitat Restoration Plan for review and approval by the CDFG and Department of Building and Planning. In addition, San Luis Obispo County Parks or its designee would be required to comply with all County requirements upon application for use and construction permits.	Consistent

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
<p><b>Environmentally Sensitive Habitats, Policy 7: Protection of Environmentally Sensitive Habitats.</b> Coastal wetlands are recognized as environmentally sensitive habitat areas. The natural ecological functioning and productivity of wetlands and estuaries shall be protected, preserved and where feasible, restored.</p>	<p>The proposed project and recommended mitigation measures include standards for wetland protection and restoration within the Coastal Zone.</p>	<p>Consistent</p>
<p><b>Environmentally Sensitive Habitats, Policy 8: Principally Permitted Use.</b> Principally permitted uses in wetlands are as follows: hunting, fishing and wildlife management; education and research projects.</p>	<p>Proposed uses within seasonal wetland areas located Segment 4 are limited to development of a Class I bikeway, culvert extensions and two additional bridges, which are not principally permitted, but are considered conditionally allowed by the County, and will likely require review and approval by other resource agencies (i.e., California Department of Fish and Game (CDFG), Regional Water Quality Control Board (RWQCB), U.S. Fish and Wildlife Service (USFWS), Army Corps of Engineers (ACOE), as applicable).</p>	<p>Consistent</p>
<p><b>Environmentally Sensitive Habitats, Policy 12: State Department of Fish and Game Review.</b> The State Department of Fish and Game shall review all applications for development in or adjacent to coastal wetlands and recommend appropriate mitigation measures where needed which should be incorporated in the project design.</p>	<p>Recommended mitigation measures include submittal and authorization of a Wetland Delineation and Habitat Mitigation and Monitoring Plan for all jurisdictional waters by CDFG, USACE, and RWQCB prior to initiation of construction. In addition, mitigation measures are proposed to reduce potential impacts to habitats to less than significant.</p>	<p>Consistent</p>
<p><b>Environmentally Sensitive Habitats, Policy 13: Diking, Dredging or Filling of Wetlands.</b> All diking, dredging, and filling activities shall conform to the provisions of Section 30233, 30411 and 30607.1 of the Coastal Act. These policies establish the appropriate uses, criteria for evaluation of a project and requirements for restoration or replacement. Allowable activities within coastal waters, and wetlands include:</p> <ul style="list-style-type: none"> <li>g. Restoration purposes.</li> <li>h. Nature study, aquaculture, or similar resource-dependent activities.</li> <li>i. Maintenance of flood control facilities by permit.</li> </ul> <p>Diking, dredging, and filling for these types of development in wetlands... shall be permitted only where there is no feasible, less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental impacts, and where consistent with the maintenance of the tidal flow and continued biological viability of the wetland habitat. The development must meet the following conditions:</p>	<p>Proposed activities within coastal wetland habitats are limited to a passive recreational trail, culvert extensions and some bridges. Mitigation measures would prohibit filling wetlands and the culvert extension. Various mitigation measures are recommended to avoid or minimize effects to wetland habitat, and all applicable actions shall be conducted consistent with the policy standards.</p>	<p>Consistent</p>

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
<p>a. Diking, dredging and filling shall be prohibited in breeding and nursery areas and during periods of fish migration and spawning.</p> <p>b. Diking, dredging and filling shall be limited to the smallest area feasible that is necessary to accomplish the project.</p> <p>c. Designs for diking, dredging and filling and excavation projects shall include protective measures such as silt curtains, and weirs to protect water quality in adjacent areas during construction by preventing the discharge of refuse, petroleum spills and unnecessary dispersal of silt materials.</p> <p>Dredge spoils shall not be deposited in areas where public access or environmental habitats would be significantly or adversely affected. Dredging and spoils disposal shall be planned and carried out to avoid significant disruption to marine and wildlife habitats and water circulation. Dredge spoils suitable for beach replenishment should be transported for such purposes to appropriate beaches or into suitable longshore currents. Limitations may be necessary on the timing of the operation, the type of operations and the quality and location of the spoils site. Other mitigation measures are required under Section 30607.1. Where any dike fill development is permitted in wetlands in conformity with Chapter 3 of the Coastal Act, mitigation measures shall include, at a minimum, either acquisition of equivalent areas of equal or greater biological productivity or opening up equivalent areas to tidal action; provided however, that if no appropriate restoration site is available an in-lieu fee sufficient to provide an area of equivalent productive value or surface area shall be dedicated to an appropriate public agency or such replacement site shall be purchased before the dike or fill development may proceed. Such mitigation measures shall not be required for temporary or short-term fill or diking; provided that a bond or other evidence of financial responsibility is provided to assure that restoration will be accomplished in the shortest feasible time.</p>		
<p><b>Environmentally Sensitive Habitats, Policy 15: Vehicle Traffic in Wetlands.</b> No vehicle traffic shall be permitted in wetlands. This shall not restrict local and state agencies or the property owner from completing the actions necessary to accomplish a permitted use within the wetland. Pedestrian traffic shall be regulated and incidental to the permitted uses.</p>	<p>Vehicle traffic within wetlands areas is not permitted, except during construction and maintenance activities. Mitigation measures are required to avoid or minimize impacts to wetlands during construction activities.</p>	<p>Consistent</p>

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
<p><b>Environmentally Sensitive Habitats, Policy 16: Adjacent Development.</b> Development adjacent to coastal wetlands shall be sited and designed to prevent significant impacts to wetlands through noise, sediment or other disturbances. Development shall be located as far away from the wetland as feasible, consistent with other habitat values on the site.</p>	<p>Proposed activities within coastal wetland habitats are limited to the passive Class I bikeway. Mitigation measures are recommended to avoid or minimize effects to wetland habitat, and all applicable actions shall be conducted consistent with the policy standards.</p>	<p>Consistent</p>
<p><b>Environmentally Sensitive Habitats, Policy 17: Wetland buffer.</b> In new development, a buffer strip shall be required and maintained in natural condition along the periphery of all wetlands. This shall be a minimum of 100 feet in width measured from the upland extent of the wetland unless a more detailed requirement for a greater or lesser amount is included in the LUE or the LUO would allow for adjustment to recognize the constraints which the minimum buffer would impose upon existing subdivided lots. If a project involves substantial improvements or increased human impacts, necessitating a wide buffer area, it shall be limited to utility lines, pipelines, drainage and flood control facilities, bridges and road approaches to bridges, and roads when it can be demonstrated that: a) alternative routes are infeasible or more environmentally damaging, and b) the adverse environmental effects are mitigated to the maximum extent feasible. Access paths and/or fences necessary to protect habitats may also be permitted.</p> <p>The minimum buffer strip may be adjusted by the county if the minimum setback standard would render the parcel physically unusable for the principal permitted use. To allow a reduction in the minimum standard setback, it must be found that the development cannot be designed to provide for the standard. When such reductions are permitted, the minimum standard shall be reduced to only the point at which the principal permitted use (development), modified as much as is practical from a design standpoint, can be accommodated. At no point shall this buffer be less than 25 feet.</p>	<p>Proposed activities within coastal wetland habitats are limited to a passive bikeway, culvert extensions and bridges. Bridges and roads to bridges are an allowed use when alternative routes are infeasible and adverse effects are mitigated to the extent feasible. Mitigation measures are recommended to avoid or minimize effects to wetland habitat, and all applicable actions shall be conducted consistent with the policy standards. An adjustment to this standard would be required for uses within coastal wetland areas, including the construction and maintenance of the bikeway.</p>	<p>Consistent</p>
<p><b>Environmentally Sensitive Habitats, Policy 18: Wetland Buffers Less than 100 Feet.</b> For buffers less than 100 feet as established consistent with Policy 15 (above) mitigation measures to ensure wetland protection shall be required, and shall include (where applicable) vegetative screening, landscaping with native vegetation, drainage controls and other such measures. When the minimum buffer strip is adjusted by the county, it shall be done on a case-by-case basis only after the investigation of the following factors:</p>	<p>Proposed activities within coastal wetland habitats are limited to a passive bikeway, culvert extensions and bridges. Mitigation measures are recommended to avoid or minimize effects to wetland habitat, and all applicable actions shall be conducted consistent with the policy standards. An adjustment to this standard would be required for uses within coastal wetland areas.</p>	<p>Consistent</p>

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
<ul style="list-style-type: none"> <li>a. Soil type and stability of development site, including susceptibility to erosion.</li> <li>b. Slope of land adjacent to the wetland and the ability to use natural topographic features to locate development.</li> <li>c. Types and amount of vegetation and its value as wildlife habitat including: 1) the biological significance of the adjacent lands in maintaining the functional capacity of the wetland, and 2) the sensitivity of the species to disturbance.</li> <li>d. Type and intensity of proposed uses.</li> <li>e. Lot size and configuration, and the location of existing development.</li> </ul>		
<b>Environmentally Sensitive Habitats, Policy 20: Coastal Streams and Riparian Vegetation.</b> Coastal streams and adjoining riparian vegetation are environmentally sensitive habitat areas and the natural hydrological system and ecological function of coastal streams shall be protected and preserved.	Mitigation measures recommended in the EIR provide for the protection and preservation of coastal streams and riparian vegetation.	Consistent
<b>Environmentally Sensitive Habitats, Policy 21: Development in or Adjacent to a Coastal Stream.</b> Development adjacent to or within the watershed (that portion within the coastal zone) shall be sited and designed to prevent impacts which would significantly degrade the coastal habitat and shall be compatible with the continuance of such habitat areas. This shall include evaluation of erosion and runoff concerns.	Mitigation measures recommended in the EIR provide for the protection and preservation of coastal streams and riparian vegetation, including mitigation for both direct and indirect effects and preparation of a sediment and erosion control plan for approval.	Consistent
<b>Environmentally Sensitive Habitats, Policy 22: Fish and Game Review of Streambed Alterations.</b> Significant streambed alterations require the issuance of a California Department of Fish and Game 1601-1603 agreement. The Department should provide guidelines on what constitutes significant streambed alterations so that the county and applicants are aware of what is considered a "significant" streambed alteration. In addition, streambed alterations may also require a permit from the U.S. Army Corp of Engineers.	Proposed actions that would require a CDFG agreement and/or ACOE permit would be limited to the public bikeway, culvert extensions and bridges. The project includes provisions for a 1603 agreement with CDFG and a Section 404 USACE permit. County Parks or its designee would comply with federal, state, and local regulations.	Consistent
<b>Environmentally Sensitive Habitats, Policy 23: County and State Review of Coastal Stream Projects.</b> The State Water Resources Control Board and the county shall ensure that the beneficial use of coastal stream waters is protected, for projects over which it has jurisdiction. For projects which do not fall under the review of the State Water Resources Control Board, the county (in its review of public works and stream alterations) shall ensure that the quantity and quality surface	Proposed actions within 100 feet of riparian corridors are limited to development of the Class I bike path, culvert extensions and bridges. Mitigation measures recommended in the EIR provide for protection of sensitive riparian habitat.	Consistent

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
water discharge from streams and rivers shall be maintained at levels necessary to sustain the functional capacity of streams, wetland, estuaries and lakes.		
<b>Environmentally Sensitive Habitats, Policy 26: Riparian Vegetation.</b> Cutting or alteration of naturally occurring vegetation that protects riparian habitat is not permitted except for permitted streambed alterations (defined in Policy 23) and where no feasible alternative exists or an issue of public safety exists.	Activities requiring removal of riparian vegetation are limited to a bikeway, culvert extensions and bridges. The project requires a CDFG 1603 agreement and County Parks or its designee would comply with federal, state, and local regulations.	Consistent
<b>Environmentally Sensitive Habitats, Policy 28: Buffer Zone for Riparian Setbacks.</b> In rural areas (outside the USL) a buffer setback zone of 100 feet shall be established between any new development (including new agricultural development) and the upland edge of riparian habitats. In urban areas this minimum standard shall be 50 feet except where a lesser buffer is specifically permitted. The buffer zone shall be maintained in natural condition along the periphery of all streams. Permitted uses within the buffer strip shall be limited to passive recreational, educational or existing nonstructural agricultural developments in accordance with adopted best management practices. Other uses that may be found appropriate are limited to utility lines, pipelines, drainage and flood control facilities, bridges and road approaches to bridges to cross a stream and roads when it can be demonstrated that: 1) alternative routes are infeasible or more environmentally damaging and 2) adverse environmental effects are mitigated to the maximum extent feasible. Lesser setbacks on existing parcels may be permitted if application of the minimum setback standard would render the parcel physically unusable for the principal permitted use. In allowing a reduction in the minimum setbacks, they shall be reduced only to the point at which a principal permitted use (as modified as much as is practical from a design standpoint) can be accommodated.	Proposed actions within 100 feet of riparian corridors would be limited to passive recreational uses, culvert extensions and bridges, consistent with this policy. In addition, mitigation measures recommended in the EIR provide for protection of sensitive riparian habitat.	Consistent
<b>Environmentally Sensitive Habitats, Policy 29: Protection of Terrestrial Habitats.</b> Designated plant and wildlife habitats are environmentally sensitive habitat areas and emphasis for protection should be placed on the entire ecological community. Only uses dependent on the resource shall be permitted within the identified sensitive habitat portion of the site.  Development adjacent to environmentally sensitive habitat areas and holdings of the State Department of Parks and Recreation shall be sited	Proposed uses within sensitive habitat areas would be limited to a recreational bike path, culvert extensions and bridges. Mitigation measures, including environmental ecology signage, environmental awareness training, and preparation and implementation of habitat restoration measures, are recommended to avoid loss of individual species and ensure restoration and improvement of habitat, if disturbed.	Consistent



Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
and designed to prevent impacts that would significantly degrade such areas and shall be compatible with the continuance of such habitat areas.		
<b>Environmentally Sensitive Habitats, Policy 30: Protection of Native Vegetation.</b> Native trees and plant cover shall be protected wherever possible. Native plants shall be used where vegetation is removed.	Based on mitigation measures recommended in the EIR, native vegetation would be protected and, if necessary, restored along the project corridor.	Consistent
<b>Environmentally Sensitive Habitats, Policy 31: Design of Trails In and Adjoining Sensitive Habitats.</b> San Luis Obispo County, or the appropriate public agency, shall ensure that the design of trails in and adjoining sensitive habitat areas shall minimize adverse impact on these areas.	Based on mitigation measures recommended in the EIR, sensitive habitat areas would be protected and, if necessary, restored along the project corridor.	Consistent
<b>Environmentally Sensitive Habitats, Policy 35: Protection of Vegetation.</b> Vegetation which is rare or endangered or serves as cover for endangered wildlife shall be protected against any significant disruption of habitat value. All development shall be designed to disturb the minimum amount possible of wildlife or plant habitat.	Based on mitigation measures recommended in the EIR, sensitive habitat areas and special status species would be protected and, if necessary, restored along the project corridor.	Consistent
<p><b>Environmentally Sensitive Habitats, Policy 36: Protection of Dune Vegetation.</b> Disturbance or destruction of any dune vegetation shall be limited to those projects which are dependent upon such resources where no feasible alternatives exist and then shall be limited to the smallest area possible. Development activities and uses within dune vegetation shall protect the dune resources and shall be limited to resource dependent, scientific, educational and passive recreational uses.</p> <p>Revegetation with California native plant species propagated from the disturbed sites or from the same species at adjacent sites shall be necessary for all projects.</p>	Proposed uses within dune habitat are limited to a passive recreational bikeway, consistent with this policy. Permanent impacts related to the bike path would occur on 0.3 acres and temporary development impacts would occur on 0.87 acres of central dune habitat. However, mitigation measures proposed in the EIR, including preparation and approval of a Dune Habitat Restoration Plan, provide for protection and restoration of dune habitat.	Consistent
<b>Environmentally Sensitive Habitats, Policy 40: Shoreline Access Consistent with Habitat Protection.</b> Coastal access shall be monitored and regulated to minimize impacts on marine resources. If negative impacts are demonstrated, then the appropriate agency shall take steps to mitigate these impacts, including limiting the use of coastal access.	Based on mitigation measures recommended in the EIR, marine habitat would be protected.	Consistent

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
<b>Environmentally Sensitive Habitats, Policy 41: Habitat Signs.</b> The appropriate agency (in conjunction with the county Fish and Game Commission) should provide signs indicating that collecting from tide pools, etc., is illegal.	Mitigation measures are recommended in the EIR, including the placement of environmental interpretive signs informing pathway users of the ecology of bluff habitat, central foredune habitat, beach habitat and plant and wildlife species that utilize these areas, consistent with this policy.	Consistent
<p><b>Coastal Watersheds, Policy 7: Siting of New Development.</b> Grading for the purpose of creating a site for a structure or other development shall be limited to slopes of less than 20 percent.</p> <p>Grading and erosion control plans shall be prepared by a registered civil engineer and accompany any request to allow grading on slopes between 20 percent and 30 percent. It shall also be demonstrated that the proposed grading is sensitive to the natural landform of the site and surrounding area. In all cases, siting of development and grading shall not occur within 100 feet of any environmentally sensitive habitat. In urban areas as defined by the Urban Services Line, grading may encroach within the 100 foot setback when locating or siting a principally permitted development, if application of the 100 foot setback renders the parcel physically unusable for the principally permitted use. Secondly, the 100 foot setback shall only be reduced to a point at which the principally permitted use, as modified as much as practical from a design standpoint, can be accomplished to no point less than the setback allowed by the planning area standard or 50 feet whichever is the greater distance</p>	Proposed development on slopes greater than 20 percent and within 100 feet of environmentally sensitive habitats would be limited to bike path construction, culvert extensions and bridges. Mitigation measures including erosion control measures, best management practices, and restoration of disturbed soils are included in the EIR.	Consistent
<p><b>Coastal Watersheds, Policy 8: Timing of Construction and Grading.</b> Land clearing and grading shall be avoided during the rainy season if there is a potential for serious erosion and sedimentation problems. All slope and erosion control measures should be in place before the start of the rainy season. Soil exposure should be kept to the smallest area and the shortest feasible period.</p>	Grading and construction activities would comply to these standards, pursuant to the County Ordinance and mitigation measures proposed in the EIR.	Consistent
<p><b>Coastal Watersheds, Policy 9: Techniques for Minimizing Sedimentation.</b> Appropriate control measures (such as sediment basins, terracing, hydro-mulching, etc.) shall be used to minimize erosion and sedimentation. Measures should be utilized from the start of site preparation. Selection of appropriate control measures shall be based on evaluation of the development's design, site conditions, predevelopment erosion rates, environmental sensitivity of the adjacent areas and also consider costs of on-going maintenance. A site specific erosion control plan shall be prepared by a qualified soil scientist or other qualified</p>	The EIR includes mitigation measures recommending implementation of erosion and sedimentation control measures; in addition, all actions would be conducted pursuant to the County Ordinance.	Consistent

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
professional. To the extent feasible, non-structural erosion techniques, including the use of native species of plants, shall be preferred to control run-off and reduce increased sedimentation.		
<b>Coastal Watersheds, Policy 10: Drainage Provisions.</b> Site design shall ensure that drainage does not increase erosion. This may be achieved either through on-site drainage retention, or conveyance to storm drains or suitable watercourses.	The EIR includes mitigation measures recommending implementation of drainage control measures to avoid erosion and subsequent sedimentation. The proposed plan actions would maintain natural drainage patterns to the maximum extent feasible.	Consistent
<b>Coastal Watersheds, Policy 13: Vegetation Removal.</b> Vegetation clearance on slopes greater than 30% in geologically unstable areas or on soils rated as having severe erosion hazards shall require an erosion and sedimentation control plan.	Erosion and sedimentation control measures would be implemented pursuant to recommended mitigation measures.	Consistent
<b>Visual and Scenic Resources, Policy 1: Protection of Visual and Scenic Resources.</b> Unique and attractive features of the landscape, including but not limited to unusual landforms, scenic vistas and sensitive habitats are to be preserved protected, and in visually degraded areas restored where feasible.	Based on implementation of mitigation measures recommended in the Aesthetic Resources section of the EIR, visual resources would be protected and minimized to the extent feasible. However, safety concerns and Caltrans standards requiring a barrier along the shoulder of Highway 1, along with high viewer sensitivity from the highway, would nevertheless result in residual significant and unavoidable impacts.	Potentially Inconsistent
<b>Visual and Scenic Resources, Policy 2: Site Selection for New Development.</b> Permitted development shall be sited so as to protect views to and along the ocean and scenic coastal areas. Wherever possible, site selection for new development is to emphasize locations not visible from major public view corridors. In particular, new development should utilize slope created "pockets" to shield development and minimize visual intrusion.	Proposed development along the ocean and within public scenic areas would include the paved bikeway, highway barrier, signage, bridges, and retaining walls. Because of the limited terrace width, the barrier can't be "pushed back" from the highway. Other than the barrier, structures associated with the bikeway would not significantly obstruct scenic views, but would contribute to a more developed appearance of the project area. Mitigation measures are recommended to minimize all identified visual impacts to the greatest extent feasible to protect the aesthetic quality of the area. However, the barrier would nevertheless result in residual significant and unavoidable impacts.	Potentially Inconsistent

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
<b>Visual and Scenic Resources, Policy 4: New Development in Rural Areas.</b> New development shall be sited to minimize its visibility from public view corridors. Structures shall be designed (height, bulk, style) to be subordinate to, and blend with, the rural character of the area. New development which cannot be sited outside of public view corridors is to be screened utilizing native vegetation; however, such vegetation, when mature, must also be selected and sited in such a manner as to not obstruct major public views.	Mitigation measures have been recommended to ensure the project blends with the rural character of the area to the extent feasible, including softening the appearance of the barrier through the use of "sandy beach" or similar muted-color concrete, and minimizing vertical elements and embellishments.	Consistent
<b>Visual and Scenic Resources, Policy 5: Landform Alterations.</b> Grading, earthmoving, major vegetation removal and other landform alterations within public view corridors are to be minimized. Where feasible, contours of the finished surface are to blend with adjacent natural terrain to achieve a consistent grade and natural appearance.	Mitigation measures are recommended to minimize soil disturbance, require restoration of disturbed areas, and ensure compatibility with scenic resources.	Consistent
<b>Visual and Scenic Resources, Policy 9: Signs.</b> Information and direction signs shall be designed to be simple, easy-to-read and harmonize with surrounding elements.	Mitigation measures regarding signage along the project corridor would ensure consistency with this policy.	Consistent
<b>Visual and Scenic Resources, Policy 10: Development on Beaches and Sand Dunes.</b> Prohibit new development on open sandy beaches, except facilities required for public health and safety (e.g., beach erosion control structures). Limit development on dunes to only those uses which are identified as resource dependent in the LCP. Require permitted development to minimize visibility and alterations to the natural landform and minimize removal of dune stabilizing vegetation.	Construction would require machinery to access the site from the beach. This impact has been addressed with mitigation measures in the Biological Resources section. Proposed uses along the central foredune areas would be limited to the bikeway. Mitigation measures are recommended to minimize impacts associated visual impacts, including vegetation removal and alterations to the natural landform.	Consistent
<b>Visual and Scenic Resources, Policy 11: Development on Coastal Bluffs.</b> New development on bluff faces shall be limited to public access stairways and shoreline protection structures. Permitted development shall be sited and designed to be compatible with the natural features of the landform as much as feasible. New development on bluff tops shall be designed and sited to minimize visual intrusion on adjacent sandy beaches.	The proposed project does not propose development on the bluff face.	Consistent
<b>Hazards, Policy 1: New Development.</b> All new development proposed within areas subject to natural hazards from geologic or flood conditions (including beach erosion) shall be located and designed to minimize risks to human life and property.	County regulations already in place and the EIR include mitigation measures to protect human life and property from ocean storm surge, tsunamis, flooding, drainage, bluff retreat, soil erosion, and other public safety hazards.	Consistent

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
<b>Hazards, Policy 2: Erosion and Geologic Stability.</b> New development shall ensure structural stability while not creating or contributing to erosion or geological instability.	The EIR includes mitigation measures to prevent erosion during construction activities, and assess soil and geological conditions to ensure structural stability.	Consistent
<b>Hazards, Policy 3: Development Review in Hazard Areas.</b> The county shall require a detailed review of development proposed within the geologic study area and flood hazard combining designations as indicated on the Land Use Element maps for the coastal zone. The review shall be performed by a qualified registered and/or certified engineering geologist and shall be adequately detailed to provide recommendations and conclusions consistent with this plan.	County Parks shall comply with all County regulations upon application for land use and construction permits for project elements. Mitigation measures proposed in the EIR also include preparation of a design-level geotechnical report, a drainage plan, a sedimentation and erosion control plan, and stormwater pollution prevention plan, as well as environmental monitoring to ensure compliance.	Consistent
<b>Hazards, Policy 6: Bluff Setbacks.</b> New development or expansion of existing uses on bluffs shall be designed and set back adequately to assure stability and structural integrity and to withstand bluff erosion and wave action for a period of 75 years without construction of shoreline protection structures which would require substantial alterations to the natural landforms along bluffs and cliffs. A site stability evaluation report shall be prepared and submitted by a certified engineering geologist based upon an on-site evaluation that indicates that the bluff setback is adequate to allow for bluff erosion over the 75 year period. Specific standards for the content of geologic reports are contained in the Coastal Zone Land Use Ordinance (Section 23.04.118).	The existing Bluff Trail is located within an area potentially subject to bluff erosion. While the EIR includes mitigation measures to locate affected areas of the proposed bikeway as far away from the coastal bluffs and as close to Highway 1 as possible, there is still the potential that the bikeway could be undermined by bluff retreat in considerably less than 75 years.	Potentially Inconsistent
<b>Hazards, Policy 8: Coastal Access and Pipelines.</b> New development shall not be permitted on the bluff except where public access or pipelines for coastal dependent uses are necessary and no feasible alternative exists.	The existing Bluff Trail is located within an area potentially subject to bluff erosion. New development is limited to a passive recreational bikeway, retaining walls, culvert extensions and bridges.	Consistent
<b>Archaeology, Policy 1: Protection of Archaeological Resources.</b> The county shall provide for the protection of both known and potential archaeological resources. All available measures, including purchase, tax relief, purchase of development rights, etc., shall be explored at the time of a development proposal to avoid development on important archaeological sites. Where these measures are not feasible and development will adversely affect identified archaeological or paleontological resources, adequate mitigation shall be required.	The EIR includes measures to avoid and protect known and potentially unknown resources.	Consistent
<b>Archaeology, Policy 2: Vandalizing of Resources.</b> Activities other than development, which could damage or destroy archaeological sites, including off-road vehicle use on or adjacent to known sites and	The proposed project would not promote activities that could result in damage or looting of cultural resources.	Consistent

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
unauthorized collecting of artifacts, shall be prohibited.		
<b>Archaeology, Policy 4: Preliminary Site Survey for Development within Archaeologically Sensitive Areas.</b> Development shall require a preliminary site survey by a qualified archaeologist knowledgeable in Chumash culture prior to a determination of the potential environmental impacts of the project.	The EIR analysis includes an extended phase I survey and monitoring by a Native American representative.	Consistent
<b>Archaeology, Policy 5: Mitigation Techniques for Preliminary Site Survey before Construction.</b> Where substantial archaeological resources are found as a result of a preliminary site survey before construction, the county shall require a mitigation plan to protect the site. Some examples of specific mitigation techniques include: <ul style="list-style-type: none"> <li>a. Project redesign could reduce adverse impacts of the project through relocation of open space, landscaping or parking facilities.</li> <li>b. Preservation of an archaeological site can sometimes be accomplished by covering the site with a layer of fill sufficiently thick to insulate it from impact. This surface can then be used for building that does not require extensive foundations or removal of all topsoil.</li> <li>c. When a project impact cannot be avoided, it may be necessary to conduct a salvage operation. This is usually a last resort alternative because excavation, even under the best conditions, is limited by time, costs and technology. Where the chosen mitigation measure necessitates removal of archaeological resources, the county shall require the evaluation and proper deposition of the findings based on consultation with a qualified archaeologist knowledgeable in the Chumash culture.</li> <li>d. A qualified archaeologist knowledgeable in the Chumash culture may need to be on-site during initial grading and utility trenching for projects within sensitive areas.</li> </ul>	The EIR includes mitigation measures consistent with this policy, and requires preparation and implementation of a mitigation and monitoring plan prior to site disturbance, including all activities requiring grading (i.e., trail construction, etc.).	Consistent
<b>Archaeology, Policy 6: Archaeological Resources Discovered during Construction or through Other Activities.</b> Where substantial archaeological resources are discovered during construction of new development, or through non-permit related activities (such as repair and maintenance of public works projects) all activities shall cease until a qualified archaeologist knowledgeable in the Chumash culture can determine the significance of the resource and submit alternative mitigation measures.	The EIR includes mitigation measures consistent with this policy.	Consistent

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
COUNTY OF SAN LUIS OBISPO ESTERO AREA PLAN (Revised January 2009)		
<b>Introduction and General Goals, A. Planning Areawide, Goal 1:</b> Provide maximum public access, and protect existing public access, to the coast, the shoreline, the bay, and public recreation areas, consistent with the need to protect natural and agricultural resources and private property rights.	The purpose of the project is to provide additional passive public recreational access to the coastline between Morro Bay and Cayucos, and enhance existing access, consistent with this goal.	Consistent
<b>Land Use Policies and Programs, II. Rural Land Use Policies, D. Recreation, Policy 1:</b> Promote development of recreational and visitor-serving uses, especially lower cost opportunities, consistent with protection of agricultural and sensitive resources.	The purpose of the project is to provide free public recreational access to the coastline between Morro Bay and Cayucos, and enhance existing access, consistent with this policy. Mitigation measures are proposed in the EIR to reduce impacts on agricultural and other sensitive resources.	Consistent
<b>Land Use Policies and Programs, II. Rural Land Use Policies, D. Recreation, Policy 3:</b> Limit uses to open space, recreation, and visitor-serving-related uses.	The purpose of the project is to provide passive public recreational access to the coastline between Morro Bay and Cayucos, consistent with this policy.	Consistent
<b>Land Use Policies and Programs, II. Rural Land Use Policies, D. Recreation, Policy 4:</b> Pursue improved coastal access and amenities south of Cayucos, such as a bicycle and pedestrian path connection between Cayucos and the City of Morro Bay.	The purpose of the project is to provide a recreational bicycle and pedestrian path connection between Cayucos and the City of Morro Bay, consistent with this policy.	Consistent
<b>Land Use Policies and Programs, VI. Programs, E. County Parks, Cayucos and Vicinity, Program 2b: Coastal Bluff Park and Coastal Access Between Cayucos and Morro Bay.</b> The County or other applicable agency should acquire and develop a park on the coastal bluff between Cayucos and Morro Bay, south of Studio Drive, and should acquire and improve coastal access between Cayucos and Morro Bay, as follows:  An off-highway bike path should be built connecting Cayucos and Morro Bay.	The purpose of the project is to provide an off-highway recreational bicycle and pedestrian path connection between Cayucos and the City of Morro Bay, consistent with this policy.	Consistent

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
<b>Environmental and Cultural Resource Policies and Programs, III. Combining and Other Designations, B. Geologic Study Area, Policy 2: Bluff Erosion.</b> Bluff erosion poses a concern for siting new development along portions of the coastline. Development should generally be located to withstand 100 years of bluff erosion without the need for a shoreline protection structure that would substantially alter the landform, affect public access, or impact sand movement.	There is the possibility that portions of the proposed bikeway could be impacted by bluff erosion in significantly less than 100 years. However, the project would enhance public access and mitigation measures are proposed in the EIR to minimize alterations to the natural landform or impacts on sand movement.	Consistent
<b>Planning Area Standards, IV. Rural Area Standards, Recreation, C. Seaward of Highway 1 Between the City of Morro Bay and the Cayucos Urban Reserve Line, Policy 1: Limitations on Use.</b> Allowable uses shall be limited to passive recreation, pipelines and transmission lines, coastal accessways, and water wells and impoundments.	The purpose of the project is to provide a passive recreational bicycle and pedestrian path connection between Cayucos and the City of Morro Bay, consistent with this policy.	Consistent
<b>Coastal Access, VI. Estero Area Plan Goals, Policies and Standards, Policy B1:</b> Maximize public access to and along the coast by: <ul style="list-style-type: none"> <li>Developing all feasible vertical and lateral pedestrian access to and along the shoreline, consistent with public access goals and policies of this plan;</li> <li>Developing a coastal trail from Los Osos to Cayucos, consistent with the California Coastal Trail and County Trails Plan, and a bicycle path connecting Morro Bay and Cayucos;</li> <li>Developing all other feasible pedestrian circulation systems in the coastal zone, consistent with other public access goals and policies of this plan;</li> <li>Providing a regional bike path system; and</li> <li>Providing conspicuous signs for all public access.</li> </ul>	The purpose of the project is to enhance public access along the shoreline and provide a recreational bicycle and pedestrian path connection between Cayucos and the City of Morro Bay, consistent with this Policy.	Consistent
<b>COUNTY OF SAN LUIS OBISPO GENERAL PLAN PARKS AND RECREATION ELEMENT</b>		
<b>Recreation Goal, Objectives and Policies, Trails, Policy 3.7:</b> County Parks shall consider as the highest priority those trail projects which: <ul style="list-style-type: none"> <li>Are on land owned or operated by the County, including public rights of way;</li> <li>Connect urban communities or provide access to recreation areas;</li> <li>Complete a trail corridor, where only small portions are missing;</li> </ul>	The project corridor generally follows a series of County-accepted roads and lands and the Highway 1 right-of-way. It would complete an important segment of the bikeway network between Cayucos and Morro Bay. It offers alternative transportation, and provides a safer off-highway bikeway along this portion of the coastline.	Consistent



Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
<ul style="list-style-type: none"> <li>Will be popular due to their length or location;</li> <li>Offer alternative transportation;</li> <li>Solve a safety concern;</li> <li>Include a funding source;</li> <li>Minimize costs of development or maintenance.</li> </ul>		
<p><b>Recreation Goal, Objectives and Policies, Trails, Policy 3.8:</b> To protect the interests of adjacent land uses (both public and private) and the environment, trail projects shall:</p> <ul style="list-style-type: none"> <li>Be consistent with the standards in the General Plan including the County's Agriculture and Open Space Element;</li> <li>Stay as far away as reasonable from production agriculture, commercial activities and residences;</li> <li>Be built to minimize impacts to sensitive resources;</li> <li>Provide signs that identify permitted trail uses, directions to relevant public areas, and provide for safety and protection of trail users and adjacent private property.</li> </ul>	<p>Mitigation measures are proposed in the EIR that minimize impacts to agricultural and other sensitive resources to the extent feasible, consistent with this policy. The EIR also recommends preparation of a Signage and Striping Plan in consultation with the County Public Works Department, the County Bicycle Advisory Committee, the Cayucos Advisory Committee, and the City of Morro Bay.</p>	Consistent
<b>COUNTY OF SAN LUIS OBISPO GENERAL PLAN AGRICULTURE AND OPEN SPACE ELEMENT</b>		
<p><b>OSP6: Management of Public Open Space Lands.</b></p> <ol style="list-style-type: none"> <li>Manage public open space lands so as to protect and, where necessary, restore the open space resources.</li> <li>Coordinate efforts to manage open space lands with other public agencies and conservation organizations.</li> <li>Utilize best management practices.</li> </ol>	<p>The proposed project and mitigation measures included in the EIR include management practices consistent with these policies.</p>	Consistent
<p><b>OSP16: Habitat Protection.</b></p> <ol style="list-style-type: none"> <li>Maintain unique or sensitive plant or animal habitat on public lands.</li> </ol>	<p>Mitigation measures are proposed in the EIR to minimize impacts on sensitive plant or animal habitat on lands adjacent to the project corridor, consistent with this policy.</p>	Consistent
<p><b>OSP18: Protection of Streams and Riparian Corridors.</b></p> <ol style="list-style-type: none"> <li>Protect stream and riparian corridors in their natural state on public lands</li> <li>Where appropriate, utilize stream and riparian corridors as part of a network of wildlife corridors.</li> </ol>	<p>Mitigation measures are proposed in the EIR to minimize impacts to creeks, associated tributaries, and drainages in the vicinity of the project area, consistent with this policy.</p>	Consistent
<p><b>OSP25: Development within Scenic Corridors (Highway One).</b></p> <ol style="list-style-type: none"> <li>Proposed discretionary development and land divisions within scenic corridors shall address the protection of scenic vistas as follows:</li> </ol>	<p>The proposed project generally meets the standards identified in OSP25. Additional mitigation measures are recommended to minimize impacts on scenic viewsheds from</p>	Consistent

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
<ol style="list-style-type: none"> <li>1. Balance the protection of the scenic resources with the protection of biological resources that may co-exist within the scenic corridor.</li> <li>2. Locate structures, roads, and grading on portions of a site that minimize visual impact. Locate structures below prominent ridgelines and hilltops so they are not silhouetted against the sky.</li> <li>3. Use natural landforms and vegetation to screen development. Where that cannot be done, it is preferred to screen development with native vegetation that is compatible with the scenic resource being protected and does not obstruct public vistas.</li> <li>4. Design structures with colors that are taken from the natural landscape.</li> <li>5. Minimize the visibility of utilities from public view corridors and place them underground where feasible.</li> <li>6. Minimize signs, especially freestanding signs, and locate them so they do not interfere with vistas from scenic corridors. Secure removal of non-conforming signs within scenic corridors as part of the review of discretionary development projects wherever feasible.</li> </ol>	Highway 1 and ensure consistency.	
<p><b>OSP26: Recreational Uses of Publicly-owned Open Space.</b></p> <ol style="list-style-type: none"> <li>b. Work closely with other agencies to plan and provide recreational use of publicly-owned open space.</li> <li>c. Park sites and recreation areas shall protect scenic and environmentally sensitive resources.</li> </ol>	The project provides additional and enhanced recreational use of open space lands between Cayucos and Morro Bay in conjunction with County Parks, the County Bicycle Advisory Committee, the Cayucos Advisory Committee, and the City of Morro Bay. The project as proposed, and with the incorporation of mitigation measures, would ensure that scenic and environmentally sensitive areas are protected.	Consistent
<p><b>OSP29: Trail Access to Public Lands.</b></p> <ol style="list-style-type: none"> <li>a. In accordance with the County Trails Plan, support non-vehicular trail access to large units of public land.</li> <li>b. Access trails should not conflict with agriculture or with environmentally sensitive resources.</li> <li>c. Provide sufficient policing and maintenance so that trails do not result in trespass or in damage to sensitive resources, crops, livestock, other personal property, or individuals.</li> </ol>	The project proposed a non-vehicular coastal trail between Morro Bay and Cayucos. Environmentally sensitive resources within the project area include seasonal wetlands, ESHAs, jurisdictional waters, central foredunes, coastal bluffs and beach, and special status plants and wildlife. Mitigation measures recommended in the EIR would ensure compliance with these policies.	Consistent

