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Product	**Name**	**Extended**
FISH	FISH AND WILDLIFE FILING	$81.00
	# Pages	13
	Document #	40-08202025-176
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Comment	1002682968

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8/20/25 10:17 AM mkatz
San Luis Obispo

State of California - Department of Fish and Wildlife

2025 ENVIRONMENTAL DOCUMENT FILING FEE CASH RECEIPT

DFW 753.5a (REV. 01/01/25) Previously DFG 753.5a

RECEIPT NUMBER: 40-08202025-176

STATE CLEARINGHOUSE NUMBER *(If applicable)*: 2008121100

SEE INSTRUCTIONS ON REVERSE. TYPE OR PRINT CLEARLY.

LEAD AGENCY	LEAD AGENCY EMAIL	DATE
SAN LUIS OBISPO COUNTY	mdenning@co.slo.ca.us	08/20/2025

COUNTY/STATE AGENCY OF FILING	DOCUMENT NUMBER
COUNTY OF SAN LUIS OBISPO	

PROJECT TITLE: AVILA SCHOOLHOUSE C-DRC2021-00028

PROJECT APPLICANT NAME	PROJECT APPLICANT EMAIL	PHONE NUMBER
SHEAR EDGE DEVELOPMENT	shawn@arris-studio.com	(805) 547-2240

PROJECT APPLICANT ADDRESS	CITY	STATE	ZIP CODE
1327 ARCHER STREET SUITE 220	SAN LUIS OBISPO	CA	93401

PROJECT APPLICANT *(Check appropriate box)*

☐ Local Public Agency ☐ School District ☐ Other Special District ☐ State Agency ☒ Private Entity

CHECK APPLICABLE FEES:

☐ Environmental Impact Report (EIR)	$4,123.50	$
☒ Mitigated/Negative Declaration (MND)(ND)	$2,968.75	$
☐ Certified Regulatory Program (CRP) document - payment due directly to CDFW	$1,401.75	$
☐ Exempt from fee		
☐ Notice of Exemption (attach)		
☐ CDFW No Effect Determination (attach)		
☒ Fee previously paid (attach previously issued cash receipt copy)		
☐ Water Right Application or Petition Fee (State Water Resources Control Board only)	$850.00	$
☒ County documentary handling fee		$ $81.00
☐ Other		$

PAYMENT METHOD:

☐ Cash ☐ Credit ☐ Check ☒ Other **TOTAL RECEIVED** $ $81.00

SIGNATURE	AGENCY OF FILING PRINTED NAME AND TITLE
x Melissa Katz	Melissa Katz, Deputy County Clerk-Recorder

Filed in County Clerk's Office
Elaina Cano
San Luis Obispo - County Clerk-Recorder

40-08202025-176

08/20/2025
FISH
Pages: 13
Fee: $ 81.00

By mkatz, Deputy

ORIGINAL - PROJECT APPLICANT | COPY - CDFW/ASB | COPY - LEAD AGENCY | COPY - COUNTY CLERK | DFW 753.5a (Rev. 01012025)

COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING & BUILDING

NEGATIVE DECLARATION ADDENDUM

PLN-2041
02/14/2020

ENVIRONMENTAL DETERMINATION NO. ED24-073

DATE: **June 2, 2025**

PROJECT/ENTITLEMENT: **Avila Schoolhouse C-DRC2021-00028**

APPLICANT NAME: Shear Edge Development

CONTACT PERSON: Shawn Ridenhour

ADDRESS: 1327 Archer Street Suite 220, San Luis Obispo, CA 93401

EMAIL: shawn@arris-studio.com

TELEPHONE: 805-547-2240

PROPOSED USES/INTENT: A request by Shear Edge Development Avila, LLC for a Development Plan / Coastal Development Permit (C-DRC2021-00028) to authorize a conversion and addition to the historic Avila Schoolhouse into an eight-room (and manager unit), approximately 5,200 square feet, two-story with basement level Bed and Breakfast Facility and approximately 285 square foot cabana as an ancillary support building. The project meets the Secretary of Interior Standards for rehabilitation and includes a common area and outdoor patio, site grading for on-site improvements (parking and circulation), removal of three trees, and right-of-way and infrastructure improvements and appurtenances. The project includes a request for exceptions to the Special Use Standards for a Bed and Breakfast Facility pursuant to CZLUO Section 23.08.102.b., includes a parking modification pursuant to CZLUO Section 23.04.162.h., to allow two compact parking spaces on a site containing less than 20 parking spaces and to locate portions of parking spaces within the 25-foot front setback (along San Luis Street) due to on-site circulation constraints. The project includes undergrounding of overhead utilities and removal of utility poles with an exception to maintain one multi-directional pole at the corner of San Antonia St. and San Luis St. pursuant to CZLUO Section 23.05.120. The proposed project is within the Residential Multiple-Family Land Use Category and is located at 190 San Antonia Street, within the community of Avila Beach. The site is in the San Luis Bay Coastal Planning Area of the Coastal Zone.

LOCATION: The project is located at 190 San Antonia Street, within the community of Avila Beach. The site is within San Luis Bay Planning Area of the Coastal Zone. APN: 076-221-016.

LEAD AGENCY: **County of San Luis Obispo**
Dept of Planning & Building
976 Osos Street, Rm. 200
San Luis Obispo, CA 93408-2040
Website: http://www.sloplanning.org

Findings: Per State CEQA Guidelines (Sec. 15164(a), Sec. 15162), the Lead Agency may prepare an addendum to an adopted Mitigated Negative Declaration where all of the following apply: 1) only minor technical changes or additions are necessary; 2) no substantial changes have been made or occurred that would require major revisions to the Mitigated Negative Declaration due to either new significant effects or substantial increases in the severity of previously identified significant effects; 3) substantial changes have not occurred with respect to the circumstances under which the project is undertaken; 4) no new information of substantial importance which was not known or could not have been known at the time of the adopted Mitigated Negative Declaration.

Based on the staff's determination that all the above conditions apply, an addendum to the adopted Mitigated Negative Declaration is appropriate. The basis for this conclusion is described in the following section. In addition, please refer to the original Mitigated Negative Declaration (SCH #2008121100) for further discussion about all potentially significant issues originally identified for the proposed project.

Basis for Addendum: On February 02, 2009, the County of San Luis Obispo (County) adopted an Initial Study/Negative Declaration (ED05-039 / SCH #2008121100) (MND) and approved a Lot Line Adjustment (SUB2007-00192) to adjust the boundaries between two existing parcels within the community of Avila Beach. The MND provided a robust history of the associated property and structures on-site; pursuant to CEQA Guidelines Section 15150, that MND is incorporated into this addendum by reference, which is included as Attachment 6 within the staff report. Subsequently, in 2009, the County also approved a Vesting Tentative Tract Map/Coastal Development Permit/Development Plan (SUB2004-00259 / Tract 2667) for a Planned Development of nine residential units in four buildings (Avila Bungalows) on the southern vacant reconfigured parcel, determining the project to be consistent with the previously adopted MND. The northern parcel of that lot line adjustment housed a historic structure, the Avila Schoolhouse (Schoolhouse).

The MND specifically examined the impacts of a lot line adjustment and subsequent tract map with a development plan on the vacant reconfigured parcel. While no development for that project was proposed on the reconfigured parcel that included the historic Schoolhouse, the MND did recognize that development would likely occur and impact the Schoolhouse in the future and addressed preliminary plans for development of the parcel and historic structure. Numerous development scenarios were discussed for exploratory purposes, which adequately addressed and disclosed impacts related to potential future actions. An adaptive reuse of the Schoolhouse on location was anticipated, including exploring impacts related to a 4–7-unit residential project for permanent inhabitants, 3 of which would be located within the historic schoolhouse. The MND identified potentially significant impacts related to aesthetics, air quality, cultural resources, geology and soils, hazards and hazardous materials, public services and utilities, recreation, and transportation and circulation.

