COUNTY OF SAN LUIS OBISPO

FOR OFFICIAL USE ONLY (ML)

MITIGATED NEGATIVE DECLARATION & NOTICE OF DETERMINATION

ENVIRONMENTAL DETERMINATION NO. ED05-039 **DATE: December 26**

PROJECT/ENTITLEMENT: San Luis Coastal Unified School District/Shear Edge Development LLC
Lot Line Adjustment SUB2007-00192 COAL 07-0079

APPLICANT NAME: Shear Edge Development LLC
ADDRESS: 351 San Miguel Ave., San Luis Obispo, CA, 93405
CONTACT PERSON: Mike Hodge **Telephone:** 805-215-8753

PROPOSED USES/INTENT: Request by Shear Edge Development Avila LLC. for approval of: 1) a Lot Line Adjustment (SUB2007-00192/COAL07-0079) to adjust the lot lines between two existing parcels of approximately 10,088 square feet and 17,216 square feet, resulting in two parcels of approximately 13,609 square feet and 13,695 square feet; and 2) a Development Plan and Tract Map (SUB2004-00249/TR2667) for a planned development of ten residential units ranging in size from 475 square feet to 2,300 square feet in four buildings located on the reconfigured Parcel 1 (13,609 sq. ft.). The proposed Lot Line Adjustment will result in no physical impacts to the site. This currently proposed project is referred to herein as the "Proposed Development" and would result in the disturbance of this 13,609 square foot parcel. A separate Right-of-Way Abandonment will also be required in order to abandon a seven-foot wide strip running along San Antonia Street.

LOCATION: The entire 0.63 acre site lies within the Residential Multi-Family land use category and is located at 190 San Antonia Street on the corner of San Antonia Street and San Luis Street in the community of Avila Beach.This site is in the San Luis Bay (Coastal) Planning Area.

LEAD AGENCY: **County of San Luis Obispo Department of Planning & Building**
County Government Center, Rm. 310
San Luis Obispo, CA 93408-2040

OTHER POTENTIAL PERMITTING AGENCIES: California Coastal Commission

ADDITIONAL INFORMATION: Additional information pertaining to this environmental determination may be obtained by contacting the above Lead Agency address or (805) 781-5600.

COUNTY "REQUEST FOR REVIEW" PERIOD ENDS AT ..... 4:30 p.m. on January 8, 2009

30-DAY PUBLIC REVIEW PERIOD begins at the time of public notification

Notice of Determination

State Clearinghouse No. _____

This is to advise that the San Luis Obispo County_____ as ☐ *Lead Agency*
☐ *Responsible Agency* approved/denied the above described project on _____, 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 were made a condition of the 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:

Department of Planning and Building, County of San Luis Obispo,
County Government Center, Room 310, San Luis Obispo, CA 93408-2040

	Ryan Hostetter		County of San Luis Obispo
Signature	**Project Manager Name**	**Date**	**Public Agency**

COUNTY OF SAN LUIS OBISPO
INITIAL STUDY SUMMARY - ENVIRONMENTAL CHECKLIST

Project Title & No. Avila Schoolhouse Site Development Plan and Tract Map
SUB2004-00259 ED 05-039

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.

☒ Aesthetics	☒ Geology and Soils	☒ Recreation
☐ Agricultural Resources	☒ Hazards/Hazardous Materials	☒ Transportation/Circulation
☒ Air Quality	☐ Noise	☐ Wastewater
☐ Biological Resources	☐ Population/Housing	☐ Water
☒ Cultural Resources	☒ Public Services/Utilities	☐ 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.

Ryan Hostetter / Doug Wood — Ryan Hostetter — 12/18/08
Prepared by (Print) — Signature — Date

Steven McMasters — Ellen Carroll, Environmental Coordinator (for) — 12/18/08
Reviewed by (Print) — Signature — Date

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. 310, County Government Center, San Luis Obispo, CA, 93408-2040 or call (805) 781-5600.

A. PROJECT DESCRIPTION

Request by Shear Edge Development Avila LLC. for approval of: 1) a Lot Line Adjustment (SUB2007-00192/COAL07-0079) to adjust the lot lines between two existing parcels of approximately 10,088 square feet and 17,216 square feet, resulting in two parcels of approximately 13,609 square feet and 13,695 square feet; and 2) a Development Plan and Tract Map (SUB2004-00249/TR2667) for a planned development of ten residential units ranging in size from 475 square feet to 2,300 square feet in four buildings located on the reconfigured Parcel 1 (13,609 sq. ft.). The proposed Lot Line Adjustment will result in no physical impacts to the site. This currently proposed project is referred to herein as the "Proposed Development" and would result in the disturbance of this 13,609 square foot parcel. A separate Right-of-Way Abandonment will also be required in order to abandon a seven-foot wide strip running along San Antonia Street.

The entire 0.63 acre site lies within the Residential Multi-Family land use category and is located at 190 San Antonia Street on the corner of San Antonia Street and San Luis Street in the community of Avila Beach (see Figure 1, Location Maps and Figure 2, Aerial Photograph). This site is in the San Luis Bay (Coastal) Planning Area.

No development is currently proposed at this time on Parcel 2 (13,695 sq. ft.) that contains the existing vacant Avila Schoolhouse. However, recognizing that development of this second parcel will likely occur in the future, this Initial Study addresses preliminary plans for future development of Parcel 2 (referred to herein as the "Future Development"). This Future Development will likely involve the provision of four to seven dwelling units. This Future Development is also anticipated to involve one of five development options for the existing schoolhouse structure to accommodate this new development including: demolition and rebuilding of the schoolhouse at a new on-site location; moving and the adaptive re-use of the schoolhouse at a new on-site location to the north and downslope of its current location; moving and the adaptive reuse of the schoolhouse approximately ten feet to the east of its current location; the adaptive re-use of the schoolhouse at its current location and development around but not including the adaptive re-use of the schoolhouse structure. Reuse of the Avila Schoolhouse would include three of the new units contained within the restored schoolhouse structure which would also contain a 1,000 square foot common area for photographs and other information pertinent to the history of Avila Beach and the schoolhouse.

Project History

The subject property has served as the site of the Avila Schoolhouse since 1903. At that time, a one-room schoolhouse served the Avila Beach community at this location. With the entry of Union Oil to the Avila Beach area, a larger school was needed to serve the growing community. In 1913, the existing two-room Avila School was constructed on this same lot. Two years later, the smaller one-room structure was moved near the corner of San Luis Street and First Street. In 1950, the Avila School District Board of Trustees purchased an adjacent parcel of land in order to expand the school property to the south and provide for the construction of a paved playground, retaining walls and a chain link fence along the perimeter of the site.

The two-room schoolhouse was closed in 1966 and students were then bussed to the Bellevue-Santa Fe School on San Luis Drive. The Avila School was then leased by the Functional Living Program between 1967 and 1980 for workshops for the handicapped, mentally disabled and adult education. Later uses included a museum and a little theatre. As recently as 2003, the schoolhouse building housed the Avila Beach Christian Fellowship. The building has been vacant since August, 2003.

The schoolhouse structure has recently been the subject of several historical evaluations. In September, 2003, a Cultural Resource Surface Reconnaissance of the subject property was completed by Bertrando & Bertrando Resource Consultants. Their research indicated that the project area "contains a potentially significant historic structure and prehistoric archeological deposit" (page 1). Both the structure and prehistoric archeological deposit were recorded as CA-SLO-2233. The report also provided recommendations for future analysis of these resources in order to determine the nature and extent of their significance. A Phase II assessment of the archeological site and an in-depth study of the local history of the role of the schoolhouse structure was recommended.

In October, 2005, an historic architect, Mr. Andrew Merriam, was retained by several individuals in the Avila Beach community to evaluate the historical basis for the County's consideration of a Negative Declaration for the proposed project. Findings relative to the potential historical resource impacts in the Initial Study were based upon data from the 2003 Cultural Resource Surface Reconnaissance noted above. The October 20, 2005 correspondence prepared by Mr. Merriam concluded that the existing schoolhouse structure had greater structural integrity than indicated in the prior report and that the historic criteria of the structure's "contribution to the patterns of local history" was met (Page 3).

In November, 2005, Bertrando & Bertrando Resource Consultants prepared a letter response to the correspondence submitted by Mr. Merriam. This letter response discussed in detail the historic significance of the school house in terms of: 1) its role in community activities; 2) the integrity of the structure and its historic settings; 3) the importance and rarity of the schoolhouse structure and 4) the structures historic importance to the community. This response concluded that the schoolhouse lacked the structural integrity or historic importance to be considered a significant historic resource (page 8).

In March, 2006, Mr. Andrew Merriam submitted a separate Historic Resource Evaluation Report which was intended to provide conclusions of the historic significance of the schoolhouse structure "based upon a more complete historical record" (Page 1). This report concludes that "the structure's history supports the conclusion that the association of the school with the broad patterns of Avila's local history is connected to both the structure and to its physical location within the community" (Page 8).

This report was followed in May, 2006 by a formal "Response to the Historic Resource Evaluation Report prepared by Andrew Merriam." This response, again authored by Bertrando & Bertrando, provided significant additional detail concerning the historic significance of the schoolhouse structure. The evaluation of historic significance in this response was based upon State criteria for nomination of

resources to the State Register of Historical Resources. Discussions in the response included the issues of structural integrity, location, design, setting, materials, workmanship, feeling and association of uses. This information provided the basis for the conclusion that "the Avila School is not eligible for listing in the California Register of Historic Places"(Page 10).

In August, 2007, the firm Garcia and Associates was retained by the County of San Luis Obispo to prepare a separate historic assessment of the Avila Schoolhouse. Their evaluation, while consulting the previously-prepared analyses noted above, is intended to present an independent analysis of the historic significance of the Avila Schoolhouse. This analysis, titled "Historic Structure Report for the Avila Schoolhouse," dated August 2008, provides the basis for the assessment of cultural resources impacts within this Initial Study (see Subsection 5, Cultural Resources, Environmental Checklist) and is included in its entirety as an Attachment to this Initial Study.

ASSESSOR PARCEL NUMBER(S): 076-221-007 & -008 SUPERVISORIAL DISTRICT # 3

B. EXISTING SETTING

PLANNING AREA: San Luis Bay(Coastal), Avila Beach

LAND USE CATEGORY: Residential Multi-Family

COMBINING DESIGNATION(S): Archaeolgically Sensitive, Local Coastal Plan/Program, Coastal Appealable Zone

EXISTING USES: Site currently contains the old Avila Schoolhouse

TOPOGRAPHY: Nearly level to steeply sloping

VEGETATION: Grasses, ornamental landscaping

PARCEL SIZE: 0.63 acres

SURROUNDING LAND USE CATEGORIES AND USES:

North: Residential Multi-Family; residential	*East:* Residential Single Family; residential
South: Residential Multi-Family; residential and vacant lots	*West:* Residential Multi-Family; residential and vacant lots

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.

Discussion of project impacts and proposed mitigation measures are, where applicable, identified as those associated with the "Proposed Development", that being the currently proposed lot line Adjustment and Development Plan/Tract Map for Parcel 1, and "Future Development", that being the future development of Parcel 2 (see "Project Description" for additional detail).