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
<b>OSP31: Natural Hazards.</b> <b>a.</b> In areas subject to flood, geological, seismic, or fire hazards, encourage open space uses that are consistent with public safety.	Open spaces uses are limited to passive recreation along the project corridor. Upon implementation of recommended mitigation measures, implementation of the proposed project would not adversely affect public safety.	Consistent
<b>OSP33: Protection of Archaeological and Cultural Sites.</b> <b>a.</b> In consultation with Native Americans and archaeological and conservation organizations, identify significant archaeological and cultural sites that should be acquired or otherwise protected. <b>b.</b> Protect archaeological and culturally-sensitive sites from the effects of discretionary development by avoiding disturbance where feasible. <ol style="list-style-type: none"> <li>1. If sensitive sites cannot be avoided, mitigate the impact of development to the maximum extent feasible.</li> <li>2. Consult with Native Americans in the design of appropriate mitigations.</li> <li>3. As a last resort, the use of fill to cap sites or the recovery of resources may be permitted.</li> </ol> <b>d.</b> Protect sensitive sites from vandalism and unauthorized collection of artifacts by educating the public as well as land owners about the importance of such sites and by admonishing or prosecuting violators, as described in chapter five of the LUO and CZLUO.	Based on implementation of recommended mitigation measures to avoid or minimize effects to cultural resources, the proposed project is consistent with this policy.	Consistent
<b>COUNTY OF SAN LUIS OBISPO SAFETY ELEMENT</b>		
<b>Water Hazards, Implementation Measure S-16:</b> To the extent practicable, do not allow development in areas of high flood hazard potential.	Uses in designated flood zones are limited to a passive recreational trail, culvert extensions, retaining walls and bridges. Additional mitigation measures are proposed in the EIR to minimize risks of flooding.	Consistent
<b>Water Hazards, Implementation Measure S-19:</b> Do not allow development which will create or worsen known flood and drainage problems.	Development of the bikeway will create additional non-permeable surfaces within flood hazard areas and alter existing drainage courses. However, based on project designs, including culvert extensions, and mitigation measures proposed in the EIR , the project is consistent with this policy.	Consistent
<b>Water Hazards, Policy S-23 Coastal Bluffs:</b> Development shall not be permitted near the top of eroding coastal bluffs.	Development along the coastal bluff is limited to a passive recreational bikeway, culvert extensions, retaining walls and bridges. While the EIR includes mitigation measures to locate affected areas of the proposed bikeway as far away from the coastal bluffs and as close to Highway 1 as	Potentially Inconsistent

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
	possible, there is still the potential that the bikeway could be undermined by bluff retreat in considerably less than 75 years. There are currently no plans to increase shoreline protection or relocate Highway 1.	
CITY OF MORRO BAY LOCAL COASTAL PROGRAM –LAND USE PLAN (October 1982)		
<b>Shoreline Access and Recreation, Policy 1.06:</b> All accessways shall be properly signed and should conform to Coastal Conservancy/Coastal Commission access standards and guidelines.	Proposed mitigation measures include preparation of a Signage and Striping Plan, and County Parks shall comply with all CCC regulations upon application for land use and construction permits for project elements.	Consistent
<b>Shoreline Access and Recreation, Policy 1.07A:</b> In reviewing all new development requests, provision shall be made for adequate off-street parking in order to serve the needs of the development.	The EIR analyses existing and planned parking facilities to serve the project area, consistent with this policy.	Consistent
<b>Shoreline Access and Recreation, Area 1 – North Morro Bay, Policy 1.09:</b> As a condition to the approval of any development permit on the Chevron U.S.A. property the City shall require clear dedication of a lateral access easement along the sand area and under the pier.	The purpose of the project is to provide additional and enhanced public access to the coast, and the proposed project is designed to utilize the informal parking and beach access located along Highway 1 adjacent to the Chevron pier, consistent with this policy.	Consistent
<b>Visitor Serving Facilities, Policy 2.01:</b> Lower-cost visitor and recreation facilities for persons or families of low or moderate income shall be protected, encouraged, and where feasible, provided. Developments providing public recreational facilities are preferred.	The purpose of the project is to provide a no-cost, public recreational bike and pedestrian pathway along the coast between Morro Bay and Cayucos, consistent with this policy.	Consistent
<b>Hazards, Policy 9.01:</b> All new development located within areas subject to natural hazards from geologic, flood and fire conditions, shall be located so as to minimize risks to life and property.	Proposed development has been designed, and mitigation measures proposed in the EIR, to minimize potential impacts associated with flood, geological and other hazards, consistent with this policy.	Consistent
<b>Hazards, Policy 9.02:</b> All new development shall ensure structural stability while not creating nor contributing to erosion or geologic instability or destruction of the site or surrounding area.	Based on mitigation measures proposed in the EIR, including preparation of a design-level geotechnical report, a drainage plan, a sedimentation and erosion control plan, and stormwater pollution prevention plan, the project is consistent with this policy.	Consistent

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
<b>Hazards, Policy 9.03:</b> All development, including construction, excavation and grading, except for flood control projects and agricultural uses shall be prohibited in the 100-year floodplain areas unless off-setting improvements in accordance with the HUD regulations are required.	Based on mitigation measures proposed in the EIR, the project is consistent with this policy.	Consistent
<b>Hazards, Policy 9.14:</b> All development along bluffs shall be adequately set back to ensure protection of the development for its economic life and development shall not require alteration of the existing bluff land form or beach.	The proposed project does not alter the existing coastal bluff and has been set back from the bluff as far as possible; however, there is still the potential that the bikeway could be undermined by bluff retreat in considerably less than 75 years.	Potentially Inconsistent
<b>Hazards, Policy 9.15:</b> All new development on bluff tops shall be required to install drainage systems to carry runoff inland to the nearest public street.	Mitigation measures are proposed in the EIR, including preparation of a drainage plan, to minimize impacts associated with drainage and runoff, consistent with this policy.	Consistent
<b>Environmentally Sensitive Habitat Areas, Policy 11.01:</b> Environmentally Sensitive Habitat Areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed in such areas.	Development in ESHA areas is limited to a passive recreational bike path, culvert extensions, and bridges. Based on mitigation measures proposed in the EIR, the project is consistent with this policy.	Consistent
<b>Environmentally Sensitive Habitat Areas, Policy 11.02:</b> Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall maintain the habitat's functional capacity.	Mitigation measures are proposed in the EIR to minimize impacts to ESHA areas to the extent feasible, consistent with this policy.	Consistent
<b>Environmentally Sensitive Habitat Areas, Policy 11.06:</b> Buffering setback areas a minimum of 100 feet from sensitive habitat areas shall be required. No permanent structures shall be permitted within the setback area except for structures of a minor nature such as fences or at-grade improvements for pedestrian or equestrian trails.	The purpose of the project is development of a passive recreational bike and pedestrian pathway between Morro Bay and Cayucos, consistent with this policy.	Consistent.
<b>Environmentally Sensitive Habitat Areas, Policy 11.07:</b> Passive recreational activities (i.e. Bird-watching, walking, nature studies) shall be permitted with appropriate controls to prevent adverse impacts.	Development within ESHA areas is limited to a passive recreational bike and pedestrian pathway, culvert extensions, and bridges. Mitigation measures are proposed in the EIR to minimize impacts to ESHA areas to the extent feasible, consistent with this plan.	Consistent

Goals, Policies, Plans, Programs and Standards	Proposed Action	Determination
<b>Environmentally Sensitive Habitat Areas, Policy 11.14:</b> A minimum buffer zone along all streams shall be required as follows: a minimum buffer strip of 100 feet in rural areas. The buffer may be adjusted downward only to a point where the designated use can be accommodated but in no case shall the buffer be reduced to less than 50 feet for rural areas. Adjustments to the minimum buffer must protect the biological productivity and water quality of the streams.	The project may result in development within 50 feet of various ESHA areas associated with creeks and other drainages along the project corridor. However, mitigation measures are proposed in the EIR to minimize impacts resulting from such development to the greatest extent feasible.	Potentially Inconsistent
<b>Environmentally Sensitive Habitat Areas, Policy 11.15:</b> No structures shall be located within the stream corridor except: public trails located within a buffer when no alternative location is feasible but outside of riparian habitat.	The purpose of the proposed project is to provide a no-cost public recreational bike and pedestrian pathway between Morro Bay and Cayucos, consistent with this policy.	Consistent
<b>Environmentally Sensitive Habitat Areas, Policy 11.16:</b> All permitted development, including dredging, filling and grading within stream beds and setback buffer areas shall be limited to activities necessary for the construction of uses specified in Policy 11.15. When such activities require removal of riparian plant species, revegetation with local native riparian species shall be required.	Proposed development within stream bed buffer areas are consistent with this policy, and mitigation measures proposed in the EIR include measures for habitat protection and revegetation, if necessary.	Consistent
<b>Environmentally Sensitive Habitat Areas, Policy 11.20:</b> Coastal dune habitats shall be preserved and protected from all but resource-dependent, scientific, educational, and passive recreational use. Disturbance or destruction of any dune vegetation shall be prohibited, unless no feasible alternative exists, and then only if revegetation is made a condition of project approval.	Mitigation measures are proposed in the EIR which protect and, if necessary, mitigate impacts to dune habitat to the extent feasible, consistent with this policy.	Consistent
<b>Visual Resources, Policy 12.01:</b> The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic and coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and where feasible, to restore and enhance visual quality in visually degraded areas.	Mitigation measures proposed in the EIR mitigate impacts to visual resources to the extent feasible, consistent with this policy.	Consistent
<b>Visual Resources, Policy 12.03:</b> Development between State Highway One and the ocean shall provide view corridors so as not to significantly block views of travelers on the Highway. New development shall be subordinate to the character of its setting and shall be visually compatible with the surrounding areas.	The proposed project includes development of a highway barrier along a portion of the bikeway, which will impact the scenic views of travelers on the highway. However, impacts to traveler views have been mitigated to the extent feasible, and the barrier has been designed to be visually compatible with the surrounding area, consistent with this policy.	Consistent

**Appendix C.**  
**URBEMIS Data Sheets**





## Detail Report for Annual Construction Unmitigated Emissions (Tons/Year)

File Name: C:\Documents and Settings\klmiller\Desktop\Projects\MB to Cayucos\Reports\MBtC URBEMIS.urb924

Project Name: Morro Bay to Cayucos Connector

Project Location: San Luis Obispo County APCD

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

## CONSTRUCTION EMISSION ESTIMATES (Annual Tons Per Year, Unmitigated)

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10 Dust</u>	<u>PM10 Exhaust</u>	<u>PM10 Total</u>	<u>PM2.5 Dust</u>	<u>PM2.5 Exhaust</u>	<u>PM2.5 Total</u>	<u>CO2</u>
2013	0.05	0.34	0.24	0.00	0.87	0.02	0.89	0.18	0.02	0.20	44.22
Fine Grading 06/03/2013-07/31/2013	0.04	0.31	0.21	0.00	0.87	0.02	0.89	0.18	0.02	0.20	40.89
Fine Grading Dust	0.00	0.00	0.00	0.00	0.87	0.00	0.87	0.18	0.00	0.18	0.00
Fine Grading Off Road Diesel	0.04	0.29	0.17	0.00	0.00	0.02	0.02	0.00	0.02	0.02	34.89
Fine Grading On Road Diesel	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.02
Fine Grading Worker Trips	0.00	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.98
Asphalt 07/25/2013-07/31/2013	0.01	0.03	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.34
Paving Off-Gas	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	0.00	0.03	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.45
Paving On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.41
Paving Worker Trips	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.48

Phase Assumptions

Phase: Fine Grading 6/3/2013 - 7/31/2013 - Grade alignment and construct retaining walls, etc.

Total Acres Disturbed: 1.8

Maximum Daily Acreage Disturbed: 0.5

Fugitive Dust Level of Detail: Low

Onsite Cut/Fill: 300 cubic yards/day; Offsite Cut/Fill: 0 cubic yards/day

On Road Truck Travel (VMT): 34.88

Off-Road Equipment:

1 Dumpers/Tenders (16 hp) operating at a 0.38 load factor for 8 hours per day

1 Graders (174 hp) operating at a 0.61 load factor for 6 hours per day

2 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day

1 Water Trucks (189 hp) operating at a 0.5 load factor for 8 hours per day

Phase: Paving 7/25/2013 - 7/31/2013 - Paving trail

Acres to be Paved: 1

Off-Road Equipment:

4 Cement and Mortar Mixers (10 hp) operating at a 0.56 load factor for 6 hours per day

1 Pavers (100 hp) operating at a 0.62 load factor for 7 hours per day

1 Rollers (95 hp) operating at a 0.56 load factor for 7 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day

## Detail Report for Summer Construction Unmitigated Emissions (Pounds/Day)

File Name: C:\Documents and Settings\klmiller\Desktop\Projects\MB to Cayucos\Reports\MBtC URBEMIS.urb924

Project Name: Morro Bay to Cayucos Connector

Project Location: San Luis Obispo County APCD

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

## CONSTRUCTION EMISSION ESTIMATES (Summer Pounds Per Day, Unmitigated)

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10 Dust</u>	<u>PM10 Exhaust</u>	<u>PM10 Total</u>	<u>PM2.5 Dust</u>	<u>PM2.5 Exhaust</u>	<u>PM2.5 Total</u>	<u>CO2</u>
Time Slice 6/3/2013-7/24/2013 Active	1.92	14.45	9.89	0.00	40.41	0.84	41.25	8.44	0.77	9.22	1,901.63
Fine Grading 06/03/2013-07/31/2013	1.92	14.45	9.89	0.00	40.41	0.84	41.25	8.44	0.77	9.22	1,901.63
Fine Grading Dust	0.00	0.00	0.00	0.00	40.40	0.00	40.40	8.44	0.00	8.44	0.00
Fine Grading Off Road Diesel	1.82	13.64	8.14	0.00	0.00	0.82	0.82	0.00	0.75	0.75	1,622.81
Fine Grading On Road Diesel	0.04	0.69	0.22	0.00	0.00	0.02	0.03	0.00	0.02	0.02	140.44
Fine Grading Worker Trips	0.06	0.12	1.54	0.00	0.01	0.00	0.01	0.00	0.00	0.01	138.38
Time Slice 7/25/2013-7/31/2013 Active	<b>4.19</b>	<b>25.48</b>	<b>19.09</b>	<b>0.01</b>	<b>40.43</b>	<b>1.71</b>	<b>42.14</b>	<b>8.45</b>	<b>1.57</b>	<b>10.02</b>	<b>3,236.97</b>
Asphalt 07/25/2013-07/31/2013	2.27	11.03	9.19	0.00	0.02	0.87	0.88	0.01	0.80	0.80	1,335.34
Paving Off-Gas	0.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	1.61	10.07	6.79	0.00	0.00	0.83	0.83	0.00	0.77	0.77	979.23
Paving On Road Diesel	0.05	0.80	0.25	0.00	0.01	0.03	0.03	0.00	0.02	0.03	162.38
Paving Worker Trips	0.08	0.16	2.16	0.00	0.01	0.01	0.02	0.00	0.00	0.01	193.73
Fine Grading 06/03/2013-07/31/2013	1.92	14.45	9.89	0.00	40.41	0.84	41.25	8.44	0.77	9.22	1,901.63
Fine Grading Dust	0.00	0.00	0.00	0.00	40.40	0.00	40.40	8.44	0.00	8.44	0.00
Fine Grading Off Road Diesel	1.82	13.64	8.14	0.00	0.00	0.82	0.82	0.00	0.75	0.75	1,622.81
Fine Grading On Road Diesel	0.04	0.69	0.22	0.00	0.00	0.02	0.03	0.00	0.02	0.02	140.44
Fine Grading Worker Trips	0.06	0.12	1.54	0.00	0.01	0.00	0.01	0.00	0.00	0.01	138.38

Phase Assumptions

Phase: Fine Grading 6/3/2013 - 7/31/2013 - Grade alignment and construct retaining walls, etc.

Total Acres Disturbed: 1.8

Maximum Daily Acreage Disturbed: 0.5

Fugitive Dust Level of Detail: Low

Onsite Cut/Fill: 300 cubic yards/day; Offsite Cut/Fill: 0 cubic yards/day

On Road Truck Travel (VMT): 34.88

Off-Road Equipment:

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Phase: Paving 7/25/2013 - 7/31/2013 - Paving trail

Acres to be Paved: 1

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1 Rollers (95 hp) operating at a 0.56 load factor for 7 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day

**Appendix D.**  
**Biological Resources Background Information**



## **Appendix D. Special-Status Species Evaluations**

A total of 94 special-status species were considered in the evaluation of the Morro Bay to Cayucos Connector project (see Tables C-1 and C-2). The purpose of this document appendix is to evaluate whether special-status species or their critical habitat are known to be or could be present within the project area and to determine the need for consultation and conference with the U.S. Fish and Wildlife Service or other resource agencies. For the purposes of this evaluation, special-status species are defined as plants and animals that are:

- Afforded protection under the Federal Endangered Species Act (FESA) and/or California Endangered Species Act (CESA);
- Proposed for listing under the FESA and/or CESA;
- Afforded protection under sections of the California Fish and Game Code;
- Afforded protection under the Migratory Bird Treaty Act of 1918;
- Considered either Federal Species of Concern or California Special Concern Species;
- That meet the definitions of rare or endangered species under CEQA;
- Considered sensitive by the California Native Plant Society (CNPS); and,
- Considered sensitive by local resource groups/agencies or the scientific community.

Each species in the following tables was evaluated to determine (1) the known or likely occurrence of a species or its preferred habitat in the vicinity of the project area, and the possibility of a species or its preferred habitat types occurring in areas expected to be affected; (2) the direct physical loss of habitat; (3) the loss of habitat from its modification; and (4) the effective loss of habitat due to construction activity, noise, trampling, or other types of direct and indirect effects. Habitat fragmentation was also considered. Special-status species are considered further in the body of the Environmental Impact Report (in Chapter 3, Biological Resources) if the proposed project could have direct, indirect, or cumulative impacts on the species.

As a result of this evaluation, including an analysis of distribution and abundance, habitat requirements of each species, and habitat characteristics of the project site, and existing human disturbances at the site, it was determined that 8 of the 94 special-status species listed in the tables warrant further consideration in the body of the Environmental Impact Report (EIR) and are discussed below the tables. The remaining 86 special-status species do not occur in the project area and there would be no direct, indirect, or cumulative effect on these species from the proposed project. These species are not evaluated further in this EIR.

Table D-1. Special-Status Plant Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Flower Season	Legal Status Federal/ State/ CNPS	Rationale for Expecting Presence or Absence
red sand verben <i>Abronia maritima</i>	Perennial herb that occurs in coastal dunes. 0-100 meters	February-November	--/--/4.2	<b>Suitable Conditions Present:</b> Several occurrences were observed in the BSA.
Arroyo de la cruz manzanita <i>Arctostaphylos cruzensis</i>	Broadleaf upland forest, coastal scrub, closed cone coniferous forest, chaparral and grassland. On sandy soils. 60-310 meters	December-March	--/--/1B.2	<b>Suitable Conditions Absent:</b> The BSA is at a lower elevation than this species documented range. No <i>Arctostaphylos</i> species were observed in the BSA.
Santa Lucia manzanita <i>Arctostaphylos luciana</i>	Evergreen shrub; occurs on Chaparral with shale outcrops. 350-850 meters	February-March	--/--/1B.2	<b>Suitable Conditions Absent:</b> The BSA is at a lower elevation than this species documented range. No <i>Arctostaphylos</i> species were observed in the BSA.
Morro manzanita <i>Arctostaphylos morroensis</i>	Chaparral, cismontane woodland, coastal scrub, on stabilized coastal dunes. 5-205 meters	December-March	FT/--/1B.1	<b>Suitable Conditions Absent:</b> The BSA is north of this species range and does not support stabilized dunes. No <i>Arctostaphylos</i> species were observed in the study area.
Oso Manzanita <i>Arctostaphylos osoensis</i>	Evergreen shrub; occurs in chaparral and cismontane woodland associated with dacite porphyry (purple/red igneous volcanic rock) on buttes. 300-500 meters	February-March	--/--/1B.2	<b>Suitable Conditions Absent:</b> The BSA is at a lower elevation than this species documented range and does not contain dacite soils or the appropriate community. No <i>Arctostaphylos</i> species were observed in the study area.
Pecho manzanita <i>Arctostaphylos pechoensis</i>	Closed coniferous forest, chaparral, and coastal scrub on siliceous shale. 125–850 meters	November to March	--/--/1B.2	<b>Suitable Conditions Absent:</b> The BSA is at a lower elevation than this species documented range. No <i>Arctostaphylos</i> species were observed in the study area.
Santa Margarita manzanita <i>Arctostaphylos pilosula</i>	Evergreen shrub; occurs in closed coniferous forest, chaparral, and cismontane woodland on shale soils. 170-1100 meters	December - March	--/--/1B.2	<b>Suitable Conditions Absent:</b> The BSA is at a lower elevation than this species documented range and does not contain shale soils or the appropriated community. No <i>Arctostaphylos</i> species were observed

Table D-1. Special-Status Plant Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Flower Season	Legal Status Federal/ State/ CNPS	Rationale for Expecting Presence or Absence
				in the study area.
dacite manzanita <i>Arctostaphylos tomentosa</i> ssp. <i>daciticola</i>	Evergreen shrub occurs in chaparral and cismontane woodland associated with dacite porphyry (purple/red igneous volcanic rock) on buttes. 100-300 meters	March	--/--/1B.1	<b>Suitable Conditions Absent:</b> The BSA is at a lower elevation than this species documented range and does not contain dacite soils or the appropriate community. No <i>Arctostaphylos</i> species were observed in the BSA.
Well's manzanita <i>Arctostaphylos wellsii</i>	Sandstone outcrops in chaparral, closed-cone coniferous forest. 30-400 meters	December-May	--/--/1B.1	<b>Suitable Conditions Absent:</b> The BSA does not contain sandstone outcrops, sandstone soils, or the appropriate communities. No <i>Arctostaphylos</i> species were observed in the BSA.
marsh sandwort <i>Arenaria paludicola</i>	Marshes and swamps. Grows through dense mats of <i>Typha</i> , <i>Juncus</i> , <i>Scirpus</i> , etc. in freshwater marsh. 10-170 meters	May-August	FE/CE/1B.1	<b>Suitable Conditions Absent:</b> Shallow portions of Toro Creek provide suitable habitat; however, Toro Creek is located north of marsh sandwort's range. The nearest occurrence are planted specimens located six miles south of the project site. Species not observed during surveys conducted in the appropriate season.
Mile's milk vetch <i>Astragalus didymocarpus</i> var. <i>milesianus</i>	Annual herb; Occurs in coastal scrub on clay soils. 20-90 meters	March-June	--/--/1B.2	<b>Suitable Conditions Present:</b> Species not observed during survey conducted in the appropriate period.
San Joaquin spearscale <i>Atriplex joaquiniana</i>	Shrub occurs in chenopod scrub, meadows, seeps, playas, and valley and foothill grassland. Often in alkaline soils. 1 - 835 meters	April-October	--/--/1B.2	<b>Suitable Conditions Absent:</b> The BSA does not contain alkali soils. The last recorded occurrence in the Morro Bay area was 1899. Species not observed during surveys conducted in the appropriate season.

**Table D-1. Special-Status Plant Species Investigated for Potential Occurrence**

Species Name	Habitat and Distribution	Flower Season	Legal Status Federal/ State/ CNPS	Rationale for Expecting Presence or Absence
round-leaved filaree <i>California macrophylla</i>	Annual herb occurs in cismontane woodland and valley and foothill grassland with clay soils. 15-1200 meters	March-May	--/--/1B.1	<b>Suitable Conditions Absent:</b> The BSA is located east of this species documented range. The one documented occurrence was observed in the Creston area in 1952. Species not observed during surveys conducted in the appropriate season.
La Panza mariposa-lily <i>Calochortus obispoensis</i>	Chaparral, coastal scrub, valley and foothill grassland. Often in serpentine grassland. 75-665 meters	May-July	--/--/1B.2	<b>Suitable Conditions Absent:</b> The BSA is at a lower elevation than this species documented range. No serpentine soils are present. Species not observed during surveys conducted in the appropriate season.
San Luis Obispo mariposa lily <i>Calochortus simulans</i>	Chaparral, cismontane woodlands, lower montane coniferous forest, valley and foothill grassland; often in sandy, granitic, or serpentine soils. 395-1100 Meters	April-May	--/--/1B.3	<b>Suitable Conditions Absent:</b> The BSA is at a lower elevation than this species documented range. Sandy, granitic, or serpentine soils do not occur on the site. Species not observed during surveys conducted in the appropriate season.
Cambria morning-glory <i>Calystegia subacaulis</i> ssp. <i>episcopalis</i>	Grassland and rocky areas associated with chaparral and cismontane woodland. 60-500 meters	April-May	--/--/1B.2	<b>Suitable Conditions Present:</b> Several individuals observed in the BSA. These occurrences are located in two drainages directly west of the proposed alignment, near Segment 4 The proposed alignment will avoid the individuals.
San Luis Obispo sedge <i>Carex obispoensis</i>	Closed cone coniferous forests, chaparral, coastal prairie, coastal scrub, and valley and foothill grassland. Usually adjacent to seeps, springs, stream sides or other water source with sand, clay or serpentine. 5-790 meters	April-June	--/--/1B.2	<b>Suitable Conditions Present:</b> Clay and sand interface at the mouth of Toro Creek provides suitable habitat. The proposed project has been designed to avoid this area. Species not observed during surveys conducted in the appropriate season.



Table D-1. Special-Status Plant Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Flower Season	Legal Status Federal/ State/ CNPS	Rationale for Expecting Presence or Absence
San Luis Obispo owls clover <i>Castilleja densiflora</i> ssp. <i>obispoensis</i>	Valley and foothill grassland. 10-215 meters	April	--/--/1B.2	<b>Suitable Conditions Present:</b> Numerous individuals observed east of Highway 1 during the 2005 surveys. The preferred western alignment will avoid these individuals; however, the eastern alternative would impact them.
Lemmon's jewelflower <i>Caulanthus coulteri</i> var. <i>lemmonii</i>	Occurs on dry exposed slopes in pinyon and juniper woodland and valley and foothill grassland. 80 - 1220 meters	March-May	--/--/1B.2	<b>Suitable Conditions Absent:</b> The BSA is located at a lower elevation and west of the species documented range. Species not observed during surveys conducted in the appropriate season.
Condon's tarplant <i>Centromadia parryi</i> ssp. <i>congdonii</i>	Depressional areas within valley and foothill grassland. 1-230 meters	June- November	--/--/1B.2	<b>Suitable Conditions Present:</b> Species not observed during surveys conducted in the appropriate season.
dwarf soaproot <i>Chlorogalum pomeridianum</i> var. <i>minus</i>	Chaparral habitats with serpentine soils. 305-1000 meters	May-August	--/--/1B.2	<b>Suitable Conditions Absent:</b> The BSA does not contain serpentine soils and is located at a lower elevation than the species documented range. Species not observed during surveys conducted in the appropriate season.
Brewer's spineflower <i>Chorizanthe breweri</i>	Chaparral, cismontane woodland, coastal scrub, closed-cone coniferous forest; rocky or gravelly serpentine sites; usually in barren areas. 45-800 meters	May -August	--/--/1B.3	<b>Suitable Conditions Absent:</b> The BSA is at a lower elevation than this species documented range. Soils on site are not suitable for this species. Species not observed during surveys conducted in the appropriate season.
straight-awned spineflower <i>Chorizanthe rectispina</i>	Chaparral, cismontane woodland, coastal scrub. Often on granite in chaparral. 355-1035 meters	April-July	--/--/1B.3	<b>Suitable Conditions Absent:</b> The BSA is at a lower elevation than this species documented range. Soils on site are not conducive to this species. Species not observed during surveys conducted in the appropriate season.

Table D-1. Special-Status Plant Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Flower Season	Legal Status Federal/ State/ CNPS	Rationale for Expecting Presence or Absence
San Luis Obispo fountain thistle <i>Cirsium fontinale</i> var. <i>obispoense</i>	Chaparral, cismontane woodlands; serpentine seeps or bogs. 35-380 meters	February-July	FE/SE/1B.2	<b>Suitable Conditions Absent:</b> The BSA does not contain serpentine soils. Species not observed during surveys conducted in the appropriate season.
compact cobwebby thistle <i>Cirsium occidentale</i> var. <i>compactum</i>	A perennial herb that occurs in chaparral, coastal dunes, coastal prairie and coastal scrub. 5 - 150 meter	April-June	--/--/1B.2	<b>Suitable Conditions Present:</b> Species not observed during surveys conducted in the appropriate season.
la graciosa thistle <i>Cirsium loncholepis</i>	Coastal dunes, brackish marsh, riparian scrub. Sandy wet areas .5-185 meters.	May-August	FE/ST/1B.1	<b>Suitable Conditions Present:</b> Sandy wet areas in the BSA could support the species; however, the BSA is located north of most occurrences. Species not observed during surveys conducted in the appropriate season.
surf thistle <i>Cirsium rhotophilum</i>	Coastal dunes, coastal bluff scrub. Open areas in central dune scrub; usually in coastal dunes. 3-60 meters	April-June	--/CT/1B.2	<b>Suitable Conditions Present:</b> BSA supports suitable conditions but is located north of most occurrences. Species not observed during surveys conducted in the appropriate season.
salt marsh bird's-beak <i>Cordylanthus maritimus</i> ssp. <i>maritimus</i>	Annual herb; occurs in marshes and swamps on coastal dunes. 0-30 meters	May-October	FE/SE/1B.2	<b>Suitable Conditions Present:</b> Species not observed during surveys conducted in the appropriate season.
beach spectaclepod <i>Dithyrea maritima</i>	Coastal dunes, coastal scrub. Sea shores, on sand dunes, and sandy places near the shore. 3-50 meters	March-May	--/ST/1B.1	<b>Suitable Conditions Present:</b> Species not observed during surveys conducted in the appropriate season. Impacts to suitable habitat would be limited to equipment access areas.
Betty's dudleya <i>Dudleya abramsii</i> ssp. <i>bettinae</i>	Coastal scrub, valley and foothill grassland, chaparral; rocky barren serpentine exposures. 20-180 meters	May-July	--/--/1B.2	<b>Suitable Conditions Absent:</b> BSA does not contain serpentine outcrops. Species not observed during surveys conducted in the appropriate season.

Table D-1. Special-Status Plant Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Flower Season	Legal Status Federal/ State/ CNPS	Rationale for Expecting Presence or Absence
mouse-gray dudleya <i>Dudleya abramsii</i> ssp. <i>murina</i>	Serpentine outcrops in chaparral, cismontane woodland. 90-300 meters.	May-June	--/--/1B.3	<b>Suitable Conditions Absent:</b> BSA does not contain serpentine outcrops and is at a lower elevation than the species documented range. Species not observed during surveys conducted in the appropriate season.
Blochman's dudleya <i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i>	Coastal scrub, chaparral, and valley and foothill grassland habitats on rocky outcrops in clay or serpentine soils. 5-450 meters.	April-June	--/--/1B.1	<b>Suitable Conditions Present:</b> Species was not observed during surveys conducted in the appropriate flowering season.
Yellow-flowered eriastrum <i>Eriastrum luteum</i>	Annual herb occurs in broadleaved upland forest, chaparral, and cismontane woodland on sandy or gravelly soils. 290-1000 meters	May-June	--/--/1B.2	<b>Suitable Conditions Absent:</b> The BSA does not support the appropriate communities and is located at a lower elevation than the species documented range. Species not observed during surveys conducted in the appropriate season.
Blochman's leafy daisy <i>Erigeron blochmaniae</i>	Perennial rhizomatous herb. Occurs in coastal dunes and coastal scrub on sandy soils. 3-45 meters.	July–August	--/--/1B.2	<b>Suitable Conditions Present:</b> Species not observed during surveys conducted in the appropriate season.
Indian knob mountainbalm <i>Eriodictyon altissimum</i>	Evergreen shrub. Occurs in maritime chaparral, cismontane woodland, and coastal scrub with sandstone substrates. 80-270 meters	March-June	FE/SE/1B.1	<b>Suitable Conditions Absent:</b> The BSA does not contain sandstone substrates and is located at a lower elevation than this species documented range. Species was not observed during surveys conducted in the appropriate season.
Hoover's button-celery <i>Eryngium aristulatum</i> var. <i>hooveri</i>	Vernal pools in alkaline depressions near the coast. 5-45 meters.	July	--/--/1B.1	<b>Suitable Conditions Present:</b> Species not observed during surveys conducted in the appropriate season. Similar species <i>E. armatum</i> occurs in the BSA.

Table D-1. Special-Status Plant Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Flower Season	Legal Status Federal/ State/ CNPS	Rationale for Expecting Presence or Absence
San Benito fritillary <i>Fritillaria viridea</i>	Chaparral on serpentine slopes; elev. 200-1525 meters.	March-May	--/--/1B.2	<b>Suitable Conditions Absent:</b> BSA does not support chaparral or serpentine substrate. BSA is at a lower elevation than this species documented range. Species not observed during surveys conducted in the appropriate season.
Hardhams bedstraw <i>Galium hardhamiae</i>	A perennial herb that occurs in closed-cone coniferous forest and chaparral with serpentinite. 395 - 975 meters	April-October	--/--/1B.3	<b>Suitable Conditions Absent:</b> BSA does not support the appropriate communities or serpentine soils. BSA is located at a lower elevation than this species documented range. Species not observed during surveys conducted in the appropriate season.
mesa horkelia <i>Horkelia cuneata</i> ssp. <i>puberula</i>	Perennial herb that occurs in chaparral, cismontane woodlands, coastal scrub; in sandy or gravelly sites. 70-810 meters	February-September	--/--/1B.1	<b>Suitable Conditions Absent:</b> Beach sand and clay soils in BSA are not conducive to this species. The BSA is located at a lower elevation than the species documented range. Species was not observed during surveys conducted in the appropriate flowering season.
Santa Lucia dwarf rush <i>Juncus luciensis</i>	Annual herb that occurs in chaparral, Great Basin scrub, lower montane coniferous forest, meadows and seeps, and vernal pools. 300 -2040 meters	April-July	--/--/1B.2	<b>Suitable Conditions Absent:</b> BSA does not support the appropriate communities and is located at a lower elevation than this species documented range.
Coulter's goldfields <i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	Annual herb occurs in freshwater wetlands coastal salt marshes, wetland-riparian habitat, alkali sink, playas, vernal-pools, and swamps. 1-1220 meters	February-June	--/--/1B.1	<b>Suitable Conditions Present:</b> Species not observed during surveys conducted in the appropriate season.
Jones's layia <i>Layia jonesii</i>	Chaparral and valley and foothill grassland on clay or serpentine outcrops. 5-400 meters.	March-May	--/--/1B.2	<b>Suitable Conditions Present:</b> Species not observed during surveys conducted in the appropriate season.

Table D-1. Special-Status Plant Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Flower Season	Legal Status Federal/ State/ CNPS	Rationale for Expecting Presence or Absence
Carmel Valley bush-mallow <i>Malacothamnus palmeri</i> var. <i>involucratus</i>	Perennial shrub; occurs in chaparral, cismontane woodland, and coastal scrub. 30 - 1100 meters	May-August	--/--/1B.2	<b>Suitable Conditions Absent:</b> BSA is located at a lower elevation than the species documented range and does not support the appropriate communities. Species not observed during surveys conducted in the appropriate season.
Santa Lucia bush-mallow <i>Malacothamnus palmeri</i> var. <i>palmeri</i>	Deciduous shrub occurs in chaparral with rocky substrates. 60 - 360 meters	May-July	--/--/1B.2	<b>Suitable Conditions Absent:</b> BSA is located at a lower elevation than the species documented range and does not support the appropriate communities. Species not observed during surveys conducted in the appropriate season.
crisp monardella <i>Monardella crispera</i>	Rhizomatous herb occurs on coastal dunes and with coastal scrub and sandy soils. 10-120 meters	April-August	--/--/1B.2	<b>Suitable Conditions Present:</b> Species not observed during surveys conducted in the appropriate season.
San Luis Obispo monardella <i>Monardella frutescens</i>	Rhizomatous herb occurs on coastal dunes and with coastal scrub and sandy soils. 10-200 meters	May-September	--/--/1B.2	<b>Suitable Conditions Present:</b> Species not observed during surveys conducted in the appropriate season.
Palmer's monardella <i>Monardella palmeri</i>	Chaparral and cismontane woodland on serpentine slopes. 200-800 meters.	June-August	--/--/1B.2	<b>Suitable Conditions Absent:</b> BSA is located at a lower elevation than the species documented range and does not support the appropriate communities or substrate. Species not observed during surveys conducted in the appropriate season.
shinning navarretia <i>Navarretia nigelliformis</i> ssp. <i>radians</i>	Annual herb that occurs in vernal pools within cismontane woodland and valley and foothill grassland. 76 - 1000 meters	April-July	--/--/1B.2	<b>Suitable Conditions Absent:</b> BSA is located at a lower elevation than the species documented range. Species not observed during surveys conducted in the appropriate season.