The applicant is proposing a revised project on the reconfigured parcel that includes the Schoolhouse, which had an impact analysis that was adequately encompassed within the previous MND. The project includes a request for a Development Plan/Coastal Development Permit (DP/CDP) for the conversion and addition to the historic Schoolhouse into an eight (8) room (and manager's unit) Bed

and Breakfast Facility that will include a basement, kitchen, and historic storage room. The revised project also includes an office/cabana and outdoor patio, site grading for on-site parking and circulation, and associated on-site infrastructure improvements.

The proposed office/cabana is an ancillary support building, the use of which is ancillary to the primary use proposed and includes two levels that will feature a small check-in office on the bottom (basement) level to be used for a check-in and guest assistance office, and a rear-facing top level that will open on occasion to support common gathering uses (i.e., outdoor breakfast and small wine tastings for guests). The office/cabana structure will be sited on an area of the parcel that allows the structure to be recessed from the Schoolhouse and built into the slope of the property to minimize the appearance and any impacts from new construction.

A basement level of the Schoolhouse will be added and will include a common seating area, office, restroom, laundry room, trash storage, storage room for Schoolhouse-related historical documents, and the manager's unit. The historical storage room will be accessible by the property manager and will include a rotation of items either a) on display on the property for guests within the lobby and common areas of the facility, or b) to be used by the San Luis Coastal School Board (School Board) for use in special events off-site or with the Avila Valley Advisory Council for historic society functions. The School Board will sort and catalogue the significance of the historical remnants for the most applicable and emblematic items to display within the Schoolhouse common areas, and for display at local historic events. The inclusion of the historical room within the basement waives the requirement for additional buildings that would otherwise be requested. The first level of the structure and property will include several guest rooms with private balconies, the lobby, and the detached cabana mentioned previously. The second level of the structure will include several guest rooms with private decks. The structure's remodel and adaptive reuse will comply with the Secretary of Interior Standards (SOI) for rehabilitation of a historic structure.

Pursuant to Section 15162 of the State CEQA Guidelines, when a lead agency has adopted an Initial Study (IS)/MND for a project, a subsequent IS/MND does not need to be prepared for the project unless the lead agency determines that one or more of the following conditions are met:

1. Substantial project changes are proposed that will require major revisions of the previous IS/MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the followed:

    a. The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration;

b. Significant effects previously examined will be substantially more severe than show in the previous EIR;

c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Pursuant to Section 15164 of the State CEQA Guidelines, preparation of an Addendum to an IS/MND is appropriate when none of the conditions specified in Section 15162 are present and some minor technical changes to the previously adopted IS/MND are necessary. The proposed project would not result in increased construction of new development beyond what was previously analyzed in the adopted MND through development scenarios. The proposed project would not amend or modify the previously approved Tract Map/Development Plan/Coastal Development Permit, which is considered vested and not part of the proposed project. Lastly, the State CEQA Guidelines Appendix G, Environmental Checklist Form has been revised and now includes a discussion of new topic areas. Their current inclusion in the CEQA checklist does not warrant an analysis of the entire project unless the proposed project would result in new or more severe significant environmental impacts or unless there is new information of substantial importance that was not known at the time of adoption of the MND.

An addendum has been prepared to assess the proposed minor technical changes and modifications to the MND. All information presented is a determination of consistency with the approved MND, or helps to clarify, amplify, or make insignificant minor technical modifications to the MND. As discussed in the following sections, the new information is not considered "significant" pursuant to CEQA, and circulation or preparation of a new formal environmental document is not required. A discussion on issue areas previously identified within the adopted MND is included below.