COUNTY OF SAN LUIS OBISPO
INITIAL STUDY CHECKLIST

1.	**AESTHETICS** – *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a)	*Create an aesthetically incompatible site open to public view?*	☐	☐	☒	☐
b)	*Introduce a use within a scenic view open to public view?*	☐	☐	☒	☐
c)	*Change the visual character of an area?*	☐	☒	☐	☐
d)	*Create glare or night lighting, which may affect surrounding areas?*	☐	☒	☐	☐
e)	*Impact unique geological or physical features?*	☐	☐	☒	☐
f)	*Other:* _____	☐	☐	☐	☐

Setting. The project site is located on the corner of San Antonia and San Luis Streets which is within a developed residential neighborhood. The 0.63 acre project site is surrounded primarily by single and multi-family residential uses. Immediately north of the site, across San Luis Street are single-family residences on San Luis Street Parkway, Laurel Lane and Ocean Oaks Drive. Further north, across Avila Beach Drive, is the Avila Beach Resort and Golf Course. East of the site across San Antonia Street are multi-story residential housing (apartments) and single family homes. South of the site are older single family residences (mostly single story) interspersed with several vacant lots. West of the site are several multi-story residences along San Luis Street that are currently (June, 2008) under construction. Several of these structures are of similar size and massing (i.e. multi-story apartments and residences) and effectively block views of the project site particularly from areas to the west and east. Existing landscaping shields views of the site from the south. The steep slope leading to San Luis Street restricts views of the site and partially shields views of the schoolhouse structure from the north.

Impact.

Proposed Development and Future Development

Construction and operation of the proposed project will result in the permanent alteration in the nature and appearance of the 0.63 acre project site. Areas devoted to project facilities, those being residential structures involving a total of ten dwelling units within the Proposed Development and a maximum of seven additional dwelling units and the schoolhouse structure within the Future Development will be visually altered from their current condition. In addition, on-site driveways, parking areas and landscaping will also be visible from external vantage points. Given the nature of surrounding development (multi-storied residential structures to the east and west of the site) as well as the elevated nature of the project site (downward slopes to the north and south) development of the project site will not intrude upon scenic views open to the public.

The architecture of all proposed structures will incorporate a craftsman design comprised of shingle and smooth stucco exteriors with a low profile hip roof design. According to the project applicant, the design of the proposed residential structures will reflect and incorporate elements of the design of the existing schoolhouse structure (see Mitigation Measure A-1). The color palate of the structures will range from off-white to washed colors of green, tan, brown and rust. All proposed structures (except the schoolhouse building) will be no more than 25 feet in height from existing average grade with

setbacks in conformance with County requirements. A Landscape Plan has been prepared which includes several large tree species, shrubs and groundcover along the northern, western and eastern boundaries of the project site. Low-level lighting will be provided along the path of travel from the proposed parking areas to San Antonia and San Luis Streets.

Construction of the proposed project will result in short-term impacts to views of the project site during construction activities. Temporary construction impacts will result from grading activities and construction of proposed structures, driveways, parking area, etc. While highly visible, impacts to views of the area during project construction are considered to be less than significant due to their temporary nature.

The proposed project will have lighting outside the proposed structures as well as in parking areas and driveways. As such, night lighting will be generated on the developed project site. The extent of visual impacts of building and parking lot lighting is highly dependent upon the type and design of lighting selected for the project. By specifying appropriate lighting fixtures for access roads and parking lots and requiring provision of a Lighting Management Plan, these potential light and glare impacts can be mitigated to a level of insignificance (see Mitigation Measure A-2).

Mitigation/Conclusion. The following mitigation measures will reduce potentially significant aesthetics impacts to an insignificant level.

Proposed Development and Future Development

A-1 At the time of application for building permits, the applicant shall submit a refined site plan, grading plan and set of building elevations to the County Department of Planning and Building for review and approval. This review shall insure that building site locations and elevations have not changed significantly from the previously-submitted preliminary plans and the proposed structures reflect and incorporate the design of the existing schoolhouse structure.

A-2 At the time of application for building permits, the applicant shall provide a Lighting Management Plan. The plan shall include the height, location and intensity of all exterior lighting. All light fixtures shall be shielded so that neither the lamp nor the reflective interior surface is visible from areas outside the project site. All light poles, fixtures and hoods shall be dark (non-reflective) colored. All exterior lighting sources shall be low-level and adjusted so that light is directed into the project site. Security lighting shall be shielded so as not to create glare when viewed outside the project boundaries.

2. AGRICULTURAL RESOURCES - ***Will the project:***	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Convert prime agricultural land to non-agricultural use?	☐	☐	☒	☐
b) Impair agricultural use of other property or result in conversion to other uses?	☐	☐	☒	☐
c) Conflict with existing zoning or Williamson Act program?	☐	☐	☒	☐
d) Other: _____	☐	☐	☐	☐

Setting. The project site is located in a predominantly non-agricultural area with no agricultural activities occurring on the property or immediate vicinity. On-site soil types include: Gazos-Lodo clay

loams, (15 - 30 % slope). As described in the Natural Resource Conservation Service Soil Survey, this soil type has a "non-irrigated" soil class of "IV", and an "irrigated" soil class of "NA". As such, no prime agricultural soils exist on-site.

Impact.

Proposed Development and Future Development

Given the lack of agricultural activities in the area and prime agricultural soils, no significant impacts to agricultural resources are anticipated.

Mitigation/Conclusion. No significant impacts to agricultural resources were identified, therefore, no mitigation measures are required.

3. AIR QUALITY - *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Violate any state or federal ambient air quality standard, or exceed air quality emission thresholds as established by County Air Pollution Control District?	☐	☐	☒	☐
b) Expose any sensitive receptor to substantial air pollutant concentrations?	☐	☒	☐	☐
c) Create or subject individuals to objectionable odors?	☐	☐	☒	☐
d) Be inconsistent with the District's Clean Air Plan?	☐	☐	☒	☐
e) Other: _____	☐	☐	☐	☐

Setting. The climate of San Luis Obispo County and Avila Beach in particular can be generally characterized as Mediterranean with warm, dry summers and cooler, relatively damp winters. Along the coast, mild temperatures are the rule throughout the year due to the moderating influence of the Pacific Ocean. Maximum summertime temperatures average about 70 degrees Fahrenheit near the coast with average minimum winter temperatures in the low 30's.

Air pollutant concentrations are primarily determined by the amount of pollutant emissions in an area and the degree to which these pollutants are dispersed in the atmosphere. During the late spring and early summer months, cool air over the ocean can intrude under the relatively warmer air over the land causing a marine inversion. These inversions can restrict dispersion along the coast but they are typically shallow and will dissipate with surface heating.

The San Luis Obispo County Air Pollution Control District (APCD) has developed the CEQA Air Quality Handbook to determine the extent of project specific impacts, evaluate the need for air quality mitigation measures or determine if potentially significant impacts could result. In order to evaluate long-term emissions, identify cumulative effects and establish countywide programs to reach acceptable air quality levels, a Clean Air Plan has been adopted by the APCD.

Impact.

Proposed Development and Future Development

The proposed project involves the construction of residential structures containing a maximum of 15 dwelling units as well as parking areas, driveways and landscaped areas. A maximum of 0.63 acres would be graded in order to accommodate these proposed uses. A total of 1480 cubic yards of cut and fill is estimated to be required to prepare the site for project construction. Construction of the proposed project is projected to occur in two phases with the grading of the site resulting in the disturbance of approximately 0.31 acres for the Proposed Development and the disturbance of 0.32 acres for grading necessary for the Future Development.

Temporary impacts would result from project construction activities. Air pollutants would be emitted by construction equipment and fugitive dust would be generated during grading and site preparation. Construction activities (i.e. grading) are estimated in the Air Pollutant Control District CEQA Handbook to generate approximately 40 pounds per acre per day or approximately 0.42 tons per acre per month of grading activity. If water or other soil stabilizers are used to control dust, the emissions can be reduced by 50 percent. Given a maximum disturbance of 0.63 acres to occur over both phases of project development, a combined total of 1,058 pounds or 0.53 tons of particulates will be generated by the proposed project without mitigation. With dust control measures, this total is reduced to 0.264 tons. Approximately half of this total applies to each project phase. These totals fall well below the 2.5 tons per quarter APCD threshold for this pollutant. However, mitigation measures are proposed to ensure compliance with the PM10 emissions standards and reduce generation of other pollutants which may be exposed to sensitive receptors in surrounding areas (see Mitigation Measures AQ-1 through AQ-10).

The proposed project will generate automobile traffic upon roadways serving the project. This traffic generation as well as the on-site combustion of energy represent a long-term source of air pollutants which will alter air quality within areas immediately adjacent to project facilities (local impacts) as well as quality on a regional scale (regional impacts). Although the proposed project introduces additional vehicular traffic onto local roadways, localized carbon monoxide levels will not exceed any State or Federal standards. Pollutant emissions associated with the proposed project are not expected to exceed any of the Tier 1 pollutant thresholds established by the Air Pollution Control District (see table below).

OPERATIONAL PROJECT EMISSIONS

	Pollutant Emissions (lbs/day)				
SOURCE	**CO**	**ROG**	**NOx**	**PM10**	**SOx**
Vehicular Trips	18.66	1.24	1.86	0.11	0.48
Natural Gas Consumption	0.08	0.02	1.19	0.01	0.00
Electrical Generation	0.06	0.01	0.35	0.02	0.04
Total Project Emissions	**18.80**	**1.27**	**3.40**	**0.14**	**0.52**
APCD Thresholds					
Tier 1 Thresholds	*50*	*10*	*10*	*10*	*10*
Tier 2 Thresholds	*550*	*25*	*25*	*25*	*25*

Any demolition of existing structures on-site could result in the generation of airborne asbestos due to the removal and disposal of potential asbestos-containing materials which may expose sensitive receptors in adjacent areas to these pollutants. However, mitigation measures are proposed to reduce or eliminate generation of these pollutants. (see Mitigation Measure AQ-11)

The use of non-certified wood-burning devices may generate particulates and other pollutants which may impact sensitive receptors in adjacent areas. However, mitigation measures are proposed to reduce or eliminate emissions from these sources (see Mitigation Measures AQ-12).

Mitigation/Conclusion.

The following mitigation measures will reduce potentially significant air quality impacts to an insignificant level.

Proposed Development and Future Development

- Dust Control

AQ-1 Water trucks or sprinkler systems shall be used in sufficient quantities to prevent airborne dust from leaving the site. All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust. Watering shall occur at least twice a day with complete coverage, preferably in the late morning and after work is done for the day. Increased watering frequency will be required whenever wind speeds exceed 15 mph. Reclaimed water shall be used for dust control and other construction-related purposes during project construction.

AQ-2 All dirt stock-pile areas shall be sprayed daily as needed.

AQ-3 Exposed ground areas that are planned to be reworked at dates greater than one month shall be sown with a fast-germinating native grass seed and watered until vegetation is established.

AQ-4 All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting or other methods approved in advance by the APCD.