**Table D-1. Special-Status Plant Species Investigated for Potential Occurrence**

Species Name	Habitat and Distribution	Flower Season	Legal Status Federal/ State/ CNPS	Rationale for Expecting Presence or Absence
hooked popcorn-flower <i>Plagiobothrys uncinatus</i>	Annual herb occurs in chaparral, cismontane woodland, and valley and foothill grassland with sandy soils. 300 - 760 meters	April-May	--/--/1B.1	<b>Suitable Conditions Absent:</b> BSA is located at a lower elevation than the species documented range and does not support the appropriate communities. Species not observed during surveys conducted in the appropriate season.
Diablo Canyon blue grass <i>Poa diabolii</i>	Rhizomatous herb occurs in closed-cone coniferous forest, chaparral, cismontane woodland, and coastal scrub with shale substrates. 120 - 400 meters	March-April	--/--/1B.2	<b>Suitable Conditions Absent:</b> BSA is located at a lower elevation than the species documented range and does not support shale substrates. Species not observed during surveys conducted in the appropriate season.
adobe sanicle <i>Sanicula maritima</i>	Moist seeps within coastal prairie, chaparral, meadows, and valley and foothill grassland habitats in clay or serpentine soils. 30-240 meters	February-May	--/SR/1B.1	<b>Suitable Conditions Present:</b> Species not observed during surveys conducted in the appropriate season.
rayless (chaparral) ragwort <i>Senecio aphanactis</i>	Chaparral, cismontane woodlands; coastal scrub/alkaline. 15-800 meters	January-April	--/--/2.2	<b>Suitable Conditions Absent:</b> BSA is located at a lower elevation than the species documented range and does not contain alkaline soils. Species not observed during surveys conducted in the appropriate season.
most beautiful jewel-flower <i>Streptanthus albidus</i> ssp. <i>peramoenus</i>	Chaparral, cismontane woodlands, valley and foothill grasslands on serpentine soil. 110-1000 meters	April-June	--/--/1B.2	<b>Suitable Conditions Absent:</b> BSA is located at a lower elevation than the species documented range and does not support the appropriate soils. Species not observed during surveys conducted in the appropriate season.
California seablite <i>Suaeda californica</i>	Low growing evergreen shrub occurs in coastal salt marshes and swamps. 0 - 15 meters	July-October	FE/--/1B.1	<b>Suitable Conditions Present:</b> Species observed near Segment 5. The individuals will not be impacted by project activities.

Table D-1. Special-Status Plant Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Flower Season	Legal Status Federal/ State/ CNPS	Rationale for Expecting Presence or Absence
saline clover <i>Trifolium depauperatum</i> var. <i>hydrophilum</i>	Marshes and swamps, valley and foothill grassland, vernal pools; alkaline sites. 0-300 meters	April-June	--/--/1B.2	<b>Suitable Conditions Present:</b> Species not observed during surveys conducted in the appropriate season.
Cook's triteleia <i>Triteleia ixiodes</i> ssp. <i>cookii</i>	Bulbiferous herb that occurs in serpentinite seeps within closed-cone coniferous forest and cismontane woodland. 150 - 700 meters	May-June	--/--/1B.3	<b>Suitable Conditions Absent:</b> BSA is located at a lower elevation than the species documented range and does not support the appropriate soils. Species not observed during surveys conducted in the appropriate season.
Natural Communities of Concern				
central dune scrub	A back dune plant community characterized by low growing, drought tolerant shrubs that develop considerable cover. Diagnostic species include <i>Ericameria ericoides</i> and <i>Lupinus chamissonis</i> .			BSA does not support this community.
central foredunes	A foredune plant community characterized by scattered low growing perennial plants including <i>Abronia</i> sp. <i>Ambrosia</i> sp. and <i>Cackile</i> sp. Usually occurring in areas exposed to tidal action.			<b>XX acres</b> of central foredunes are located in the western portion of the BSA.
central maritime chaparral	A variable scrub community of moderate to high cover dominated by various <i>Arctostaphylos</i> sp. Found on well drained sandy soils in areas subject to summer fog.			BSA does not support this community.
coastal brackish marsh	Marsh habitat dominated by perennial, emergent, herbaceous monocots such a <i>Scirpus</i> sp. Salinity varies but is brackish from freshwater input. Usually located at interior edges of coastal bays and estuaries or in coastal lagoons.			BSA does not support this community.
coastal and valley freshwater marsh	A wetland community that is found in areas of permanently or prolonged freshwater saturation without significant current or flow. Vegetation is dominated by perennial emergent monocots including cattails and rushes.			Several occurrences of coastal and valley freshwater marsh are located in the Toro Creek Channel and the eastern portion of the BSA.

Table D-1. Special-Status Plant Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Flower Season	Legal Status Federal/ State/ CNPS	Rationale for Expecting Presence or Absence
northern coastal salt marsh	Marsh habitat supporting herbaceous, suffrutescent, salt tolerant hydrophytes often active in summer and dormant in winter. Characteristic species include <i>Jaumea carnosa</i> , <i>Limonium californicum</i> , and <i>Frankenia salina</i> . Developed around Humboldt Bay, Tomales Bay, San Francisco Bay, Elkhorn Slough, and Morro Bay.			Several occurrences of northern coastal salt marsh are located at the mouths of the ephemeral drainages.
northern interior cypress forest	An open serotinous forest that is often found on dry, rocky soils. Often associated with serpentine soils. Vegetation consists of dense to sparse stands of <i>Cupressus</i> species.			BSA does not support this community.
serpentine bunchgrass	An open grassland community that is dominated by perennial bunch grasses. Typically, total cover is low but native species' dominate the composition. Associated species include <i>Nassella cernua</i> , <i>N. lepida</i> , <i>N. pulchra</i> , and <i>Melica californica</i> . Always occurring on serpentine substrates.			BSA does not support this community.

General references: CDFG 2008, Hickman (ed.) 1993, Munz 1974, CNDDDB 2008

Status Codes

--= No status

Federal: FE = Federal Endangered; FT=Federal Threatened

State: SE=State Endangered; ST= State Threatened; SR= State Rare

California Native Plant Society (CNPS):

List 1B = rare, threatened, or endangered in California and elsewhere.

List 2 = rare, threatened, or endangered in California, but more common elsewhere.

List 3 = plants that about which more information is needed.

List 4 = a watch list plants of limited distribution.

Threat Code:

.1 = Seriously endangered I California (over 80% of occurrences threatened / high degree and immediacy of threat)

.2 = Fairly endangered in California (20-80% occurrences threatened)

.3 = Not very endangered I California (<20% of occurrences threatened or no current threats known)



Table D-2. Special-Status Wildlife Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Legal Status Federal/State/CDFG	Rationale for Expecting Presence or Absence
Gastropods			
Morro shoulderband snail <i>Helminthoglypta walkeriana</i>	The Morro shoulderband snail (MSS) is restricted to Baywood fine sand in coastal dune and coastal sage scrub communities near Morro Bay. MSS often occurs under shrubs that exhibit dense, low growth and have ample contact with the ground. Mock heather, seaside golden yarrow, deerweed, sand almond, and ice plant include some species the MSS utilize.	FE/--/--	<b>Suitable Conditions Absent:</b> Soils within the BSA consist of clay and will not support MSS. MSS will not utilize sand on the beaches and foredunes. The BSA is located north of the known MSS range. Species not observed during surveys.
Insects			
Monarch butterfly <i>Danaus plexippus</i>	Occurs along the coast from northern Mendocino to Baja California, Mexico. Winter roosts in wind protected tree groves (eucalyptus, Monterey pine and cypress), with nectar and water sources nearby.	--/SA/--	<b>Suitable Conditions Absent:</b> The BSA does not contain eucalyptus, Monterey pine and cypress trees suitable for winter roosting. Species not observed during surveys.
Morro Bay blue butterfly <i>Plebejus icarioides moroensis</i>	Locally common from March to July, this species flies only along the immediate coast of San Luis Obispo and western Santa Barbara counties. Feeds on <i>Lupinus chamissonis</i> . This variety is restricted to the dunes at Vandenberg Air Force Base, Pismo/Guadalupe dune system and the dunes of Morro Bay.	--/SA/--	<b>Suitable Conditions Present:</b> The coastal scrub in the BSA provides suitable conditions for Morro blue butterfly. Species not observed during surveys.
Branchiopods			
Vernal pool fairy shrimp <i>Branchinecta lynchi</i>	Endemic to grasslands of the Central Valley, Central Coast Mountains, and South Coast Mountains. Occurs in vernal pool habitats including depressions in sandstone, to small swale, earth slump, or basalt-flow depressions with a grassy or, occasionally, muddy bottom in grassland (Eriksen and Belk, 1999).	FT/--/--	<b>Suitable Conditions Absent:</b> The BSA is located west of the documented range for vernal pool fairy shrimp and not within any of the counties vernal pool regions.

Table D-2. Special-Status Wildlife Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Legal Status Federal/State/CDFG	Rationale for Expecting Presence or Absence
California linderiella <i>Linderiella occidentalis</i>	Seasonal ponds in grasslands, sandstone depressions and alluvial flats with hardpan beneath.	--/--/--	<b>Suitable Conditions Absent:</b> The BSA is located west of the documented range for California linderiella and not within any of the counties vernal pool regions.
Fish			
Tidewater goby <i>Eucyclogobius newberryi</i>	Occurs in brackish shallow lagoons and lower stream reaches where water is fairly still, but not stagnant.	FE/--/CSC	<b>Suitable Conditions Present:</b> The lower reach of Toro Creek provides suitable habitat. Tidewater goby was observed in Toro Creek in 1995. Subsequent surveys conducted in 2004 and 2008 produced negative findings. The proposed project has been designed to avoid impacts to the aquatic portions of Toro Creek.
South-central California coast steelhead ESU <i>Oncorhynchus mykiss irideus</i>	Clear, cool water with abundant in-stream cover, well-vegetated stream margins, relatively stable water flow, and a 1:1 pool-to-riffle ratio.	FT, PCH /-- /CSC	<b>Suitable Conditions Present:</b> Toro Creek provides suitable habitat. Steelhead was documented in Toro Creek in 1988. Species not observed during surveys. The proposed project has been designed to avoid impacts to the aquatic portions of Toro Creek.
Amphibians			
California tiger salamander <i>Ambystoma californiense</i>	Occurs in grasslands or oak woodlands that support natural ephemeral pools or ponds that mimic them. This species requires seasonal water for breeding and small mammal burrows, crevices in logs, piles of lumber, and shrink-swell cracks in the ground for refuges. To be suitable, aquatic sites must retain at least 30 centimeters of water for a minimum of ten weeks in the winter.	FT/--/CSC	<b>Suitable Conditions Absent:</b> The BSA supports grassland habitat and mammal burrows; however, lacks suitable breeding ponds for tiger salamander. Species not observed during surveys.
California red-legged frog <i>Rana draytonii</i>	Aquatic habitats with little or no flow and surface water depths to at least 2.3 feet. Presence of fairly sturdy underwater supports such as cattails.	FT /-- /CSC	<b>Suitable Conditions Present:</b> Suitable aquatic habitat occurs within Toro Creek. CNDDDB documents one occurrence in Toro Creek in 1996. Red legged frog was not observed during the surveys, but is assumed

Table D-2. Special-Status Wildlife Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Legal Status Federal/State/CDFG	Rationale for Expecting Presence or Absence
			to inhabit the creek. The proposed project has been designed to avoid impacts to the aquatic portions of Toro Creek.
western spadefoot <i>Spea hammondi</i>	Inhabits vernal pools in primarily grassland, but also in valley and foothill hardwood woodlands.	--/--/CSC	<b>Suitable Conditions Absent:</b> The BSA supports grassland habitat; however, lacks suitable breeding ponds for western spadefoot. Species not observed during surveys.
Coast range newt <i>Taricha torosa torosa</i>	Breed in ponds, reservoirs, and slow-moving streams. Frequents terrestrial habitats such as oak woodlands.	--/--/CSC	<b>Suitable Conditions Present:</b> The Toro Creek riparian corridor may support coast range newt. However, project impacts would be limited to portions of the Creek banks lacking suitable cover. Species not observed during surveys.
Reptiles			
southwestern pond turtle <i>Actinemys marmorata pallida</i>	Quiet waters of ponds, lakes, streams, and marshes. Typically in the deepest parts with an abundance of basking sites.	--/--/CSC	<b>Suitable Conditions Present:</b> Suitable aquatic habitat occurs within Toro Creek. The proposed project has been designed to avoid impacts to the aquatic portions of Toro Creek.
silvery legless lizard <i>Anniella pulchra pulchra</i>	Sandy or loose loamy soils with high moisture content under sparse vegetation.	--/--/CSC	<b>Suitable Conditions Absent:</b> Soil type and moisture content does not provide suitable habitat for silvery legless lizard. Species not observed.
black legless lizard <i>Anniella pulchra nigra</i>	Sandy or loose loamy soils with high moisture content under sparse vegetation.	--/--/CSC	<b>Suitable Conditions Absent:</b> Soil type and moisture content does not provide suitable habitat for black legless lizard. Species not observed.
Coast horned lizard <i>Phrynosoma coronatum</i> (blainvillii population)	Frequents a wide variety of habitats, commonly occurring in lowlands along sandy washes, coastal sage scrub and chaparral in arid and semi-arid climate conditions. Species prefers friable, rocky or shallow	--/--/CSC	<b>Suitable Conditions Present:</b> Foredunes provide suitable habitat. One occurrence documented in similar habitat located approximately 1.2 miles south of the BSA.

Table D-2. Special-Status Wildlife Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Legal Status Federal/State/CDFG	Rationale for Expecting Presence or Absence
	sandy soils.		Pre-disturbance capture and relocation efforts are proposed.
Birds			
Cooper's hawk <i>Accipiter cooperii</i>	Deciduous riparian woodland habitat throughout California. Cooper's Hawks nest in deciduous, mixed-deciduous, and evergreen forests, as well as in suburban and urban environments. Cooper's Hawks tend to nest in more open areas that have older and larger trees.	MBTA/--/--	<b>Suitable Conditions Present:</b> The Toro Creek riparian corridor supports suitable perching and foraging habitat; however, nesting habitat is limited. Species not observed during the surveys.
tricolored blackbird <i>Agelaius tricolor</i>	(Nesting colony); requires open water, protected nesting substrate such as cattails or tall rushes, and foraging area with insect prey.	MBTA/--/CSC	<b>Suitable Conditions Absent:</b> Toro Creek provides open water habitat; however, lacks suitable nesting substrate.
burrowing owl <i>Athene cunicularia</i>	Open, dry grasslands, deserts and scrublands. Subterranean nester, dependent upon burrowing mammals.	MBTA/-- /CSC	<b>Suitable Conditions Absent:</b> Proposed project is located outside of breeding range for burrowing owl and does not support suitable burrow sites for wintering burrowing owls. Species not observed during the surveys.
ferruginous hawk <i>Buteo regalis</i>	(Wintering) open grasslands, sagebrush flats, desert scrub, low foothills, and fringes of pinyon-juniper habitats; eats lagomorphs, ground squirrels, and mice.	MBTA/--/--	<b>Suitable Conditions Present:</b> Grasslands on the eastern portion of the BSA provides suitable foraging habitat for ferruginous hawks. Any occurrence during project activities would be a "flyby" and would not adversely impact the individual. Species not observed during the surveys.
western snowy plover <i>Charadrius alexandrinus nivosus</i>	Occurs on sandy beaches, salt pond levees, and shores of large alkali lakes. Needs sandy, gravelly or friable soils for nesting.	MBTA, FT/ --/CSC	<b>Suitable Conditions Present:</b> The sandy beach habitat supports suitable nesting substrate. Pre-activity nesting bird surveys are recommended.

Table D-2. Special-Status Wildlife Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Legal Status Federal/State/CDFG	Rationale for Expecting Presence or Absence
western yellow-billed cuckoo <i>Coccyzus americanus</i>	Forests to open riparian woodlands with thick under story.	FC, MBTA/SE/ --	<b>Suitable Conditions Present:</b> The upper portions of the Toro Creek riparian corridor could support western yellow-billed cuckoo. However, project activities would not impact suitable riparian habitat. Species not observed during surveys.
white-tailed kite <i>Elanus leucurus</i>	Open grasslands, meadows, or marshlands for foraging close to isolated trees for nesting and perching.	MBTA / -- / FP	<b>Suitable Conditions Present:</b> Grasslands on the eastern portion of the BSA may provide suitable foraging habitat for white-tailed kite. Toro Creek riparian corridor may provide suitable nesting habitat; however, the proposed project would not impact trees suitable for nesting. Any occurrence during project activities would be a “flyby” and would not adversely impact the individual. Species not observed during the surveys.
California horned lark <i>Eremophila alpestris actia</i>	Occurs in short grass prairies, coastal plains, fallow grain fields and alkali flats. Found in coastal regions from Sonoma to San Diego county, and west to the San Joaquin Valley. .	MBTA/--/--	<b>Suitable Conditions Present:</b> Grasslands on the eastern portion of the BSA could support the species; however, the project is located outside the species typical range. Pre-disturbance nesting bird surveys are proposed to avoid impacts to nesting birds. Species not observed during the surveys.
California black rail <i>Laterallus jamaicensis coturniculus</i>	California black rail are shore birds known to frequent tidal salt marshes. These birds utilize densely vegetated mud flats and the high tide line in salt water marsh systems.	--/ST/--	<b>Suitable Conditions Absent:</b> The patches of salt marsh vegetation in the BSA are subject to regular disturbance and are too small to support this species. The BSA does not contain densely vegetated mudflats. Species not observed during the surveys.
California brown pelican <i>Pelecanus occidentalis californicus</i>	Nests on coastal islands in colonies; forages throughout coastal California ocean waters.	FE/SE/--	<b>Suitable Conditions Present:</b> Sandy beaches and near-shore open water habitat located adjacent to the project area supports resting and foraging habitat. Any occurrence during project activities would be a “flyby” and

Table D-2. Special-Status Wildlife Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Legal Status Federal/State/CDFG	Rationale for Expecting Presence or Absence
			would not adversely impact the individual. Several pelicans were observed flying over the study area during the surveys.
purple martin <i>Progne subis</i>	Occupies valley foothill and montane hardwood forests, conifer forests, and riparian habitats. May nest in old woodpecker cavities or in human-made structures such as bridges and culverts. Feeds on insects.	--/--/CSC	<b>Suitable Conditions Present:</b> Toro Creek riparian corridor provides suitable nesting habitat; however, the proposed project would not impact trees suitable for nesting. Pre-disturbance nesting bird surveys are proposed to avoid impacts to nesting birds. Species not observed during the surveys.
California clapper rail <i>Rallus longirostris obsoletus</i>	Occurs within salt and brackish marshes dominated by pickleweed and Pacific cordgrass. Currently, this species is restricted to marsh areas within the vicinity of San Francisco Bay. The last California clapper rail to be sighted in Morro Bay was documented in 1939.	FE/SE/--	<b>Suitable Conditions Absent:</b> The BSA does not contain brackish marsh. Species not observed during the surveys.
California least tern <i>Sterna antillarum brownie</i>	Largely a coastal species that feed on fish and nest on sandy dunes or beaches. Once a common species in California; currently nesting colonies are isolated to Southern California and scattered Bay Area beaches.	FE/SE/--	<b>Suitable Conditions Present:</b> Sandy beaches and near-shore open water supports resting and foraging habitat. However, the constant recreational use of the adjacent beaches renders this area unsuitable for nesting colonies. The closest documented nesting area is in the Oso Falco Lake area. Any occurrence during project activities would be a "flyby" and would not adversely impact the individual.
Class Aves Other migratory bird species (nesting)	Annual grasslands, coastal scrub, chaparral, and oak woodlands may provide nesting habitat.	MBTA/--/--	<b>Suitable Conditions Present:</b> Potential nesting habitat occurs throughout the BSA. Pre-disturbance nesting bird surveys are proposed to avoid impacts to nesting birds.
<b>Mammals</b>			
pallid bat <i>Antrozous pallidus</i>	Prefers rocky outcrops, cliffs, and crevices with access to open habitats for foraging. Day roosts are in caves,	--/--/CSC	<b>Suitable Conditions Present:</b> The Toro Creek Bridge and various trees could support

Table D-2. Special-Status Wildlife Species Investigated for Potential Occurrence

Species Name	Habitat and Distribution	Legal Status Federal/State/CDFG	Rationale for Expecting Presence or Absence
	crevices, mines, and occasionally in hollow trees and buildings. Night roosts may be in more open sites, such as porches and buildings.		roosting bats. Project activities will not impact the bridge or remove large trees; therefore, no actions are necessary. Species not observed during surveys.
Townsend's big-eared bat <i>Corynorhinus townsendii</i>	Occurs in a wide variety of habitats; most common in mesic (wet) sites. May use trees for day and night roosts; however, requires caves, mines, rock faces, bridges or buildings for maternity roosts. Maternity roosts are in relatively warm sites.	--/--/CSC	<b>Suitable Conditions Present:</b> The Toro Creek Bridge and various trees could support roosting bats. Project activities will not impact the bridge or remove large trees; therefore, no actions are necessary. Species not observed during surveys.
Morro Bay kangaroo rat <i>Dipodomys heermanni morroensis</i>	Typically occurs in habitats associated with stabilized dunes and coastal dune scrub communities with dominant vegetation including mock heather, buck brush, and deer weed.	SE/FE/--	<b>Suitable Conditions Absent:</b> The BSA is approximately 5.2 miles north of this species historic range and does not contain appropriate habitat. Species not observed during surveys.
western mastiff bat <i>Eumops perotis</i>	Found in many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, chaparral, etc.; roosts in crevices in cliff faces, high buildings, trees, and tunnels.	--/--/CSC	<b>Suitable Conditions Present:</b> The Toro Creek Bridge and various trees could support roosting bats. Project activities will not impact the bridge or remove large trees; therefore, no actions are necessary. Species not observed during surveys.
San Diego desert woodrat <i>Neotoma lepida intermedia</i>	Ranges from Baja California northward to northern San Luis Obispo County. Typically occurs in woodlands and coastal scrub habitats. Desert woodrats build nests within cracks and rock crevices, or in clumps of cactus.	--/--/CSC	<b>Suitable Conditions Absent:</b> The BSA does not support woodland communities with significant rock crevices. Species not observed during surveys.
big free-tailed bat <i>Nyctinomops macrotis</i>	Rare vagrant in California, probable resident in Texas, New Mexico, and southern Arizona. Probably does not breed in California. Prefers rugged, rocky canyons but will roost on buildings or in caves and trees.	--/--/CSC	<b>Suitable Conditions Present:</b> The BSA does not contain suitable rock cliffs; however, the bridge provides marginal roosting habitat. Considering the species rarity in California, lack of preferred roosting habitat, and that project activities will not impact the bridge or remove large trees, impacts to this species are not expected.

**Table D-2. Special-Status Wildlife Species Investigated for Potential Occurrence**

Species Name	Habitat and Distribution	Legal Status Federal/State/CDFG	Rationale for Expecting Presence or Absence
American badger <i>Taxidea taxus</i>	Occurs in open stages of shrub, forest, and herbaceous habitats; needs uncultivated ground with friable soils.	--/--/CSC	<b>Suitable Conditions Absent:</b> Clay soils in the BSA are not conducive to badger burrows.
San Joaquin kit fox <i>Vulpes macrotis munita</i>	The historic range of the San Joaquin kit fox included most of the San Joaquin Valley from San Joaquin County southward to southern Kern County (USFWS, 1998). Currently, kit foxes occur in the remaining native valley and foothill grasslands and saltbush scrub communities of the valley floor and surrounding foothills from southern Kern County north to Merced County.	FE/ST/--	<b>Suitable Conditions Absent:</b> The proposed project is not within the documented range of San Joaquin kit fox.

## Status Codes

--= No status

## Federal:

FE = Federal Endangered

FT= Federal Threatened

FC= Federal Candidate

CH= Federal Critical Habitat

PCH= Proposed Federal Critical Habitat

MBTA= Protected by Federal Migratory Bird Treaty Act

## State:

SE= State Endangered

ST= State Threatened

California Department of Fish and Game:

CSC= California Special Concern Species

FP= Fully Protected Species

SA= Not formally listed but included in CDFG "Special Animal" List.



## **SPECIAL STATUS PLANT SPECIES**

### **Red sand verbena**

Red sand verbena (*Abronia maritima*) is a perennial herb that occurs in coastal dunes at elevations ranging from zero to 100 meters. Several occurrences of red sand verbena were observed in the foredunes within the BSA (refer to Figure 4-3.2). Red sand verbena is included in the CNPS list 4.2, which is a “watch list” that indicates that this species has a limited distribution and is “fairly endangered in California.” Generally, species included on List 4 do not meet the definitions of Sec. 1901, Chapter 10 (Native Plant Protection Act) or Secs. 2062 and 2067 (California Endangered Species Act) of the CDFG Code (CNPS, 2008). However, CNPS recommends special considerations for List 4 species if the individuals are located near the periphery of the species range, in areas where the species is uncommon, or the species has sustained heavy losses in its locality.

### **Cambria morning-glory**

Cambria morning-glory (*Calystegia subacaulis* ssp. *episcopalism*) is a perennial herb in the Convolvulaceae family that is endemic to California and found only in San Luis Obispo County. It occurs in chaparral and woodland habitats (CNPS, 2005; Hickman, 1993), but is also known to occur in grasslands on clay soils (Hoover, 1970) and in coastal scrub. This species blooms from April through May. The CNPS includes this species on List 1B.2 and considers it to be “rare, threatened, or endangered in California and elsewhere” with 20-80% of its occurrences threatened. Several Cambria morning-glory individuals were observed in two drainages directly west of the proposed western alignment. The proposed alignment will avoid these individuals.

### **San Luis Obispo owl’s clover**

San Luis Obispo owl’s clover (*Castilleja densiflora* ssp. *obispoensis*) is an annual herb in the Scrophulariaceae family that is a California and San Luis Obispo County endemic. It occurs in valley and foothill grassland habitats. The CNPS includes this species on List 1B.2 and considers it to be “rare, threatened, or endangered in California and elsewhere” with 20-80% of its occurrences threatened. A large population of San Luis Obispo owl’s clover was observed in the grasslands at the eastern portion of the BSA. The proposed western alignment would avoid the population; however, the eastern alternative would impact it.

### **California seablite**

California seablite (*Suaeda californica*) is a low growing evergreen shrub that occurs in coastal salt marshes and swamps, with an elevation ranging from zero to fifteen meters. California seablite is federally endangered under the FESA and included on the CNPS List 1B.1. Several individuals were observed near Segments 3 and 5 of the proposed project. The individual located in Segment 3 is located adjacent to proposed activities and would need to be avoided during construction of the project. The individuals located near Segment 5 are in a drainage just west of the existing Studio Drive. Development of Segment 5 is located on the existing road surface and would not impact the drainage or the seablite individuals.

## **SPECIAL STATUS WILDLIFE SPECIES**

### **Tidewater goby**

The tidewater goby (*Eucyclogobius newberryi*) is a small (to 50 mm) fish found along coastal California from Humboldt County to San Diego County (Moyle 1976). While most gobies are marine fishes, the tidewater goby occupies fresh or brackish waters for a significant portion of its life. In coastal streams, gobies usually occur in slow moving reaches or within pools away from excessive current. USFWS has designated Critical Habitat for tidewater goby in Villa Creek and San Geronimo Creek in northern Cayucos (approximately 6.0 miles from the BSA). The lower reach of Toro Creek provides suitable habitat for this species. Tidewater goby was observed in Toro Creek in 1995; however, subsequent surveys conducted in 2004 and 2008 produced negative findings (CNDDDB 2009). The proposed project has been designed to avoid impacts to the aquatic portions of Toro Creek; therefore, no impacts to this species are anticipated.

### **South-central California coast steelhead ESU**

South-central California coast steelhead (*Oncorhynchus mykiss irideus*) is the anadromous form of rainbow trout. Steelhead historically ranged from Alaska to the California-Mexico border, though current data suggest that the Ventura River is presently the southernmost drainage supporting substantial steelhead runs. Optimal habitat for steelhead is characterized by clear, cool water with abundant instream cover (i.e., submerged branches, rocks, logs), well-vegetated stream margins, relatively stable water flow, and a 1:1 pool-to-riffle ratio (Raleigh et al., 1984). Steelhead is occasionally found in streams containing less than optimal habitat. All populations of steelhead occurring within the south-central California coast ESU region were listed as federally threatened in 1997 (USFWS, 1998), and are also considered a California Special Concern (CSC) species by CDFG. Toro Creek supports suitable habitat for steelhead and NOAA Fisheries considers Toro creek to be critical habitat for the species. CNDDDB documents a steelhead occurrence in Toro Creek in 1988. It is assumed that the species is still occupying the Creek.

The following impact assessment evaluates five project attributes to determine if installing the proposed bridge over Toro Creek would adversely affect steelhead in Toro Creek. Based on the following evaluation and the proposed project design it was determined that installation of the bridge would not adversely affect steelhead.

- 1) Would the project alter aquatic habitat in Toro Creek? Alterations to aquatic habitat could include changing the topography of the channel, changing the hydrology of the creek, removing debris or aquatic vegetation, or adding/removing shade. Due to the constant fluctuations in the tidal influences, the topography and hydrology of this portion of Toro Creek is highly variable. Based on the conditions observed during the survey and past observations, this area can be completely inundated during high tides and rain events, or lack open water habitat during the summer months. Due to the constant fluctuations and beach sand substrate, this area typically lacks aquatic vegetation. In addition, debris is regularly brought in and washed out by creek and tidal flows. Since the mouth of Toro Creek is highly variable and the proposed bridge has been designed to avoid impacts in the channel, the project would not cause significant physical alterations to the creek topography, hydrology, substrate or aquatic vegetation. Placement of the bridge would increase the amount of shade at the mouth of the creek, which could alter water temperatures when water is present.

- 2) Would the project require capture and relocation of steelhead? The bridge has been designed to avoid all impacts to the creek channel. The proposed construction methods would not require dewatering any portion of the creek; therefore, capture and relocation of steelhead would not be necessary.
- 3) Would the project result in the loss of aquatic insects? Aquatic insects are typically associated with creek systems that have cobble substrates and semi permanent water. The substrate in the location of the proposed bridge consists of beach sand and only supports flowing water during storm events. This indicates the aquatic insect population is likely variable. The proposed bridge would not alter the hydrology, topography, substrate, or chemical composition of the creek. Therefore, a loss of aquatic insects is not anticipated.
- 4) Would the project disturb streamside vegetation? The vegetation located on the banks of Toro Creek in the location of the proposed bridge consists of ruderal species, sporadic coyote brush, and foredune species. This composition does not constitute riparian vegetation or provide suitable shade or cover habitat for steelhead. Considering the existing vegetation in the area, significant disturbance to streamside vegetation is not anticipated.
- 5) Would the project alter water quality? Access to the creek channel would not be necessary for bridge installation; therefore, increased turbidity is not expected. However, the use of equipment adjacent to the creek would increase the potential for accidental release of hazardous substances into the creek channel.

### **California red-legged frog**

The California red-legged frog (*Rana draytonii*) historically ranged from Marin County southward to northern Baja California. Presently, Monterey, San Luis Obispo, and Santa Barbara counties support the largest remaining California red-legged frog populations within the state. California red-legged frog was listed as federally threatened by the USFWS in 1996 (USFWS, 1996), and is also considered a CSC species by CDFG. California red-legged frogs prefer aquatic habitats with little or no flow, the presence of surface water to at least early June, surface water depths to at least 0.7 meters (2.3 feet), and the presence of fairly sturdy underwater supports such as cattails (*Typha* spp.). Breeding areas include lagoons, streams and ponds; however, the species is often found traversing upland areas while traveling between breeding sites. Toro Creek supports suitable habitat for this species; CNDDDB documents one occurrence in Toro Creek in 1996. California red-legged frog was not observed during the surveys, but is assumed to inhabit the creek at least on a sporadic basis. The proposed project has been designed to avoid impacts to the aquatic portions of Toro Creek; therefore, no impacts to this species are anticipated.

### **Western Snowy Plover**

The western snowy plover (*Charadrius alexandrinus nivosus*) is a small pale colored shorebird. The Pacific coast population of western snowy plovers frequents sandy beaches and estuarine shores, and requires sandy, gravelly, or friable soil substrates for nesting. Nests are typically built in flat, open areas, with sandy or saline substrates and sparse vegetation. Nesting season extends from early March through late September. Western snowy plovers feed on invertebrates in the intertidal zone. The coastal snowy plover population is federally threatened under the FESA and is considered a California Special Concern species by the CDFG. Both

resident and migratory individuals compose the coastal snowy plover population. Several nesting occurrences of western snowy plover are documented on the foredunes and beaches at the mouth of Toro Creek. The occurrence records indicate that the recreational uses of the area have decreased the sites nesting productivity; however, the site is utilized by plovers to some capacity. SWCA biologists have observed western snowy plover foraging in the intertidal zone in the BSA. Although the proposed project alignment will not permanently impact plover habitat, temporary impacts could occur from accessing the work areas via the beach.