A summary of the relevant environmental issues:

The following analysis examines the environmental issues that were previously analyzed in the adopted MND and determines if the proposed project will create any new significant impacts or would increase the severity of an environmental impact as identified in the adopted MND. Provided below is an assessment of how the proposed project affects the conclusions of each respective environmental issue analyzed in the MND.

Aesthetics: Construction and operation of the proposed project will not result in substantial permanent alteration of the nature and appearance of the Schoolhouse. The construction will prepare the existing Schoolhouse for adaptive reuse while restoring the structure to, and remain consistent with, the SOI Standards for rehabilitation, including maintaining the traditional character of the building that has been on location for over 100 years. All non-historic additions to the Schoolhouse will be removed, and all missing historical pieces will be reconstructed to the most feasible extent possible based on permit history and historic photographs. Given the character of the

existing and surrounding development, the proposed project will not intrude upon scenic views open to the public and is consistent with Avila Beach Specific Plan policies aimed at protecting public viewsheds because the building is pre-existing and won't be substantially altered externally.

The previously approved project on the neighboring parcel was required, as part of mitigation measures identified in the previous MND to reduce aesthetic impacts, to include designs that would remain consistent with the historic design of the Schoolhouse and requirements related to the height, location, design, and intensity of exterior lighting via a Lighting Management Plan. Projects within the Coastal Zone are also required to abide by CZLUO Section 23.04.320 to minimize project impacts associated with lighting and glare. The proposed project will comply with these standards by 1) being the baseline for which the neighboring project was aesthetically compared and subject to incorporate into designs, and 2) complying with current ordinance standards for lighting. The new cabana structure on site will be required to adhere to mitigation measure A-1 to reflect and incorporate the design elements of the existing schoolhouse. Therefore, potential impacts to aesthetics are less than significant and no additional mitigation other than that which was originally proposed is required.

Air Quality: The previous MND examined air quality impacts related to the construction of proposed and future development that included both the Avila Bungalows and the proposed Schoolhouse conversion. Temporary impacts would result from project construction activities resulting in air pollutant emissions from construction equipment and fugitive dust during grading and site preparation. Construction emissions were previously analyzed using the SLO County Air Pollution Control District (APCD) CEQA Handbook, including application of standard best management practices (BMPs), and resulting in emissions totals that fell below the thresholds for pollutants analyzed. However, standard mitigation measures were proposed to reduce the generation of fugitive dust and other pollutants to sensitive receptors in the surrounding areas.

The project originally examined traffic generation and on-site combustion of energy to determine the effects of long-term sources of air pollutants that would alter air quality locally and regionally. It was found that localized carbon monoxide levels would not exceed any applicable State or Federal standards and that pollutant emission associated with the proposed project were not expected to exceed any of the Tier 1 pollutant thresholds established by the Air Pollution Control District examined at that time. As discussed below in the Hazards and Hazardous Materials section, demolition of the existing structure, or portions of that structure, on-site could result in the generation of airborne asbestos due to removal of potential asbestos containing materials, exposing sensitive receptors in adjacent areas to the pollutant. Adherence to standards and treatment procedures for asbestos were previously incorporated within the approved MND, though current construction standards and BMPs will adequately address any potential concerns related to hazardous building materials during demolition and construction, resulting in a less than significant impact overall to the project's emissions exposure to sensitive receptors.

Mitigation measures were originally proposed for the management of construction emissions, the use of best available control technology for construction equipment, demolition compliance with regulatory standards for an asbestos survey, removal, and disposal of any associated material, and standards for allowance of wood burning devices.