AQ-5 All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible. In addition, building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

AQ-6 All dust control measures required must be included on grading and building plans. In addition, the contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, in order to prevent transport of dust off-site. These monitoring 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 issuance of grading permits.

- Best Available Control Technology for Construction Equipment (CBACT)

AQ-7 The project applicant shall require that all construction equipment be properly maintained and tuned according to manufacturer's specifications.

AQ-8 The project applicant shall require that all off-road and portable, diesel-powered equipment, including, but not limited to, bulldozers, grading equipment, cranes, loaders, scrapers, backhoes, generators, compressors or auxiliary power units, be fueled exclusively with CARB motor vehicle diesel fuel.

AQ-9 Where possible, diesel powered equipment should be replaced with gasoline, electrical, CNG or LPG powered equipment.

AQ-10 The use of diesel equipment meeting the California Air Resource Board's 1996 certification for off-road heavy-duty diesel engines shall be maximized.

- Demolition

AQ-11 Prior to issuance of any construction permit to remove or demolish any building or utility pipes on the subject property, the applicant shall provide evidence they have contacted APCD to determine: a) what regulatory jurisdictions apply to proposed demolition, such as National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M – Asbestos NESHAP); b) APCD notification requirements; c) the need for an asbestos survey conducted by a Certified Asbestos Inspector and d) applicable removal and disposal requirements of the asbestos-containing material.

- Wood Burning Devices

AQ-12 Only the following types of wood burning devices shall be allowed (based on District Rule 504):

a) EPA-Certified Phase II wood burning devices;

b) catalytic wood burning devices emitting less than or equal to 4.1 grams per hour of particulate matter, as verified by a nationally-recognized testing lab;

c) non catalytic wood burning devices which emit less than or equal to 7.5 grams per hour of particulate matter, as verified by a nationally recognized testing lab;

d) pellet-fueled woodheaters;

e) or dedicated gas-fired fireplaces. Prior to construction permit issuance, such devices shall be shown on all applicable plans

4. BIOLOGICAL RESOURCES - *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Result in a loss of unique or special status species or their habitats?	☐	☐	☒	☐
b) Reduce the extent, diversity or quality of native or other important vegetation?	☐	☐	☒	☐
c) Impact wetland or riparian habitat?	☐	☐	☒	☐
d) Introduce barriers to movement of resident or migratory fish or wildlife species, or factors, which could hinder the normal activities of wildlife?	☐	☐	☒	☐
e) Other: _____	☐	☐	☐	☐

Setting. The 0.63 acre project site contains several mature trees, those being four pines, a palm and a sycamore tree as well as other ornamental non-native vegetation and native and non-native grasses. According to the California Diversity Database, the following sensitive species or habitats were identified as being located in the project area.

Plants: Black-flowered Figwort approximately 1.0 mile east of the subject property; Wells Manzanita approximately 1.0 mile east of the subject property; Obispo Indian Paintbrush approximately 1.0 mile east of the subject property;

Wildlife: California Red Legged Frog and Tidewater Goby approximately 0.15 miles north and 0.2 miles north of the subject property;

Habitats: Coastal Oak Woodland (Scattered less than 10% density) approximately 0.2 miles north of the subject property, (High 76% to 100% density) approximately 0.5 miles northeast of the subject property and Pismo Clarkia approximately 0.9 miles northeast of the subject property

However, the project site is mostly developed and does not support any sensitive native vegetation, significant wildlife habitats or special status plant or wildlife species.

Impact.

Proposed Development and Future Development

The proposed project will result in the removal of the existing vegetation currently found on the entire 0.63 acre project site. Since the project site does not support any sensitive native vegetation, significant wildlife habitats or special status plant or wildlife species, no significant impacts to biological resources are anticipated.

A Landscape Plan has been prepared for the proposed project which includes several large tree species, shrubs and groundcover to be located along the northern, western and eastern boundaries of the project site.

Mitigation/Conclusion. No significant impacts to biological resources were identified, therefore, no mitigation measures are required.

5. CULTURAL RESOURCES - *Will the project:*	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Disturb pre-historic resources?	☐	☒	☐	☐
b) Disturb historic resources?	☐	☒	☐	☐
c) Disturb paleontological resources?	☐	☐	☒	☐
d) Other: _____	☐	☐	☐	☐

Setting.

Prehistory

Native American (Chumash) habitation of the Avila Beach area has spanned at least 9,000 years with the most diversely populated areas usually located near ocean or riparian environments. These areas offered the most abundant and diverse array of resources utilized by these populations. The Avila Beach area appeared to have supported one of the most ongoing occupied locations in San Luis Obispo County. Currently recorded site locations in Avila Beach suggest occupations were both extensive and intensive primarily due to marine and riparian resources that were utilized in the coastal regions. This population concentration and distribution pattern appears to have occurred throughout the Chumash homeland and beyond to neighboring areas of California. Other prehistoric sites in the area suggest they were used for a particular function such as milling stations or quarry sites.

Field surveys of the project site located a potentially significant prehistoric archeological site (CA-SLO-2233). This prehistoric site was visible at several locations within the site boundaries where native soils are present and extended beyond the project site to the west and south. Soils were observed to be dark brown sandy silt and possessed characteristics indicative of midden soils which are a product of high organic content. Shellfish were the most abundant remains noted in the area. Black turban, California mussel and other clams and cockles were observed. Several pieces of chipped stone debitage and other fire-affected rock fragments were also present on the soil surface.

Two other archeological sites have been recorded in the immediate vicinity of the project site. These sites were previously observed to contain cultural material, and are indicative of the general presence of prehistoric usage in the area.

Avila Schoolhouse

The following discussion of the Avila Schoolhouse is based upon information contained in the "Historic Structure Report for the Avila Schoolhouse" (dated July, 2008) prepared by Garcia and Associates.

Further details concerning the schoolhouse, its historic significance, potential project impacts and proposed mitigation measures can be found in this Report which is included in its entirety in Technical Appendix A of this Expanded Initial Study.

In 1900, the Avila School District was formed as a means to provide education for students within the town limits of Avila Beach and Port Harford. Classes were held at several locations until a wood-framed, one-room school was built at 190 San Antonia Street. Continued growth in the area due to the development of the Union Oil Asphalt Refinery resulted in the need for a larger school. The existing Avila Schoolhouse was built next to and replaced the one-room structure in 1913. It is likely that the School District utilized the same architectural plans used for the Santa Fe School that was constructed in 1907 because the design of both structures is nearly identical. The replacement Avila Schoolhouse structure contained two classrooms, a library, supply room and a colonade porch. The older, one-room school building was subsequently moved to another location in the community to be used as a barbershop. In 1950, the Avila School District expanded the south end of the parcel through the purchase of the adjoining lot and constructed a separate building on-site that was used for lavatories and storage. At a later date, the south end of the property was graded, with retaining walls and a playground being constructed. The belfry on the top of the building was removed in 1959 because it was determined to be structurally unstable. After construction of the Bellevue-Santa Fe School in 1965, the Avila School was closed. All of the small school districts in the area consolidated to form the San Luis Coastal Unified School District in 1966. In 1967, a structural engineer determined that the Avila Schoolhouse structure did not meet State safety (Field Act) requirements due to structural flaws that included framing not fastened to the concrete foundation, insufficient reinforcement of the foundations, truss members that were over-stressed and a roof that required replacement. Despite this determination, Functional Living, Inc., a facility for handicapped individuals operated at the school from 1967 to 1980.

The exterior of the building remained unchanged until 1977 when it was renovated. These renovations included replacing the stairs on the east side of the building with a handicapped ramp, enclosing the colonade porch with windows between the columns and the construction of small additional rooms at each end of the porch. Other subsequent tenants of the building included a museum and a little theater. Most recently, the Avila Beach Christian Fellowship used the building for church services. The structure, however, is currently vacant.

According to the project historian, the Avila Schoolhouse structure is a wood-framed Neoclassical building measuring approximately 62 feet by 50 feet 6 inches with a hipped roof and a ridge with composition shingles. The eave soffits are enclosed with mitered beadboard while the exterior walls are covered with drop-board siding. Vertical wood skirting is found along the north and west elevations of the structure.

The north-facing façade of the structure features a ten-foot wide porch designed with seven evenly spaced classical wood columns. The original sills and columns, exposed on the interior of the building, have not been removed or altered. However, the spaces between the columns have been infilled with aluminum-framed windows and siding that closely conforms to the original drop-board siding on the walls. Small building additions with hipped rooflines, lower than the main roof, appear at the east and west ends of the porch. The exterior walls of both additions contain the original drop-board siding found on the rest of the building.

On the east elevation, three former double-hung sash windows have been infilled to match the existing siding; only one original wood-framed double-hung window remains near the north end. A concrete handicap access ramp equipped with a handrail extends along the side of the building to a small entrance at the northeast end of the structure. The original porch entrance is accessible inside this more recently-constructed entry. The east end of the south elevation features a set of hollow-core, plywood double doors which act as the current main entrance into the building. The west elevation shows evidence of four evenly spaced former windows, all now concealed with wood siding. There is a small basement accessed under an existing ramp at north end of the west elevation.

Significance Assessment

Under CEQA, a resource is considered "historically significant" if it meets the criteria for listing on the California Registry of Historic Resources (CRHR). As such, properties that have been determined eligible for inclusion in the National Register of Historic Places (NRHP) are also formally listed on the CRHR. The following criteria are used to evaluate the historic significance of the resource for the purposes of CRHR listing and CEQA:

1. The resource is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. The resource is associated with the lives of persons important in our past;
3. It embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of an important creative individual or possesses high artistic values; or
4. It has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting at least one of the criteria above, a resource must also have retained its integrity. Consistent with the NRHP, the seven elements of integrity include location, design, setting, materials, workmanship, feeling and association.

According to the project historian, the "Avila Schoolhouse is eligible for listing on the CRHR under Criterion 1 due to its ability to convey its significance through its contribution to the broad patterns of California's history and cultural heritage. The building is recognized as a historical resource because the essential character-defining historic fabric is intact, and although not perfect, the integrity is sufficient to qualify the building for listing in the CRHR."

In determining the impact on a historical resource, CEQA regulations identify the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings as a measure to be used to determine whether or not a development project or rehabilitation causes an adverse impact on a historical resource. In general, a project that follows the U.S. Secretary of the Interior's Standards listed below will be considered as mitigated to a level of less-than-significant on a historical resource.

1. A property shall be used for its historic purposes or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place and use. Changes that create a false sense of historical developments, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If

such resources must be disturbed, mitigation measures shall be undertaken.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale and architectural features to protect the historic integrity of the property and its environment.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

As previously noted, further detail concerning this assessment of the historic significance of the Avila Schoolhouse structure can be found within the "Historic Structure Report for the Avila Schoolhouse" included in its entirety in Technical Appendix A of this Expanded Initial Study.

Impact.

Proposed Development and Future Development

Prehistory

As noted above, field surveys of the project site located a potentially significant archeological site (CA-SLO-2233) which was visible at several locations within the site boundaries where native soils are present. In addition, historic privies, trash dumps and other historic features associated with the prior operation of the school are likely to be present on the project site. Project grading or construction may potentially impact these cultural resources. In addition, more recent historic resources associated with the schoolhouse operations may also be unearthed.