**Table D-3. Plant Species Observed on the Morro Bay to Cayucos Bike Path Site  
May 22, 2009 and July 2, 2009**

Scientific Name	Common Name	Native	Species Status / Notes
Vascular Plants nomenclature follows " The Jepson Manual" and <a href="http://ucjeps.berkeley.edu/interchange.html">http://ucjeps.berkeley.edu/interchange.html</a>			
GYMNOSPERMS			
<b>Cupressaceae</b>	<b>Cypress Family</b>		
<i>Cupressus macrocarpa</i>	Monterey cypress	Yes	Planted Specimens
ANGIOSPERMS (DICOTS)			
<b>Aizoaceae</b>	<b>Fig-marigold family</b>		
<i>Aptenia cordifolia</i>	red apple	No	
<i>Carpobrotus chilensis</i>	ice plant	No	
<i>Tetragonia tetragonioides</i>	New Zealand spinach	No	
<b>Apiaceae</b>	<b>Carrot family</b>		
<i>Eryngium armatum</i>	armed coyote thistle	Yes	
<i>Foeniculum vulgare</i>	sweet fennel	No	
<i>Lomatium californicum</i>	California lomatium	Yes	
<i>Sanicula arguta</i>	sharp toothed sanicle	Yes	
<b>Asteraceae</b>	<b>Sunflower family</b>		
<i>Ambrosia chamissonis</i>	beach bur	Yes	
<i>Anthemis cotula</i>	mayweed	No	
<i>Artemisia californica</i>	California sagebrush	Yes	
<i>Artemisia douglasiana</i>	mugwort	Yes	
<i>Baccharis pilularis var. consanguinea</i>	coyote brush	Yes	
<i>Baccharis salicifolia</i>	mule fat	Yes	
<i>Carduus pycnocephalus</i>	Italian thistle	No	
<i>Centaurea calcitrapa</i>	purple star thistle	No	
<i>Centaurea melitensis</i>	tocolote	No	
<i>Chamomilla suaveolens</i>	pineapple weed	No	
<i>Cirsium vulgare</i>	bull thistle	No	Invasive weed

Scientific Name	Common Name	Native	Species Status / Notes
<i>Cotula coronopifolia</i>	brass buttons	No	
<i>Cynara cardunculus</i>	artichoke thistle	No	
<i>Delairea odorata</i>	Cape Ivy	No	
<i>Eriophyllum staechadifolium</i>	seaside golden yarrow	Yes	
<i>Gnaphalium stramineum</i>	everlasting cudweed	Yes	
<i>Grindelia stricta</i> var. <i>platyphylla</i>	Pacific gumplant	Yes	
<i>Helianthus annuus</i>	sunflower	Yes	
<i>Hemizonia congesta</i> ssp. <i>congesta</i>	hayfield tarweed	Yes	
<i>Hemizonia congesta</i> ssp. <i>luzulifolia</i>	hayfield tarweed	Yes	
<i>Isocoma menziesii</i>	Menzies' goldenbush	Yes	
<i>Jaumea carnosa</i>	fleshy jaumea	Yes	
<i>Lessingia glandulifera</i> var. <i>pectinata</i>	valley Lessingia	Yes	
<i>Picris echioides</i>	bristly ox-tongue	No	
<i>Silybum marianum</i>	milk thistle	No	
<i>Sonchus oleraceus</i>	sow thistle	No	
<i>Taraxacum officinale</i>	dandelion	No	
<b>Boraginaceae</b>	<b>Borage family</b>		
<i>Heliotropium curassavicum</i>	salt heliotrope	Yes	
<b>Brassicaceae</b>	<b>Mustard family</b>		
<i>Abronia maritima</i>	red sand verbena	Yes	List 4.2
<i>Brassica nigra</i>	black mustard	No	
<i>Cakile maritima</i>	sea rocket	No	Invasive Weed
<i>Cardaria draba</i>	heart-podded hoary cress	No	Invasive Weed
<i>Hirschfeldia incana</i>	summer mustard	No	
<i>Lobularia maritima</i>	sweet alyssum	No	
<i>Raphanus sativus</i>	wild radish	No	
<b>Caryophyllaceae</b>	<b>Pink family</b>		
<i>Spergularia bocconi</i>	Boccone's sandspurrey	No	

Scientific Name	Common Name	Native	Species Status / Notes
<b>Chenopodiaceae</b>	<b>Goosefoot family</b>		
<i>Atriplex californica</i>	California saltbush	Yes	
<i>Atriplex leucophylla</i>	beach saltbush	Yes	
<i>Atriplex semibaccata</i>	Australian saltbush	No	Invasive Weed
<i>Chenopodium album</i>	pigweed	No	
<b>Convolvulaceae</b>	<b>Morning glory family</b>		
<i>Calystegia macrostegia</i>	coast morning glory	Yes	
<i>Convolvulus arvensis</i>	bindweed	No	
<b>Crassulaceae</b>	<b>Stonecrop family</b>		
<i>Dudleya lanceolata</i>	southern California dudleya	Yes	
<b>Euphorbiaceae</b>	<b>Spurge family</b>		
<i>Euphorbia peplus</i>	petty spurge	No	
<b>Fabaceae</b>	<b>Pea family</b>		
<i>Acacia longifolia</i>	golden wattle	No	
<i>Astragalus nuttallii</i> var. <i>nuttallii</i>	Loco weed	Yes	
<i>Lotus corniculatus</i>	bird's foot trefoil	No	
<i>Lupinus succulentis</i>	succulent lupine	Yes	
<i>Melilotus indica</i>	sourclover	No	
<i>Vicia sativa</i>	spring vetch	No	
<b>Frankenaceae</b>	<b>Frankenia family</b>		
<i>Frankenia salina</i>	Alkali heath	Yes	
<b>Geraniaceae</b>	<b>Geranium family</b>		
<i>Erodium cicutarium</i>	red-stemmed filaree	No	
<b>Malvaceae</b>	<b>Mallow family</b>		
<i>Malva neglecta</i>	common mallow	No	
<b>Myoporaceae</b>	<b>Myoporum family</b>		
<i>Myoporum laetum</i>	myoporum	No	
<b>Onagraceae</b>	<b>Evening primrose family</b>		

Scientific Name	Common Name	Native	Species Status / Notes
<i>Camissonia cheiranthifolia</i>	beach Primrose	Yes	
<b>Oxalidaceae</b>	<b>Woodsorrel family</b>		
<i>Oxalis corniculata</i>	creeping wood sorrel	No	
<i>Oxalis pes-caprae</i>	Bermuda buttercup	No	
<b>Papaveraceae</b>	<b>Poppy family</b>		
<i>Eschscholzia californica</i>	California poppy	Yes	
<b>Plantaginaceae</b>	<b>Plantain family</b>		
<i>Plantago erecta</i>	California plantain	Yes	
<i>Plantago lanceolata</i>	English plantain	No	
<i>Plantago coronopus</i>	cut leaf plantain	No	
<b>Polygonaceae</b>	<b>Buckwheat family</b>		
<i>Rumex acetosella</i>	sheep sorrel	No	
<i>Rumex crispus</i>	curly dock	No	
<b>Primulaceae</b>	<b>Primrose family</b>		
<i>Anagalis arvensis</i>	scarlet pimpernel	No	
<b>Rhamnaceae</b>	<b>Buckthorn family</b>		
<i>Ceanothus gloriosus</i> 'heart's desire'	Heart's desire	No	Ornamental Variety
<b>Rosaceae</b>	<b>Rose family</b>		
<i>Potentilla anserina</i> ssp. <i>pacifica</i>	Pacific potentilla	Yes	
<i>Rubus ursinus</i>	California blackberry	Yes	
<b>Scrophulariaceae</b>	<b>Figwort family</b>		
<i>Mimulus aurantiacus</i>	sticky monkey flower	Yes	
<b>Solanaceae</b>	<b>Nightshade family</b>		
<i>Solanum xanti</i>	white nightshade	Yes	
<b>Tropaeolaceae</b>	<b>Nasturtium family</b>		
<i>Tropaeolum majus</i>	garden nasturtium	No	
<b>Verbenaceae</b>	<b>Verbena family</b>		
<i>Verbena lasiostachys</i>	common vervain	No	



Scientific Name	Common Name	Native	Species Status / Notes
ANGIOSPERMS (MONOCOTS)			
<b>Cyperaceae</b>	<b>Sedge family</b>		
<i>Scirpus pungens</i>	three-square	Yes	
<b>Iridae</b>	<b>Iris family</b>		
<i>Sisyrinchium bellum</i>	blue-eyed-grass	Yes	
<b>Liliaceae</b>	<b>Lily family</b>		
<i>Asparagus asparagoides</i>	African asparagus fern	No	Invasive Weed
<b>Poaceae</b>	<b>Grass family</b>		
<i>Avena barbata</i>	slender wild oats	No	
<i>Bromus catharticus</i>	Rescue grass	No	
<i>Bromus diandrus</i>	ripgut brome	No	
<i>Bromus hordeaceus</i>	soft chess brome	No	
<i>Bromus madritensis ssp. madritensis</i>	Spanish brome	No	
<i>Cynodon dactylon</i>	Bermuda grass	No	
<i>Distichlis spicata</i>	saltgrass	Yes	
<i>Hordeum brachyantherum</i>	meadow barley	Yes	
<i>Hordeum marinum ssp. gussoneanum</i>	Mediterranean barley	No	
<i>Lolium multiflorum</i>	Italian ryegrass	No	
<i>Nassella pulchra</i>	purple needle-grass	Yes	
<i>Pennisetum clandestinum</i>	kikuyu grass	No	
<i>Polypogon monspeliensis</i>	annual beard grass	No	
<i>Sisyrinchium bellum</i>	blue-eyed grass	Yes	

**Table D-4. Wildlife Species Observed on the Morro Bay to Cayucos Bike Path Site  
May 22, 2009 and July 2, 2009**

Scientific Name	Common Name
Birds	
<i>Aechmophorus occidentalis</i>	Western grebe
<i>Pelecanus occidentalis</i>	Brown pelican
<i>Ardia herodias</i>	great blue heron
<i>Ardea alba</i>	great egret
<i>Cathartes aura</i>	turkey vulture
<i>Buteo lineatus</i>	red-shouldered hawk
<i>Larus occidentalis</i>	Western gull
<i>Zenaidura macroura</i>	Morning dove
<i>Sayornis nigricans</i>	Black phoebe
<i>Corvus brachyrhynchos</i>	American crow
<i>Hirundo rustica</i>	barn swallow
<i>Mimus polyglottos</i>	Northern mockingbird
<i>Agelaius phoeniceus</i>	Red-winged blackbird
<i>Euphagus cyanocephalus</i>	Brewer's blackbird
Mammals	
<i>Spermophilus beecheyii</i>	California ground squirrel
<i>Oryctolagus cuniculus</i>	cotton-tail rabbit
Reptiles	
<i>Sceloporus occidentalis</i>	Western fence lizard
<i>Pituophis melanoleucus</i>	Gopher snake
Gastropods	
<i>Helminthoglypta umbilicata</i>	Big sur shoulderband snail
<i>Helix aspersa</i>	common garden snail

**Appendix E.**  
**Bluff Retreat Study and Geotechnical Feasibility Report**  
**(Earth Systems Pacific 2008)**



**GEOLOGIC BLUFF STUDY AND GEOTECHNICAL  
FEASIBILITY EVALUATION  
MORRO BAY – CAYUCOS  
CONNECTOR TRAIL/BIKE PATH  
HIGHWAY 1  
SAN LUIS OBISPO COUNTY, CALIFORNIA**

February 15, 2008

Prepared for

County of San Luis Obispo

Prepared by

Earth Systems Pacific  
4378 Old Santa Fe Road  
San Luis Obispo, CA 93401

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## Earth Systems Pacific

4378 Old Santa Fe Road  
San Luis Obispo, CA 93401-8116

(805) 544-3276 • FAX (805) 544-1786  
mailto:respc@earthsys.com  
FILE NO.: SL-15272-GA

February 15, 2008

Ms. Jan Dileo  
County of San Luis Obispo  
Department of General Services – Parks Administration  
1087 Santa Rosa Street  
San Luis Obispo, CA 93408

PROJECT: MORRO BAY – CAYUCOS CONNECTOR TRAIL/BIKE PATH  
HIGHWAY 1  
MORRO BAY, CALIFORNIA

SUBJECT: Geologic Bluff Study and Geotechnical Feasibility Evaluation

REF.: Proposal to Provide a Geologic Bluff Study and Geotechnical Feasibility  
Evaluation, Morro Bay – Cayucos Connector Trail/Bike Path, Morro Bay,  
California, by Earth Systems Pacific, Doc. No. 0703-037.PRP, dated  
March 2, 2007

Dear Ms. Dileo:

In accordance with your authorization of the referenced proposal, this study has been prepared to determine the effect of the local geologic conditions as related to bluff retreat, erosion and stability for the preferred alignment of the Connector Trail/Bike Path on the west side of Highway One. As part of the study, a long-term bluff retreat rate was also estimated.

A geotechnical feasibility evaluation of the abutment areas on both the east and west sides of the existing Highway One bridge at Toro Creek bridge was also conducted by a Registered Geotechnical Engineer. The purpose of this evaluation was to provide general information regarding site conditions, including identification of any geotechnical characteristics that could constitute a constraint to construction of the proposed abutments. The evaluation was limited to visual observations of the site conditions; no subsurface investigation or laboratory testing was requested or performed. Anticipated foundation requirements and recommendations for a design-level soils engineering report are provided. Four copies of this report are provided for your use.

We appreciate the opportunity to have provided geologic services for this project. If there are any questions concerning this study, please feel free to contact the undersigned at your convenience.

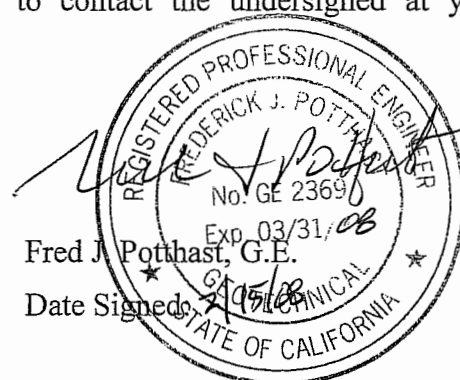
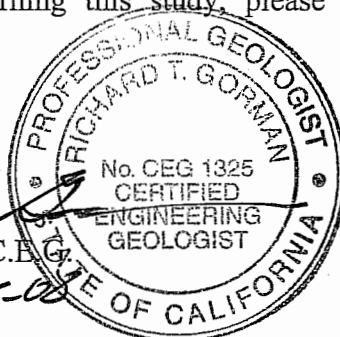
Sincerely,

Earth Systems Pacific

Richard T. Gorman, C.E.G.

Date Signed: 2-15-08

Doc. No.: 0802-084.RPT/l









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## APPENDIX

Path Alignment Plans (6 Sheets)  
Bluff Photographs (7 Sheets)  
Bluff Retreat Analysis Mosaic





## **1.0 INTRODUCTION**

### **Planned Development**

The project will consist of a Connector Trail/Bike Path (herein referred to as the "Bike Path") extending from the north end of Morro Bay to the south end of Cayucos, California. The preferred alignment of the Bike Path is along the west side of Highway 1; if this alignment does not receive California Coastal Commission approval, the alignment will follow the east side of the highway. This report only addresses the geologic conditions of the preferred alignment on the west side of Highway 1; geotechnical feasibility of the abutment areas on both east and west sides of the existing Highway 1 bridge over Toro Creek was evaluated.

The section of the Bike Path addressed for the geologic bluff study extends along the edge of the ocean bluff from the north end of Toro Lane in Morro Bay to the south end of Studio Drive in Cayucos, (see the Path Alignment Plans in the Appendix). With the exception of a bridge crossing at Toro Creek and where it will cross an existing rock rip-rap protection structure, the Bike Path will be surfaced with asphalt concrete. Wood planking will most likely be used for the bridge deck and to span the rip-rap. New abutments will be necessary to support the bridge over Toro Creek; it is unlikely that the existing Highway 1 bridge will be augmented or enlarged to support the Bike Path.

For our study, we were provided with the appended as Path Alignment Plans prepared by Boyle Engineers Group.

### **Purpose and Scope of Work**

#### Geologic Bluff Study

The purpose of the bluff study was to evaluate the on-site geologic structure, stratigraphy, and geomorphology that would influence bluff retreat and stability. This study encompassed the following work:

1. Review of geologic maps, topographic maps and reports pertinent to the area.



Morro Bay-Cayucos  
Connector Trail/Bike Path

February 15, 2008

2. Field mapping of geologic features observable at the ground surface along the proposed Bike Path and on the bluff face.
3. Analysis of the accumulated data.
4. Bluff retreat analysis.
5. Preparation of this report with associated graphics.

This report is intended to be in accordance with the requirements of the San Luis Obispo County Coastal Zone Land Use Ordinance, and common engineering geologic practices in this area under similar conditions at this time.

Geotechnical Feasibility Evaluation

The purpose of the geotechnical feasibility evaluation was to provide general information regarding site conditions, including identification of any geotechnical characteristics that could constitute a constraint to construction of bridge abutments. The evaluation encompassed limited visual observations of the site conditions only; no subsurface investigation or laboratory testing was requested or performed. Anticipated foundation requirements and recommendations for a design-level soils engineering report are provided. The evaluation was conducted in accordance with common geotechnical engineering practices in this area under similar conditions at this time.

**Site Setting**

The Bike Path is planned to extend from the north end of Morro Bay to the south end of Cayucos, a distance of approximately 1 mile. The alignment is bounded to the west by an ocean bluff and the Pacific Ocean, and to the east by Highway 1. The route is essentially flat, with one crossing over Toro Creek. The ocean bluff varies in height from about 6 feet at the northern end to about 25 feet at the southern end.



## **2.0 GEOLOGIC BLUFF CONDITIONS**

The bluff generally consists of a gently westerly sloping wave cut terrace that is capped predominantly by marine terrace deposits. Parts of the bluff face and bluff top are covered by sand dune deposits. In some areas along the bluff the wind blown dune sand accumulates on the bluff top and bluff face extending these areas towards the ocean causing an accretion effect of the bluff. Descriptions of geologic features in the bluff are addressed in the following text. The geologic features are identified on the Bluff Photographs in the Appendix.

### Feature 1

Sandstone bedrock is exposed in the lower half of the bluff face. The bedrock is approximately 5 feet high and overlain by 5 feet of marine terrace deposits. The top of bluff is covered with a thick growth of ice plant. The bluff face is cut by an erosional gully created by drainage from a culvert below Highway 1.

### Feature 2

A small pocket beach is present in this area. The sandstone bedrock exposed in the bluff face is less than 3 feet high, and is overlain by 4 to 5 feet of marine terrace deposits.

### Feature 3

Sandstone bedrock is approximately 5 to 7 feet high, and is overlain by 2 to 4 feet of terrace deposits. The bedrock forms a small point at this location.

### Feature 4

This bluff area consists of two small pocket beaches that were formed by surface water erosion of the bluff top, and sea wave attack at the bottom. The bluff face in this area exposes about 5 to 6 feet of terrace deposits.

### Feature 5

In this location there is an isolated block of sandstone exposed in the bluff face that is bounded both upcoast and downcoast by terrace deposits. Dune sand/beach deposits cover the lower part



of the bluff. Down coast of Feature 5, the sandstone bedrock appears to have been eroded and/or covered with dune sand, it is not exposed in the bluff face.

#### Feature 6

In this area the ocean bluff consists of a small exposure of terrace deposits that are capped by dune sand deposits. The dune sand is covered with a thick growth of ice plant.

#### Features 7a & 7b

This stretch of ocean bluff consists of occasional isolated blocks of metavolcanic/serpentine rock that are approximately 3 to 6 feet high, capped by 4 to 5 feet of terrace deposits and dune sand. The bedrock appears to be generally buried in this area, as only terrace deposits and dune sand are exposed in the bluff face.

#### Feature 8

Toro Creek has eroded a corridor through the bluff at this location. The bluff up coast of the creek consists of a thick deposit of dune sand that has buried the bedrock and terrace deposits. Alluvium capped by dune sand was observed downcoast of the creek.

#### Feature 9

A wooden post and plank structure is present along the bluff and it appears to be in good condition. This structure was the landfall of a pier used for off-loading of tanker ships for storage at the facility on the east side of Highway 1. The pier was never rebuilt after its destruction during winter storms in the early 1980s.

#### Feature 10

Adjacent to the post and plank structure, dune sand has buried a rip-rap bluff protection structure. The rip-rap structure is exposed approximately 200 feet downcoast and extends to a broad, rocky sandstone point. A small cluster of rip-rap is exposed adjacent to a drainage culvert downcoast of the post and plank structure.



#### Feature 11

A rip-rap structure lies along the ocean side shoulder of Highway 1. It is approximately 6 feet high and about 300 feet long. Although some boulders have fallen off the structure face and onto the beach, the structure appears to be in good condition.

#### Feature 12

A broad, sandstone rock point lies at the southern end of the proposed Bike Path. Sandstone is exposed in the bluff face, which varies from 15 to 25 feet high.

### **3.0 BLUFF RETREAT**

#### **Methodology**

To estimate the bluff retreat rate at the site, a historical aerial photograph analysis was conducted. For this analysis, primary data consisted of vertical stereographic aerial photographs proximal to and covering the site acquired in November, 1963 and May, 2005. These photographs were interpreted in combination with USGS topographic maps, oblique pictorial aerial photography and *in situ* ground level imagery.

The aerial photographs and site-specific ancillary data were processed and compiled in a digital database at a common format and scale. Stereographic interpretation of the aerial photography was first performed to determine the bluff conditions in 1963. These conditions were then combined with data derived by similar interpretation of the 2005 photography. Bluff edge locations for the two dates were co-registered and measurements were made using standard manual photogrammetric procedures and digital image processing and geographic information system techniques. Areas of maximum erosion and accretion were identified and measured. Annual maximum bluff loss and accretion rates were calculated for the 42 year period between November, 1963 and May, 2005. These results were then used to project maximum bluff loss and accretion for a 100 year period, as indicated on the Bluff Retreat Analysis Mosaic in the Appendix.



This analysis indicates that during the period between November, 1963 and May, 2005:

1. The maximum bluff retreat on the site was measured at 62 feet.
2. The maximum bluff accretion on the site was measured at 58 feet.
3. The maximum bluff retreat rate was calculated as 17.7 inches/yr.
4. The maximum bluff accretion rate was calculated as 16.8 inches/yr.
5. The maximum projected 100 year bluff retreat was calculated as 147.5 ft.

#### **4.0 GEOTECHNICAL EVALUATION OF BRIDGE ABUTMENTS**

On September 4, 2007, a Registered Geotechnical Engineer of this firm conducted a site reconnaissance of the east and west sides of the Highway 1 bridges over Toro Creek where a bridge structure is anticipated for the Bike Path. As the project is in the planning stages, the location of the proposed bridge (i.e. the east or west side of Highway 1) has not been identified. We have assumed that, regardless of its location, the Bike Path bridge will likely be placed immediately adjacent, but not structurally connected to, the highway bridges.

We understand that the bridge is envisioned to be a prefabricated clear span structure, supported only at the abutment ends. The bridge is anticipated to be designed for pedestrian and bicycle use only, and will not carry vehicle loads. Depending on the exact locations of the abutments, the span width may be in the range of 110 to 130 feet.

It appears that the existing Highway 1 bridges are supported by three rows of columns each, probably bearing on driven or drilled piles well below the bottom of the creek, with abutments at each end. Support for the existing abutments at the ends (either piles or conventional foundations) could not be determined during the field reconnaissance. The north and south banks of the creek on the west side of the bridges, as well as the areas beneath both bridges, are armored with rip-rap. Rip-rap and possible remnants of another bridge foundation are also present on the south creek bank, on the east side of the bridges. Significant vegetation precluded





February 15, 2008

a thorough examination of the north side of the creek bank on the east side of the bridges, however it appears that there may be little if any rip-rap armoring of the creek bank in this area. It also appears that some of the rip-rap below the bridges has sloughed into the creek, at least to the first line of columns on both sides of the creek.

The creek bank material below the rip-rap is alluvium, with bedrock at depth. The alluvium may be poorly consolidated above the bedrock, and there is a potential that the creek bank areas may be susceptible to liquefaction and lateral spreading in the event of a seismic event. The alluvial soils may also be expansive, which could have a minor effect on the foundation system and any adjacent approach pavement.

Considering the planned clear span distance over Toro Creek, the proposed Bike Path bridge will probably generate moderate foundation loads. Abutments located behind the top of the creek bank supported by conventional foundations may be possible, but the depth required to reach competent material and support the anticipated loads, while mitigating the possible effects of liquefaction and lateral spreading, may be significant. Also, as the exact thickness of the rip-rap armoring on the creek banks is unknown, it may be necessary to remove a considerable amount of the rip-rap in order to establish the foundation area to support the abutments. In our opinion, a more feasible foundation alternative may be the placement of drilled, cast-in-place caissons or driven piles to support the abutments. Drilling for caissons or driving of the piles may only require the removal of rip-rap in a limited area. The caissons/piles could be constructed with their tops closer to the existing grade, thus requiring less excavation for a final grade beam/abutment structure to connect the caissons/piles and support the bridge. A caisson/pile foundation would also provide ample capacity for support, which may allow a slightly longer clear span length for the bridge, thus reducing the potential to impact the creek and its banks during and after construction. Lastly, a properly designed caisson/pile foundation would mitigate the potential for liquefaction, lateral spreading and/or slumping of the creek banks to affect the structure.



## **5.0 CONCLUSIONS AND RECOMMENDATIONS**

### **Bluff Retreat**

Based on the results of the bluff retreat analysis, the maximum bluff retreat was estimated to 17.7 inches per year in the vicinity of Geologic Features 1 through 8. In some areas along this part of the proposed Bike Path dune sand has been deposited on the bluff top and face, causing accretion of the bluff. This dune sand bluff accretion was neglected in the retreat analysis due to its low resistance to sea wave erosion. Using the bluff retreat rate of 17.7 inches per year, the setback distance would be approximately 147 feet, which in most areas would be within the current alignment of Highway 1. In the vicinity of Features 8 through 11, a bluff retreat rate could not be established due to the extensive grading that took place in the late 1950's and early 1960's, and the presence of the rip-rap that was placed in the early 1960's. As the bluff top in this area is less than 15 feet from the west edge of pavement Highway 1, the proposed Bike Path would likely be within the setback zone. North of Toro Creek, the Bike Path will also be within the setback zone. As the Bike Path is considered to be a sacrificial structure, it is our understanding that it cannot be protected from sea wave impact or erosion. If the Bike Path is severely damaged due sea wave impact or erosion, it is recommended that provisions be made to remove any resultant from the public beach area.

### **Bridge Abutments**

All of the impacts discussed in Section 5.0 above are considered significant but mitigable. The final site selected for the structure should be addressed in a soils engineering report conforming to the applicable sections of the California Building Code. A subsurface exploration and analysis should be performed to determine the potential for liquefaction and lateral spreading. Laboratory tests should be performed to determine the strength and expansion characteristics of the bearing materials. The report should present seismic parameters for use in structural design, and should contain recommendations, as applicable, for mitigation of erosion, liquefaction, lateral spreading and surficial slumping along the creek banks. The design and construction of the proposed structure should conform to the recommendations presented in the soils report and the applicable sections of the California Building Code.



## **6.0 CLOSURE**

This report is valid for conditions as they exist at this time for the type of protection structure described herein. Our intent was to perform this study in a manner consistent with the level of care and skill ordinarily exercised by members of the profession currently practicing in the locality of this project under similar conditions. No representation, warranty, or guarantee, is either expressed or implied.

If changes to the project become necessary, if items not addressed in this report are incorporated into plans, or if any of the assumptions stated in this report are not correct, this firm should be notified to provide modifications as necessary to this report. Any items not specifically addressed in this report are beyond our scope of services.

If future property owners wish to use this report, such use will be allowed to the extent the report is applicable, only if the user agrees to be bound by the same contractual conditions as the original client, or contractual conditions that may be applicable at the time of the report's use.

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## REFERENCE

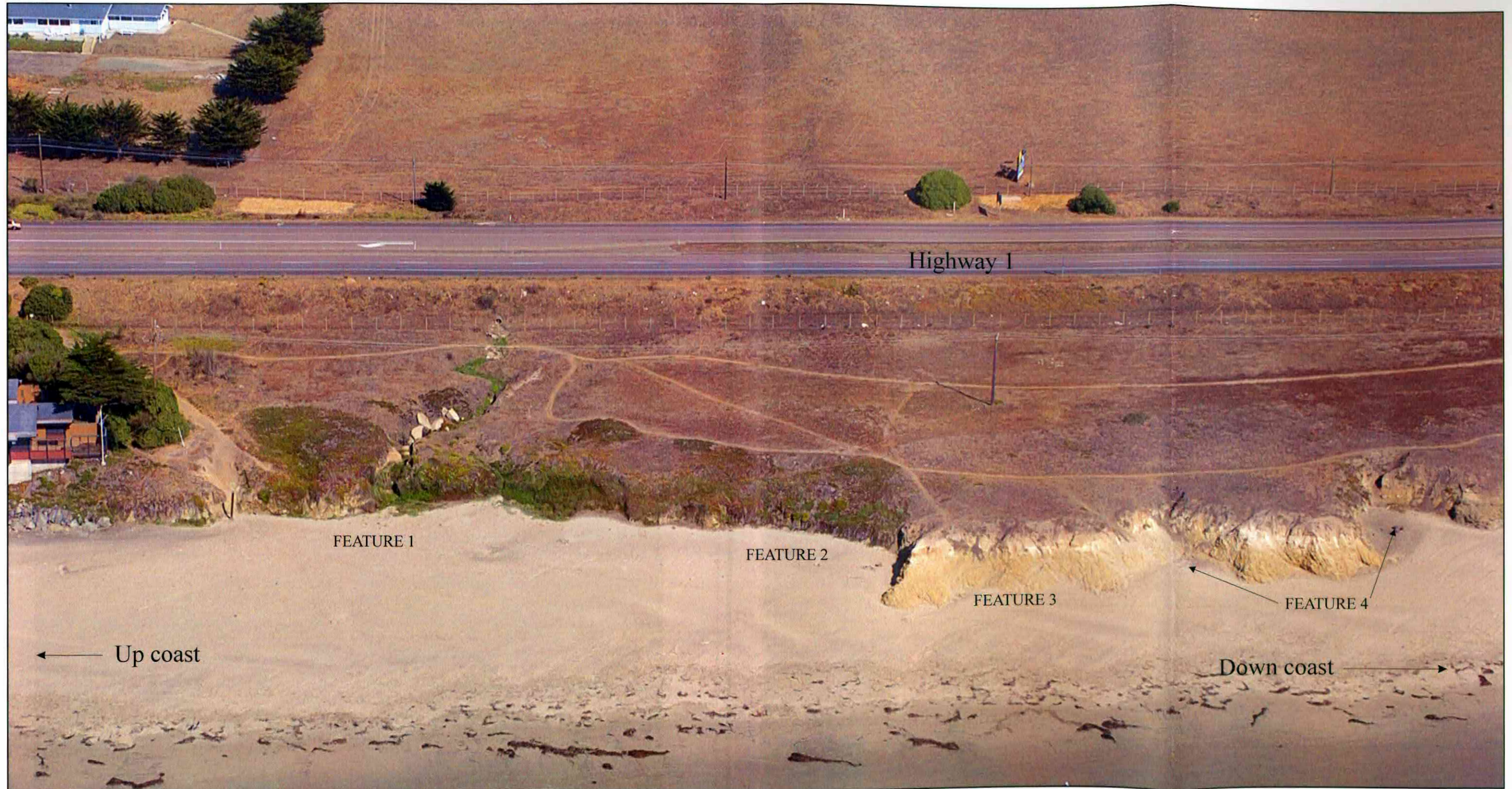
California Building Code, 2001 Edition.



# BLUFF PHOTOGRAPH - GEOLOGIC FEATURES 1 THROUGH 4

MORRO BAY - CAYUCOS CONNECTOR TRAIL/BIKE PATH

Highway 1, Morro Bay, California



**Earth Systems Pacific**

4378 Old Santa Fe Road, San Luis Obispo, CA 93401

February 2008

(805) 544-3276 - (805) 544-1786 Fax

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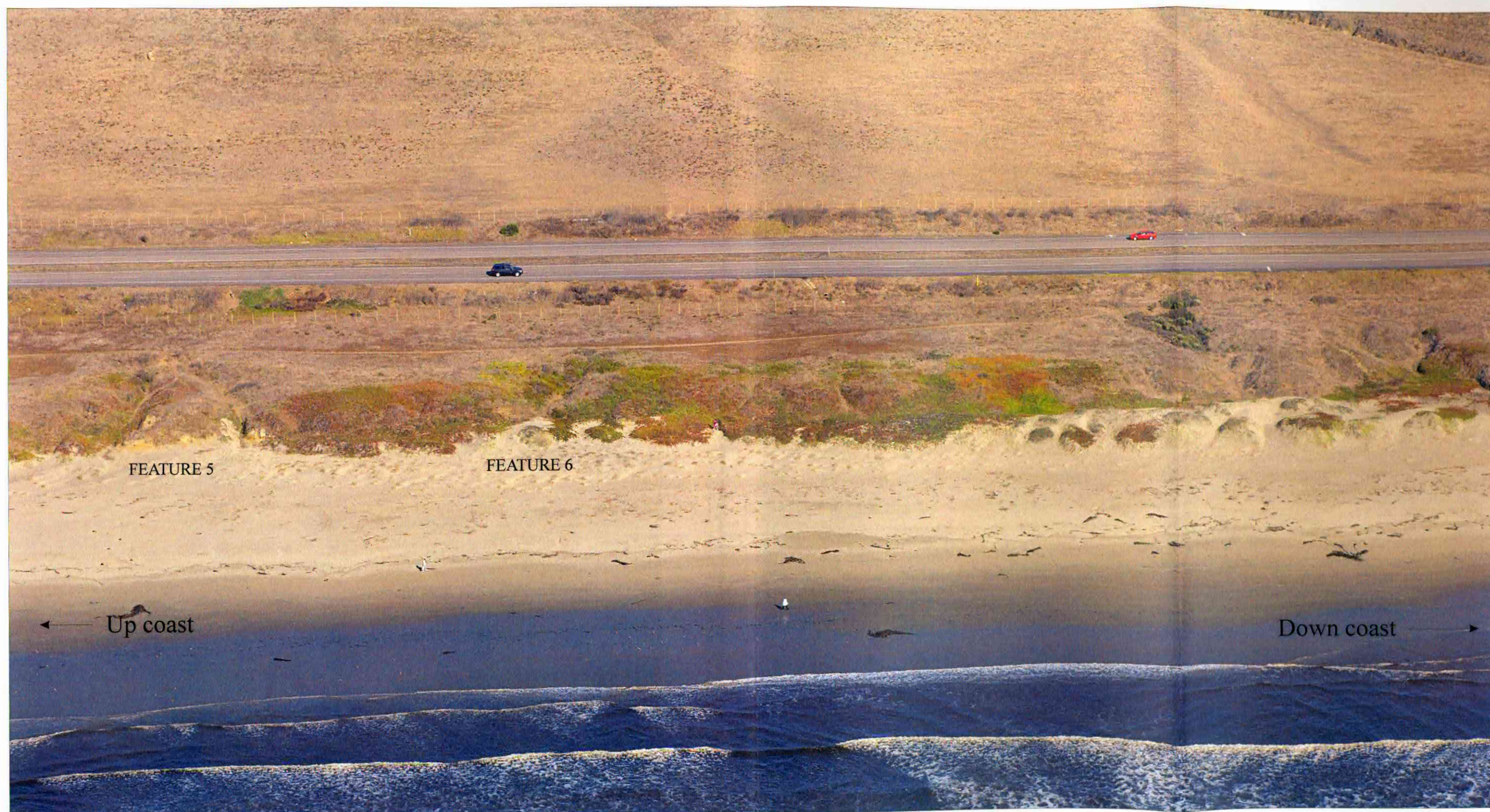
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## BLUFF PHOTOGRAPH - GEOLOGIC FEATURES 5 AND 6

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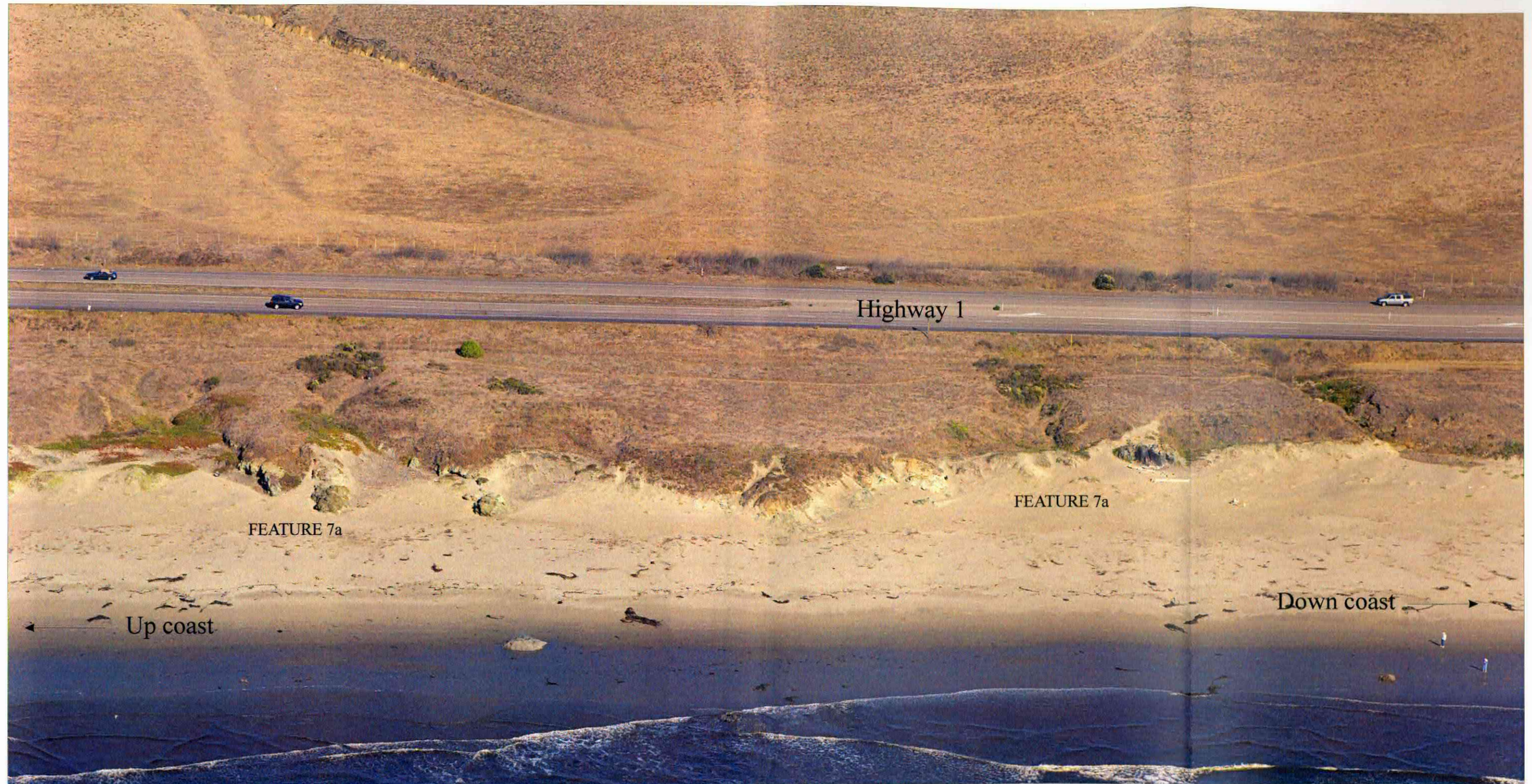
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## BLUFF PHOTOGRAPH - GEOLOGIC FEATURE 7a

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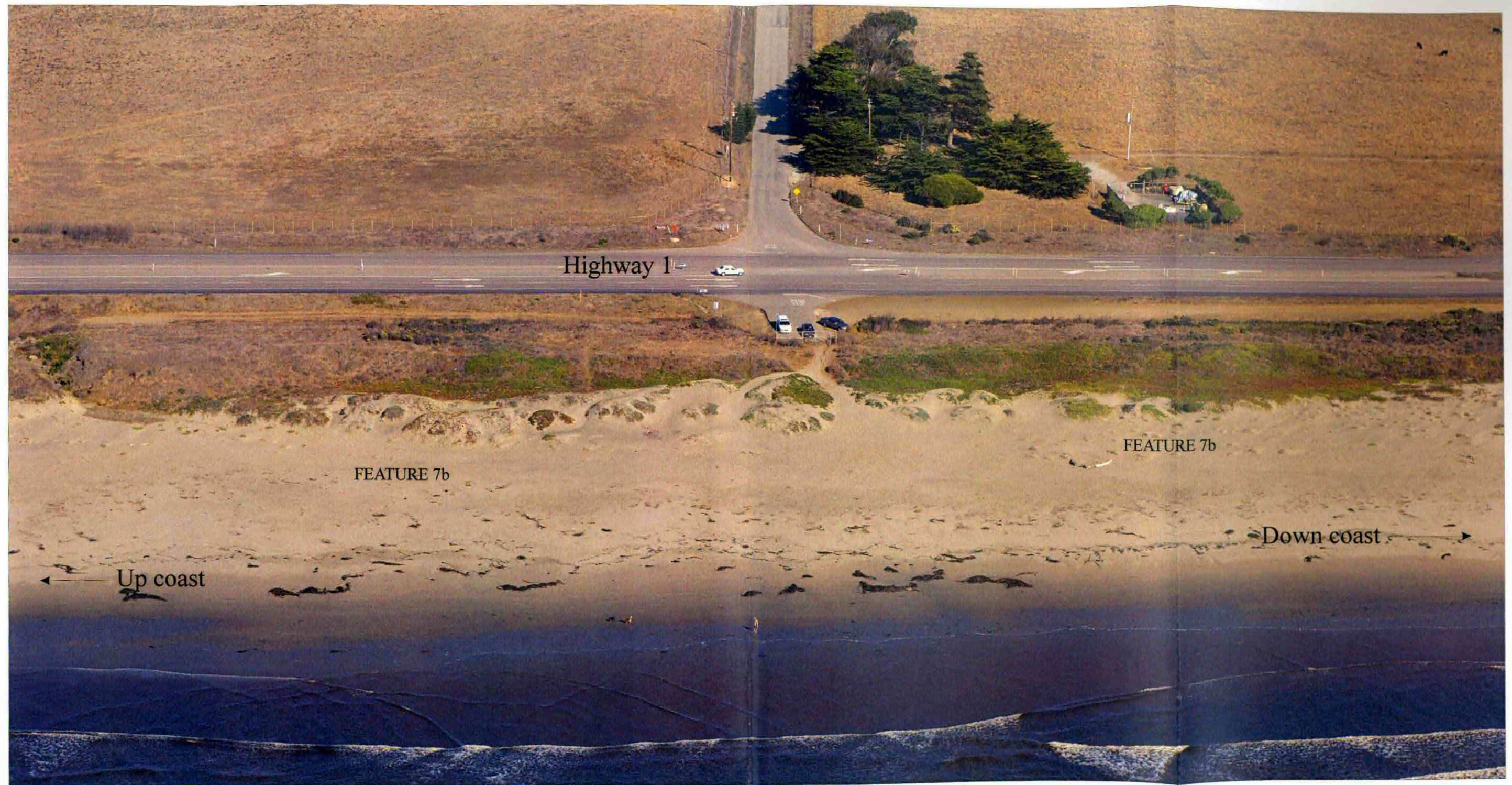
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## BLUFF PHOTOGRAPH - GEOLOGIC FEATURE 7b