Consistent with the previous analysis, the revised project is not expected to violate any state or

federal ambient air quality standard or exceed emissions thresholds as established by APCD, will not expose sensitive receptors to substantial air pollutant concentrations, will not create or subject individuals to objectionable odors, and will remain consistent with the District's Clean Air Plan. Additionally, the modern APCD standards for construction will be required to be implemented as BMPs for the proposed project and have been added as conditions of approval. Adherence to current local, state, and federal standards for air quality, emissions, and remediation of potentially occurring asbestos (i.e., SLO County Clean Air Plan, California Code of Regulations, Title 8, Section 1529) would reduce project associated impacts to less than significant level. Therefore, potential impacts to air quality are less than significant and no mitigation is required beyond standard conditions of approval.

Note: The standard APCD practices that were included as mitigation measures in the previous MND have had the language updated to reflect the current 2025 standards for implementation of BMPs and are included as conditions of approval (AQ-1 and AQ-2).

Cultural Resources: The Schoolhouse was originally built in 1913 and is eligible for listing in the California Register of Historic Resources (CRHR) as the building "qualifies as a California historic landmark due to its association with events that have made a significant contribution to the broad patterns of California's history and cultural heritage" (Denardo 2008). The County must consider project activity impacts on the cultural environment, including projects that may impact the integrity of a historical resource, which is defined by CEQA as a resource that is listed in or eligible for listing in the CRHR. Per CEQA, prior to implementation of a proposed project, the potential effects of a project on historical resources must be assessed. A project that complies with the *SOI Standards for the Treatment of Historic Properties* (Grimmer 2017) will not have a significant impact on historical resources under CEQA.

Grimmer defines rehabilitation as the act or process of making possible or compatible use for a property through repair, alterations, and additions while preserving those portions of features which convey its historical, cultural, or architectural values. Grimmer also notes that in rehabilitation, historic building materials and character-defining features are protected and maintained as they are in the Preservation treatment; however, greater latitude is given in the *SOI Standards for Rehabilitation* and *Guidelines for Rehabilitating Historic Buildings* to replace extensively deteriorated, damaged, or missing features using either the same material or compatible substitute materials. Out of the four treatments, only Rehabilitation allows alterations and the construction of a new addition, if necessary for continuing a new use for the historic building (Grimmer 2017). Further, Section 36 of the Code of Federal Regulations Part 67.3 and 67.7 defines rehabilitation as returning a building to a state of utility through repair or alteration which makes possible an efficient use while preserving those portions or features of the building and its site and environment which are significant to its historic, architectural, and cultural values as determined by the Secretary. Ultimately, due to this information, the Rehabilitation Standard is the appropriate treatment for the project as the proposed Bed and Breakfast Facility has been determined by the County to be a compatible use for the building and the treatment allows for repairs, alterations, and additions while retaining the character-defining features of the Schoolhouse (Long 2023).

The proposed project is the result of a 2012 revision to the previous development approved on the neighboring parcel in 2009. Applied Earthworks, Inc., reviewed the plans for the revised development to ensure consistency with the SOI Standards and the previously adopted MND (Smith 2012). In 2021,

the proposed project was further revised to be more consistent with SOI Standards and subsequently re-reviewed by Applied Earthworks. In 2022, the County obtained a peer review of the 2021 design from Robert Vessely, PE. As a result, the County requested that the Schoolhouse applicant team study and provide different engineering alternatives for achieving the rehabilitation that would avoid the need to dismantle and reassemble the historic Schoolhouse, leading to the currently proposed project. The current project revision was reviewed by Principal Architectural Historian Amber Long of Long Historic Preservation Services, LLC, and included a review of the proposed plans and assessed consistency of the plans with the treatment guidelines provided in the *SOI's Standards for the Treatment of Historic Properties* (Grimmer 2017), the 2008 MND (County of San Luis Obispo 2008), and the 2022 peer review (Vessely 2022) and includes:

- Description of the current conditions of the property;
- Identification of alterations through history using historic photos and permit records;
- Summary of the proposed alterations to the Avila Schoolhouse supplemented with the current design plans;
- Evaluation of consistency with the SOI Standards and the MND; and
- Recommendations for the property treatment for the Avila Schoolhouse in compliance with CEQA and SOI Standards.