Phase II subsurface archeological testing is recommended in order to determine the presence or absence of archeological deposits or historic resources, to define any archeological site boundaries and determine their significance (see Mitigation Measures CR-1 and CR-2).

In the event that cultural resources are uncovered during project grading or construction, a qualified archeologist or historian should halt or redirect construction in order to evaluate any unearthed resources and formulate recommendations in accordance with applicable County or State guidelines (see Mitigation Measures CR-3 and CR-4).

Proposed Development

The Proposed Development involves the construction of ten dwelling units with a central driveway, parking stalls and landscaping. These improvements will be confined to the boundaries of Lot 1 (Tract 2667) (see Figure 3, Conceptual Site Plan). The Proposed Development will, therefore, not directly impact the existing Avila Schoolhouse building which is located in Parcel 2 to the north.

However, all new buildings on the subject property constructed within the Proposed Development should confirm and reinforce the design established by the schoolhouse building. Their design should be compatible with the size, scale and character of the schoolhouse structure, and those buildings to the south and west of the schoolhouse should not exceed the height of the existing schoolhouse building (see Mitigation Measure CR-5).

While the Proposed Development would not result in direct physical change to the Schoolhouse structure, it would involve construction in close proximity including earth moving and grading. These activities could affect the Schoolhouse if it is not structurally stable or sound. In addition, while the Proposed Development will result in a change in setting of the Schoolhouse, measures can be taken to assure continuance of the structure until such time a Future Development scenario is chosen (see Mitigation Measure CR-6).

Future Development

Avila Schoolhouse

The Historic Structure Report for the Avila Schoolhouse (included as Technical Appendix A of this Expanded Initial Study) determined that the Avila Schoolhouse structure "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" and qualifies for listing in the California Register of Historical Resources.

The project applicant has considered five options for the possible future use of the on-site schoolhouse structure which include: 1) demolition/rebuilding of the schoolhouse at a new location on-site; 2) moving and adaptive re-use of the schoolhouse at a new location on-site to the north and downslope of its current location; 3) moving and adaptive re-use of the schoolhouse approximately ten feet to the east of its current location; 4) adaptive re-use of the schoolhouse at its current location and 5) development around but not including the adaptive re-use of the schoolhouse structure. The first four of these options would include the adaptive re-use of the schoolhouse structure or its replacement (Option 1) with the development of three residential dwelling units and a 1000 square foot common area.

Provided below is an impact analysis of these five development options:

Option 1: Demolition and rebuilding of the schoolhouse at a new location on-site.

The development option involves the demolition of the existing schoolhouse and building a replacement structure at a new location on-site.

According to the CEQA Guidelines (Section 15064.5(b)(c), the significance of an historical resource is "materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and justify its inclusion in, or eligibility for, inclusion in the California Register of Historic Resources" (CRHR). As previously noted, according to the project historian, the "Avila Schoolhouse is eligible for listing on the CRHR due to its ability to convey its significance through its contribution to the broad patterns of California's history and cultural heritage. The building is recognized as a historical resource because the essential character-defining historic fabric is intact, and although not perfect, the integrity is sufficient to qualify the building for listing in the CRHR."

Given the significance of this historic resource and in accordance with standards within the CEQA Guidelines, this development option involving demolition of the existing schoolhouse structure constitutes a significant adverse impact that cannot be mitigated to a level of insignificance. It is recommended by the project historian that demolition of the existing schoolhouse structure be avoided and other development options for the schoolhouse building as discussed below be considered.

Option 2: Moving and adaptive re-use of the schoolhouse at a new location on-site to the north and downslope of its current location.

This development option involves moving the existing schoolhouse building approximately 50 feet to the north of its current location on a slope facing San Luis Street and its adaptive re-use to include three dwelling units. It is possible that the building could incur damage as a result of this relocation which would constitute a significant adverse impact to this historical resource. Although retaining the schoolhouse structure in its current location is preferable to relocation, the potential impacts of relocation can be reduced to a level of insignificance through the preparation of documentation involving plans/drawings and photographs as well as written data of the schoolhouse (see Mitigation Measure CR-7).

Impacts to the schoolhouse building due to development of Option 2 can be mitigated to a level of insignificance through the rehabilitation of the schoolhouse building in accordance with the guidelines

in the Secretary of Interior's Standards for Treatment of Historic Properties. The specific measures required to achieve this conformance include: insuring that new site features are as unobtrusive as possible, preservation of views of the north-facing façade of the building, retention and preservation of character-defining elements of the schoolhouse building, removal and replacement of non-historic materials in the building, repair or replacement of deteriorated or missing features, provision of modifications to the building that do not obscure or alter its character-defining forms, spaces or materials, replacement of missing historic features (including the bell and belfry), provision of modifications which conform to original features of the building and proper cleaning and preservation of historic materials (see Mitigation Measure CR-8).

In addition, a permanent interpretive display including details and historic information of the Avila Beach community and Avila School within the schoolhouse building (see Mitigation Measure CR-9) and assistance in the organizing of a local historical society (see Mitigation Measure CR-10) are also recommended in order to reduce potential project impacts to a level of insignificance.

Option 3: Moving and adaptive re-use of the schoolhouse approximately ten feet to the east of its current location.

This development option involves moving the existing schoolhouse building approximately ten feet to the east of its current location and its adaptive re-use to include three dwelling units. It is possible that the building could incur damage as a result of this move which would constitute a significant adverse impact to this historic resource. Although retaining the schoolhouse structure in its current location is preferable to relocation, these potential impacts can be reduced to a level of insignificance through the preparation of documentation involving plans/drawings and photographs as well as written data of the schoolhouse (see Mitigation Measure CR-7).

Impacts to the schoolhouse building due to development of Option 3 can be mitigated to a level of insignificance through the rehabilitation of the schoolhouse building in accordance with the guidelines in the Secretary of Interior's Standards for Treatment of Historic Properties. The specific measures required to achieve this conformance include: insuring that new site features are as unobtrusive as possible, preservation of views of the north-facing façade of the building, retention and preservation of character-defining elements of the schoolhouse building, removal and replacement of non-historic materials in the building, repair or replacement of deteriorated or missing features, provision of modifications to the building that do not obscure or alter its character-defining forms, spaces or materials, replacement of missing historic features (including the bell and belfry), provision of modifications which conform to original features of the building and proper cleaning and preservation of historic materials (see Mitigation Measure CR-8).

In addition, a permanent interpretive display including details and historic information of the Avila Beach community and Avila School within the schoolhouse building (see Mitigation Measure CR-9) and assistance in the organizing of a local historical society (see Mitigation Measure CR-10) are also recommended in order to reduce potential project impacts to a level of insignificance.

Option 4: Adaptive re-use of the schoolhouse at its current location.

This development option involves retaining the schoolhouse structure in its current location with adaptive re-use of the structure to include three dwelling units. Although leaving the schoolhouse structure in place is considered to be a less than significant impact, the project historian has recommended rehabilitation of the schoolhouse building in accordance with the guidelines in the Secretary of Interior's Standards for Treatment of Historic Properties. The specific measures required to achieve this conformance include: insuring that new site features are as unobtrusive as possible, preservation of views of the north-facing façade of the building, retention and preservation of character-defining elements of the schoolhouse building, removal and replacement of non-historic materials in the building, repair or replacement of deteriorated or missing features, provision of modifications to the building that do not obscure or alter its character-defining forms, spaces or materials, replacement of missing historic features (including the bell and belfry), provision of

modifications which conform to original features of the building and proper cleaning and preservation of historic materials (see Mitigation Measure CR-8).

In addition, a permanent interpretive display including details and historic information of the Avila Beach community and Avila School within the schoolhouse building (see Mitigation Measure CR-9) and assistance in the organizing of a local historical society (see Mitigation Measure CR-10) are also recommended in order to reduce potential project impacts to a level of insignificance.

Option 5: Development around but not including the adaptive re-use of the schoolhouse structure.

This development option involves development of twelve dwelling units in the area around the schoolhouse building but no adaptive re-use of the structure itself.

Although no adaptive re-use of the schoolhouse structure is proposed within this development option, the project historian has indicated that neglect of a property eligible for listing in the California Register of Historic Resources "would result in its deterioration or destruction" which is considered to represent a potentially significant adverse impact. As such, the project historian has recommended rehabilitation of the schoolhouse building in accordance with the guidelines in the Secretary of Interior's Standards for Treatment of Historic Properties. The specific measures required to achieve this conformance include: insuring that new site features are as unobtrusive as possible, preservation of views of the north-facing façade of the building, retention and preservation of character-defining elements of the schoolhouse building, removal and replacement of non-historic materials in the building, repair or replacement of deteriorated or missing features, provision of modifications to the building that do not obscure or alter its character-defining forms, spaces or materials, replacement of missing historic features (including the bell and belfry), provision of modifications which conform to original features of the building and proper cleaning and preservation of historic materials (see Mitigation Measure CR-8).

In addition, a permanent interpretive display including details and historic information of the Avila Beach community and Avila School within the schoolhouse building (see Mitigation Measure CR-9) and assistance in the organizing of a local historical society (see Mitigation Measure CR-10) are also recommended in order to reduce potential project impacts to a level of insignificance.

As is the case for Proposed Development, all new buildings on the subject property constructed within the Future Development should confirm and reinforce the design established by the schoolhouse building. Their design should be compatible with the size, scale and character of the schoolhouse structure with any development on the north side of the structure not obstructing views of the front (north-facing) façade of the schoolhouse building or compromising its historic setting (see Mitigation Measure CR-5)

The project historian has further recommended that in the event that the north-facing slope on the property is not developed for residential use that it be retained as a community park or playground. It is additionally recommended that in the event that the schoolhouse building is not utilized for residential use that it be re-used as a local museum or meeting place. However, neither of these elements are currently proposed by the project applicant.

In summary, Development Option 1 has been identified as having a significant adverse impact that cannot be reduced to a level of insignificance whereas impacts associated with Development Options 2 through 5 can, through the implementation of proposed mitigation measures, be reduced to a level of insignificance thereby compensating for any adverse impacts to the schoolhouse structure and for any incremental loss to the local community's heritage.

Mitigation/Conclusion. With the exception of Development Option 1, the following mitigation measures will reduce cultural resources impacts associated with the Proposed Development and Development Options 2 through 5 of the Future Development to an insignificant level.

Proposed Development and Future Development

CR-1 **Prior to issuance of construction permit/ tract improvement plan**, the applicant shall submit to the Environmental Coordinator (and possibly subject to peer review) for the review and approval, an archaeological Testing, Mitigation & Monitoring Program shall be prepared by a subsurface qualified archaeologist approved by the Environmental Coordinator. The consulting archaeologist responsible for the program shall be provided with a copy of the previous archaeological investigations (Cultural Resource Surface Survey, Bertrando & Bertrando, September 25, 2003; Phase II Cultural Resource Survey, Bertrando & Bertrando, February 10, 2004; Historic Structure Report of the Avila Schoolhouse, Garcia and Associates, July, 2008). The program shall provide for testing the archaeological resources present on the site determine distribution and concentration, and to mitigate for any impacts to these resources if they will be impacted by the proposed development. The program shall include at least the following:

A. standard archaeological testing and data recovery practices, taking into consideration the resource distribution, existing fill placed on the site and the proposed project;
B. recommendation of sample size adequate to mitigate for impacts to archaeological site, including basis and justification of the recommended sample sizeif necessary
C. identification of location of sample sites/test units;
D. detailed description of sampling/testing 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 collected materials, including timeline of final analysis results;
G. list of personnel involved in sampling and analysis.