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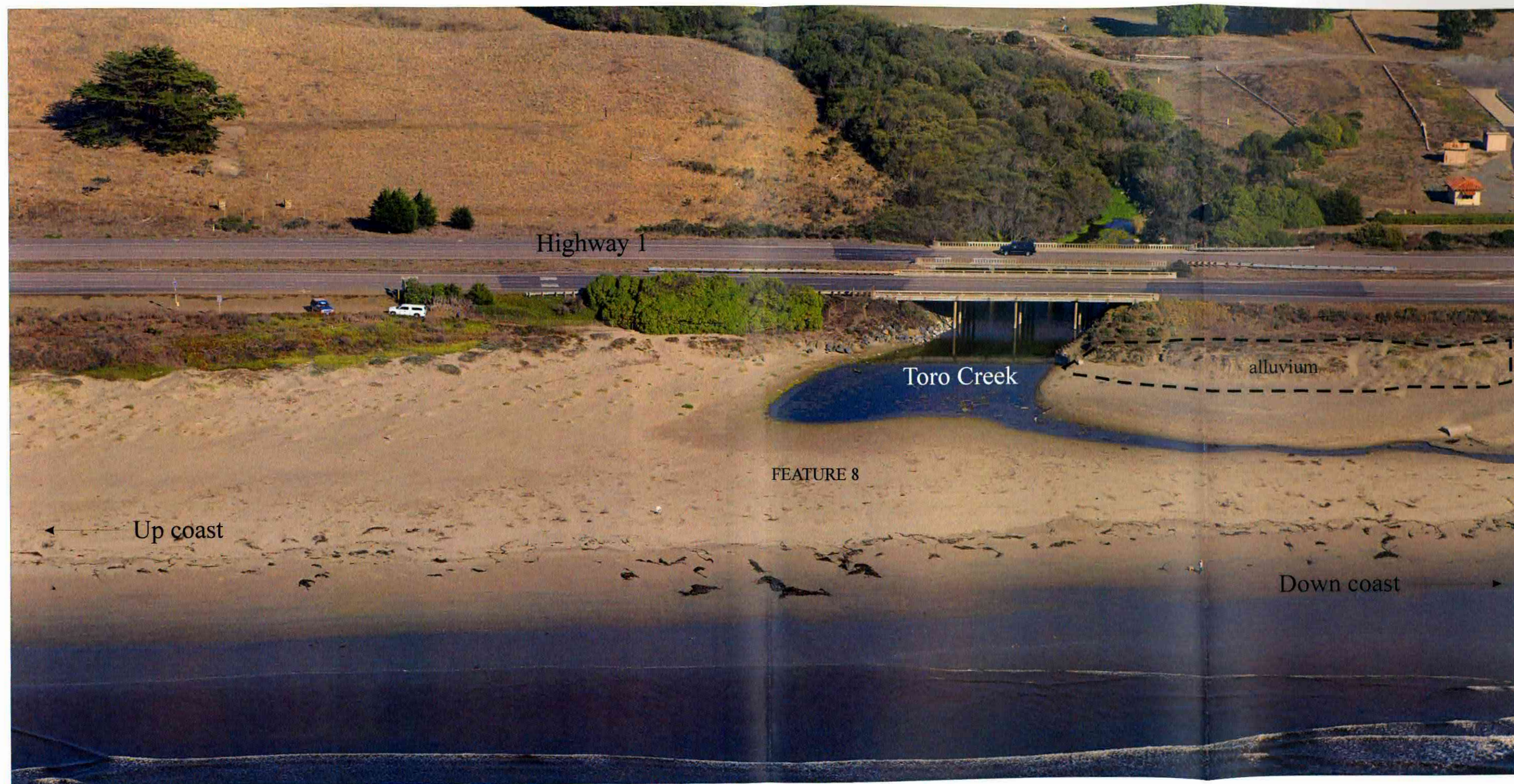
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## BLUFF PHOTOGRAPH - GEOLOGIC FEATURE 8

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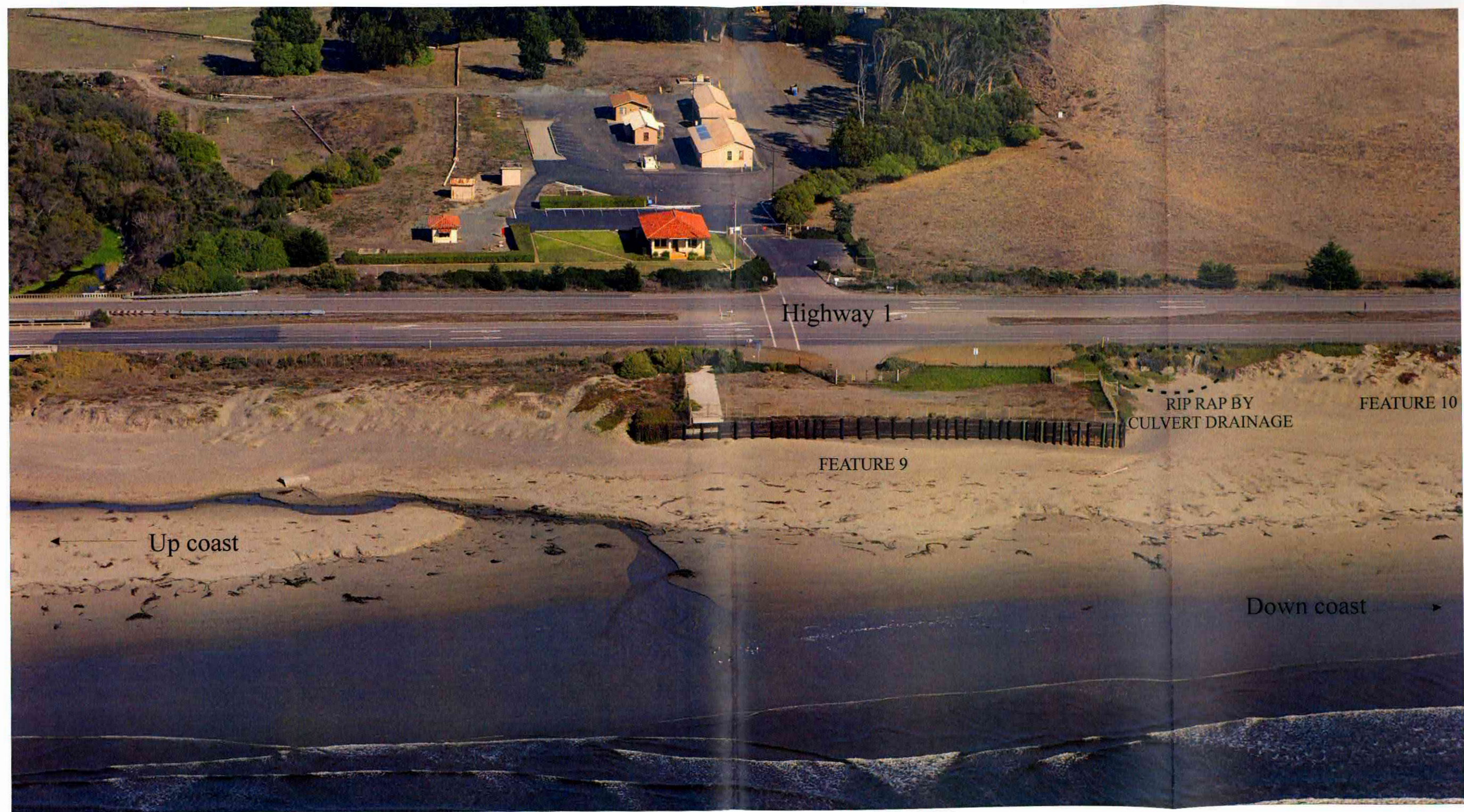
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## BLUFF PHOTOGRAPH - GEOLOGIC FEATURES 9 & 10

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## BLUFF PHOTOGRAPH - GEOLOGIC FEATURES 11 & 12

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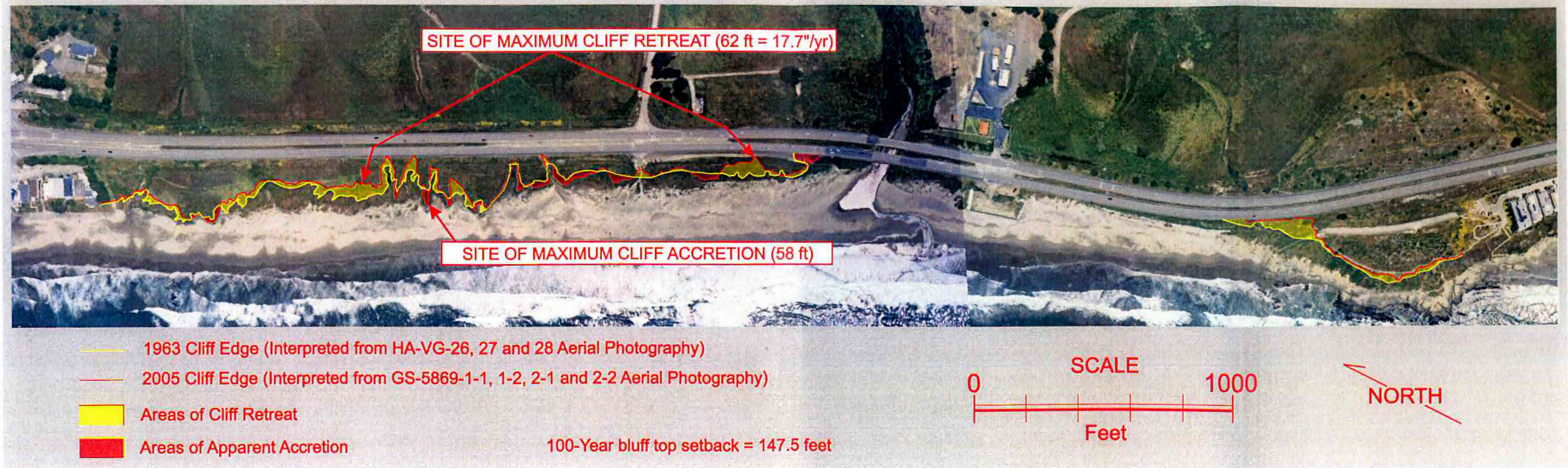
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**BLUFF RETREAT ANALYSIS MOSAIC**  
MORRO BAY - CAYUCOS CONNECTOR TRAIL/BIKE PATH  
Highway 1, Morro Bay, California

**AERIAL PHOTOGRAPH MOSAIC GS-5869-1-2 and 2-2 (5-7-2005)**



**Earth Systems Pacific**

4378 Santa Fe Road, San Luis Obispo, CA 93401  
February 2008

(805) 544-3276 - (805) 544-1786 Fax

[www.earthsys.com](http://www.earthsys.com) - e-mail: [esc@earthsystems.com](mailto:esc@earthsystems.com)

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**Appendix F.**  
**Eastern Alignment Project Description and**  
**Environmental Impacts and Mitigation Measures**



## **Appendix F-1. Eastern Alignment Project Description**

### **A. INTRODUCTION**

The Eastern Alignment Alternative will be described as four segments that relate to the level of improvements necessary. Generally the design criteria described in the Project Description for the proposed project would apply to this alternative as well. Specifically:

- Existing Class III bikeways within the project corridor would be signed as such and identified as part of the Morro Bay to Cayucos Connector.
- The Class I bikeway would be twelve-foot wide (two four-foot travel lanes, and two two-foot shoulders on each side).
- Bridge segments would be 12 feet wide, inside railing to inside railing, with railing heights a minimum of 54 inches above the bikeway surface.
- Segments within five feet of the Highway 1 edge of pavement or in close proximity to the highway and at an elevation above or below the grade of the highway would include a 32-inch high concrete barrier and 22-inch high railing/fence (total height of 54 inches) separating the bikeway from the highway pavement, unless adequate vertical separation exists.
- At-grade segments of the bikeway would be composed of asphaltic-concrete paving over approximately six inches of compacted aggregate base.

### **1. Segment 1: Cloisters Park to Yerba Buena Street**

Segment 1 of the Eastern Alignment Alternative is identical to Segment 1 of the proposed project. It would begin at Cloisters Park and follow an existing Class I bikeway. Once leaving the park, the segment follows Sandalwood Drive, and Beachcomber Lane to Yerba Buena Street (refer to Figure F-1). This segment is approximately 1.3 miles. Segment 1 includes parking facilities that could act as staging for the project at Cloisters Park, the end of Azure Street, and at Atascadero State Beach. No improvements other than signage of the route are proposed for this segment. This segment ends at the intersection of Yerba Buena Street and Highway 1.

### **2. Segment 2: Yerba Buena Street to North End of Cut-slope**

Segment 2 would begin on the north side of Yerba Street at the intersection of Yerba Buena and Main Street. This intersection is currently signalized. Segment 2 would be a Class III bikeway while following Main Street north for approximately 200 feet before entering the Caltrans right-of-way (ROW) across from the end of Zanzibar Street (refer to Figure F-2). The alignment would require the City of Morro Bay to classify this portion of Main Street a Class III bikeway. At that point it would be a Class I bikeway and located within the ROW adjacent to a large, steep cut-slope for approximately 1,800 feet. Due to the limited space between the highway and the cut-slope in this area retaining walls would be required. The base of the retaining wall would begin approximately 6 feet east of the existing edge of pavement and the wall would be approximately 4 feet tall. The bikeway would be 12 feet wide and due to the grade separation between the bikeway and the highway, the 54 inch tall protective railing/fencing described

above would be necessary. North of the cut-slope the bikeway would turn slightly east, leave the ROW and head north on the Chevron property.

### **3. Segment 3: North End of Cut-slope to Ocean Boulevard**

Segment 3 would be an approximately 4,800 (0.9 mile) long Class I bikeway constructed almost entirely at grade. The only exception is at the Toro Creek crossing where a bridge would be required. Caltrans has indicated previously that the northbound Highway 1 bridge may be replaced in the next few years, and it may be possible to incorporate the bikeway into the new bridge design. If not, a new bikeway bridge would be required. If a new bridge is required, it would be located outside of the ROW. Both potential bridge locations are shown on Figure F-3. The new bridge would be a clearspan bridge, twelve feet wide and approximately 120 feet long, similar to the proposed project, with railings 54 inches high. With the exception of the bridge and possibly the approaches, no retaining walls or protective fencing would be required for this segment.

Segment 3 would also cross the Marine Terminal property access road and Toro Creek Road. For safety, some additional striping may be included at these locations. The alignment of Segment 3 would be relatively straight, although a few curves have been added for visual interest and/or to avoid biological resources identified during the 2006 Environmental Constraints Analysis. Segment 3 would end at the south end of Ocean Boulevard.

### **4. Segment 4: South End of Ocean Boulevard to Norma Rose Park**

Segment 4 would be approximately 5,300 feet (1.0 mile) long and extend from the southern end of Ocean Boulevard to the site of Norma Rose Park (refer to Figure 5-4). From this point bicyclists could reach downtown Cayucos via Cabrillo Avenue (adjacent to the cemetery), the short existing Class I bikeway over Old Creek, and 13<sup>th</sup> Street, which crosses under Highway 1 and connects to Ocean Avenue.

Ocean Boulevard is an existing Class III bikeway in the County Bikeways Plan, although no signage currently exists. No improvements for this segment are proposed with the exception of some signage to mark the route. Segment 4 would also include an alternate leg that crosses Highway 1 at Old Creek Road to Studio Drive and heads north to an existing parking lot and beach access at the north end of Studio Drive (refer to Figure F-4). The Old Creek Road crossing is considered the safest place to cross Highway 1 in this area, as it is currently signalized.

### **5. Other Proposed Improvements**

Unlike the proposed project, the Eastern Alignment Alternative does not include any modifications to parking areas, culvert extensions, or the removal of the remnant road. The only bridge required is at Toro Creek.

Some striping would most likely be required near the start of Segment 2 at Zanzibar Street, at the Toro Creek Road crossing, and at the Marine Terminal access road crossing. Proposed signage identifying the bikeways and periodically direct bikeway users would include 42-inch tall wood posts. Low barbed wire or similar cattle fencing may be required on the eastern side of the bikeway to separate the bikeway from the rest of the Chevron property.



## 6. Earthwork and Construction Techniques

The Eastern Alignment would not require significant cut and fill or earthwork, although topographic constraints associated with Segment 2 would require retaining walls. Total earthwork associated with Segment 2 may be approximately 650 cubic yards (1,800 feet long cut 4 foot cut slope). The majority of Segment 3 would be constructed at grade, although some fill would be required at the bridge approaches. Total earthwork for the Eastern Alignment would most likely be less than 2,000 cubic yards and occur over a relatively long period (two months) due to anticipated intensive biological resources mitigation and geographic constraints. The Eastern Alignment would require approximately 42,000 square feet of asphalt (6,600 feet long by eight feet wide). The permanent area of disturbance associated with the bikeway would be approximately 80,000 square feet (6,600 feet long by 12 feet wide).

Excavations would be limited to approximately 6 inches in moist places where the bikeway would be constructed at grade. At the Toro Creek bridge location, bridge abutments would be necessary adjacent to the banks of the creek. Conventional foundations for the bridge would require relatively deep foundations and a large area of excavation. However, based on the geotechnical feasibility report prepared for the project, it is likely that drilled, cast in-place caissons or piers would be used for the bridge foundations. In that case the area of disturbance would be smaller, but the depth of disturbance would be greater, possibly more than 10 feet.

The project site is constrained by Highway 1 and the Marine Terminal. It is likely that construction staging would probably occur at the Marine Terminal parking lot and adjacent paved areas. It is likely that construction of Segment 2 would require the periodic closure of one lane of northbound Highway 1.

Figure F-1. Eastern Alignment Alternative – Segment 1





Figure F-2. Eastern Alignment Alternative – Segment 2

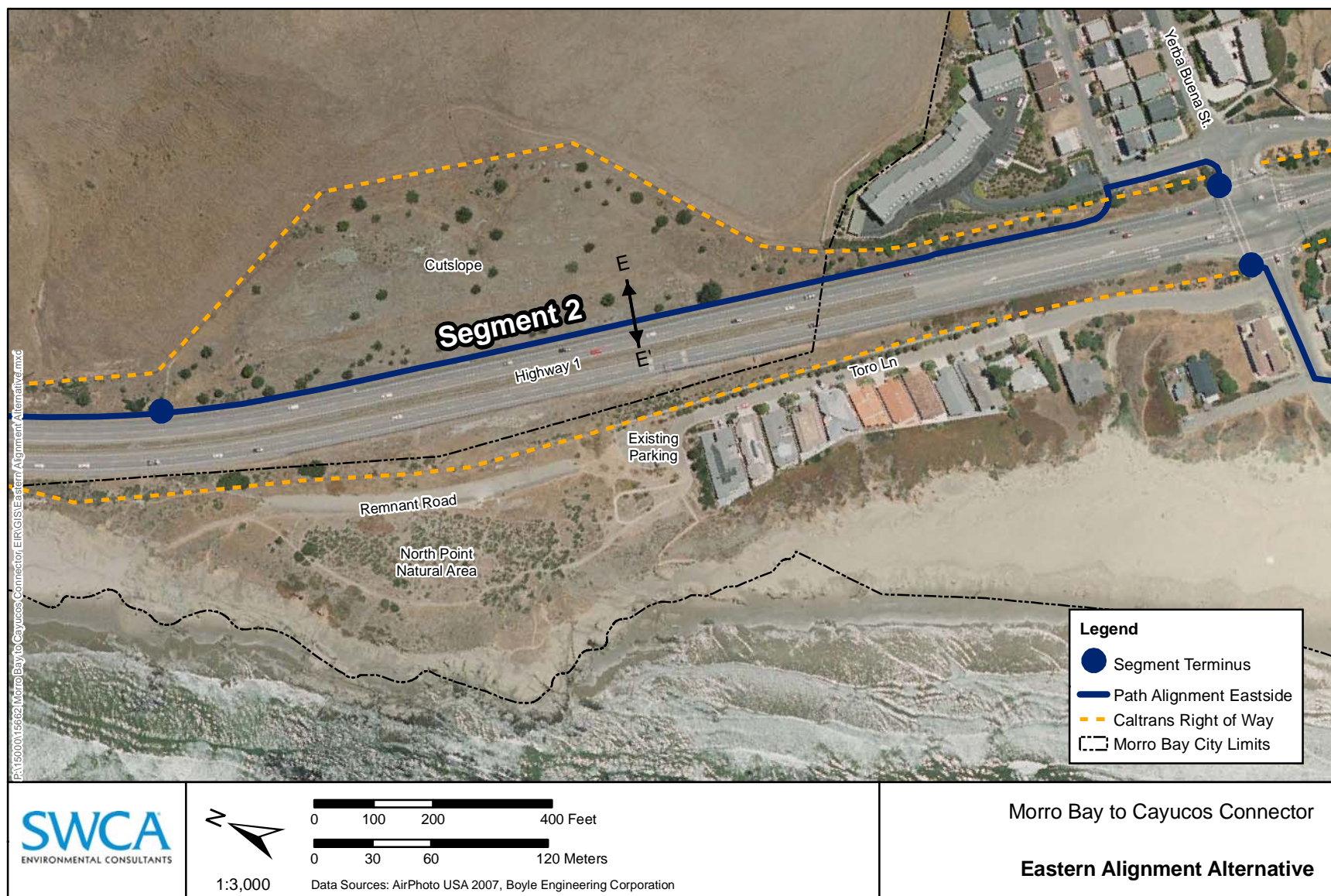




Figure F-3. Eastern Alignment Alternative – Segment 3

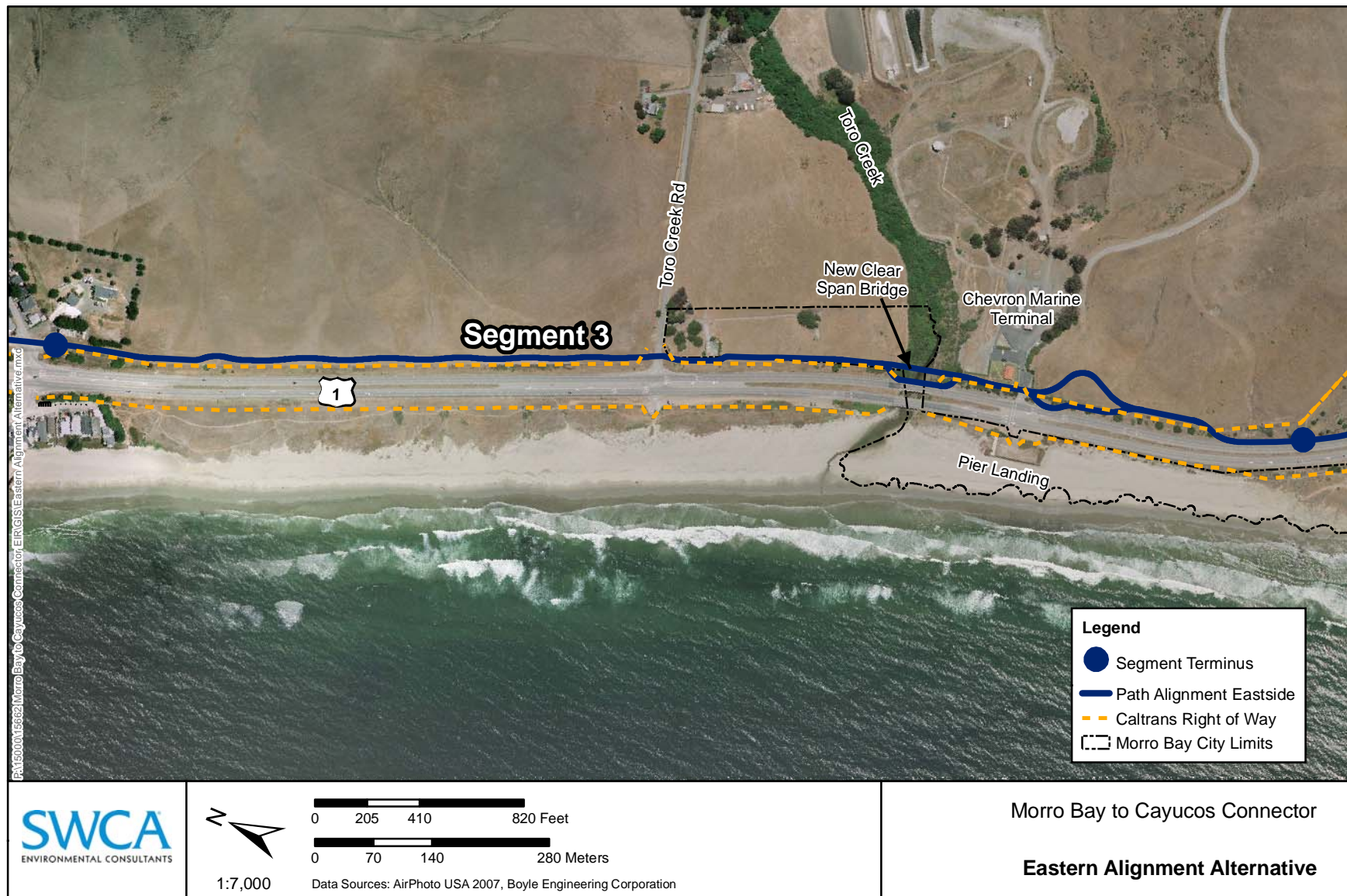
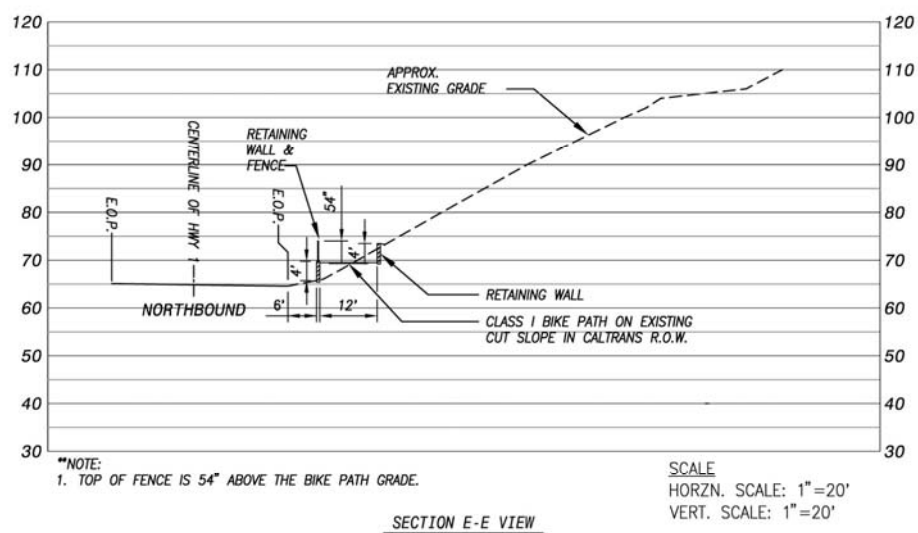




Figure F-4. Eastern Alignment Alternative – Segment 4



**Figure F-5. Eastern Alignment – Cross Section E**



## **Appendix F-2. Eastern Alignment Environmental Impacts and Mitigation Measures**

To reduce redundancy, the Eastern Alignment Environmental Impacts and Mitigation Measures section regularly refers readers to Chapter 4 rather than repeating some sections of the analysis. The Existing Conditions described for the proposed project in Chapter 4 include a project corridor that considers resources on both the east and west sides of Highway 1. This is evident in the Biological Resources section (refer to Figures 4.3), for example. The Regulatory Setting, Thresholds of Significance and Impact Assessment and Methodology described in Chapter 4 are also applicable to the Eastern Alignment and so they are not repeated in this chapter. The other sections are included in this chapter, with some modifications, described below.

Project specific impacts for the Eastern Alignment are provided in this appendix. Impacts are numbered specifically for the Eastern Alignment to avoid confusion and so distinctions can be clearly made in the Alternatives Analysis, although in some cases the impacts are identical to those identified for the proposed project.

To the extent feasible, mitigation measures developed for the proposed project are used to address Eastern Alignment impacts as well. In some cases additional or modified mitigation measures are required. Due to their length, mitigation measures are not repeated; instead the reader should refer to the Executive Summary or Chapter 4. Potential Residual Impacts, Secondary Impacts and Cumulative Impacts resulting from the Eastern Alignment are all described in this Chapter.

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## **A. AESTHETIC RESOURCES**

Segments 1 and 4 of the Eastern Alignment would be located entirely within existing roadways or bikeways. Segments 2 and 3 would require construction of a new bikeway in undeveloped areas. Due to the limited improvements (i.e. signage and/stripping) proposed for Segments 1 and 4, this section omits these Segments from discussion.

Chapter 4 of this EIR describe the site's existing aesthetic resources and conditions, regulatory environment, methods employed to evaluate potential project impacts, and the thresholds of significance utilized to assess the impacts. Please refer to Chapter 4 for detailed discussions of these topics.

### **1. Project-Specific Impacts and Mitigation Measures**

#### **a. Project Visibility**

##### Views from Southbound Highway 1

From south of Chaney Avenue, the bikeway would generally be approximately 125 feet east and five feet higher than the elevation of the Highway 1 southbound lanes. Segment 3 would be slightly visible to the casual observer in this area; however views in this area are dominated by the marine terrace, sandy beach, Pacific Ocean, and distant views of Morro Rock to the west. The vast majority of motorists would be looking west to these areas.

The proposed bridge over Toro Creek would require vegetation removal and would have railings approximately 54 inches tall. The bridge deck would be approximately the same elevation as the northbound Highway 1 bridge. Riparian vegetation in the Highway 1 ROW between the Highway and the new bridge would shield views of the bridge for all but a very short period.

Given the relatively low profile of the bikeway and lack of other improvements, south of Toro Creek the bikeway would remain partially visible from southbound Highway 1. Existing vegetation would partially shield it as well. Views in this area are still dominated by the resources west of the highway although the rolling hills and ridgelines of the Coast Range are clearly visible to the north and east.

As motorists head south the improvements associated with Segment 2, an approximately four foot tall retaining wall and the 54 inch tall barrier system would come into view at the base of the large cutslope. The entire 1,800 foot length of these improvements would be visible to motorists. As with the previous segment, and as discussed in Chapter 2, views in this portion of the corridor are dominated by high quality visual resources west of Highway 1. South of the cutslope, the urbanized areas of the City of Morro Bay dominate and Segment 2 while visible, would look consistent with other existing development at the Yerba Buena intersection.

##### Views from Northbound Highway 1

From northbound Highway 1 the south end of Segment 2 would first be visible from the Yerba Buena intersection as it enters the Highway 1 ROW. Improvements include the Class I bikeway portion of Segment 2 as the Eastern Alignment leaves Main Street at Zanzibar Street. It is likely that motorists would be looking west at views of the beach, ocean and distant ridgelines, but given the proximity to the Highway and the scale, Segment 2 improvements would be highly visible from the northbound Highway 1. The existing views and the views after implementation

of the Eastern Alignment are illustrated in Figure F-A.2a and b, Key Viewing Area 4. Figure F-A.1 identifies the locations of the Key Viewing Areas.

Segment 3 would also be visible from northbound Highway 1; however the low profile of the bikeway and the relatively limited improvements, along with the competing views of the marine terrace and ocean to the west, would limit their visibility to the casual observer. Views of Segment 3 would be shielded by existing vegetation from the south end of Segment 3 to Toro Creek as well. The proposed bridge over Toro Creek would be visible, although it would be substantially shielded by riparian and other vegetation in the Highway 1 ROW.

North of Toro Creek Segment 3 would be slightly visible to motorists. The existing views and the views after implementation of the Eastern Alignment are illustrated in Figure F-A.3a and b, Key Viewing Area 5. The views as shown from KVA 5 are typical of the northern 3,000 feet (0.6 mile) of Segment 3.

### Views from Beaches

Generally beach users would be focused on views of the beach, ocean and horizon to the west, but views of the Coast Ranges and ridgelines, and Toro Creek to the east are exceptional and expansive. Beach users may get a glimpse of the Segment 2 barrier system from the beach but the backdrop and oblique viewing angle would be the cutslope and Highway 1 lanes. Fencing and vehicles would also be visible. Other portions of Segments 2 and 3 would not be visible from the beach due to the distance between the beach and the improvements, topographic changes and the bikeways low profile.

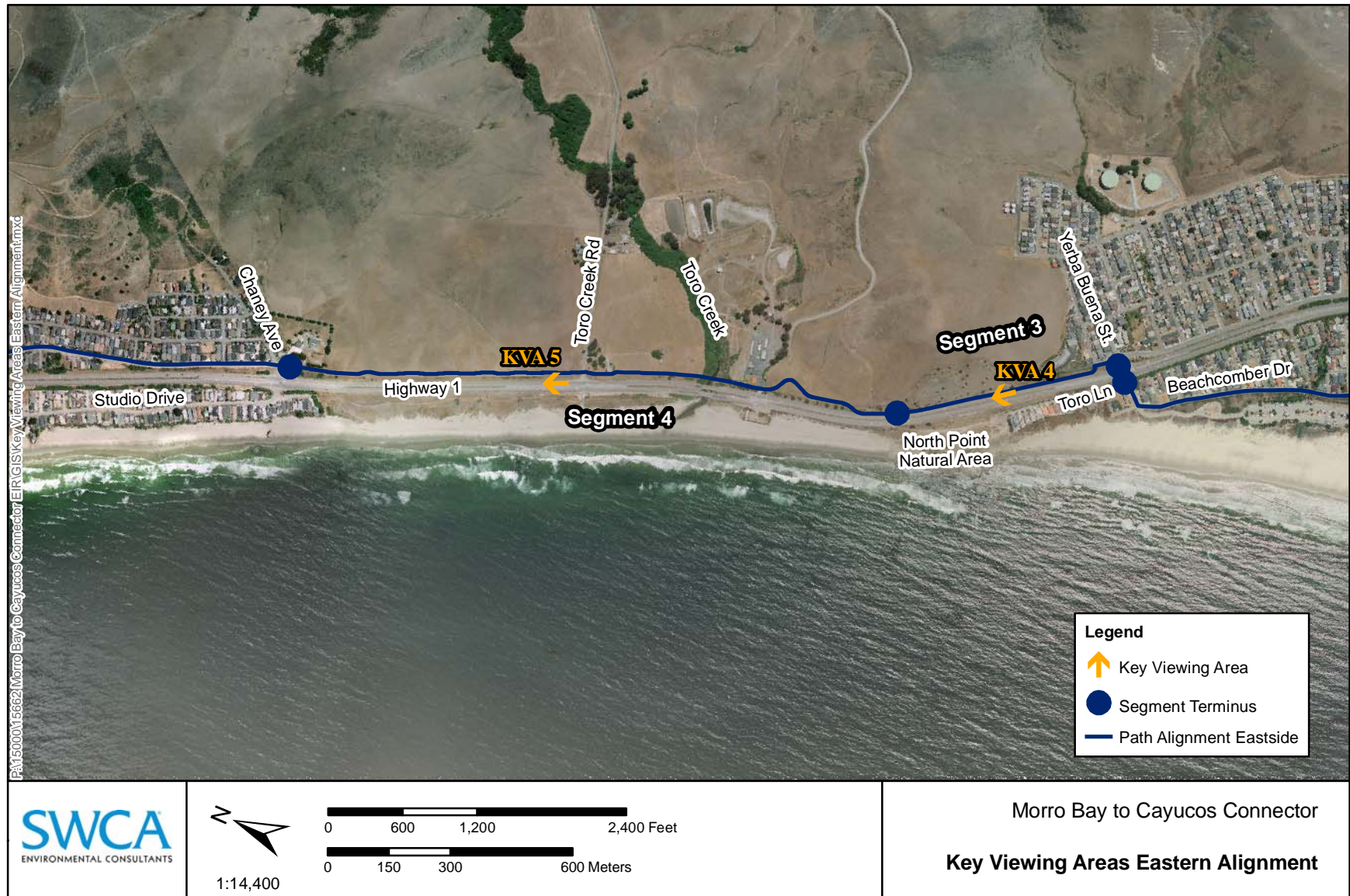
### **b. Effects on Scenic Vistas**

Because of its relatively low profile and limited scale (8-feet wide paved surface) the Eastern Alignment would not impact the sweeping views of scenic vistas when viewed from Highway 1 and the beach. This is particularly true of Segment 3. The improvements associated with Segment 2 are substantial enough that they would be visible although as shown in Figure F-A.2 (KVA 4) the barrier required along the shoulder of the northbound lanes of Highway 1 would not block views of the ocean, silhouette above ridgelines or block the horizon. Further, unlike with the barrier with the proposed project, it would not be a prominent feature in the scenic vistas, which lie to the west at this location on Highway 1. Impacts to scenic vistas would be *less than significant*. No mitigation is required.