The alterations to the Avila Schoolhouse, as proposed, have been assessed and have been found to be consistent with the SOI Standards for Rehabilitation and will not have a significant impact on historical resources under CEQA (Long 2023). Further, in 2024, because of additional requirements for access under the California Building Code, a technical memo titled *Update to the Revised Design Review for the Avila Schoolhouse* was prepared by Long Historic Preservation Services, LLC. The update provided a consistency analysis of the new additions / changes required for access and concluded that the new alterations are consistent with the SOI Standards for Rehabilitation, except for solar panel installation, which is not currently proposed as part of this project though under consideration (Long 2024). Lastly, the 2024 update recommended the implementation of the guidance from the previous 2023 report for the proposed project.

A 2009 Archaeological report, prepared by Clay A. Singer, concluded that the Schoolhouse is located within a recorded archaeological site (CA-SLO-2233) with prehistoric and historic components. The prehistoric component consists of multiple surficial deposits of low-density, shell midden brought to the location as fill material, and the 1913 Schoolhouse comprises the historic component, including undiscovered features and artifacts associated with its construction and occupation (Singer 2009). Singer states that subsurface testing at the location was unable to produce any evidence of buried resources and intact deposits of any kind are unlikely to exist beneath the present surface. Specifically, the report claimed that midden soils on the property are secondary deposits that do not meet the minimum criteria for qualification as a significant resource, as defined by CEQA, and that geological, archaeological, and topographic evidence implies that intact resources are not present below the surface (Singer 2009). Further, Singer notes that the apparent absence of any intact prehistoric deposits implies that future development will have no direct or measurable indirect impact on prehistoric resources, in addition to Phase II testing confirming the lack of intact prehistoric resources at the Schoolhouse site.

The project is located within a County mapped archaeologically sensitive area and is required to

comply with CZLUO Section 23.07.104, which provides guidelines for the protection and preservation of archaeological resources. This section includes preliminary site survey requirements, mitigation plan requirements, and standards for the treatment of inadvertent discoveries. The project complies with CZLUO Section 23.07.104 by providing a preliminary site survey (Singer 2009) and is required to adhere to the mitigation requirements outlined within the previous MND, including a historical and archaeological monitor during the appropriate phases of construction. Historical architectural evaluations were referenced within the previous MND, and several additional technical documents were used in the design of the current project, which were provided with the application and used to find the revised project consistent with the previous environmental determination. Further, the technical studies provided were able to demonstrate that the project can also qualify for a Class 31 Exemption pursuant to CEQA Guidelines Section 15331 – Restoration or Rehabilitation of a Historic Resource.

Lastly, the previous MND examined adaptive re-use of the Schoolhouse at both the current location, and approximately 10 feet to the east. Examining these proposals provided scenarios for reducing the potential impacts to a level of insignificance through adherence to the guidelines for the SOI Standards for Rehabilitation of a historic structure by assuring that new site features are / will:

- Be as unobtrusive as possible;
- Preserve views of the north-facing faced of the building;
- Retain and preserve character-defining elements of the schoolhouse building;
- Remove and replace non-historic materials in the buildings;
- Repair or replace deteriorated or missing features;
- Not allow modifications to the building that obscure or alter its character-defining forms, spaces, or materials;
- Replace missing historic features (including the bell and belfry);
- Require that all modifications will conform to original features of the building and the proper cleaning and preservation of historic materials.

Several of these requirements were incorporated as mitigation measures applicable to different development scenarios that were previously examined. Additionally, the applicable mitigation measures previously proposed have either been incorporated into the project as design elements or are standard County Code requirements and have been added as conditions of approval. Therefore, the project, as designed, is in adherence to local standards, and will not result in significant impacts to cultural resources and no additional mitigation measures other than those previously identified are required.