The monitoring plan shall include at a minimum:

H. List of personnel involved in the monitoring activities;
I. Description of how the monitoring shall occur;
J. Description of frequency of monitoring (e.g. full-time, part time, spot checking);
K. Description of what resources are expected to be encountered;
L. Description of circumstances that would result in the halting of work at the project site (e.g. What is considered "significant" archaeological resources?);
M. Description of procedures for halting work on the site and notification procedures;Description of monitoring reporting procedures.

Once approved, these measures shall be shown on all applicable plans and implemented during construction.

CR-2 ***Prior to commencement of map improvement construction* or *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 testing and mitigation program has been completed.

CR-3 **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-4 **Upon completion of all monitoring/mitigation activities, and prior to occupancy or final inspection (whichever occurs first) or final approval of tract improvements**, 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].

CR-5 The proposed new buildings on the subject property shall reinforce the established design of the Avila Schoolhouse in a way that new designs do not conflict with or detract from the character of the existing structure. Their design should be compatible with the size, scale and character of the historic schoolhouse. It is recommended that new buildings to the south and west of the schoolhouse structure not exceed the height of the schoolhouse and that adequate space be provided so that new development does not encroach on its visual space. A buffer of no less than 25 feet on the south and west sides of the schoolhouse building is recommended by the project historian. The open area on the north side of the schoolhouse should not be modified in such a way as to obstruct views of the front (north-facing) façade of the schoolhouse building or compromise its historic setting.

CR-6 **Prior to issuance of construction permit/ tract improvement plan**, the applicant shall submit to the Environmental Coordinator, a structural stabilization plan for the Avila Schoolhouse. The purpose of the plan is to identify the actions necessary to stabilize and arrest the decay of the Avila Schoolhouse so that restoration and re-use are possible in the future. The plan should focus on those measures that are necessary and it is not intended to act as a full restoration plan. The plan shall be prepared by a qualified professional and shall be reviewed by a qualified historical professional approved by the Environmental Coordinator

Future Development

CR-7 For Development Options 2 and 3 of the Avila Schoolhouse where the schoolhouse building is proposed to be relocated, HABS/HAER Level III documentation shall be prepared prior to moving and relocating the schoolhouse within Phase II of project development. Level III documentation includes a sketch plan (drawing) of the structure, photographs with large-scale negatives of exterior and interior views and written data.

CR-8 For Development Options 2, 3, 4 and 5 of the Avila Schoolhouse, the existing schoolhouse structure shall be rehabilitated within Phase II of project development, in conformance with the Guidelines for Rehabilitating Historic Buildings in the Secretary of Interior's Standards for Treatment of Historic Properties and the detailed design criteria contained within Chapter 8 of the Historic Structure Report for the Avila Schoolhouse. The following measures were determined to be necessary in order to achieve conformance with these standards:

a. In order to retain and preserve the character-defining features of the schoolhouse building, new site features should be as unobtrusive as possible. The open area on the north side of the schoolhouse building should not be modified in such a way as to obstruct views of the front (north-facing) façade of the building or compromise its historic setting.

b. The character-defining elements of the schoolhouse building should be retained and preserved. These elements include its Neoclassical design involving the hipped roof with a ridge, planciers (eave soffits) enclosed with mitered bead board, wood drop-board siding, a wide colonaded porch, scuppers and ornate vents. These existing character-defining elements shall be protected from alterations during project construction and care should be

taken to use materials that relate to and conform with the historic identity of the building.

c. It is recommended that non-historic materials on or within the schoolhouse building be removed and replaced with materials that conform to the historic fabric of the building. These more recent alterations include modern replacement doors and windows, boarded-up windows, in-fill areas on the porch and removable additions since they are not historic and are not consistent with the Neoclassical architectural design and construction materials introduced in 1913. More recent changes to the interior, such as the drop acoustical ceiling tiles and wall and floor upgrades should be removed to expose the original surfaces. All work should be performed using in-kind materials and techniques to match the original 1913 design.

d. During building reinforcement and stabilization, all exterior siding and moldings should be repaired and repainted with deteriorated or missing features repaired or replaced.

e. Modifications to the interior and exterior of the building, plus any additions required for adaptive re-use should not drastically alter, obscure, or obliterate the character-defining forms, spaces or materials. Alterations such as doors, windows, atriums, and/or skylights may be added to the proposed second level of the schoolhouse in order to allow natural light into the building. These alterations should be implemented in a manner that preserves the structural system and character-defining forms, spaces, and materials.

f. Historic features of the schoolhouse building that are now absent shall be replaced. These features include the former belfry and bell which are now missing from the structure. The design of the recently-replaced belfry at the Santa Fe School structure may provide an architectural model for this replaced feature.

g. Any new modifications to the schoolhouse building should correspond to its original visual expression as evidenced in original architectural renditions and historic photographs. If corresponding features of the structure are absent and documentation is not available, new designs should be compatible with character-defining historic features.

h. In the event that it is decided to clean the existing architectural details of the schoolhouse building, chemical or physical treatments such as sandblasting can damage historic materials. Prior to such activities, a qualified conservator shall be involved in order to insure the use of non-invasive cleaning techniques.

CR-9 For Development Options 2, 3, 4, and 5 of the Avila Schoolhouse, a permanent interpretive display for public use within the schoolhouse building shall be provided within Phase II of project development. This interpretive display will include details and historic information about the Avila Beach community and Avila School and important individuals associated with the school. Prior to preparing the display, a qualified historian will perform research regarding the role of the building and the events for which it is significant and conduct oral history interviews. This approach will impart knowledge of the history of Avila Beach to the general public and will compensate for any loss to the local community's heritage.

CR-10 For Development Options 2, 3, 4, and 5 of the Avila Schoolhouse within Phase II of project development, the project applicant shall assist in the organizing of local individuals with an interest in developing a historical society and use of the Avila School as a repository for documents and materials related to the history of Avila Beach.

6. GEOLOGY AND SOILS - *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Result in exposure to or production of unstable earth conditions, such as landslides, earthquakes, liquefaction, ground failure, land subsidence or other similar hazards?	☐	☐	☒	☐
b) Be within a California Geological Survey "Alquist-Priolo Earthquake Fault Zone"?	☐	☐	☒	☐
c) 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?	☐	☒	☐	☐
d) Change rates of soil absorption, or amount or direction of surface runoff?	☐	☒	☐	☐
e) Include structures located on expansive soils?	☐	☐	☒	☐
f) Change the drainage patterns where substantial on- or off-site sedimentation/ erosion or flooding may occur?	☐	☐	☒	☐
g) Involve activities within the 100-year flood zone?	☐	☐	☒	☐
h) *Be inconsistent with the goals and policies of the County's Safety Element relating to Geologic and Seismic Hazards?*	☐	☐	☒	☐
i) Preclude the future extraction of valuable mineral resources?	☐	☐	☒	☐
j) Other: _____	☐	☐	☐	☐

Setting. GEOLOGY - The topography of the project site consists of a gently sloping hilltop with a relatively flat south-facing slope on the southern portion of the site and a steeper sloping north-facing man-made embankment leading to San Luis Street to the north. This embankment was created when the grading for the existing parking lot was completed at least 40 years ago. The area proposed for development is outside of the Geologic Study Area designation. The landslide risk potential of the project site is considered low. The liquefaction potential of the site during a ground-shaking event is considered low. The project is not within a known area containing serpentine or ultramafic rock or soils.

DRAINAGE – The area proposed for development lies outside the 100-year Flood Hazard designation. The closest creek (an unnamed stream) from the proposed development is approximately 0.15 miles to the north. As noted in the Natural Resource Conservation Service Soil Survey, on-site soils are considered to be very poorly to not well drained. For areas where drainage is identified as a potential issue, the County Land Use Ordinance (Section 22.52.080) includes a provision requiring preparation of a drainage plan to minimize potential drainage impacts. When required, this plan would 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 – On-site soil types include: Gazos-Lodo clay loams, (15 - 30 % slope). As described in the Natural Resource Conservation Service Soil Survey, on-site soils are considered to have moderate erodibility and moderate shrink-swell characteristics.

When moderately erosive conditions exist, a sedimentation and erosion control plan is required by the County Land Use Ordinance (Section 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.

Impact.

Proposed Development and Future Development

Development of the proposed project will result in the permanent alteration of the existing landform in order to accommodate the proposed uses. Project grading will occur over the entire 0.63 acre project site with the only exception being the existing schoolhouse structure if it is not demolished or moved to a new location. A total of 1480 cubic yards of excavation will be required to allow for the construction of the proposed structures.

Development of the proposed project will result in an increase in surface runoff due to the creation of impervious surfaces such as the proposed buildings, parking lots, driveways, etc. Due to the relatively small area of impervious surfaces proposed, storm water runoff rates are not expected to be significantly increased by development of the proposed project. The proposed project does not place any structures within the 100-year floodplain or in areas containing the FH-Flood Hazard Combining Designation pursuant to the San Luis Area Plan. The proposed project facilities are also located outside of Flood Zone A of the FEMA National Flood Insurance Rate Map. Erosion of graded areas and discharge of sediment to areas downstream from both on and off-site will occur if grading operations during project construction occur during the rainy season or if adequate erosion control measures are not provided (see Mitigation Measures GS-1 and GS-2).

Mitigation/Conclusion.

The following mitigation measures will reduce potentially significant geology and soils impacts to an insignificant level.

Proposed Development and Future Development

GS-1 Prior to the issuance of grading permits, a Sedimentation and Erosion Control Plan shall be submitted to the County Department of Public Works for review and approval. The plan shall indicate methods to control erosion which may include, but are not limited to, erosion fencing, hay bales, temporary siltation basins, erosion control blankets, etc. This plan, to be prepared by a registered civil engineer, shall conform to requirements within the County Land Use Ordinance.

GS-2 Any required replacement vegetation/landscaping shall be planted well in advance of October 15th in order to provide sufficient time prior to the rainy season for roots to establish and effectively hold soil together.

7. HAZARDS & HAZARDOUS MATERIALS - *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Result in a risk of explosion or release of hazardous substances (e.g. oil, pesticides, chemicals, radiation) or exposure of people to hazardous substances?	☐	☐	☒	☐
b) Interfere with an emergency response or evacuation plan?	☐	☐	☒	☐
c) Expose people to safety risk associated with airport flight pattern?	☐	☐	☒	☐
d) Increase fire hazard risk or expose people or structures to high fire hazard conditions?	☐	☐	☒	☐
e) Create any other health hazard or potential hazard?	☐	☒	☐	☐
f) Other: _____	☐	☐	☐	☐

Setting. The project site is not located in an area of known hazardous material contamination. The project site is within a high severity risk area for fire. The project site is not within the Airport Review area.