### **c. Damage Scenic Resources within a State Scenic Highway?**

Caltrans has officially designated Highway 1 a State Scenic Highway. Scenic resources such as trees, rock outcroppings, and structures which can contribute to scenic resources are limited within the project corridor. The Eastern Alignment would not be located adjacent to or remove structures such as barns or houses which would be considered scenic or contribute to the scenic resources. Scenic resources in the project corridor do include the ocean, beaches, marine terrace, rolling hills, and ridgelines. The proposed project would not block views of these resources, or damage them. The most visible component of the Eastern Alignment is the barrier along the cut-slope (Segment 2). Existing views and scenic resources east of Highway 1 at this location have been previously compromised by the existence of the engineered-looking cut-slope. Impacts would be *less than significant*. No mitigation is required.

Figure F-A.1. Eastern Alignment KVA Location Map





**Figure F-A.2a. KVA 4 – Existing View**



**Figure F-A.2b. KVA 4 – Simulation**



**Figure F-A.3a. KVA 5 – Existing View**



**Figure F-A.3b. KVA 5 – Simulation**



**d. Degrade the Existing Visual Character or Quality**

Project components that may degrade resources which define the high visual quality of the area include retaining walls, the barrier, bridge over Toro Creek, signage, and the paved bikeway surface. The barrier system in particular would degrade the visual quality by increasing the overall developed look of the area and would potentially distract viewers from the high quality views to the west. Given the high quality of the existing visual character and the high sensitivity of those who would be travelling along Highway 1, using the bikeway, or the beach, small changes would result in significant impacts. At the same time, the Eastern Alignment would increase opportunities for pedestrians and cyclists to experience the scenic resources.

**AR Impact E1      Construction of the various bikeway improvements would degrade the existing visual quality of the area and result in significant impacts.**

*Implement AR/mm-1 and 2 (refer to Chapter 4).*

**Residual Impact**

Implementation of these measures would reduce the visibility of the proposed barrier system and other improvements. The cutslope behind the barrier is a distinctive color nearly year around and matching the retaining wall and barrier system to that color would reduce its prominence in the northbound and southbound Highway 1 viewshed. There is not enough space at this location to plant any screening vegetation. After implementation of these measures impacts would be *less than significant*. No additional mitigation is required.

**e. Create a New Source of Substantial Light or Glare**

The west-facing four foot retaining wall and barrier along Segment 2 would potentially reflect the sun briefly as it set, making it more visible to northbound and southbound motorists, although views to the west, especially as the sun sets would still dominate. The Eastern Alignment would not include any new lighting that would reflect light or add glare to the project area or surroundings. Impacts would be *less than significant*. No mitigation measures are required.

**2. Cumulative Impacts**

The discussion of cumulative impacts relates to the potential for implementation of the Eastern Alignment to contribute to an aggregate change in visual quality of the area. The Highway 1 corridor through the north coast of San Luis Obispo County has undergone relatively few visual changes over recent years. Limited development of residences within the community of Cayucos and the City of Morro Bay has been the most common form of new development. The area where Segments 2 and 3 would be located has seen little to no development in the last 20 years.

The Eastern Alignment would introduce a variety of new visual elements into the public view. The most noticeable element would be the barrier along Segment 2. The mitigation measures identified in Section 2-1 apply to the Eastern Alignment as well, and would reduce potential visual impacts and noticeability of the project. There is not likely to be additional development in this area, east or west of Highway 1, between the community of Cayucos and the City of Morro Bay. The impacts would not contribute to a cumulative degradation of aesthetic resources. Cumulative impacts would be *less than significant*. No additional mitigation is required.

## **B. AGRICULTURAL RESOURCES**

Based in the Initial Study prepared for the project (refer to Appendix A) the proposed project would have less than significant impacts to agricultural resources. Therefore this issue area was not discussed in Chapter 4 of this EIR. However, a discussion of impacts is necessary for the eastern alignment as the agricultural resource setting east of Highway 1 is substantially different from that on the west side. Only Segment 2 and 3 of the eastern alignment would require disturbance, and of those segments, only Segment 3 is located outside of the Caltrans ROW. Because of these factors this section focuses on the impacts associated with Segment 3 of the eastern alignment, which is located entirely on the Marine Terminal properties.

Because Agricultural Resources were not previously discussed in Chapter 4, this section includes a brief discussion of the Existing Setting and Regulatory Setting as well to provide the reader context when considering the impact assessment.

### **1. Existing Conditions**

#### **a. Land Uses and Agricultural Activities**

The parcels comprising the Marine Terminal property east of Highway 1 are located within the Agriculture and Industrial (refer to Figure 3-1) land use categories. The parcel within the City of Morro Bay between Toro Creek and Toro Creek Road is designated Industrial. The remaining parcels east of Highway 1 in the vicinity of the eastern alignment are in the Agriculture land use category. The parcels range in size, with the largest, approximately 260 acres, located north of Toro Creek Road, between the road and the Cayucos Urban Reserve Line. On either side of Toro Creek there are smaller parcels where the majority of the Marine Terminal related improvements are located.

Land uses east of Highway 1 on the site include industrial uses associated with the Marine Terminal, which are currently limited due to the ongoing decommissioning process, and grazing. Based on aerial photos and visits to the project site, there is currently no intensive agriculture occurring on the Marine Terminal parcels or immediate vicinity. According to the County's GIS database and the Initial Study prepared for this project, the parcels are not under a Williamson Act contract.

Land uses to the north and south of the Marine Terminal include developed single family and multi-family residential uses. West of the Highway, recreational uses dominate.

#### **b. Soil Conditions**

All the soils underlying, and in the immediate vicinity of Segment 3, are Cropley Clay #128 (refer to Figure 4.5-1). This soil is considered Class 2, when irrigated. The soil units change and the soil class increases as the topography steepens considerably to the east. According to the Soil Conservation Service Class 2 indicates "Moderate limitations that reduce the choice of plants or require moderate conservation practices". Generally, soils classified as either 1 or 2 are considered prime soils by regulatory agencies. The soil is not identified on the County's GIS database of "Important Farmland" which identifies those soils or properties with particular attributes which make them important to the local or regional agricultural economy.

There are some existing conditions that have potentially compromised the capability of the Class 2 soils which underlie Segment 3 of the eastern alignment. In general these limitations



exist between Toro Creek Road and the Marine Terminal access road. These include previous disturbances and hydrocarbon contamination. There are a significant number of underground utility lines and other conduits, including outfall lines which run from the facility west to the ocean, located within the Marine Terminal property. Other utilities, including a fiber optic line, sewer, and water lines parallel Highway 1, east of the highway. The exact location is not known, although given the variable topography and other constraints, they may not all be located within the Highway 1 ROW. Ongoing remediation activities, described in Chapter 4-6 have also resulted in significant soil disturbance in this area.

Based on information in Section 4-6, soils east of the Pier Landing are contaminated by hydrocarbons, to various degrees. Current remediation efforts will reduce the contamination levels in those areas where groundwater has been or could be contaminated in the future. However, given the long history of petroleum-related activities at the Marine Terminal, it is likely that residual contamination in relatively low levels will exist in perpetuity in areas where petroleum was stored, processed, or transferred historically.

## **2. Regulatory Setting**

The California Department of Conservation is the state agency that oversees monitoring of land conversion and implementation of the Williamson Act. Locally, the County Department of Planning and Building implements the Williamson Act, and is responsible for compliance with CEQA as it relates to agriculture, and for implementing the Agriculture and Open Space Element (ASOE) of the General Plan. That agency coordinates with the County Agriculture Department in determining consistency with the ASOE, and in identifying impacts and mitigation under CEQA.

### **a. California Land Conservation Act of 1965**

As defined by the CDC, the California Land Conservation Act of 1965 (Williamson Act) enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. As an incentive, landowners receive lower property tax assessments based on agricultural or open space land uses, as opposed to the real estate value of the land. Local governments receive a subsidy for forgone property tax revenues from the state via the Open Space Subvention Act of 1971.

### **b. County of San Luis Obispo General Plan, Agriculture and Open Space Element**

The Agriculture and Open Space Element of the San Luis Obispo County General Plan provides a background on agricultural and open space resources within the County. Through the goals, policies, implementation programs, and measures provided within the document, the County's intent is: "to promote and protect the agricultural industry of the County, to provide for a continuing sound and healthy agriculture in the County, and to encourage a productive and profitable agricultural industry."

## **3. Thresholds of Significance**

The significance of potential agricultural impacts are based on thresholds identified within Appendix G of the CEQA Guidelines, the County's CEQA checklist, and other county documents, which provide the following thresholds for determining impact significance with respect to agricultural resources. Agricultural impacts would be considered significant if the proposed project would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.
- Conflict with existing zoning for commercial agricultural use, or a Williamson Act contract.
- Involve other changes in the existing environment, which due to their location or nature, could individually or cumulatively result in loss of farmland, to non-agricultural use.
- Impair commercial agricultural use of other property or result in conversion to other uses.
- Conflict with any local, state, or federal policies or ordinances protecting agricultural resources.

#### **4. Impact Assessment and Methodology**

Potential impacts to agricultural resources were assessed by utilizing data and maps published by the USDA, and the County Planning and Building Department, including soil information, and farmland mapping. The project was analyzed for the potential conversion of important farmland, loss of productive agricultural soils, incompatible land uses, and inconsistencies with regulations and policies intended to preserve agricultural resources.

#### **5. Project-Specific Impacts and Mitigation Measures**

##### **a. Loss of Productive Soils (Soil Conversion)**

The permanent area of disturbance resulting from construction of Segment 3 would be approximately 1.3 acres (12 feet by 4,800 feet, or 57,600 square feet). These soils would be directly adjacent to the existing Highway 1 ROW and therefore the project would not bisect the remaining Class II soils or the existing pasture. When considering that much of the area between Toro Creek Road and the Marine Terminal access road is permanently disturbed by structures and other improvements, or has been historically disturbed through installation of pipelines and utilities, the area potentially capable soils converted reduces by approximately one-third, to approximately 0.9 acre (38,000 square feet). Much of this disturbance would occur on a single parcel of approximately 260 acres.

Given that the parcels where the conversion will occur are located between two urbanized areas and that they may contain residual hydrocarbon contamination, it is less likely that intensified agriculture would be proposed to replace the grazing that currently occurs. In addition, the Eastern Alignment is located adjacent to the Highway 1 ROW, does not bisect farm fields, and has a limited footprint (conversion of less than one acre of potentially productive soil). In this context the conversion of soils is considered *less than significant*. No mitigation is required.

##### **b. Incompatibilities/Conflicts**

Introducing a recreational use onto a parcel which currently supports limited grazing would potentially result in conflicts between bikeway users and cattle. The eastern alignment project description does include fencing the eastside of the bikeway with barbed wire or similar, to provide separation between cattle, and cyclists and pedestrians.

**AG Impact E1      Construction of the Eastern Alignment would potentially result in significant conflicts between cattle and bikeway users.**

- AG/mm-1      *Prior to issuance of construction permits, the General Services Agency shall provide evidence to the Department of Planning and Building that the proposed fencing along Segment 3 minimizes conflicts with the existing cattle operation in a manner acceptable to the landowner.*
- AG/mm-2      *Prior to use of the bikeway by the public, the northern and southern terminus of Segment 3 of the eastern alignment shall include signage describing the importance of local agricultural lands and providing information to the public that would reduce conflicts, including, but not limited to staying on designated trails, maintaining control of domestic animals, minimizing litter/waste, and not feeding livestock.*

#### Residual Impact

Implementation of this mitigation would result in a fencing plan that would minimize potential conflicts between cattle and bikeway users. The impact would be *less than significant*.

## 6. Cumulative Impacts

The proposed project would result in 0.9 acre of conversion of prime soils which are currently used for grazing. The project would also increase the potential for conflicts between the existing cattle operation and bikeway users. Both the conversion of prime soils and conflicts with agricultural operations are critical issues facing the local and state agricultural economies. Project-specific soil conversion impacts have been determined to be less than significant when considered in relation to likely future uses (grazing) and this conclusion is similar when considered cumulatively with other regional losses to rangeland. The proposed mitigation would mitigate project specific conflict-related impacts to a less than significant level and would be adequate to address the projects contribution to any cumulative impacts as well.

## C. AIR QUALITY

This section evaluates the Eastern Alignment to identify potential air quality impacts. Chapter 4 of this EIR describe the site's existing air quality conditions, regulatory environment, methods employed to evaluate potential project impacts, and the thresholds of significance utilized to assess the impacts. Please refer to Chapter 4 for detailed discussions of these topics. Eastern Alignment air quality impacts and mitigation measures are very similar to those for the proposed project.

### 1. Project-Specific Impacts and Mitigation Measures

#### a. Short-term Construction Emissions

##### Combustion Emissions (ROG and NOx) and Dust (PM10)

Because the improvements necessary for the Eastern Alignment are similar in scope to the proposed project (e.g., the length of paving, bridge, barrier, etc.) the emissions in Table 4.2-3 are applicable. Table 4.2-3 indicates that construction activities would result in emissions substantially below APCD thresholds. San Luis Obispo County is in non-attainment for PM<sub>10</sub>, therefore dust generated by the Eastern Alignment would be a significant impact. Compliance with existing ordinance requirements for dust control reduces impacts to a *less than significant* level.

##### Naturally-Occurring Asbestos Exposure

Construction and development of the Eastern Alignment, particularly Segment 2 along the Highway 1 cut-slope, could result in an exposure of naturally occurring asbestos due to earthwork and the excavation of bedrock which may contain naturally-occurring asbestos.

**AQ Impact E1** Earth moving activities for development of Segment 2 of the Eastern Alignment would result in grading activities that may expose naturally occurring asbestos, resulting in an indirect short-term impact.

*Implement AQ/mm-1.*

Residual Impact

Implementation of this measure would reduce impacts associated with naturally-occurring asbestos to a *less than significant* level.

#### b. Long-term Operational Emissions

Refer to Chapter 4. Long term operational impacts resulting from the Eastern Alignment would be *less than significant*. No mitigation measures are required.

#### c. Greenhouse Gas Emissions

Refer to Chapter 4. Based on the type of project proposed, the Eastern Alignment contribution to the generation of greenhouse gases would be *less than significant*.

**d. Consistency with County Clean Air Plan**

Refer to Chapter 4. The Eastern Alignment *is consistent with the CAP*.

**2. Cumulative Impacts**

Potential construction-related air quality impacts are location-specific to the extent that they would temporarily result in significant impacts on the localized environment; however, based on the limited size and project type, the impacts are not considered project or cumulatively significant. The Eastern Alignment contribution to the generation of greenhouse gases would also be less than significant. The Eastern Alignment's contribution to cumulative air quality impacts would be *less than significant*. No mitigation is required.

## **D. BIOLOGICAL RESOURCES**

This section evaluates the Eastern Alignment to identify project-related impacts to biological resources. Segments 1 and 4 of the Eastern Alignment would be located entirely within existing roadways or bikeways and only require signage and/stripping improvements. Segments 2 and 3 would require construction of a new bikeway in undeveloped areas, resulting in disturbance to biological resources. Due to the lack of improvements required and the limited biological resources in Segments 1 and 4, this section omits these segments from discussion.

Caltrans has indicated that the northbound Highway 1 bridge over Toro Creek may be replaced in the near future and it may be possible to incorporate the bikeway into the new bridge design. However, at this time, inclusion of the bikeway in to the Highway 1 bridge is speculative; therefore, is not evaluated in this EIR. The analysis that follows assumes a new clear span bridge would be constructed, similar to the proposed project.

The assumed project disturbance area includes the permanent disturbance of the proposed 12 foot wide bikeway and an additional five feet of disturbance on each side, for a total width of disturbance of 22 feet. This area was expanded to 42 feet at the location of the proposed bridge over Toro Creek, in order to allow for an additional 10 feet of disturbance on each side of the bridge. It is assumed that the stockpile/staging areas would be located in previously disturbed areas including the Pier Landing or the Marine Terminal parking areas.

Chapter 4 and Appendix D of this EIR describe the site's existing conditions, regulatory environment, methods employed to evaluate potential project impacts, and the thresholds of significance utilized to assess the impacts. Please refer to Chapter 4 and Appendix D for detailed discussions of these topics.

Figure F-D.1. Eastern Alignment Segment 2 Biological Resources Map

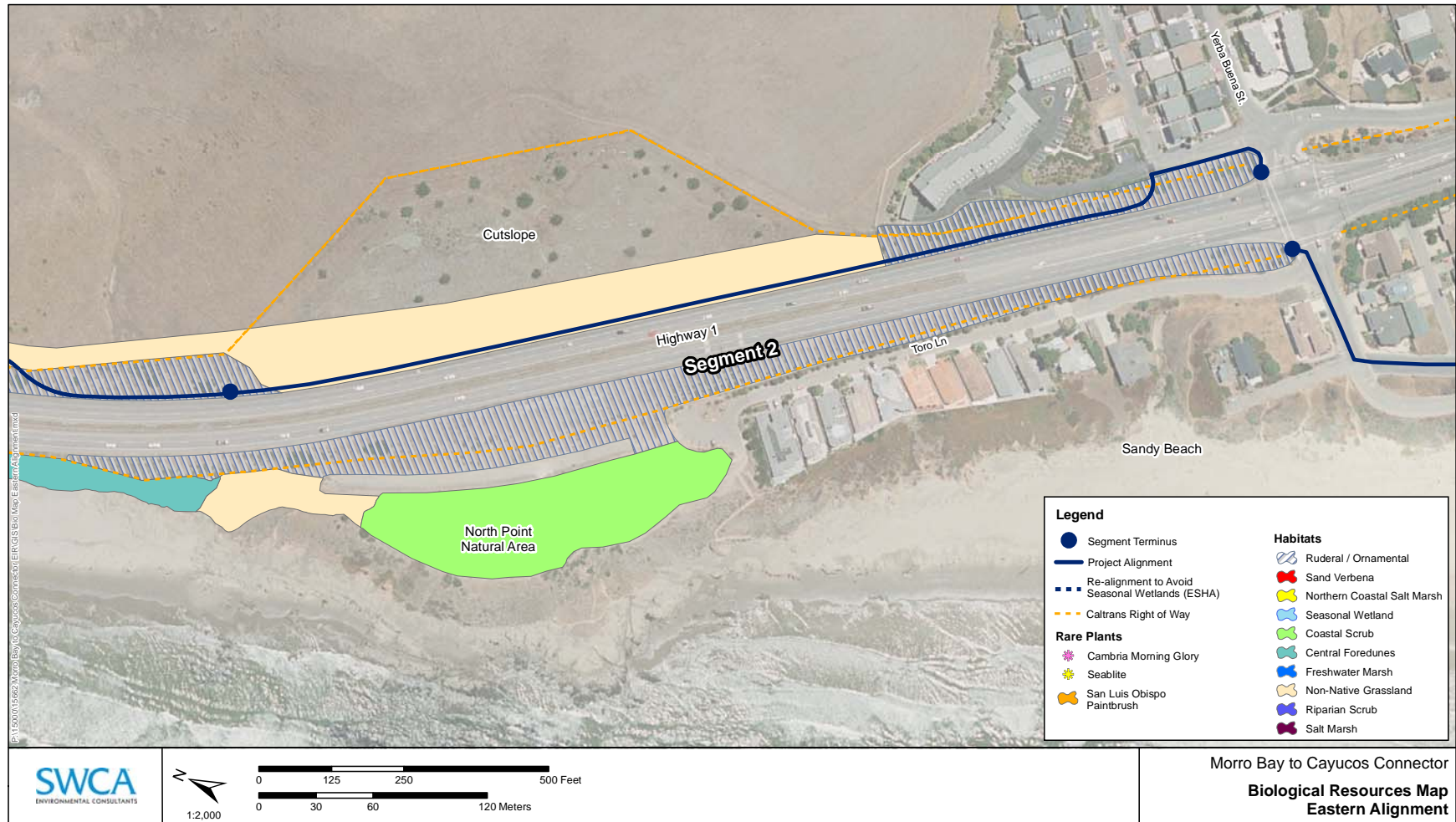




Figure F-D.2a. Eastern Alignment Segment 3 Biological Resources Map

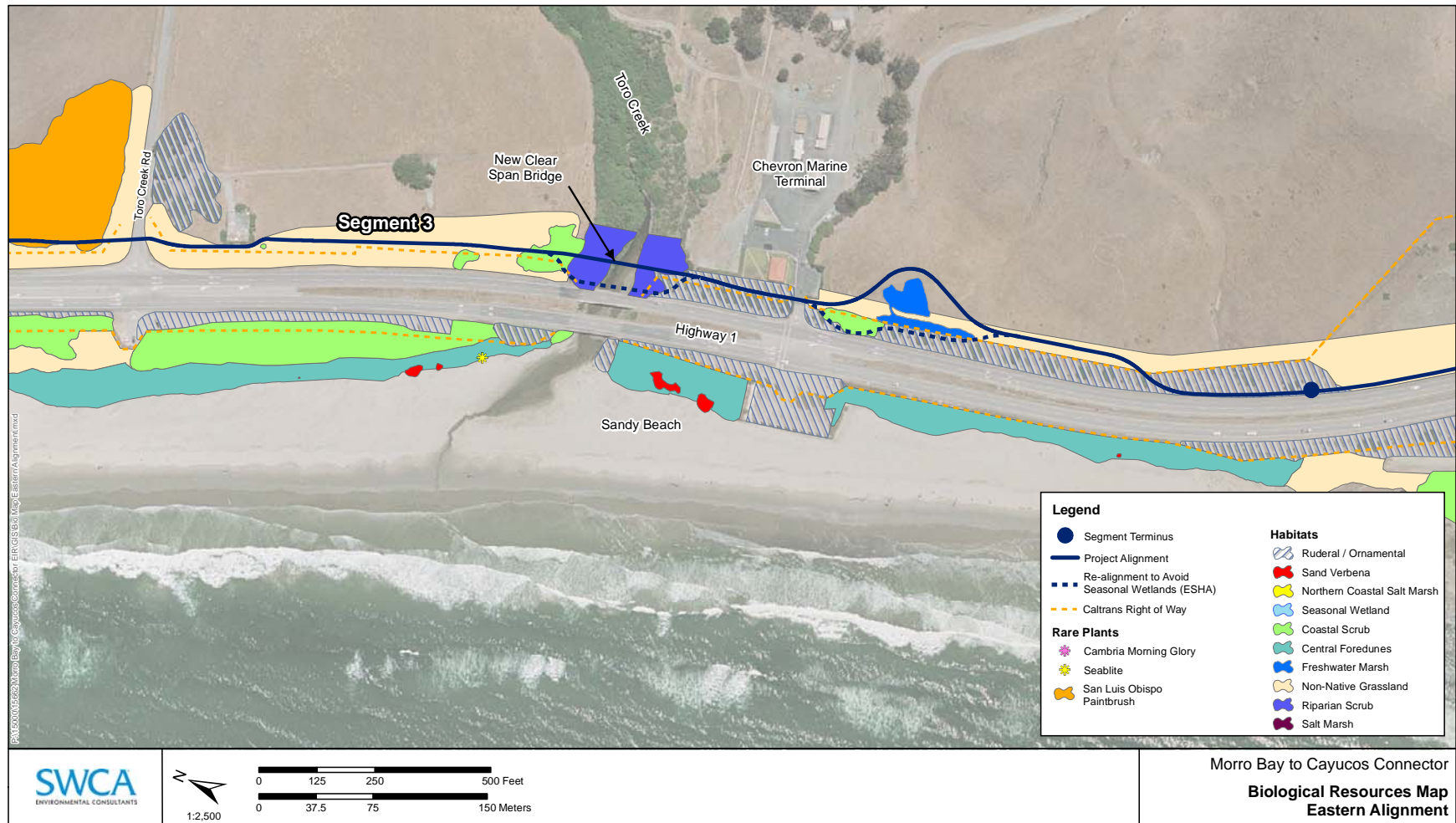
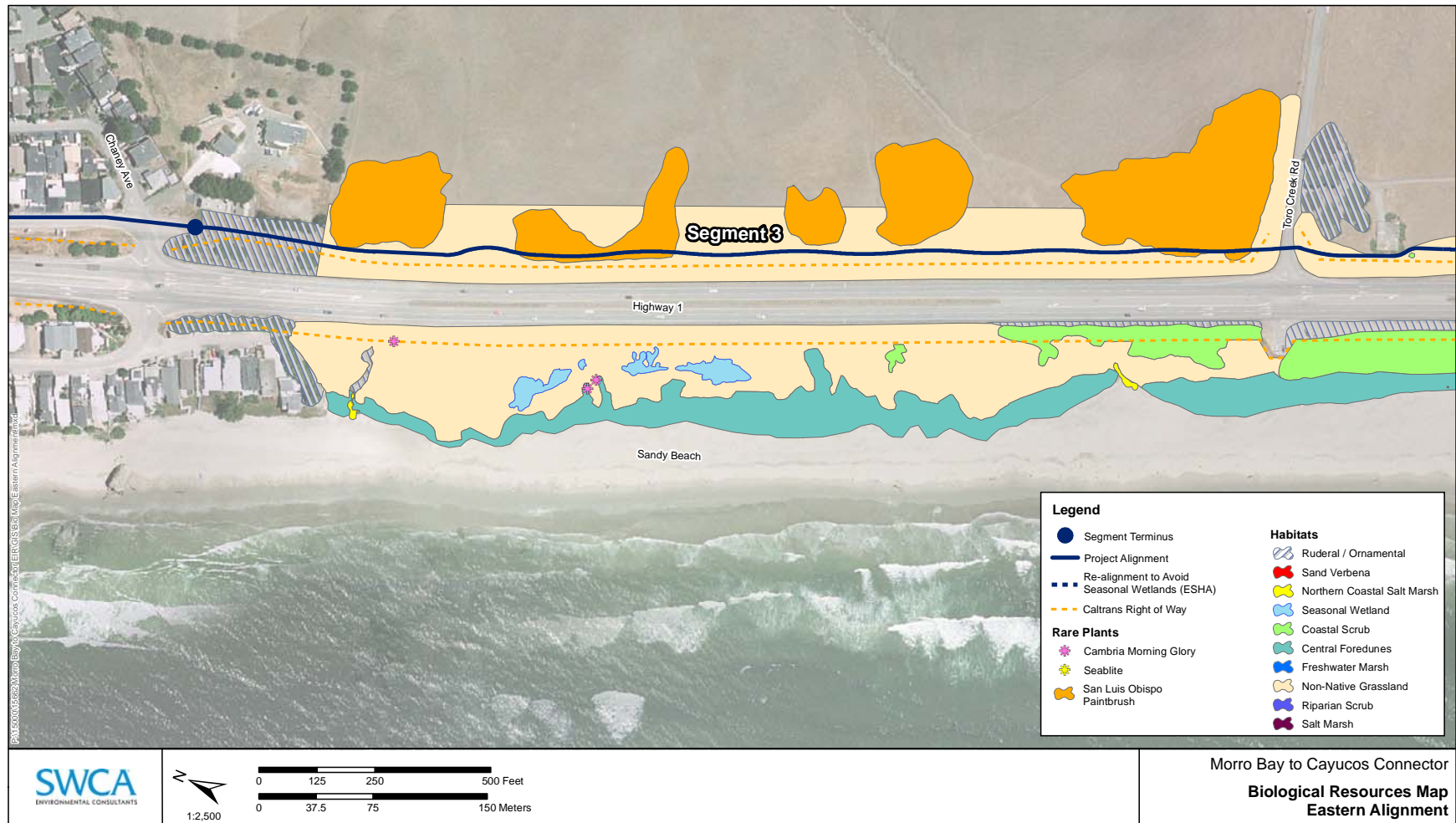


Figure F-D.2b. Eastern Alignment Segment 3 Biological Resources Map



## 1. Project-Specific Impacts and Mitigation Measures

### a. Environmentally Sensitive Habitat Areas (ESHAs)

Segments 2 and 3 of the Eastern Alignment would traverse areas that contain state and federal jurisdictional waters (Toro Creek), freshwater marsh habitat, special-status wildlife habitats and annual grassland that supports special-status plants. Under land use ordinances and coastal plan policies, these resources are considered to be ESHAs. Refer to Chapter 4 for more information.

#### Construction-Related Disturbance of ESHA

The Eastern Alignment would avoid the freshwater marsh, and the aquatic portions of Toro Creek; however, Segment 3 would result in permanent and temporary impacts to the Toro Creek riparian vegetation and special-status plants in the annual grassland. Direct impacts to these resources would result from specific activities; therefore, are evaluated under the appropriate headings below. These resources are located within close proximity to the proposed work area and would be subject to direct and indirect disturbances from grading, trampling, sedimentation and erosion or other disturbances. The close proximity of the ESHAs creates a constrained work area that must be clearly identified in the field.

**BIO Impact E-1 The Eastern Alignment is located within close proximity to several ESHAs and other sensitive resources. Work activities could result in direct or indirect disturbances to the ESHAs.**

*Implement BIO/mm-1, BIO/mm-4, and BIO/mm-5 (refer to Chapter 4)*

*BIO/mm-E1 At the time of application for construction permits all grading plans shall clearly show the location of project delineation fencing that excludes adjacent ESHAs from disturbance. With exception to the Toro Creek Bridge and the cut-slope retaining wall construction areas, the project delineation fencing shall provide no more than a 22-foot wide work area throughout the length of the Eastern Alignment. The project delineation fencing may allow for an additional 20 feet (as necessary) at the Toro Creek Bridge and cut-slope retaining wall areas. The grading plans shall clearly show all staging areas, which shall avoid ESHA's and rare plant populations.*

*BIO/mm-E2 At the time of application for permits, the plans shall clearly show the placement of environmental interpretive signs along the pathway. The signs shall inform pathway users of the ecology of grassland and riparian habitats, and plant and wildlife species that utilize these areas and warn users of the dangers of disturbance.*

#### Residual Impact

Implementation of these measures would reduce short-term construction impacts to a *less than significant* level.

#### Sedimentation and Erosion Impacts to ESHA

During construction, grading operations would require the removal of vegetation, disturbance of soil layers, and the creation of soil stockpiles. This would expose soils to erosion by rainfall and

runoff as storm water leaves the project site. The adverse effects of erosion and sediment transport include deposition of sediment within the local drainages, which may increase sediment loading on to the beach and sensitive habitats.

Soil and associated building material including asphalt and concrete has the potential to enter Toro Creek and the drainage channels, cause an increase in suspended sediments, sedimentation of aquatic habitat, and introduce compounds that could potentially be toxic to aquatic organisms.

The Water Quality Control Plan for the Central Coastal Basin includes a sediment control action that recommends construction projects in riparian areas to maintain a 30-foot filter strip of undisturbed soil and riparian vegetation between land disturbance activities and watercourses, wherever possible.

**BIO Impact E2    Vegetation removal, grading, and construction activities could result in indirect impacts including erosion and down-gradient sedimentation and pollutant discharges (e.g., sediment, oil, fuel, materials) into ESHAs.**

*Implement BIO/mm-6 through BIO/mm-10 (refer to Chapter 4).*

*BIO/mm-E3        Prior to initiation of construction, the biological monitor and the contractors shall develop a 30-foot vegetative buffer between construction activities and the Toro Creek ordinary high water mark. If creating a 30-foot buffer is not feasible, the monitor and contractors shall determine and implement the maximum vegetative buffer that project activities will allow.*

#### Residual Impact

With implementation of the above mitigation measures, sedimentation and erosion impacts to ESHA would be considered *less than significant*.

#### Jurisdictional Waters

Based on the definitions for state and federal jurisdictional areas, Toro Creek qualifies as waters of the U.S. and California. Toro Creek is perennial and supports open water habitat, wetland habitat, and riparian habitat. The Eastern Alignment (Segment 3) includes installing a clearspan bridge, twelve feet wide and approximately 120 feet long, across Toro Creek (refer to Figure F-D.2a). As proposed, the bridge would be located approximately 50 feet east of the existing Highway 1 bridge and would rest on abutments (piers or caissons) located outside of the creek banks. Installation of the bridge would require the removal of riparian vegetation including mature willows, California blackberry, and an array of exotic species. Installation of the bridge would not require dewatering the creek or placing fill within the creek's ordinary high water marks. Since the bridge installation would not require dewatering the creek or placing fill in the creek, it would not require a Clean Water Act 404 permit from USACE. However, bridge installation would result in the removal of riparian vegetation and disturbances within the creek banks; therefore, a 1602 permit from CDFG would be required. The Eastern Alignment avoids the freshwater marsh identified in the Constraints Analysis.

**BIO Impact E3    The Eastern Alignment would include installing a clearspan bridge over Toro Creek, which would result in the removal of approximately 0.17 acre of riparian vegetation within CDFG jurisdiction.**

BIO/mm-E4

*Prior to initiation of construction, the Department of General Services shall obtain a CDFG Section 1602 Streambed Alteration Agreement for activities within the tops of banks or outer edges of riparian canopies.*

*In order to obtain the Streambed Alteration Agreement, the applicant will need to prepare and submit a Revegetation Plan for review and approval by CDFG. The Revegetation Plan shall provide for the revegetation of all disturbed soils, re-contoured slopes and other cleared areas. At a minimum, the revegetation plan shall include;*

- a. Identification of locations, amounts, size and types of plants to be replanted, as well as any other necessary components (e.g., temporary irrigation, amendments, etc.) to insure successful reestablishment.*
- b. Provide for a native plant salvage effort prior to ground disturbing activities. Salvaged plants shall include locally growing willows;*
- c. Provide for the in-kind on-site replacement of all trees and shrubs removed on a 4:1 basis;*
- d. Quantification of impact and mitigation areas.*
- e. A program schedule and success criteria for a five year monitoring and reporting program that is structured to ensure the success of the Revegetation Plan;*
- f. Seeding and mulching all exposed slopes with a seed mix that includes at least three native grass species. The seed mix shall include native wildflower and shrub species.*

#### Residual Impact

With implementation of the above mitigation measures, direct impacts to jurisdictional areas would be considered *less than significant*.

#### **b. Special-status Wildlife**

The annual grassland, Toro Creek aquatic areas and riparian corridor located in the Eastern Alignment may provide forage and shelter habitat for a variety of special-status wildlife species. Various bird species may utilize the annual grasslands and Toro Creek riparian areas for nesting. California red-legged frog, south central California steelhead trout, tidewater goby, and southwestern pond turtle could occupy the aquatic portions of Toro Creek. In addition, California red-legged frog may utilize the Toro Creek riparian vegetation for upland shelter. The Eastern Alignment would avoid the aquatic portions of Toro Creek; therefore, project activities are not expected to result in significant impacts to tidewater goby or southwestern pond turtle. Since significant impacts to these species are not expected, avoidance or mitigation measures are not proposed. The Eastern Alignment would impact the annual grassland and riparian vegetation, which could affect nesting birds, California red-legged frog, and south central California steelhead. Avoidance and minimization measures for these species are provided below.

### Toro Creek and Steelhead Critical Habitat

Refer to Chapter 4 and Appendix D for more information. The Eastern Alignment bridge would require the removal of riparian vegetation. Based on preliminary design plans, the proposed construction methods, and the site existing conditions, construction of the proposed bridge over Toro Creek would not significantly impact steelhead or steelhead habitat in the creek. Construction of the eastern bridge could result in inadvertent deposition of sediment, materials, tools, or hazardous materials into the creek bed. In addition, the new bridge would increase the amount of shade over the creek. Increased shade in this portion of the creek is an unavoidable insignificant impact; therefore, mitigation for increased shade is not proposed.

**BIO Impact E4    Inadvertent depositions of sediment, materials, tools, or hazardous materials into the creek bed could occur during installation of the proposed bridge over Toro Creek.**

*Implement BIO/mm-1 through BIO/mm-10 (refer to Chapter 4)*

**BIO Impact E5    Installation of the clear span bridge over Toro Creek would result in the removal of 0.17 acre of riparian vegetation**

*Implement BIO/mm-E3 and BIO/mm-E4.*

#### Residual Impact

With implementation of the above mitigation measures, indirect impacts to steelhead habitat would be *less than significant*.

### California Red-legged Frog Upland Habitat

CNDDDB documents one California red-legged frog occurrence in Toro Creek in 1996. Red-legged frog was not observed during the surveys, but is assumed to inhabit the creek. Installation of the clear span bridge would avoid impacts to the aquatic portions of Toro Creek; however, would result in the removal of riparian vegetation that may provide upland shelter for California red-legged frog. Although unlikely, removal of the riparian vegetation could result in take of California red-legged frog utilizing the vegetation for shelter.

**BIO Impact E6    Removal of the riparian vegetation would result in the temporary loss of 0.17 acre of riparian habitat and could result in take of California red-legged frog utilizing the vegetation for shelter.**

*Implement BIO/mm-23 and BIO/mm-24.*

*BIO/mm-E5    Prior to initiation of construction that General Services Agency shall receive an incidental take permit from the USFWS that allows for capturing and relocating individuals as necessary. A qualified biologist shall survey the project area within 24 hours prior to ground disturbing activities and if any life stage of the California red-legged frog is found and these individuals are likely to be killed or injured by work activities, disturbance of the riparian vegetation shall be halted until the California red-legged frog individuals leave the area on their own accord, or until the biologist has coordinated with the USFWS and received permission to capture and relocate the individuals.*



*Before any construction activities begin on the project, the biologist will conduct a training session for all construction personnel. At a minimum, the training will include a description of the California red-legged frog and its habitat, the specific measures that are being implemented to conserve the species for the current project, and the boundaries within which the project may be accomplished.*

*The biologist will be present at the construction site until all initial disturbance of the upland habitat has been completed.*

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

### **Nesting Birds**

The various habitats occurring in the Eastern Alignment provides suitable nesting habitat for a variety of bird species. Common passerines (i.e., perching birds; songbirds) may use the non-native annual grassland for nesting; raptors and common passerines may utilize the riparian scrub for nesting. If construction occurs between March and September, the available nesting habitats would be impacted by grading, vegetation removal, and equipment access. If bird species are nesting within or adjacent to the effected area during construction, the individuals could be directly or indirectly impacted. Direct impacts may include loss of active nests during vegetation removal. Noise or other disturbances may cause an individual to abandon a nest resulting in an indirect impact.