Note: Minor verbiage changes have been included in the previous mitigation measures. Mitigation measure CR-6 has not been included as it is a structural preservation technique, whereas the current proposal is a rehabilitation that will involve structural improvements.

Geology and Soils: The project is located on a gently sloping parcel that is not located within the County's Geologic Study Area. The landslide risk potential of the project site is considered low, and the liquefaction potential of the site is considered low. The parcel is in an area not known to contain serpentine or ultramafic rock that would result in the disturbance of naturally occurring asbestos. The parcel is not located within any FEMA designated flood zone and stormwater runoff rates are not

expected to be significantly increased by development of the proposed project. No development is proposed to place structures within a FEMA designated flood plain. The Schoolhouse project will not have a significant impact in exposure to or production of unstable earth conditions or hazards, is not contained within an Alquist-Priolo Earthquake Fault Zone, does not include placement of structures on expansive soils or change the drainage patterns of the parcel substantially, does not involve activities within a FEMA designated 100-year flood zone, will remain consistent with the County's Safety Element for Geologic and Seismic Hazards, and will not preclude the future extraction of valuable mineral resources. The previously approved MND incorporated mitigation measures for Geology and Soils related impacts that would mitigate a reduction in rates of soil absorption, runoff amount, or direction and mitigate additional soil erosion, topographic changes, or loss of topsoil because of project-related improvements to an insignificant level. Project design, timing of project construction, and adherence to County Code are sufficient to address any potential impacts to Geology and Soils. Therefore, the project will result in less than significant impacts to Geology and Soils and no mitigation measures are required beyond standard conditions of approval.

Hazards / Hazardous Materials: The project is not located in an area known for hazardous material contamination and the applicant does not propose the utilization of hazardous materials. The project does not present a significant fire safety risk as the project will be required to comply with the current California Building Code and California Fire Code requirements for fire preventative construction measures, is located approximately two miles (5 minutes) away from the nearest fire station and is not expected to conflict with any regional evacuation plan. The proposed project does not explicitly involve the use of hazardous materials, though building, demolition, reconstruction, or other construction activities may result in exposure to lead-based paint, and potentially asbestos.

Mitigation measures for required adherence to standards and treatment of both lead-based paint and asbestos are incorporated within the previously approved MND; however, current BMPs will adequately address any potential concerns related to hazardous building materials during demolition and construction. Adherence to current construction industry standards for the treatment and removal of asbestos and lead-based paints would position the project to result in a less than significant impact to hazards and potential health hazards resulting from construction based hazardous material release. Therefore, no mitigation is required beyond standard conditions of approval.

Public Services / Utilities: The proposed project will result in an incremental addition to the regional demand for law enforcement and fire protection services. The Schoolhouse project will result in one (1) manager's unit with eight (8) visitor-serving Bed and Breakfast Facility rooms and is not expected to significantly impact public services and utilities. The applicant has provided a preliminary will-serve letter from the Avila Beach Community Services District. Previous mitigation measures were proposed to reduce impacts to public facilities and schools to a less than significant level via fee payment programs. The County has adopted public facilities fees to account for various project's direct and cumulative impacts upon public services, dependent upon project area, and will be required as part of permit issuance. Therefore, impacts examined within the previous MND are consistent with the potential impacts for this project and adherence to County standards, including payment of public facilities fees, will result in a less than significant impact to Public Services and Utilities, and no mitigation is required beyond standard conditions of approval.

Recreation: Avila Beach contains an extensive and wide variety of recreation facilities, restaurants,

and other visitor-serving facilities. The County Trails Plan does not indicate any trails going through or running adjacent to the subject property and the proposed development is not in a location that would affect any trail, park, or other recreational resource. The project would contribute to visitor-serving facilities and lodging within the community of Avila Beach with the adaptive reuse of the structure and will not create a significant demand upon existing recreational facilities in the area, nor will it create a specific need for additional park or recreational facilities. The previously approved MND required the payment of Quimby Fees to mitigate the previous development's direct and cumulative impacts upon existing parks and recreation facilities. The proposed project is not subject to Quimby Fees as the project will not create additional parcels and is not applicable to this project. Therefore, potential impacts to recreation are insignificant and no mitigation is required.