Impact.

Proposed Development and Future Development

Since the project site lies well within the recommended response time (fifteen minutes) from the nearest fire station (approximately two miles and less than 5 minutes away), the project does not present a significant fire safety risk. The project is not expected to conflict with any regional evacuation plan.

While the proposed project does not involve the use of hazardous materials, building demolition, reconstruction or other construction activities may result in exposure to lead-based paint. Sanding of lead-based paint will result in air exposure from dust while scraping will result in soil contamination. Any potential lead-based paint exposure or disposal should be conducted in accordance with applicable Health and Safety Code requirements (see Mitigation Measure HM-1).

Mitigation/Conclusion. The following mitigation measure will reduce potentially significant hazardous materials impacts to an insignificant level.

Proposed Development and Future Development

HM- 1 Exposure and/or disposal of lead-based paint or lead-based painted materials must be conducted in accordance with applicable Health and Safety Code requirements.

8. NOISE - *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Expose people to noise levels that exceed the County Noise Element thresholds?	☐	☐	☒	☐
b) Generate increases in the ambient noise levels for adjoining areas?	☐	☐	☒	☐
c) Expose people to severe noise or vibration?	☐	☐	☒	☐
d) Other: _____	☐	☐	☒	☐

Setting. The primary noise source in the project area is local roadways. San Luis Street, which runs along the northern boundary of the project site, receives a significant amount of traffic as it is one of the major routes into Avila Beach. As such, it is the primary noise source impacting the project site. According to the County Noise Element, noise contour maps indicate that the northern sloping portion of the project site could be exposed to noise levels ranging from 60 to 65 dB(A). The County Noise Element requires residential uses have exterior noise levels not exceeding 60 dBA.

Impact.

Proposed Development and Future Development

The northern portion of the project site could be exposed to noise levels exceeding 60 dBA. However, the extent of this noise exposure is minimized due to the significant elevation change (7 to 12 feet) between the noise source (San Luis Street) and the receptor. The portion of the proposed project which could be potentially exposed to these noise levels is proposed to contain landscaping, garages, parking areas and the rear of the proposed structures. Given the change in elevation (a six foot elevation change reduces noise levels by 6 to 8 dBA), proposed structures are located outside the 60 db(A) noise contour emanating from San Luis Street. As such, future residents will not be exposed to exterior noise levels that exceed County noise standards.

Mitigation/Conclusion. No significant noise impacts were identified, therefore, no mitigation measures are required.

9. POPULATION/HOUSING - *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Induce substantial growth in an area either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?	☐	☐	☒	☐
b) Displace existing housing or people, requiring construction of replacement housing elsewhere?	☐	☐	☒	☐
c) Create the need for substantial new housing in the area?	☐	☐	☒	☐

9. POPULATION/HOUSING - *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
d) Use substantial amount of fuel or energy?	☐	☐	☒	☐
e) Other: _____	☐	☐	☐	☐

Setting The project site contains the currently-abandoned Avila Schoolhouse structure and vacant land. As such, the subject property does not provide any housing opportunities or generate any population.

The 0.63 acre project site is surrounded primarily by single and multi-family residential uses. Immediately north of the site across San Luis Street are single-family residences on San Luis Street Parkway, Laurel Lane and Ocean Oaks Drive. Further north across Avila Beach Drive is the Avila Beach Resort and Golf Course. East of the site across San Antonia Street are multi-story residential housing (apartments) and single-family homes. South of the site are older, single-family residences (mostly single story) interspersed with several vacant lots. West of the site are several multi-story residences along San Luis Street that are currently (June, 2008) under construction. Recent site surveys have noted several instances of vacation rentals being offered.

Impact.

Proposed Development and Future Development

The proposed project will generate a maximum of ten dwelling units within the Proposed Development and seven dwelling units within the Future Development. Based upon a multi-family population generation factor of 2.49 persons per dwelling unit (County Housing Element), the Proposed Development will generate approximately 20 new residents while the Future Development will generate an additional 17 residents. Since the proposed project is generating new housing opportunities, it will not result in the need for significant new housing nor will it displace any existing housing.

Title 18 of the County Code (Public Facilities Fees) requires that an affordable housing mitigation fee be imposed as a condition of approval of any new residential development project. The proposed project includes one affordable studio unit out of the maximum of fifteen total units of proposed housing.

Prior to map recordation, the applicant will pay an affordable housing mitigation fee of 3.5 percent of the adopted Public Facility Fee. This fee will not apply to any County-recognized affordable housing included within the project.

Mitigation/Conclusion. No significant impacts to population and housing were identified, therefore, no mitigation measures are required.

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
a) Fire protection?	☐	☒	☐	☐
b) Police protection (e.g., Sheriff, CHP)?	☐	☒	☐	☐
c) Schools?	☐	☒	☐	☐
d) Roads?	☐	☒	☐	☐
e) Solid Wastes?	☐	☐	☒	☐
f) Other public facilities?	☐	☐	☒	☐
g) Other: _____	☐	☐	☐	☐

Setting. The project area is served by the County Sheriff's Department and CDF/Cal Fire as the primary emergency responders. The closest CDF/Cal Fire station (Avila Valley Station 62) is approximately 1.75 miles to the north. The closest Sheriff substation is in Oceano, which is approximately 11 miles from the proposed project. The project is located in the San Luis Coastal Unified School District.

Impact.

Proposed Development and Future Development

The proposed project will represent an incremental addition to the regional demand for law enforcement and fire protection services. With any increase in public use, it can be expected that activities will occur (such as vandalism, trespassing or burglary) which, in turn, may require Sheriff's office response. Additional demand for fire protection services may contribute to the need for additional fire fighters or equipment. The project site lies well within the recommended response time (fifteen minutes) from the nearest fire station (approximately two miles and less than five minutes away). Based upon a student generation factor of 0.65 students per household, a total of approximately ten students would, as a "worst-case" be generated by the proposed project. The Proposed Development will generate approximately five students while the Future Development will generate an additional four students. The use of proposed residences as vacation rentals would eliminate any potential student generation. None of the impacts to public services notes above are considered to be significant.

The project, along with numerous others in the area, will have a cumulative effect on the demand for public services in the area and the County. The project's direct and cumulative impacts are within the general assumptions of allowed use for the subject property that were used to estimate required public facility and school fees currently in place (see Mitigation Measure PS-1)

Mitigation/Conclusion. The following mitigation measure will reduce potentially significant public services/utilities impacts to an insignificant level.

Proposed Development and Future Development

PS- 1 Public facility (County) and school (State Government Code Section 65995 et sec) fee programs have been adopted to address the project's direct and cumulative impacts upon public services serving the project area.

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 Avila Beach area contains an extensive and wide variety of recreation facilities including Avila Beach, Avila Pier, Olde Port Beach, Harford Pier, numerous restaurants and other visitor-serving facilities on or near Front Street and Harford Pier, trails to the Avila Lighthouse, the Avila Beach Resort and Golf Course and the Bob Jones Bicycle Trail.

The County Trails Plan does not indicate any trails going through or running adjacent to the subject property. The proposed project is not proposed in a location that will affect any trail, park or other recreational resource.

Impact.

Proposed Development and Future Development

The proposed project will not create a significant demand upon existing recreation facilities in the area nor will it create a specific need for additional park or recreation facilities. The project is not proposed in a location that will affect any trail, park or other recreational resource.

The proposed project, in combination with other projects in the area will add to the cumulative demand for parks and recreation resources. Prior to map recordation, County ordinances require payment of Quimby Act fees for the development and/or improvement of neighborhood or community parks which is intended to respond to the proposed project's incremental demand upon local recreational facilities (see Mitigation Measure R-1).

Mitigation/Conclusion. The following mitigation measure will reduce potentially significant recreation impacts to an insignificant level.

Proposed Development and Future Development

R- 1 Quimby Act fees have been adopted to address the project's direct and cumulative impacts upon existing parks and recreation facilities serving the project area.

12. TRANSPORTATION/ CIRCULATION - *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Increase vehicle trips to local or areawide circulation system?	☐	☒	☐	☐
b) Reduce existing "Levels of Service" on public roadway(s)?	☐	☒	☐	☐
c) Create unsafe conditions on public roadways (e.g., limited access, design features, sight distance, slow vehicles)?	☐	☒	☐	☐

12. TRANSPORTATION/ CIRCULATION - *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
d) Provide for adequate emergency access?	☐	☒	☐	☐
e) Result in inadequate parking capacity?	☐	☐	☒	☐
f) Result in inadequate internal traffic circulation?	☐	☐	☒	☐
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., pedestrian access, bus turnouts, bicycle racks, etc.)?	☐	☐	☒	☐
h) Result in a change in air traffic patterns that may result in substantial safety risks?	☐	☐	☒	☐
i) Other: _____	☐	☐	☐	☐

Setting. The Avila Schoolhouse site is bounded by San Luis Street to the north and San Antonia Street on the east. Access to the site is currently provided by a driveway midway along the eastern property line leading to San Antonia Street. Other roadways in the immediate vicinity include San Rafael Street, 1st and 2nd Streets, San Luis Street Parkway, Laurel Lane, Ocean Oaks Drive and Avila Beach Drive. All of these thoroughfares are two lane, local roadways with the exception of Avila Beach Drive which has two lanes and left turn pockets and represents the primary regional access route in conjunction with San Luis Bay Drive to U.S. Highway 101. These local roadways lead to Front Street and Avila Beach which is approximately 0.2 miles to the south of the site.

According to the County Public Works Department, Avila Beach's highest traffic volumes throughout the year are generally event-driven rather than due to daily afternoon or morning peak hour traffic levels. The highest daily traffic levels occur during holidays, (Fourth of July, Labor Day or Memorial Day weekends) or during events (concerts, the beginning of salmon fishing season, etc.)

The Avila Beach Specific Plan Final Environmental Impact Report (November 9, 1999) evaluated the potential traffic circulation impacts at full build-out of the Specific Plan. As stated therein;

> "With the addition of the 338 additional peak hour trips generated by Specific Plan build-out, total peak hour trips would be 1,124 and the LOS on Avila Beach Drive would be LOS 'B'. Therefore, the additional housing units will not significantly impact the LOS on Avila Beach Drive by causing it to drop below LOS 'C'. In addition, not all trips would include the segment of Avila Beach Drive between San Luis Street and San Luis Bay Drive. Therefore, peak hour trips on that segment would be even less than 1,124." (page 32 of the Final EIR for the Avila Beach Specific Plan).

Impact.

Proposed Development and Future Development

The County of San Luis Obispo utilizes a peak hour traffic generation factor of 0.6 afternoon (PM) peak hour automobile trips per dwelling unit for multi-family housing. The County Public Works Department has indicated that this multi-family trip generation factor would apply to this project given its proposed residential density (a maximum of 15 dwelling units on 0.63 acres.) As such, the

proposed project at ultimate development would generate a maximum of nine peak hour automobile trips. This equates to one additional automobile on the roadway every 6.6 minutes. The Proposed Development will generate approximately five peak hour trips while the Future Development will generate an additional four peak hour trips. This addition of traffic onto the local and regional roadway system is considered to be insignificant.