**BIO Impact E7 Construction activities conducted during the nesting season (March through September) could directly or indirectly impact nesting birds.**

*Implement BIO/mm-18.*

#### **Residual Impact**

With implementation of the above mitigation measures, direct and indirect impacts to nesting birds would be *less than significant*.

### **c. Special-status Plants**

The annual grassland community supports a population of San Luis Obispo owl's clover (formerly San Luis Obispo Paintbrush). Segment 3 of the Eastern Alignment would traverse portions of the population resulting in the loss of 0.30 acre of occupied habitat and the loss of 0.94 acre of available habitat. The loss of occupied and available habitat would result from ground disturbing activities such as grading and paving.

**BIO Impact E8 Construction of the Eastern Alignment would result in the loss of 0.30 acre of habitat occupied by San Luis Obispo owl's clover and 0.94 acre of habitat available to the species.**

*Implement BIO/mm-E1*



*BIO/mm-E6 Prior to commencement of site grading, the biological monitor shall collect a minimum of 0.25 pounds (clean) of San Luis Obispo owl's clover seed to be included in a hydroseed mix. The hydroseed mix shall include a variety of native grasses and wildflowers and be applied to the temporarily disturbed areas located on the shoulders of the new bike path.*

Residual Impact

With implementation of the above mitigation measures, direct and indirect impacts to San Luis Obispo owl's clover would be *less than significant*.

## **2. Cumulative Impacts**

The Eastern Alignment would result in permanent and temporary impacts to ESHAs, including jurisdictional waters, special status plants and wildlife. These resources fall under the jurisdiction of various state and federal resource agencies. Cumulatively, the project would result in an increased demand for public access and associated parking, which has the potential to affect natural resources and habitats. The potential impacts to the sensitive species and habitat types discussed in this section, when considered in context with the potential for losses of similar habitats due to the construction of future projects within the County, constitute a cumulative impact to these biological resources.

**BIO Impact E9 The impacts to sensitive species and habitats resulting from development of the Eastern Alignment would result in the direct loss of biological resources, and would contribute to the cumulative degradation of biological resources of the area, resulting in a potentially significant cumulative impact.**

*Implement BIO/mm-1 through BIO/mm-10, 18, and BIO/mm-E1 through E6.*

Residual Impact

Implementation of these measures would reduce project specific and cumulative impacts to a *less than significant level*.

## E. CULTURAL RESOURCES

This section discusses potential cultural resources impacts that would result from the development of the Eastern Alignment. It focuses on Segments 2 and 3 as that is where improvements with the greatest potential to affect cultural resources are proposed. Chapter 4 of this EIR describes the project area's existing cultural resources (including archaeological, historical, and paleontological) conditions, regulatory environment, methods employed to evaluate potential project impacts, and the thresholds of significance utilized to assess the impacts. Please refer to Chapter 4 for detailed discussions of these topics.

### 1. Project-Specific Impacts and Mitigation Measures

#### a. Prehistoric Resources

Based on the results of previous surveys and the Extended Phase I (XPI) Study (SWCA 2010) prepared for this EIR, the Eastern Alignment would bisect a known cultural resources site, CA-SLO-879. This site includes significant subsurface resources, and has been determined eligible for the National Register of Historic Places (NRHP). Due to the size of the site, volume and density of resources within it, and the physical constraints that exist east of Highway 1 (i.e., the Marine Terminal improvements), avoidance of these resources is infeasible. Impacts would be potentially most significant near the proposed Toro Creek bridge as that is where deeper excavations and a wider area of disturbance would be necessary.

Because the Eastern Alignment cannot be redesigned to avoid resources, and because of the significance of the site, recommended mitigation includes development and implementation of a Phase III (data recovery) plan prior to construction.

**CR Impact E1    The proposed project would potentially disturb intact subsurface cultural resources associated with a known cultural resources site, resulting in a significant impact.**

*Implement CR/mm-3 through 7 (refer to Chapter 4).*

#### Residual Impacts

These measures include preparation and implementation of a Phase III data recovery plan prior to issuance of construction permits, so that data recovery can be completed prior to disturbance. A qualified archaeologist and a Native American will also be required to monitor all construction activities in the vicinity of the cultural resources site. These measures would reduce potential impacts to a *less than significant* level. No additional mitigation is necessary.

#### b. Historical Resources

Due to the lack of potentially historic structures within the Eastern Alignment and limited area and depth of disturbance required for the project, it is unlikely that significant historical resources would be encountered as a result of construction. Impacts to historic resources would be *less than significant*. No mitigation measures are required.

### **c. Paleontological Resources**

Generally the Eastern Alignment would be located on alluvium associated with the Toro Creek floodplain or other formations that are not known to contain significant paleontological resources. In addition, because construction of the project would generally require excavations of approximately six inches, disturbance of the underlying bedrock to any significant degree is unlikely. Impacts to paleontological resources would be *less than significant*. No mitigation is required.

## **2. Cumulative Impacts**

Implementation of the Eastern Alignment would potentially contribute to the cumulative degradation of significant archaeological resources in the County. The destruction of archaeological resources has a significant cumulative impact as they are inherently important to the descendants of native peoples and make the study of prehistoric and historic life unavailable for study by scientists. Given the prevalence of cultural resource sites in San Luis Obispo, and the number of construction activities that involve disturbance of archaeologically sensitive areas that are not regulated, it is likely that significant prehistoric and historic resources are often not identified and are permanently lost. For the Eastern Alignment, impacts to known potential subsurface prehistoric archaeological resources would be mitigated by implementation of data recovery and monitoring. Based on implementation of mitigation measures recommended in this EIR, potential cumulative impacts resulting from the Eastern Alignment are considered *less than significant*. No additional mitigation is required.

## **F. GEOLOGY, SOILS, AND DRAINAGE**

This section discusses potential geologic, soils, and drainage impacts that would result from the Eastern Alignment. It focuses on Segments 2 and 3 as that is where improvements are proposed. Chapter 4 of this EIR describes the site's existing geology, soils and drainage conditions, regulatory environment, methods employed to evaluate potential project impacts, and the thresholds of significance utilized to assess the impacts. Please refer to Chapter 4 for detailed discussions of these topics.

### **1. Project-Specific Impacts and Mitigation Measures**

#### **a. Faulting and Seismicity**

Seismic activity could induce liquefaction, resulting in uneven settlement of the bikeway or cracking of the pavement along the Eastern Alignment. Based on the geotechnical report, liquefaction resulting from an earthquake could induce settlement and lateral spreading of soils and even failure of the bridge abutments. The Eastern Alignment does not include habitable structures and failures of the majority of the bikeway would necessarily expose persons to injury; however bridge or retaining wall failures could. Any failure could also indirectly accelerate localized erosion and sedimentation.

**GSD Impact E1 The Eastern Alignment improvements would be subject to damage or failure may become unstable when a seismic event results in liquefaction of the underlying soils.**

*Implement GSD/mm-1 (refer to Chapter 4).*

#### **Residual Impacts**

The potential exists that a major seismic event coupled with other events such as high groundwater conditions and/or storm events will impact the project improvements; however, implementation of GSD/mm-1 would reduce potential impacts to a *less than significant* level. No additional mitigation is necessary.

#### **b. Soil Conditions**

##### **Soil Erosion**

Construction activities would increase the amount of exposed soils and create small slopes subject to erosion. Erosion would be accelerated where soils are directly exposed to concentrated stormwater runoff such as at culverts and existing drainage swales.

**GSD Impact E2 Construction activities, including soil disturbance and removal of vegetation would cause erosion and down-gradient sedimentation, resulting in a potentially significant impact.**

*Implement BR/mm-6 through 10 (refer to Chapter 4).*

## Residual Impacts

Implementation of these measures, which include preparation of a sedimentation and erosion control plan, would reduce potential erosion and sedimentation impacts to a less than significant level. No additional mitigation is necessary.

## Expansive Soils

Refer to Section 4-5. There is no indication that measures beyond those already required by ordinance required would be necessary. Impacts associated with expansive soils are *less than significant*.

## Bluff Retreat

Bluff retreat is not applicable to the Eastern Alignment.

## Drainage

There are no proposed drainage improvements proposed for the Eastern Alignment. Segment 2 would be located adjacent to Highway 1. Stormwater currently sheet flows and is collected at a curb on the eastside of the highway, or flows into the center median. In both cases, stormwater is then carried by culvert under Highway 1 as discussed in Chapter 4. Segment 2 would require retaining walls, in some cases on both sides of the bikeway. These walls and the bikeway surface would be impervious and could channel runoff which currently percolates or sheetflows into the existing drainage along Highway 1.

Segment 3 would be located east of the Highway 1 ROW and east of the Highway stormwater collection and drainage system (culvert intakes, curbs, etc.) The bikeway surface along Segment 3 would be impervious and is located slightly above the grade of the highway; therefore may contribute stormwater to the Highway 1 drainage system. In other cases, the topography appears to be such that drainage from the bikeway may sheet flow into existing coastal marsh (refer to Figure 4.3-2) or Toro Creek. Given the limited topographic changes along Segment 3 and that bikeway is relatively narrow compared to the drainage area east of Highway 1, increased impervious surface would not significantly affect runoff patterns.

Portions of Segment 3, including the bridge approaches and abutments would be constructed within the 100-year floodplain. The deck of the bridge is expected to be located at the same level or slightly higher than the Highway 1 bridge to avoid constricting the highest flows of Toro Creek under the bridge; nevertheless, the bridge could capture debris and the bikeway approaches would technically result in “filling” a small portion of the floodplain, potentially raising floodlevels downstream and affecting the function of Highway 1 during high flow events.

**GSD Impact E3 Construction of the Eastern Alignment bikeway, the bridge over Toro Creek, retaining walls, and the barrier system, would increase impervious surfaces, capture and concentrate stormwater, and alter local drainage patterns.**

*Implement GSD/mm-4, 5 and BR/mm-9.*

## Residual Impacts

Implementation of these measures would reduce drainage impacts to a *less than significant* level. No additional mitigation is required.

## 2. Cumulative Impacts

Potential impacts related to geologic, soils, and seismic hazards are generally site-specific, and mitigation measures are applied to each project to minimize the potential for significant geologic impacts. In this case potential Eastern Alignment impacts have been reduced to a less than significant level. The relatively small scope of development would have limited impact on existing geology, soils and drainage conditions and would not contribute cumulatively to changes in local conditions. Cumulative impacts are *less than significant*. No mitigation is required.

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## **G. HAZARDS AND HAZARDOUS MATERIALS**

This section describes existing and potential sources of environmental hazards and hazardous materials associated with the Eastern Alignment. Because no subsurface disturbance is proposed for Segments 1 and 4, this section focuses on Segments 2 and 3. Chapter 4 of this EIR describes the site's existing hazardous conditions, regulatory environment, methods employed to evaluate potential project impacts, and the thresholds of significance utilized to assess the impacts. Please refer to Chapter 4 for detailed discussions of these topics.

### **1. Project-Specific Impacts and Mitigation Measures**

#### **a. Marine Terminal Contamination**

Given the area of contamination shown in Figure 4.6-1, and the depths of contamination provided by Chevron, it appears that hydrocarbon contaminated soils would be encountered during construction of the Eastern Alignment. This is particularly true of Segment 3 at the proposed Toro Creek bridge. Excavations for the bridge abutment foundations would likely reach at least nine feet below the surface, where contamination is known to exist currently, especially if piers or caissons are used. However Chevron's ongoing clean-up and abatement actions on the Marine Terminal east of Highway 1 would reduce the potential for encountering contamination. Because the contamination is at considerable depth, there is little potential for bikeway users to encounter it.

**HAZ Impact E1 Hydrocarbon-contaminated soils would potentially be encountered during construction of the Eastern Alignment improvements within the Marine Terminal property, resulting in a release of hazardous materials into the environment.**

*Implement HAZ/mm-1 and HAZ/mm-2 (refer to Chapter 4).*

Residual Impact

With implementation of HAZ/mm-1, impacts would be *less than significant*. No additional mitigation measures are required.

#### **b. Underground Pipelines**

Refer to Section 4-6. Compliance with construction and engineering standards, which require identification of utilities and pipelines on project plans and in the field, would reduce potential impacts to a *less than significant level*. No mitigation is required.

#### **c. Tsunamis**

Refer to Section 4-6. Existing procedures would adequately reduce the potential exposure of bikeway users to a tsunami hazard. Impacts would be *less than significant*. No mitigation measures are required.

#### **d. Rockfall**

Segment 2 would be located on a large cutslope where the geologic formation is highly fractured and where there is with little soil or vegetative cover. The cut-slope includes a series of benches which act as drainage conduits, and they also could detain rocks and soil which

comes free from the slopes above. One such bench is located approximately 35 feet above the proposed Eastern Alignment. Based on the lack of debris at the bottom of the cutslope and the fact that no debris catching system is in place despite the proximity of the slope to Highway 1, it does not appear that rockfall on the lowest slopes has historically been a safety or maintenance issue for Caltrans. However, the Eastern Alignment would require construction of two retaining walls and place bikeway users in close proximity to a large cut-slope where rocks could come loose during seismic events or as a result of erosion.

**HAZ Impact E2    Bikeway users could be exposed to rockfall hazards along Segment 2 of the Eastern Alignment.**

*Implement GSD/mm-1 (refer to Chapter 4).*

**Residual Impact**

Implementation of GSD/mm-1 would reduce potential rockfall hazard impacts to a *less than significant* level.

## **2. Cumulative Impacts**

Potential hazards and use of hazardous materials are location-specific to the extent that they may result in significant impacts on the localized environment, but they are not “cumulative” in the sense normally applied in CEQA documents. Further, the impacts identified in this section are associated with relatively short-term construction activities; therefore, the cumulative impacts related to these issues and mitigation measures that have been identified for the proposed project would apply cumulatively as well. Cumulative impacts would be *less than significant*. No additional mitigation is required.

## H. TRANSPORTATION AND CIRCULATION

This section of the EIR documents the transportation-related impacts associated with the Eastern Alignment. Section 4-7 of this EIR describe the site's existing circulation system and conditions, regulatory environment, methods employed to evaluate potential project impacts, and the thresholds of significance utilized to assess the impacts. Please refer to Chapter 4-7 for detailed discussions of these topics.

### 1. Project-Specific Impacts and Mitigation Measures

#### a. Intersection and Roadway Capacity

Refer to Section 4-7. The Eastern Alignment would not generate enough traffic to impact local roads and intersections that are all currently and anticipated to operate at acceptable LOS. Impacts would be *less than significant*. No mitigation is required.

#### b. Short-term Highway 1 Lane Closure

Construction of Segment 2 would result in the periodic closure of at least one northbound lane of Highway 1. This closure would likely slow traffic along Highway 1 and cause congestion during the period of construction.

**TC Impact E1      Construction of the Eastern Alignment would result in periodic lane closures along Highway 1 during construction, resulting in a potentially significant impact.**

*Implement TC/mm-1 (refer to Chapter 4).*

Residual Impact

With implementation of mitigation, this impact would be *less than significant*.

#### c. Bicycle and Pedestrian Traffic

Refer to Section 4-7. The Eastern Alignment would connect existing bikeways in Morro Bay and Cayucos, as well as provide a Class I bikeway along Highway, separate from highway traffic. There would be *no impacts* to bicycle or pedestrian traffic. No mitigation is required.

#### d. Parking

##### Parking Congestion

The Eastern Alignment does not include the same potential parking capacity as the proposed project. Informal lots between Yerba Buena and Studio Drive would likely not be as attractive to bikeway users as they would require an unsignalized crossing of Highway 1 to get to the bikeway. As a result those lots may not be impacted, however that may result in additional burdens to parking areas along Segment 1 at the Cloisters Park and Azure Street, but in particular at the North Point Natural Area and the Morro Strand State Parks day use parking area.

An increase in use resulting from the Eastern Alignment would potentially create parking demands that exceed supply, especially if the large parking area at the Norma Rose Park is not

effectively utilized. Neighborhood streets along Segment 1, Zanzibar and Main Street in Morro Bay, and Ocean Boulevard in Cayucos would likely see an increase in curbside parking as well. During holiday weekends, demand may exceed supply at these locations based on analysis of current usage of the parking areas utilized by the Eastern Alignment. This impact would be temporary, and limited to peak holiday and travel weekends (i.e., Fourth of July, Labor Day, etc.).

**TC Impact E2      The Eastern Alignment would result in parking demand exceeding proposed supply, as well as an increase in neighborhood curbside parking in areas where existing parking may be insufficient to meet user needs, resulting in a potentially significant impact.**

*Implement TC/mm-2 (refer to Chapter 4).*

#### Residual Impact

Even with implementation of this measure impacts would be likely during peak holiday and weekend times. However, these impacts already exist to a degree and the contribution of the Eastern Alignment may not be perceptible. With mitigation and in the context of existing high coastal access parking demand this impact would be considered *less than significant*.

#### Short-term Disturbance of Parking Areas

This impact is not applicable to the Eastern Alignment.

### **e. Safety**

#### Increased Cyclist and Pedestrian Use of Local Roads

The proposed Class I bikeway would separate bicycle and pedestrian users from the high-speed motorized traffic on Highway 1. However, the Eastern Alignment is expected to result in an increase in bicycle and pedestrian traffic along the project corridor, including an increase in use within those existing neighborhoods where Class III paths already exist. The increased traffic in established neighborhoods could create potentially dangerous driving conditions in residential areas serving as a passageway for bicycle and pedestrian traffic, as bicyclists can be hard to see in the context of street parking, signage, and/or landscaping. While the increased trips would not significantly reduce the level of service on these local roads residents may notice the increased level of bike and pedestrian traffic. Local streets likely affected by the increase in visitor traffic include Sandalwood Avenue, Beachcomber Drive, Toro Lane, Zanzibar Street, Main Street, Studio Drive and Ocean Boulevard.

**TC Impact E3      The Eastern Alignment would increase cyclist and pedestrian use of surface streets, and require them to navigate streets with fairly dense housing, substantial on-street parking, narrow streets, and limited visibility.**

*Implement to TC/mm-2 (refer to Chapter 4).*

#### Residual Impact

With implementation of mitigation measure TC/mm-2, this impact would be *less than significant*.

### Highway 1 Crossing

The Eastern Alignment would require crossing Highway 1 at Yerba Buena Street, which could lead to increased conflicts between motorists and cyclists. The intersection already acts as a pedestrian and bike path crossing, and crosswalks and a traffic signal at this intersection are currently utilized to provide the safest crossing possible, short of a grade-separated route. There is a limited history of bicycle-related accidents at this intersection. However, increased traffic, particularly from less experienced cyclists and tourists, could lead to reduced safety at this location. In addition, bikeway users may attempt to cross Highway 1 at unsignalized locations, such as at Toro Creek Road and Studio Drive, to access the marine terrace, beach and the Studio Drive coastal access points

**TC Impact E4      The Eastern Alignment would result in increased bicycle and pedestrian traffic at the Highway 1/Yerba Buena intersection, and at undesignated locations along Highway 1.**

*Implement TC/mm-2.*

Residual Impact

With implementation of mitigation, this impact would be considered *less than significant*.

## **2. Cumulative Impacts**

Population and tourism in the areas surrounding the Eastern Alignment are expected to slowly and steadily increase in the future, resulting in a corresponding steady increase in parking demands and safety conflicts along the Eastern Alignment corridor. At the same time the proposed project may reduce vehicle trips as it would create an alternative transportation option between Morro Bay and Cayucos. Traffic along Highway 1 and other roads in the surrounding street network would increase along with beach tourism and bikeway usage. The Eastern Alignment would contribute cumulatively to the temporary parking impacts on holidays and weekends in the future.

**TC Impact E5      The Eastern Alignment would contribute to cumulative impacts associated with population and tourism growth in the area, resulting in increased traffic congestion, parking demand, and motorist and cyclist interaction safety issues.**

*Implement TC/mm-1 and 2 (refer to Chapter 4).*

Residual Impact

With implementation of mitigation, this cumulative impact would be *less than significant*.

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## I. LAND USE

This section of the EIR documents the Land Use impacts associated with the Eastern Alignment. The Eastern Alignment would in general be located within the same Land Use categories and Combining Designations as the proposed project (refer to Section 4.8, Land Use, Figures 4.8-1 and 4.8-2), although portions of Segments 2 and 3 of the Eastern Alignment are located in the County's Agriculture land use category. Appendix B and Section 4.8 of this EIR describe the plans and policies relevant to the proposed project, and with the exception of the shoreline/bluff setback related policies, they are also relevant to the Eastern Alignment. Relevant Agriculture and Open Space Policies are specifically discussed in this section.

### 1. Project-Specific Impacts and Mitigation Measures

#### a. Physically Divide an Established Community

The Eastern Alignment would not divide either the City of Morro Bay or the community of Cayucos in any way; rather, it would serve as an alternative transportation connection between and throughout those communities resulting in a beneficial impact to community connectivity. The project is consistent with various regional transportation and coastal plans encouraging public coastal access and alternative transportation methods. Impacts would be *less than significant*. No mitigation is required.

#### b. Conflict with Any Applicable Land Use Plan, Policy, or Regulation

Appendix B identifies approximately 100 policies relevant to the proposed project. These policies are in general also relevant to the Eastern Alignment. Exceptions include those policies such as Hazards Policy 6 from the County Coastal Plan Policies, which require specific bluff setbacks. Because portions of the Eastern Alignment would be located within the Agriculture land use category, additional policies from the County's General Plan, Agriculture and Open Space Element are also relevant. These policies are described below.

##### AGP 18a. Locate new buildings, access roads, and structures so as to protect agricultural land.

This policy is intended to ensure that new developments are sited such that the most productive agricultural lands are maintained for production. Specifically, it notes that new development on farmland should be (1) minimized, (2) located on least productive areas of farmland, and (3) sited in ways so that new roads do not bisect farm fields.

##### AGP 24. Conversion of Agricultural Land.

This policy discourages the conversion of agricultural lands to non-agricultural lands. It suggests that locating new public facilities outside of urban and village reserve line should be avoided if feasible alternatives exist.

##### AGP 31 Recreational Use of Agricultural Lands

This policy encourages recreational uses on private lands in cases where such uses are compatible with agriculture, scenic, and environmentally sensitive resources.



### AGP 32. Trail Access to Public Lands

This policy is intended to ensure that trails do not result in trespass or damage to sensitive resources, livestock.

A project which is inconsistent with any of these policies would potentially impact agricultural resources directly through the conversion of agricultural lands to another use, or indirectly by introducing an incompatible use into an agricultural area, bisecting farm fields, and/or otherwise reducing the capability of an existing agricultural operation. The Eastern Alignment is consistent with AGP 18a. The bikeway is located as close to the non-agricultural portions of the property (Highway 1 right-of-way) as possible, and it would not bisect farm fields.

The Eastern Alignment is potentially inconsistent with AGP 24 because it would result in a conversion of agricultural land (0.9 acres) to a non-agricultural use. It is also potentially inconsistent with AGP 31 and 32 as it would potentially result in conflicts between the recreational uses and the agricultural uses. However, mitigation which would reduce impacts resulting from these inconsistencies, have been fully discussed in the Agricultural Resources section (F-2B). It was determined in that section that impacts would be less than significant. Therefore the Eastern Alignment is considered consistent with these policies.

Of the policies identified in Appendix B and those Agriculture and Open Space policies identified above, the Eastern Alignment would only potentially be inconsistent with the City of Morro Bay's Environmentally Sensitive Habitat Area policy 11.14, which requires a minimum buffer of 50 feet between coastal streams and development. Compliance with this policy is infeasible however, as the proposed project must cross Toro Creek to meet its objectives of providing an off-highway alternative transportation link between the City's of Morro Bay and the community of Cayucos. Substantial mitigation measures have been developed in the Biological Resources section that address potential impacts to Toro Creek. There are no additional impacts resulting from plan or policy conflicts that need to be addressed in the Land Use section. Impacts are considered *less than significant*. No additional mitigation is required.

### **c. Conflict with any Applicable Habitat Conservation Plan or Natural Community Conservation Plan**

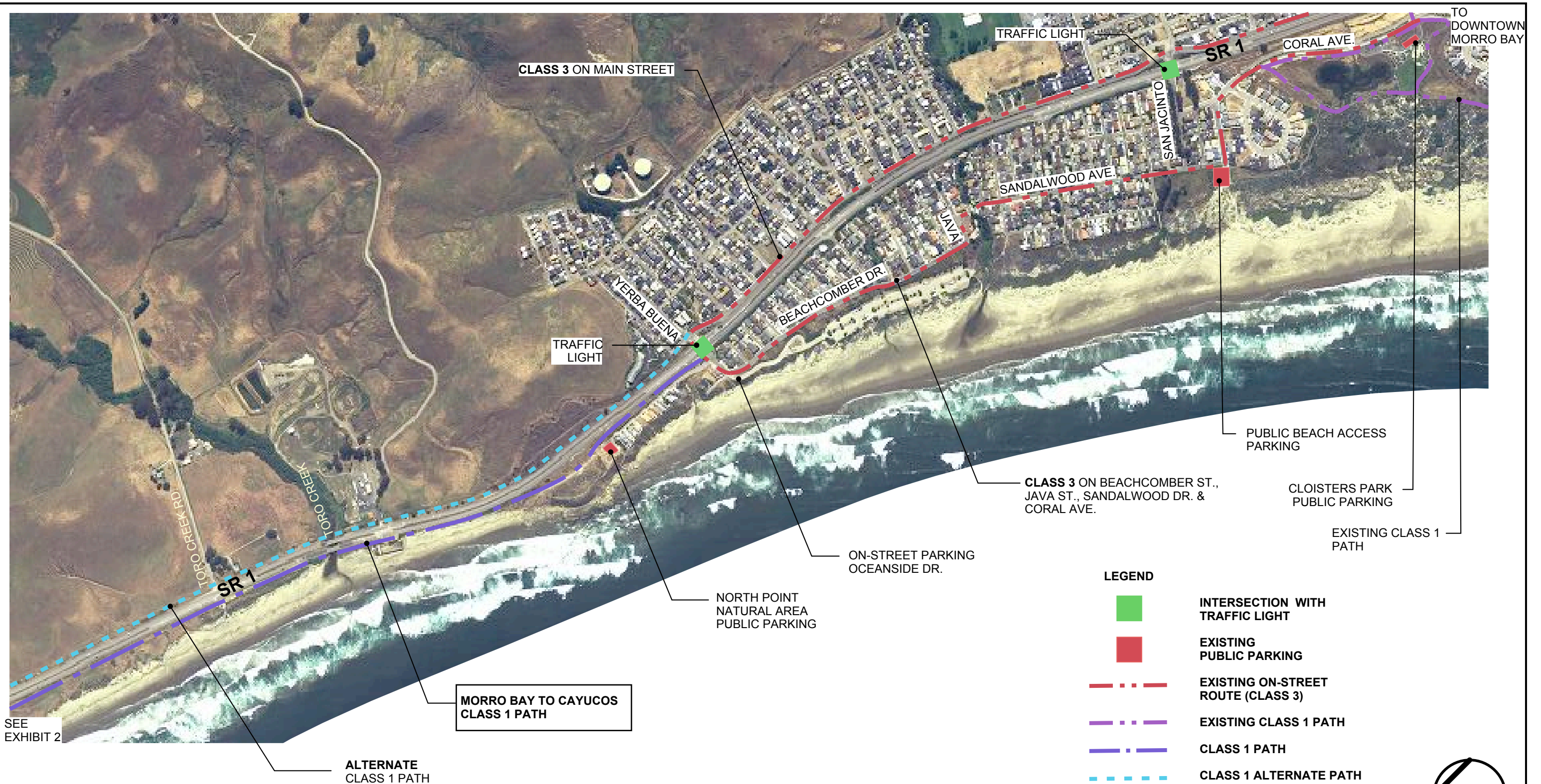
There are no applicable Habitat Conservation Plans or Natural Community Conservation Plans that regulate lands within the project corridor. Therefore, the proposed project would not conflict with the regulations of any such plans. There is *no impact*. No mitigation is required.

## **2. Cumulative Impacts**

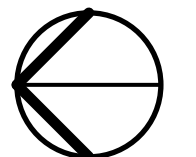
Potential cumulative land use impacts would be avoided or minimized through implementation of the design standards and procedures incorporated into the proposed project. Cumulative impacts related to other impact areas (e.g., biological resources, air quality, etc.) are analyzed and discussed in the impact sections of this EIR.

**Appendix G.**  
**Preliminary Plans**





**EXHIBIT 1**  
The Cloisters to Yerba Buena Street



**North**  
**no scale**

File Name: Firma\_MB-Cayucos Path(2502) Last Date Modified: 6/16/08

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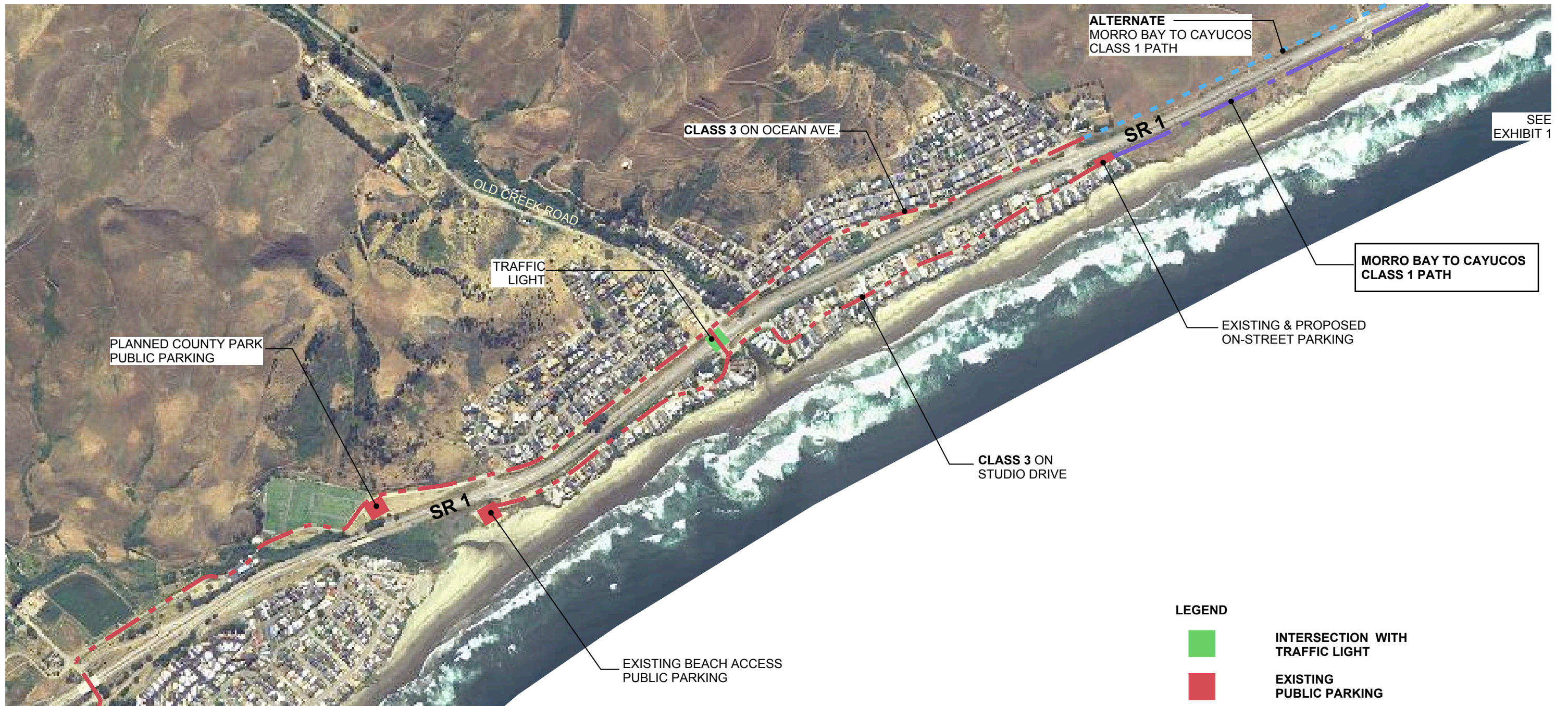
**BOYLE**  
ENGINEERING CORPORATION  
1194 Pacific St., Suite 204  
San Luis Obispo, CA. 93401  
Tel. 805-542-9840  
Fax 805-542-9990  
WWW.BOYLEENGINEERING.COM

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landscape architects  
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**Morro Bay To Cayucos Path**  
San Luis Obispo County, CA  
**Regional Context & Access-South**

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drawn by:	
checked by:	
plan check	5/14/08
issue date:	
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issue date:	

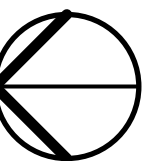
SHEET  
**1**  
OF 8 SHEETS



TO DOWNTOWN CAYUCOS  
VIA OCEAN AVE.

#### LEGEND

- INTERSECTION WITH TRAFFIC LIGHT
- EXISTING PUBLIC PARKING
- EXISTING ON-STREET ROUTE (CLASS 3)
- CLASS 1 PATH
- CLASS 1 ALTERNATE PATH



**North**  
**no scale**

## EXHIBIT 2

Studio Drive to SR1 Underpass at Ocean Blvd.