Transportation / Circulation: The project site is located on San Antonia Street, a County maintained local road within the community of Avila Beach. The previously approved MND examined trip generation and noted full development would generate nine (9) peak hour automobile trips, half of which were attributed to the theoretical Schoolhouse development that was encompassed at that time, resulting in insignificant additions of traffic onto the local and regional roadway systems. While more rooms are proposed under the current revision, only one (1) full-time unit is proposed (manager's unit) and eight (8) guest rooms are proposed, leading to an increase of one (1) residential unit and eight (8) part-time guest accommodation rooms. The MND included discussion of vacation rental peak hour trip generation and determined that the small amount of additional traffic associated with the project was assumed within the build-out numbers in the Avila Beach Specific Plan, and will, therefore, not result in a significant change to the existing roadway levels of service or traffic safety levels in the project area. Therefore, no significant impacts to transportation / circulation will occur and no mitigation is required.

Additionally, while not required due previous analysis, the project has been analyzed under SB743 for impacts related to Vehicle Miles Traveled (VMT), and the project was found to be pre-screened from VMT reduction requirements due to project location, type, and VMT generation. However, the project may be subject to additional development impact fees, including the Road Improvement Fee because of the Avila Beach Circulation Study, offsetting any potential impacts to local traffic or recreation.

Other CEQA Issues Considered

County staff also considered issue areas such as Agricultural Resources, Biological Resources, Noise, Population and Housing, Wastewater, and Water, and determined that impacts to these issue areas are less than significant as the overall operational characteristics and proposed development will not substantially change from the previously examined project. While not required, County staff also considered impacts to subsequently established issue areas, including Energy, Greenhouse Gas Emissions, Land Use and Planning, and Wildfire and have determined that the proposed project will have a less than significant effect to these issue areas.

While not incorporated into the adopted MND, the inclusion of the previously mentioned areas in the current CEQA checklist does not warrant an analysis of the entire project unless the project changes would result in new or more severe significant environmental impacts or unless there is new information of substantial importance that was not known at the time of adoption of the MND.

Conclusion

The Environmental Coordinator, after review of the previously-prepared MND finds that: there are no substantial changes proposed for the project which would require substantial revisions of the previous MND; no substantial changes have occurred with respect to the circumstance under which the project is undertaken; no new mitigations are necessary to reduce potential environmental impacts; and no new information of substantial importance has been identified which was not known at the time that the previous MND was adopted. Therefore, recirculation of the previously adopted MND is not required.

Additionally, following review of the previous MND and current application materials, the Environmental Coordinator finds that the project may also qualify for a Class 31 Categorical Exemption

Additional Information: Additional information pertaining to this environmental determination may be obtained by contacting the Lead Agency at the above address or telephone number (provided on page 1 of this report).

Notice of Determination **State Clearinghouse No. 2008121100**

This is to advise that the San Luis Obispo County Planning Commission as ☒ *Lead Agency* *Responsible Agency* approved/denied the above described project on 7/24/25, and has made the following determinations regarding the above described project:

The project will not have a significant effect on the environment. A Negative Declaration was prepared for this project pursuant to the provisions of CEQA. Mitigation measures and monitoring were made a condition of approval of the project. A Statement of Overriding Considerations was not adopted for this project. Findings were made pursuant to the provisions of CEQA.

This is to certify that the Negative Declaration with comments and responses and record of project approval is available to the General Public at the 'Lead Agency' address above.

Signature	Project Manager Name	Date	Public Agency
Mason Denning	Mason Denning (mdenning@co.slo.ca.us)	7/23/25	County of San Luis Obispo