According to the County Public Works Department, vacation rentals have been found to generate fewer peak hour trips than traditional rental and/or for-sale housing. Vacation rental automobile trips tend to occur outside of the typical peak hours since they do not generate work-related trips and do not exhibit a traditional residential trip pattern (such as transportation of children to after-school events, late afternoon errands, etc.). In addition, vacation rentals will likely not contribute to event-driven traffic to Avila Beach that originates from outside the community since these residents (i.e. vacationers) will not be commuting to and from the Avila Beach area for these events. The small amount of additional traffic with this proposed 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.

The proposed project along with numerous others in the Avila Beach and Avila Valley area will contribute fees to be used toward the provision of areawide circulation improvements in response to their cumulative impacts upon areawide circulation (see Mitigation Measure TC-1).

Mitigation/Conclusion. The following mitigation measure will reduce potentially significant transportation/circulation impacts to an insignificant level.

Proposed Development and Future Development

TC- 1. The proposed project is subject to the fees identified within the Avila Circulation Fee Program. These fees contribute towards areawide circulation improvements and will respond to the project's cumulative circulation impacts.

13. WASTEWATER - *Will the project:*	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Violate waste discharge requirements or Central Coast Basin Plan criteria for wastewater systems?	☐	☐	☒	☐
b) Change the quality of surface or ground water (e.g., nitrogen-loading, daylighting)?	☐	☐	☒	☐
c) Adversely affect community wastewater service provider?	☐	☐	☒	☐
d) Other: _____	☐	☐	☐	☐

Setting. The project area is provided wastewater treatment services by the Avila Community Services District. Secondary wastewater treatment is provided at the District Treatment Facility located at San Miguel Street and Avila Beach Drive. This facility is permitted to treat up to 200,000 gallons per day and in April, 2008 treated an average flow of approximately 40,000 gallons per day.

Impact.

Proposed Development and Future Development

Based upon water usage factors, provided by the Avila Community Services District and estimated 20% deduction for on-site common area landscape irrigation, the proposed project will generate a total of 4,973 gallons of wastewater per day. Of this total, approximately 2,829 gallons per day will be generated within the Proposed Development while Future Development will generate an additional 2,144 gallons per day.

According to the Avila Community Services District, this additional demand for wastewater treatment falls within the current service capabilities of the District. The project applicant has provided a preliminary will-serve letter (dated February 11, 2005) from the Avila Community Services District stating that they are willing and capable of providing wastewater treatment service to the proposed project.

Mitigation/Conclusion. No significant wastewater impacts were identified, therefore, no mitigation measures are required.

14. WATER - ***Will the project:***	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Violate any water quality standards?	☐	☐	☒	☐
b) Discharge into surface waters or otherwise alter surface water quality (e.g., turbidity, temperature, dissolved oxygen, etc.)?	☐	☐	☒	☐
c) Change the quality of groundwater (e.g., saltwater intrusion, nitrogen-loading, etc.)?	☐	☐	☒	☐
d) Change the quantity or movement of available surface or ground water?	☐	☐	☒	☐
e) Adversely affect community water service provider?	☐	☐	☒	☐
f) Other: _____	☐	☐	☐	☐

Setting. The project area is provided water service by the Avila Beach Community Services District. The District's current sources of water are the State Water Project (an allocation of 100 acre-feet per year) and Lopez Lake (68.8 acre-feet per year).

The topography of the site is a gently sloping hilltop with a relatively flat south-facing slope and a steeper sloping north-facing embankment. The closest creek (an unnamed stream) from the proposed development is approximately 0.15 miles to the north of the project site. As described in the NRCS Soil Survey, the soil surface is considered to have moderate erodibility.

Impact.

Proposed Development and Future Development

Based upon water usage factors provided by the Avila Community Services District, the proposed project will generate the demand for a total of 6,216 gallons of water per day. Of this total, approximately 3,536 gallons per day will be required to serve the Proposed Development while 2,680 gallons per day will be required to serve the Future Development.

PROJECT WATER DEMAND

HOUSING TYPE	USAGE RATE (gal/day)	PROPOSED DEVELOPMENT d.u.Total	PROPOSED DEVELOPMENT Water Use	FUTURE DEVELOPMENT d.u.Total	FUTURE DEVELOPMENT Water Use
Studio/1 Bedroom	244	3	732	3	732
2 Bedroom	407	0	0	0	0
3 Bedroom	487	2	974	4	1948
4 Bedroom	610	3	1830	0	0
	TOTAL	8	3,536	7	2,680

According to the Avila Community Services District, this additional water demand falls with the current supply and service capabilities of the District. The project applicant has provided a preliminary will-serve letter (dated February 11, 2005) from the Avila Community Services District stating that they are willing and capable of providing water service to the proposed project.

Standard drainage and erosion control measures will be required for the proposed project which will adequately protect and maintain surface water quality.

Mitigation/Conclusion. No significant water impacts were identified, therefore, no mitigation measures are required.

15. LAND USE - ***Will the project:***	**Inconsistent**	**Potentially Inconsistent**	**Consistent**	**Not Applicable**
a) 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?	☐	☐	☒	☐
b) Be potentially inconsistent with any habitat or community conservation plan?	☐	☐	☒	☐
c) Be potentially inconsistent with adopted agency environmental plans or policies with jurisdiction over the project?	☐	☐	☒	☐
d) Be potentially incompatible with surrounding land uses?	☐	☐	☒	☐
e) Other: _____	☐	☐	☐	☐

Setting. The 0.63 acre project site is surrounded primarily by single and multi-family residential uses. Immediately north of the site across San Luis Street are single-family residences on San Luis Street Parkway, Laurel Lane and Ocean Oaks Drive. Further north across Avila Beach Drive is the Avila Beach Resort and Golf Course. East of the site across San Antonia Street are multi-story residential housing (apartments) and single-family homes. South of the site are older, single-family residences (mostly single story) interspersed with several vacant lots. West of the site are several multi-story residences along San Luis Street that are currently (June, 2008) under construction. Recent site surveys have noted several instances of vacation rentals being offered.

Impact.

Proposed Development and Future Development

The proposed project was reviewed for consistency with policy and/or regulatory documents relating to the environment and appropriate land use (i.e., County Land Use Ordinance, Local Coastal Plan, etc.). Referrals were sent to outside agencies to review the proposed project for policy consistencies (CDF for Fire Code, APCD for Clean Air Plan, etc.). The proposed project was found to be consistent with these documents.

The proposed project is not within or adjacent to any Habitat Conservation Plan area. The project is consistent or compatible with the surrounding uses as noted above.

Mitigation/Conclusion. No inconsistencies were identified and no significant land use impacts were identified, therefore, no mitigation measures are required.

16. MANDATORY FINDINGS OF SIGNIFICANCE - ***Will the project:***	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) 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?	☐	☒	☐	☐
b) 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)	☐	☒	☐	☐
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

For further information on CEQA or the county's environmental review process, please visit the County's web site at "www.sloplanning.org" under "Environmental Review", or the California Environmental Resources Evaluation System at "http://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 Division 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:

Contacted	Agency	Response
☒	County Public Works Department	**Attached**
☒	County Environmental Health Division	**In File****
☐	County Agricultural Commissioner's Office	**Not Applicable**
☐	County Airport Manager	**Not Applicable**
☐	Airport Land Use Commission	**Not Applicable**
☒	Air Pollution Control District	**Attached**
☐	County Sheriff's Department	**Not Applicable**
☐	Regional Water Quality Control Board	**Not Applicable**
☒	CA Coastal Commission	**None**
☐	CA Department of Fish and Game	**Not Applicable**
☒	CA Department of Forestry	**None**
☐	CA Department of Transportation	**Not Applicable**
☒	Avila Community Service District	**Attached**
☐	Other _____	
☐	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 this Initial Study:

1. Cultural Resource Surface Survey, Bertrando & Bertrando, September 25, 2003
2. Phase II Cultural Resource Survey, Bertrando & Bertrando, February 10, 2004
3. Correspondence from Andrew Merriam, October 20, 2005
4. Letter Response to Andrew Merriam, Bertrando & Bertrando, November 7, 2005
5. Historic Resource Evaluation Report, Andrew Merriam, March, 2006
6. Response to Historic Resource Evaluation Report Prepared by Andrew Merriam, Bertrando & Bertrando, May, 2006
7. Soils Engineering Report, Earth Systems Pacific, December 20, 2004
8. Avila Beach Specific Plan Final Environmental Impact Report, County of San Luis Obispo, November 5, 1999
8. Historic Structure Report of the Avila Schoolhouse, Garcia and Associates, July, 2008

Persons Consulted

Ryan Chapman, County Department of Public Works

Kathy Davidson, Avila Community Services District

Carole Denardo, Garcia and Associates

Exhibit B - Mitigation Summary Table

Proposed Development

Aesthetics

A-1 At the time of application for building permits, the applicant shall submit a refined site plan, grading plan and set of building elevations to the County Department of Planning and Building for review and approval. This review shall insure that building site locations and elevations have not changed significantly from the previously-submitted preliminary plans and the proposed structures reflect and incorporate the design of the existing schoolhouse structure.

A-2 At the time of application for building permits, the applicant shall provide a Lighting Management Plan. The plan shall include the height, location and intensity of all exterior lighting. All light fixtures shall be shielded so that neither the lamp nor the reflective interior surface is visible from areas outside the project site. All light poles, fixtures and hoods shall be dark (non-reflective) colored. All exterior lighting sources shall be low-level and adjusted so that light is directed into the project site. Security lighting shall be shielded so as not to create glare when viewed outside the project boundaries.

Air Quality

AQ-1 Water trucks or sprinkler systems shall be used in sufficient quantities to prevent airborne dust from leaving the site. All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust. Watering shall occur at least twice a day with complete coverage, preferably in the late morning and after work is done for the day. Increased watering frequency will be required whenever wind speeds exceed 15 mph. Reclaimed water shall be used for dust control and other construction-related purposes during project construction.

AQ-2 All dirt stock-pile areas shall be sprayed daily as needed.

AQ-3 Exposed ground areas that are planned to be reworked at dates greater than one month shall be sown with a fast-germinating native grass seed and watered until vegetation is established.

AQ-4 All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting or other methods approved in advance by the APCD.

AQ-5 All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible. In addition, building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

AQ-6 All dust control measures required must be included on grading and building plans. In addition, the contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, in order to prevent transport of dust off-site. These monitoring 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 issuance of grading permits.

AQ-7 The project applicant shall require that all construction equipment be properly maintained and tuned according to manufacturer's specifications.

AQ-8 The project applicant shall require that all off-road and portable, diesel-powered equipment, including, but not limited to, bulldozers, grading equipment, cranes, loaders, scrapers, backhoes, generators, compressors or auxiliary power units, be fueled exclusively with CARB motor vehicle diesel fuel.

AQ-9 Where possible, diesel powered equipment should be replaced with gasoline, electrical, CNG or LPG powered equipment.

AQ-10 The use of diesel equipment meeting the California Air Resource Board's 1996 certification for off-road heavy-duty diesel engines shall be maximized.