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## Morro Bay To Cayucos Path

San Luis Obispo County, CA

### Regional Context & Access-North

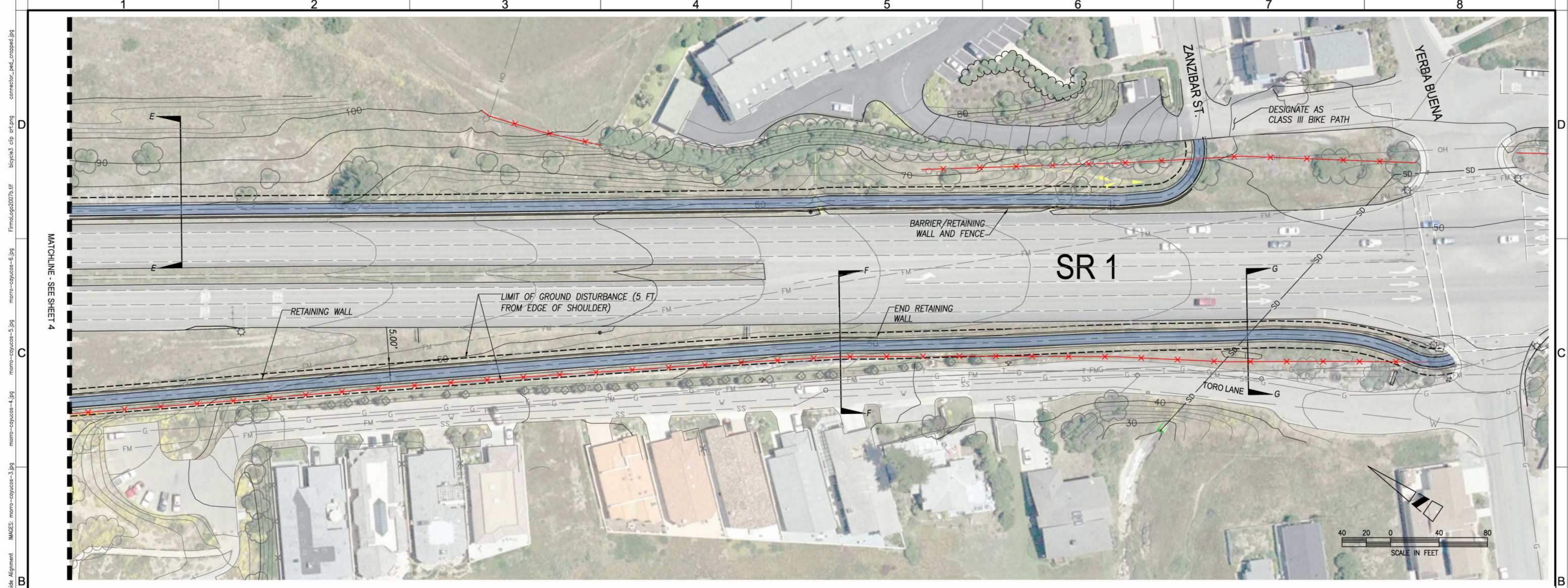
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**2**

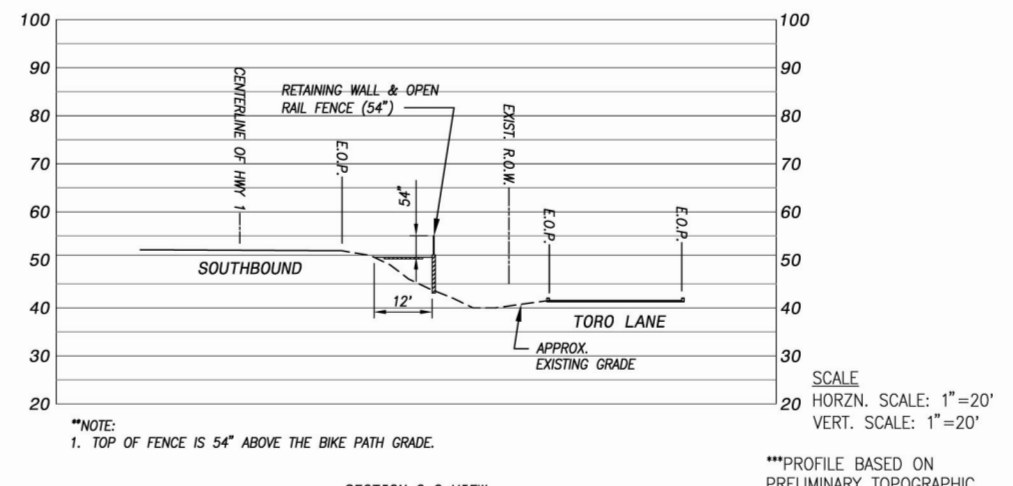
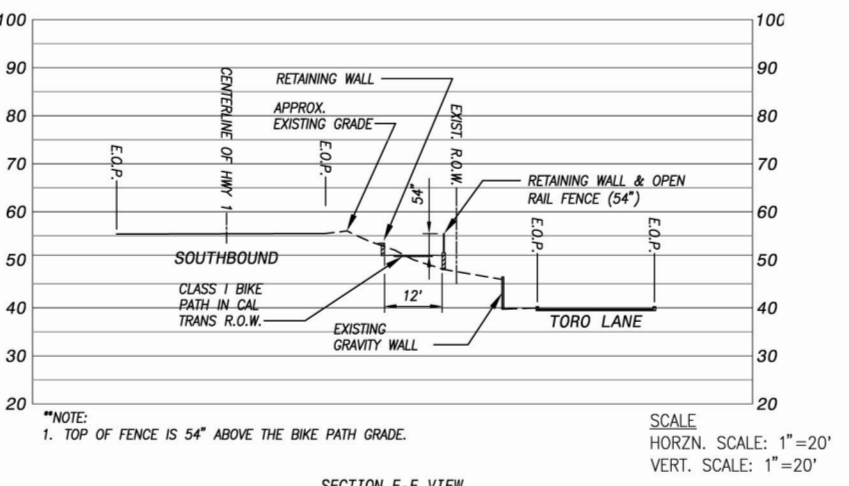
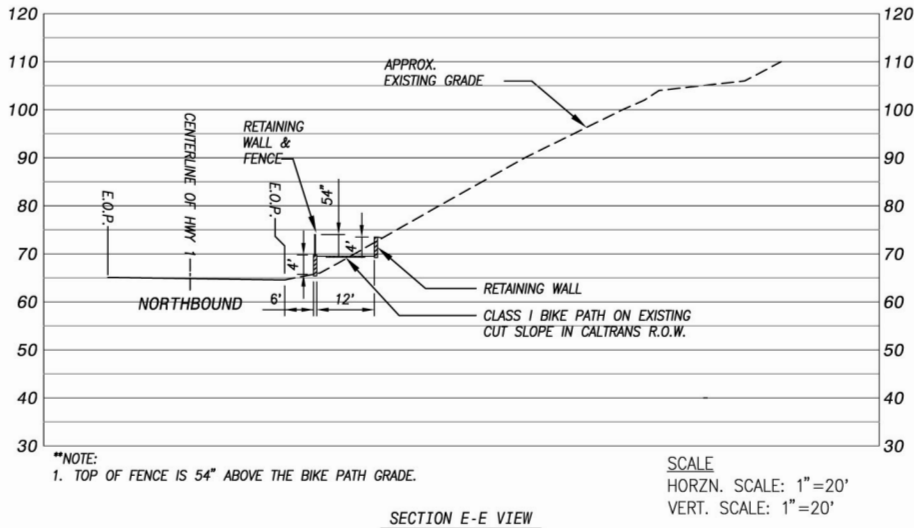
OF 8 SHEETS





FOR SYMBOL LEGEND  
SEE EXHIBIT 8, SHEET 8

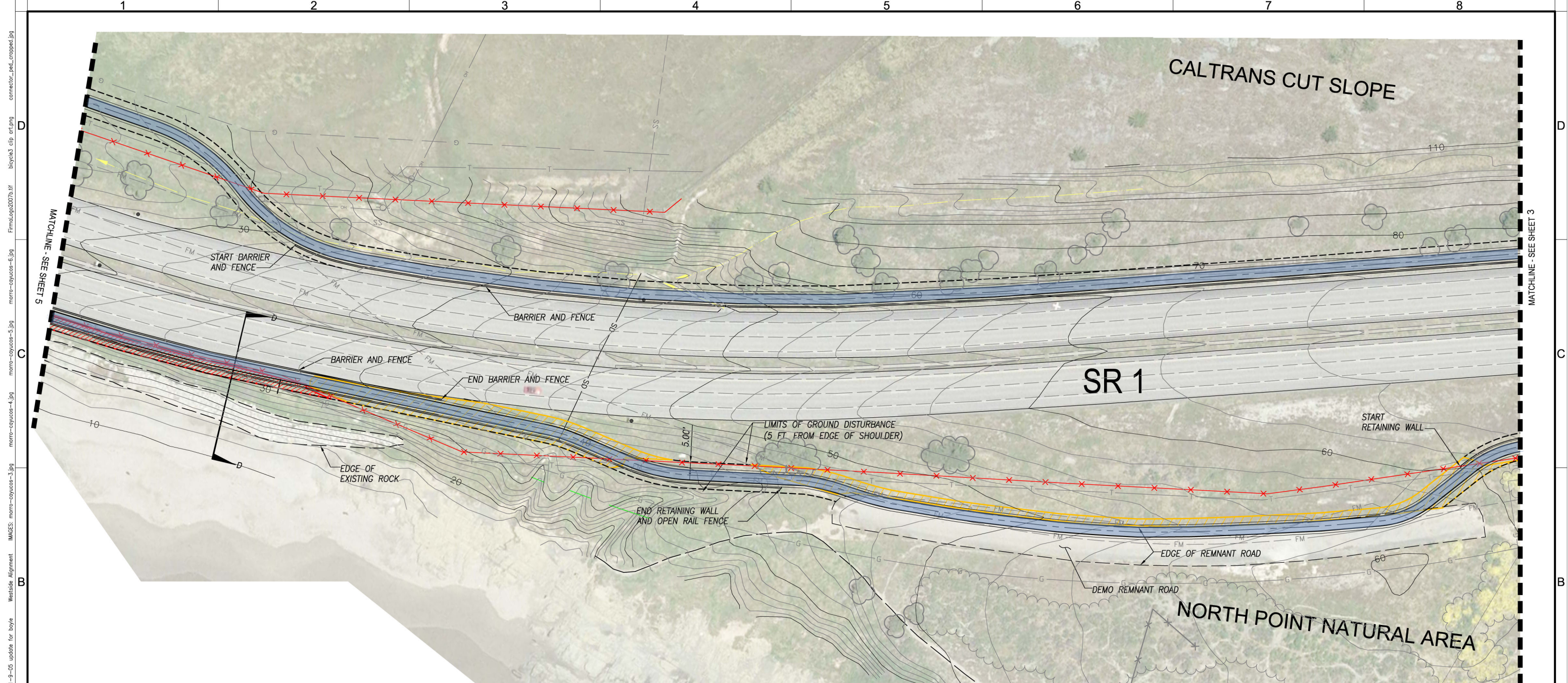
**EXHIBIT 3 – Segment A**  
Yerba Buena to North Point Natural Area



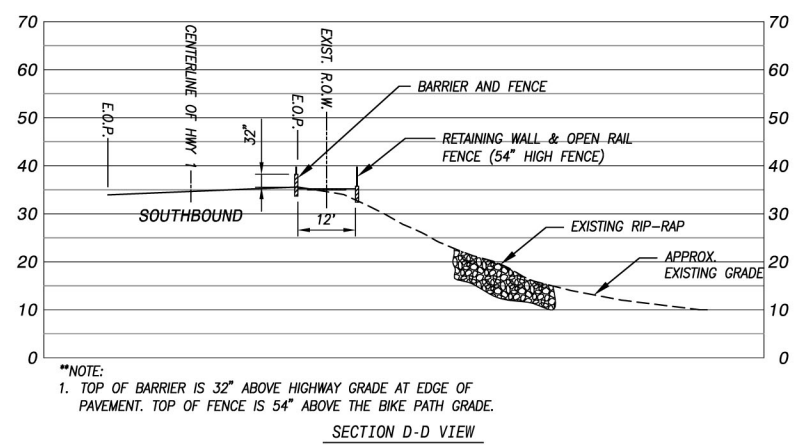
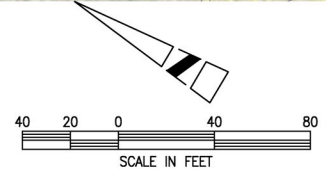
\*\*\*PROFILE BASED ON  
PRELIMINARY TOPOGRAPHIC  
DATA. ADDITIONAL DATA  
NEEDED FOR DETAILED DESIGN

VERIFY SCALES BAR IS ONE INCH ON ORIGINAL DRAWING IF NOT ONE INCH ON THIS SHEET, ADJUST SCALES ACCORDINGLY		DESIGNED BY MM DRAWN BY JPF CHECKED BY DATE JAN. 2008	PROJECT ENGINEER Malcolm McEwen REC NUMBER C55874 PROJECT NUMBER 19986.00 CADD STANDARDS BOYLE	<b>BOYLE</b> ENGINEERING CORPORATION 1194 Pacific St., Suite 204 Tel. 805-542-9840 San Luis Obispo, CA 93401 Fax 805-542-9990 WWW.BOYLEENGINEERING.COM	<b>firma</b> landscape architects planning-environmental studies	MORRO BAY TO CAYUCOS PATH SAN LUIS OBISPO COUNTY, DEPARTMENT OF GENERAL SERVICES <b>PATH ALIGNMENT PLAN</b>	DRAWING - SHEET <b>3</b> OF 8 SHEETS
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**EXHIBIT 4 – Segment B**  
North Point Natural Area to Rock Barrier

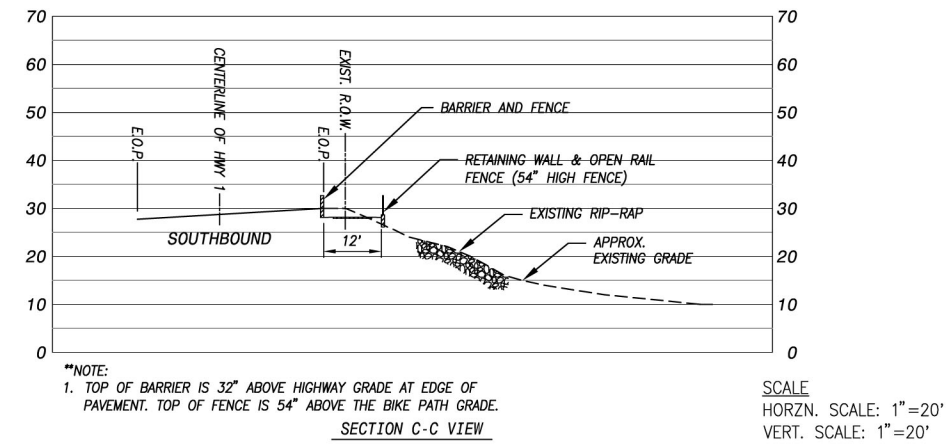
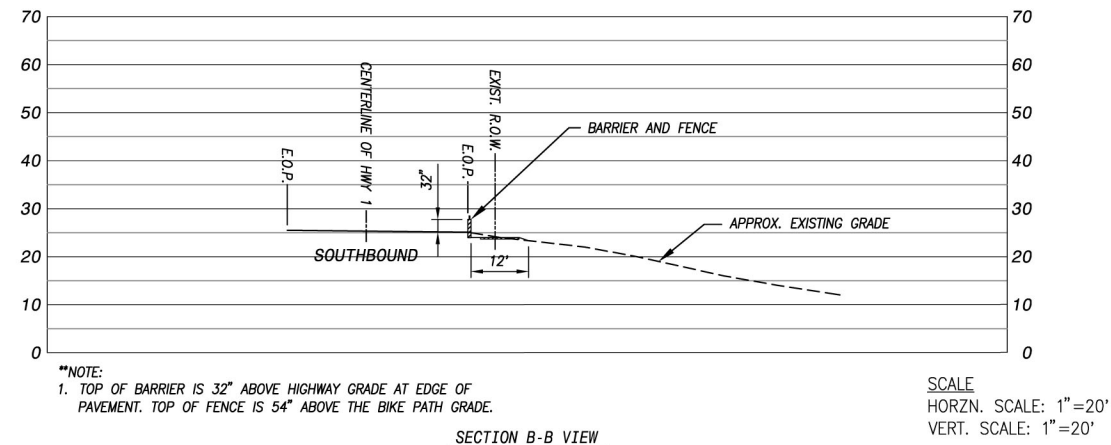
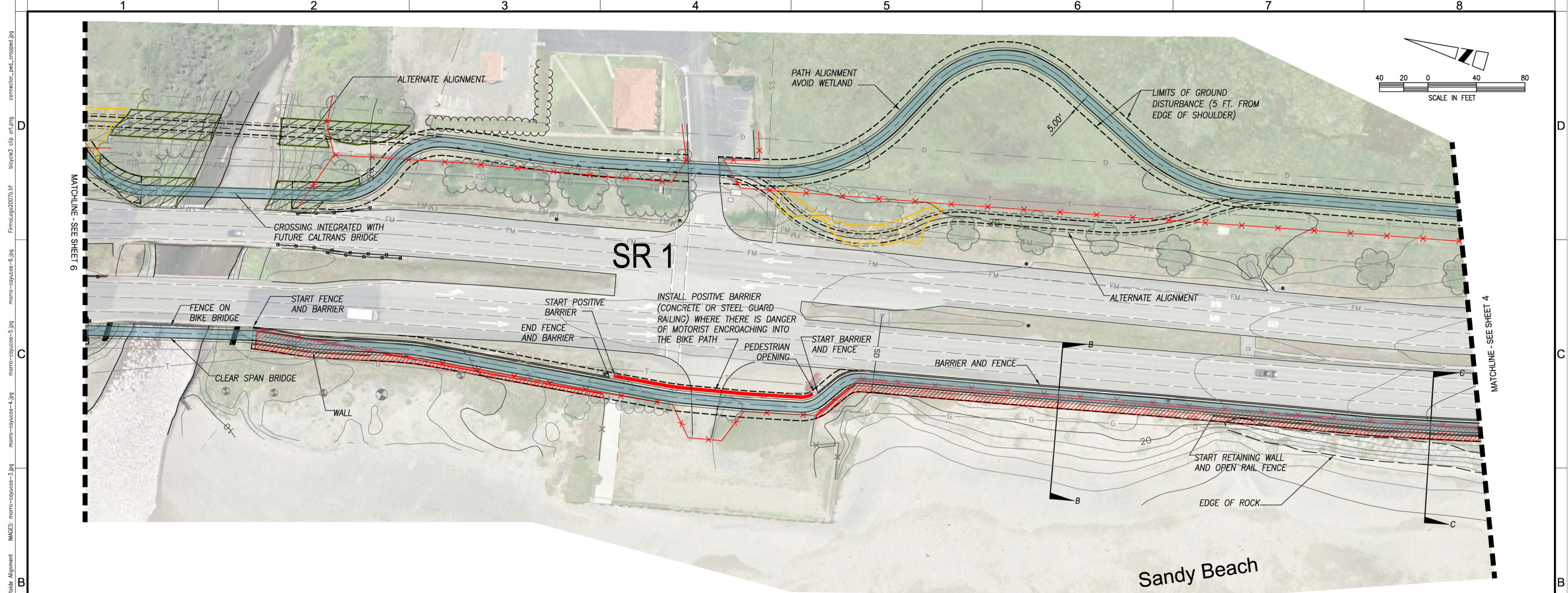


SCALE  
HORZN. SCALE: 1"=20'  
VERT. SCALE: 1"=20'

\*\*\*PROFILE BASED ON  
PRELIMINARY TOPOGRAPHIC  
DATA. ADDITIONAL DATA  
NEEDED FOR DETAILED DESIGN

<div>VERIFY SCALES</div> <div>BAR IS ONE INCH ON ORIGINAL DRAWING</div> <div>IF NOT ONE INCH ON THIS SHEET, ADJUST SCALES ACCORDINGLY</div>			<div>DESIGNED BY</div> <div>MM</div> <div>PROJECT ENGINEER</div> <div>Malcolm McEwen</div> <div>REC NUMBER</div> <div>C55874</div> <div>EXP DATE</div> <div>12/31/2008</div>		<div>CHECKED BY</div> <div>JPF</div> <div>PROJECT NUMBER</div> <div>19986.00</div> <div>DATE</div> <div>JAN. 2008</div> <div>CADD STANDARDS</div> <div>BOYLE</div>			<div>BOYLE</div> <div>ENGINEERING CORPORATION</div> <div>1194 Pacific St., Suite 204 Tel. 805-542-9840</div> <div>San Luis Obispo, CA 93401 Fax 805-542-9990</div> <div>WWW.BOYLEENGINEERING.COM</div>		<div>firma</div> <div>landscape architects</div> <div>planning environmental studies</div>		<div>MORRO BAY TO CAYUCOS PATH</div> <div>SAN LUIS OBISPO COUNTY, DEPARTMENT OF GENERAL SERVICES</div> <div>PATH ALIGNMENT PLAN</div>		<div>DRAWING</div> <div>-</div> <div>SHEET</div> <div>4</div> <div>OF 8 SHEETS</div>
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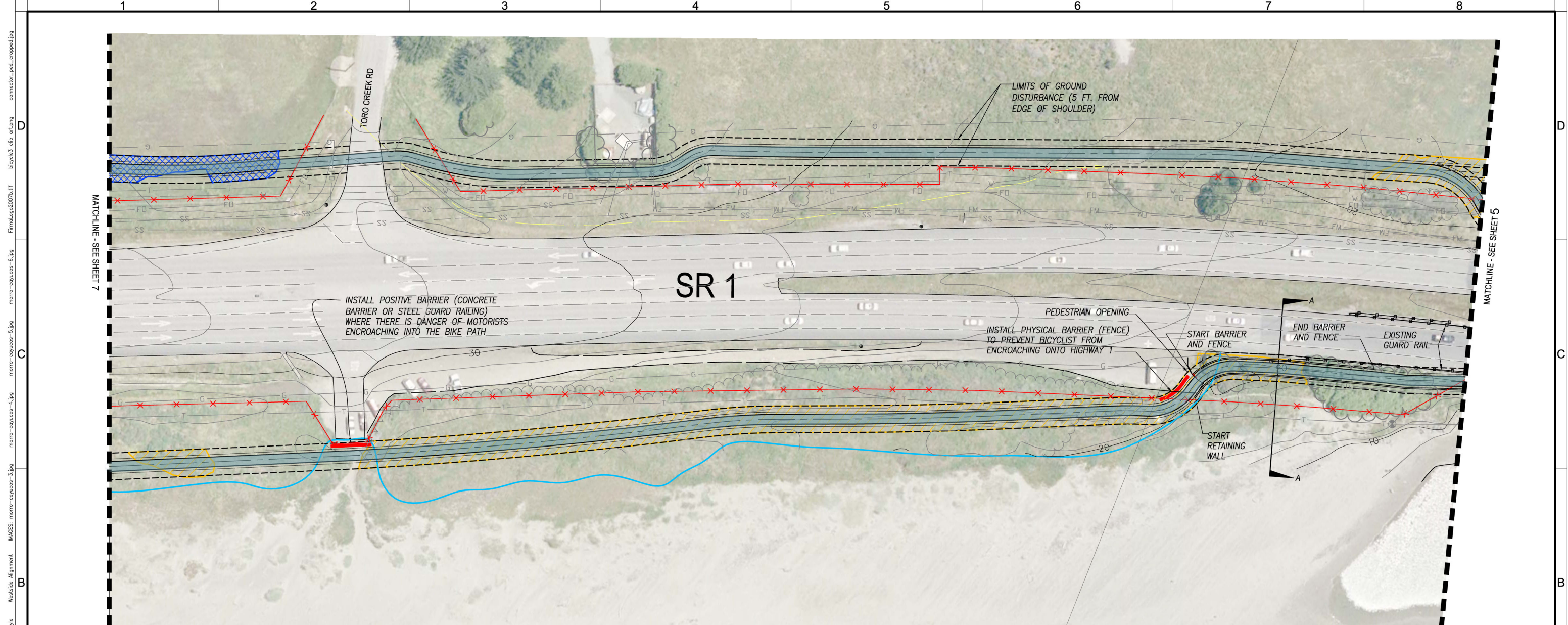




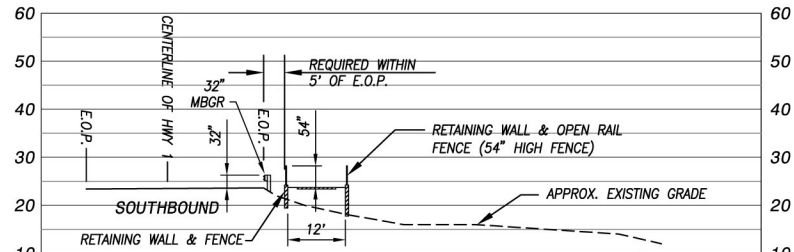
**EXHIBIT 5 – Segment C**  
**Rock Barrier to Toro Creek**

<div>W:\F21001\108 Bike Path\1008 PLANSET\BIKE PATH-Sheets3-8.dwg DATE: Feb 08, 2008 11:10am USER: jfrederich UNITES: 11-9-05 update for boye MAGES: morro-cayucos-3.jpg morro-cayucos-4.jpg morro-cayucos-5.jpg morro-cayucos-6.jpg firmLogo2007b.tif biocycle3 clip art.png connector_ped_cropped.jpg</div>	REV	DATE	DESCRIPTION	APPR	VERIFY SCALES BAR IS ONE INCH ON ORIGINAL DRAWING IF NOT ONE INCH ON THIS SHEET, ADJUST SCALES ACCORDINGLY	DESIGNED BY MM DRAWN BY JPF CHECKED BY DATE JAN. 2008	PROJECT ENGINEER Malcolm McEwen REC NUMBER C55874 EXP DATE 12/31/2008 PROJECT NUMBER 19986.00 CADD STANDARDS BOYLE	<div><b>BOYLE</b> ENGINEERING CORPORATION 1194 Pacific St., Suite 204 Tel. 805-542-9840 San Luis Obispo, CA 93401 Fax 805-542-9990 WWW.BOYLEENGINEERING.COM</div> <div><b>firma</b> landscape architects planning environmental studies</div>	MORRO BAY TO CAYUCOS PATH SAN LUIS OBISPO COUNTY, DEPARTMENT OF GENERAL SERVICES	DRAWING - SHEET <b>5</b> OF 8 SHEETS
	PATH ALIGNMENT PLAN									



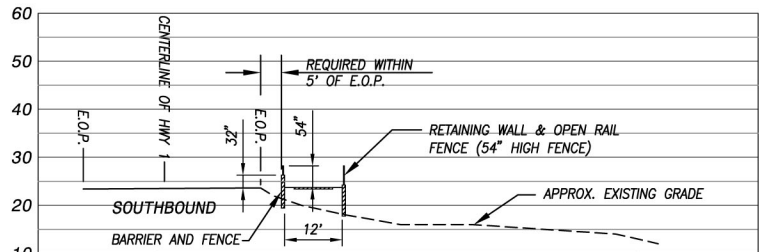


**EXHIBIT 6 – Segment D**  
**Toro Creek to Toro Creek Road**



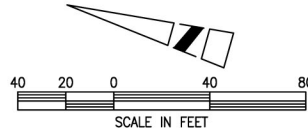
**\*\*NOTE:**  
1. TOP OF BARRIER IS 32\"/>

**ALTERNATE SECTION A-A VIEW**



**\*\*NOTE:**  
1. TOP OF BARRIER IS 32\"/>

**SECTION A-A VIEW**



**SCALE**  
**HORZN. SCALE: 1\"/>**

**\*\*\*SECTION VIEW BASED ON PRELIMINARY TOPOGRAPHIC DATA. ADDITIONAL DATA NEEDED FOR DETAILED DESIGN**

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REV

DATE

DESCRIPTION

APPR

VERIFY SCALES

BAR IS ONE INCH ON ORIGINAL DRAWING

IF NOT ONE INCH ON THIS SHEET, ADJUST SCALES ACCORDINGLY

DESIGNED BY

MM

DRAWN BY

JPF

CHECKED BY

DATE

JAN. 2008

PROJECT ENGINEER

Malcolm McEwen

REG NUMBER

C55874

EXP DATE

12/31/2008

PROJECT NUMBER

19986.00

CADD STANDARDS

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ENGINEERING CORPORATION

1194 Pacific St., Suite 204  
San Luis Obispo, CA. 93401

Tel. 805-542-9840  
Fax 805-542-9990

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MORRO BAY TO CAYUCOS PATH

SAN LUIS OBISPO COUNTY, DEPARTMENT OF GENERAL SERVICES

PATH ALIGNMENT PLAN

DRAWING

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SHEET

6

OF 8 SHEETS



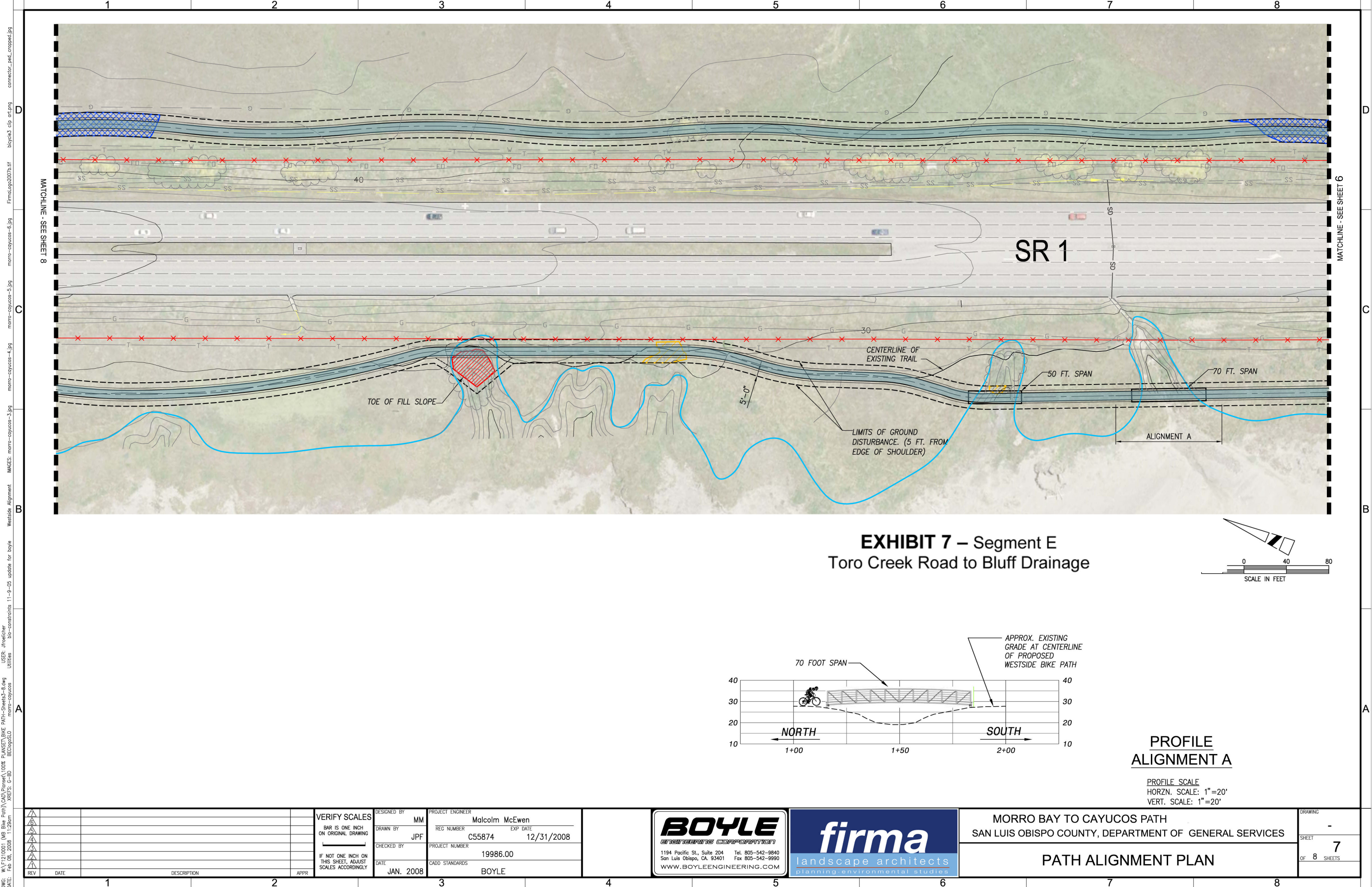
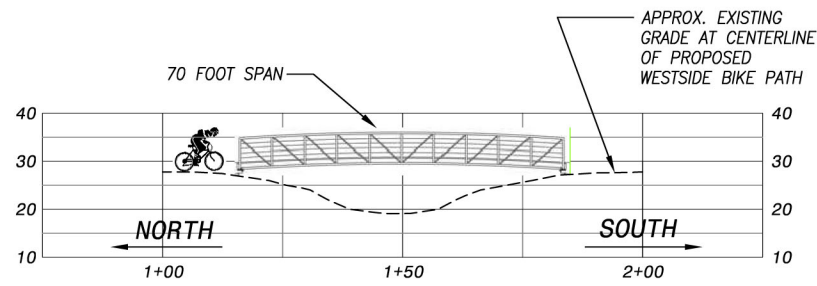
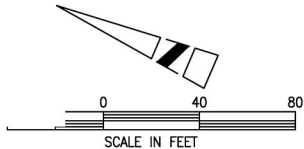


EXHIBIT 7 – Segment E  
Toro Creek Road to Bluff Drainage

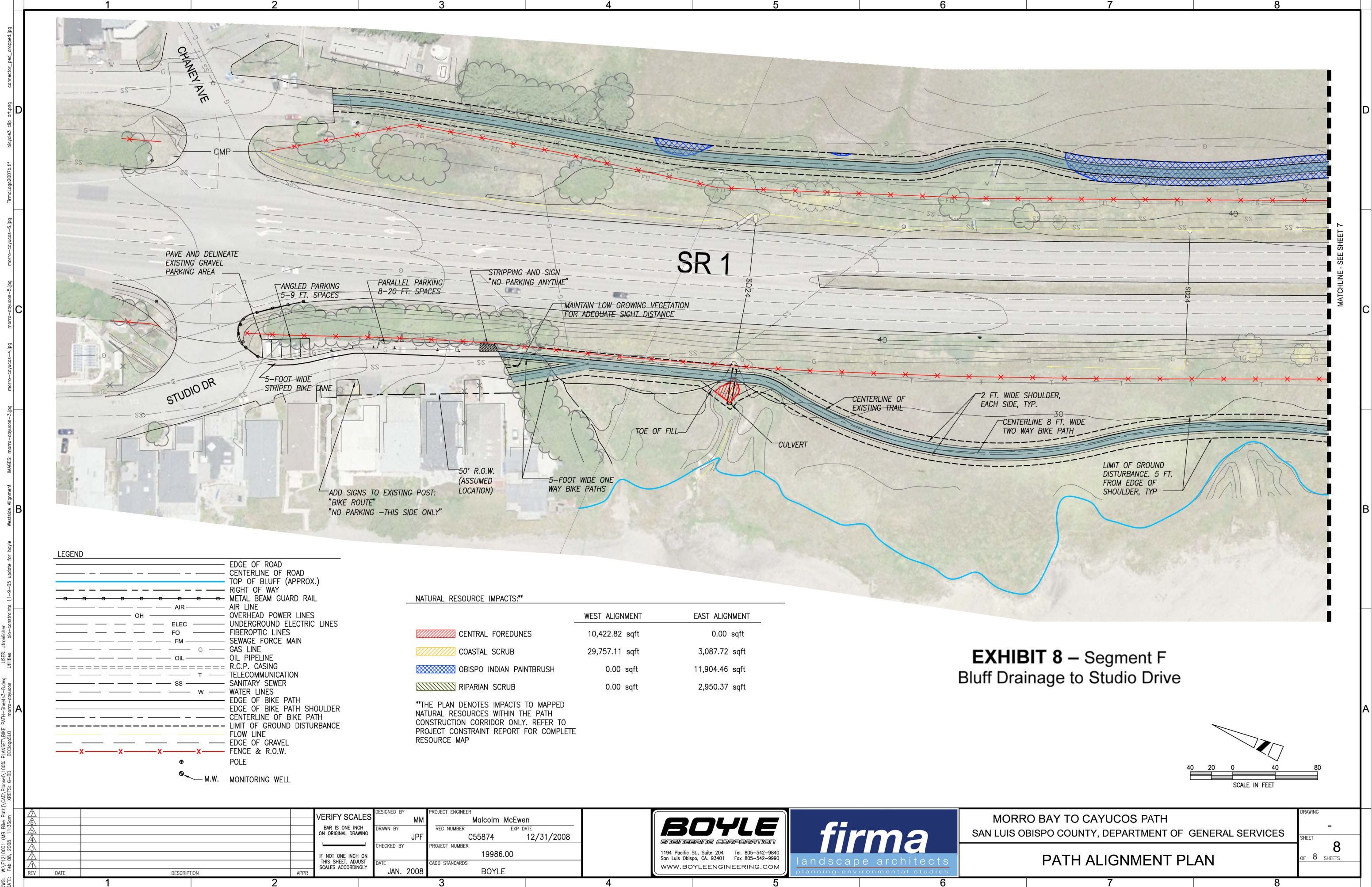


PROFILE  
ALIGNMENT A

PROFILE SCALE  
HORZN. SCALE: 1"=20'  
VERT. SCALE: 1"=20'

DWG: W:\F\21001\ (UB Bike Path) CAD\PlanSet\100% PLANSET\BIKE PATH-Sheets3-5.dwg DATE: Feb 06, 2008 11:25am USER: jfreelicher Utilities D:\Constraints 11-9-05 update for boyle IMAGES: morro-cayucos-3.jpg morro-cayucos-4.jpg morro-cayucos-5.jpg morro-cayucos-6.jpg FirmLogo2007a.tif biopel3 clip art.png connector_ped_cropped.jpg	REV DATE DESCRIPTION APPR	VERIFY SCALES BAR IS ONE INCH ON ORIGINAL DRAWING IF NOT ONE INCH ON THIS SHEET, ADJUST SCALES ACCORDINGLY	DESIGNED BY MM	PROJECT ENGINEER Malcolm McEwen	BOYLE ENGINEERING CORPORATION 1194 Pacific St., Suite 204 San Luis Obispo, CA 93401 Tel. 805-542-9840 Fax 805-542-9990 WWW.BOYLEENGINEERING.COM	firma landscape architects planning-environmental studies	MORRO BAY TO CAYUCOS PATH SAN LUIS OBISPO COUNTY, DEPARTMENT OF GENERAL SERVICES PATH ALIGNMENT PLAN	DRAWING - SHEET 7 OF 8 SHEETS	
			DRAWN BY JPF	REG NUMBER C55874					EXP DATE 12/31/2008
			CHECKED BY	PROJECT NUMBER 19986.00					
			DATE JAN. 2008	CADD STANDARDS BOYLE					



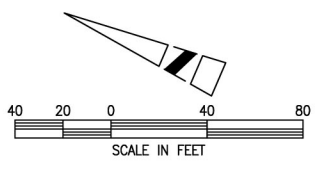


LEGEND	
	EDGE OF ROAD
	CENTERLINE OF ROAD
	TOP OF BLUFF (APPROX.)
	RIGHT OF WAY
	METAL BEAM GUARD RAIL
	AIR LINE
	OVERHEAD POWER LINES
	UNDERGROUND ELECTRIC LINES
	FIBEROPTIC LINES
	SEWAGE FORCE MAIN
	GAS LINE
	OIL PIPELINE
	R.C.P. CASING
	TELECOMMUNICATION
	SANITARY SEWER
	WATER LINES
	EDGE OF BIKE PATH
	EDGE OF BIKE PATH SHOULDER
	CENTERLINE OF BIKE PATH
	LIMIT OF GROUND DISTURBANCE
	FLOW LINE
	EDGE OF GRAVEL FENCE & R.O.W.
	POLE
	M.W. MONITORING WELL

NATURAL RESOURCE IMPACTS:**		
	WEST ALIGNMENT	EAST ALIGNMENT
CENTRAL FOREDUNES	10,422.82 sqft	0.00 sqft
COASTAL SCRUB	29,757.11 sqft	3,087.72 sqft
OBISPO INDIAN PAINTBRUSH	0.00 sqft	11,904.46 sqft
RIPARIAN SCRUB	0.00 sqft	2,950.37 sqft

\*\*THE PLAN DENOTES IMPACTS TO MAPPED NATURAL RESOURCES WITHIN THE PATH CONSTRUCTION CORRIDOR ONLY. REFER TO PROJECT CONSTRAINT REPORT FOR COMPLETE RESOURCE MAP

EXHIBIT 8 – Segment F  
Bluff Drainage to Studio Drive



W:\F\21001\ (MB Bike Path) CAD\Planes\1008 PLANSET\BIKE PATH-Sheets3-6.dwg  
DATE: Feb 06, 2008 11:30am  
XREFS: G-BD  
BIOG05LD

USER: jfreedricher  
Utilities  
bio-constraints 11-9-05 update for boye

Westside Alignment  
IMAGES: morro-cayucos-3.jpg  
morro-cayucos-4.jpg  
morro-cayucos-5.jpg  
morro-cayucos-6.jpg  
FirmLogo2007b.tif  
biopel3 clip art.png  
connector\_red\_cropped.jpg

REV

DATE

DESCRIPTION

APPR

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DESIGNED BY

MM

DRAWN BY

JPF

CHECKED BY

DATE

JAN. 2008

PROJECT ENGINEER

Malcolm McEwen

REG NUMBER

C55874

EXP DATE

12/31/2008

PROJECT NUMBER

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MORRO BAY TO CAYUCOS PATH

SAN LUIS OBISPO COUNTY, DEPARTMENT OF GENERAL SERVICES

PATH ALIGNMENT PLAN

DRAWING

-

SHEET

8

OF 8 SHEETS