AQ-11 Prior to issuance of any construction permit to remove or demolish any building or utility pipes on the subject property, the applicant shall provide evidence they have contacted APCD to determine: a) what regulatory jurisdictions apply to proposed demolition, such as National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M – Asbestos NESHAP); b) APCD notification requirements; c) the need for an asbestos survey conducted by a Certified Asbestos Inspector and d) applicable removal and disposal requirements of the asbestos-containing material.

AQ-12 Only the following types of wood-burning devices shall be allowed (based on District Rule 504):

a) EPA-Certified Phase II wood burning devices;

b) catalytic wood burning devices emitting less than or equal to 4.1 grams per hour of particulate matter, as verified by a nationally-recognized testing lab;

c) non catalytic wood burning devices which emit less than or equal to 7.5 grams per hour of particulate matter, as verified by a nationally recognized testing lab;

d) pellet-fueled woodheaters;

e) or dedicated gas-fired fireplaces. Prior to construction permit issuance, such devices shall be shown on all applicable plans.

Cultural Resources

CR-1 Prior to issuance of construction permit/ tract improvement plan, the applicant shall submit to the Environmental Coordinator (and possibly subject to peer review) for the review and approval, an archaeological Testing, Mitigation & Monitoring Program shall be prepared by a subsurface qualified archaeologist approved by the Environmental Coordinator. The consulting archaeologist responsible for the program shall be provided with a copy of the previous archaeological investigations (Cultural Resource Surface Survey, Bertrando & Bertrando, September 25, 2003; Phase II Cultural Resource Survey, Bertrando & Bertrando, February 10, 2004; Historic Structure Report of the Avila Schoolhouse, Garcia and Associates, July, 2008). The program shall provide for testing the archaeological resources present on the site determine distribution and concentration, and to mitigate for any impacts to these resources if they will be impacted by the proposed development. The program shall include at least the following:

H. standard archaeological testing and data recovery practices, taking into consideration the resource distribution, existing fill placed on the site and the proposed project;
I. recommendation of sample size adequate to mitigate for impacts to archaeological site, including basis and justification of the recommended sample sizeif necessary
J. identification of location of sample sites/test units;
K. detailed description of sampling/testing 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);
L. disposition of collected materials;
M. proposed analysis of results of collected materials, including timeline of final analysis results;
N. list of personnel involved in sampling and analysis.

The monitoring plan shall include at a minimum:

N. List of personnel involved in the monitoring activities;

O. Description of how the monitoring shall occur;
P. Description of frequency of monitoring (e.g. full-time, part time, spot checking);
Q. Description of what resources are expected to be encountered;
R. Description of circumstances that would result in the halting of work at the project site (e.g. What is considered "significant" archaeological resources?);
S. Description of procedures for halting work on the site and notification procedures;Description of monitoring reporting procedures.

Once approved, these measures shall be shown on all applicable plans and implemented during construction.

CR-2 Prior to commencement of map improvement construction or 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 testing and mitigation program has been completed.

CR-3 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-4 Upon completion of all monitoring/mitigation activities, and prior to occupancy or final inspection (whichever occurs first) or final approval of tract improvements, 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].

CR-5 The proposed new buildings on the subject property shall reinforce the established design of the Avila Schoolhouse in a way that new designs do not conflict with or detract from the character of the existing structure. Their design should be compatible with the size, scale and character of the historic schoolhouse. It is recommended that new buildings to the south and west of the schoolhouse structure not exceed the height of the schoolhouse and that adequate space be provided so that new development does not encroach on its visual space. A buffer of no less than 25 feet on the south and west sides of the schoolhouse building is recommended by the project historian. The open area on the north side of the schoolhouse should not be modified in such a way as to obstruct views of the front (north-facing) façade of the schoolhouse building or compromise its historic setting.

CR-6 Prior to issuance of construction permit/ tract improvement plan, the applicant shall submit to the Environmental Coordinator, a structural stabilization plan for the Avila Schoolhouse. The purpose of the plan is to identify the actions necessary to stabilize and arrest the decay of the Avila Schoolhouse so that restoration and re-use are possible in the future. The plan should focus on those measures that are necessary and it is not intended to act as a full restoration plan. The plan shall be prepared by a qualified professional and shall be reviewed by a qualified historical professional approved by the Environmental Coordinator

Geology and Soils

GS-1 Prior to the issuance of grading permits, a Sedimentation and Erosion Control Plan shall be submitted to the County Department of Public Works for review and approval. The plan shall indicate methods to control erosion which may include, but are not limited to, erosion fencing, hay bales, temporary siltation basins, erosion control blankets, etc. This plan, to be prepared by a registered civil engineer, shall conform to requirements within the County Land Use Ordinance.

GS-2 Any required replacement vegetation/landscaping shall be planted well in advance of October 15th in order to provide sufficient time prior to the rainy season for roots to establish and effectively hold soil together.

Hazardous Materials

HM-1 Exposure and/or disposal of lead-based paint or lead-based painted materials must be conducted in accordance with applicable Health and Safety Code requirements.

Public Services/Utilities

PS- 1 Public facility (County) and school (State Government Code Section 65995 et sec) fee programs have been adopted to address the project's direct and cumulative impacts upon public services serving the project area.

Recreation

R- 1 Quimby Act fees have been adopted to address the project's direct and cumulative impacts upon existing parks and recreation facilities serving the project area.

Transportation/Circulation

TC- 1. The proposed project is subject to the fees identified within the Avila Circulation Fee Program. These fees contribute towards areawide circulation improvements and will respond to the project's cumulative circulation impact.

Future Development

Aesthetics

A-1 At the time of application for building permits, the applicant shall submit a refined site plan, grading plan and set of building elevations to the County Department of Planning and Building for review and approval. This review shall insure that building site locations and elevations have not changed significantly from the previously-submitted preliminary plans and the proposed structures reflect and incorporate the design of the existing schoolhouse structure.

A-2 At the time of application for building permits, the applicant shall provide a Lighting Management Plan. The plan shall include the height, location and intensity of all exterior lighting. All light fixtures shall be shielded so that neither the lamp nor the reflective interior surface is visible from areas outside the project site. All light poles, fixtures and hoods shall be dark (non-reflective) colored. All exterior lighting sources shall be low-level and adjusted so that light is directed into the project site. Security lighting shall be shielded so as not to create glare when viewed outside the project boundaries.

Air Quality

AQ-1 Water trucks or sprinkler systems shall be used in sufficient quantities to prevent airborne dust

from leaving the site. All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust. Watering shall occur at least twice a day with complete coverage, preferably in the late morning and after work is done for the day. Increased watering frequency will be required whenever wind speeds exceed 15 mph. Reclaimed water shall be used for dust control and other construction-related purposes during project construction.

AQ-2 All dirt stock-pile areas shall be sprayed daily as needed.

AQ-3 Exposed ground areas that are planned to be reworked at dates greater than one month shall be sown with a fast-germinating native grass seed and watered until vegetation is established.

AQ-4 All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting or other methods approved in advance by the APCD.

AQ-5 All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible. In addition, building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

AQ-6 All dust control measures required must be included on grading and building plans. In addition, the contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, in order to prevent transport of dust off-site. These monitoring 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 issuance of grading permits.

AQ-7 The project applicant shall require that all construction equipment be properly maintained and tuned according to manufacturer's specifications.

AQ-8 The project applicant shall require that all off-road and portable, diesel-powered equipment, including, but not limited to, bulldozers, grading equipment, cranes, loaders, scrapers, backhoes, generators, compressors or auxiliary power units, be fueled exclusively with CARB motor vehicle diesel fuel.

AQ-9 Where possible, diesel powered equipment should be replaced with gasoline, electrical, CNG or LPG powered equipment.

AQ-10 The use of diesel equipment meeting the California Air Resource Board's 1996 certification for off-road heavy-duty diesel engines shall be maximized.

AQ-11 Prior to issuance of any construction permit to remove or demolish any building or utility pipes on the subject property, the applicant shall provide evidence they have contacted APCD to determine: a) what regulatory jurisdictions apply to proposed demolition, such as National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M – Asbestos NESHAP); b) APCD notification requirements; c) the need for an asbestos survey conducted by a Certified Asbestos Inspector and d) applicable removal and disposal requirements of the asbestos-containing material.

AQ-12 Only the following types of wood-burning devices shall be allowed (based on District Rule 504):

a) EPA-Certified Phase II wood burning devices;

b) catalytic wood burning devices emitting less than or equal to 4.1 grams per hour of particulate matter, as verified by a nationally-recognized testing lab;

c) non catalytic wood burning devices which emit less than or equal to 7.5 grams per hour of particulate matter, as verified by a nationally recognized testing lab;

d) pellet-fueled woodheaters;

e) or dedicated gas-fired fireplaces. Prior to construction permit issuance, such devices shall be shown on all applicable plans.

Cultural Resources

CR-1 Prior to issuance of construction permit/ tract improvement plan, the applicant shall submit to the Environmental Coordinator (and possibly subject to peer review) for the review and approval, an archaeological Testing, Mitigation & Monitoring Program shall be prepared by a subsurface qualified archaeologist approved by the Environmental Coordinator. The consulting archaeologist responsible for the program shall be provided with a copy of the previous archaeological investigations (Cultural Resource Surface Survey, Bertrando & Bertrando, September 25, 2003; Phase II Cultural Resource Survey, Bertrando & Bertrando, February 10, 2004; Historic Structure Report of the Avila Schoolhouse, Garcia and Associates, July, 2008). The program shall provide for testing the archaeological resources present on the site determine distribution and concentration, and to mitigate for any impacts to these resources if they will be impacted by the proposed development. The program shall include at least the following:

O. standard archaeological testing and data recovery practices, taking into consideration the resource distribution, existing fill placed on the site and the proposed project;
P. recommendation of sample size adequate to mitigate for impacts to archaeological site, including basis and justification of the recommended sample sizeif necessary
Q. identification of location of sample sites/test units;
R. detailed description of sampling/testing 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);
S. disposition of collected materials;
T. proposed analysis of results of collected materials, including timeline of final analysis results;
U. list of personnel involved in sampling and analysis.

The monitoring plan shall include at a minimum:

T. List of personnel involved in the monitoring activities;
U. Description of how the monitoring shall occur;
V. Description of frequency of monitoring (e.g. full-time, part time, spot checking);
W. Description of what resources are expected to be encountered;
X. Description of circumstances that would result in the halting of work at the project site (e.g. What is considered "significant" archaeological resources?);
Y. Description of procedures for halting work on the site and notification procedures;Description of monitoring reporting procedures.

Once approved, these measures shall be shown on all applicable plans and implemented during construction.

CR-2 *Prior to commencement of map improvement construction* or *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 testing and mitigation program has been completed.

CR-3 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-4 Upon completion of all monitoring/mitigation activities, and prior to occupancy or final inspection (whichever occurs first) or final approval of tract improvements, 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].

CR-5 The proposed new buildings on the subject property shall reinforce the established design of the Avila Schoolhouse in a way that new designs do not conflict with or detract from the character of the existing structure. Their design should be compatible with the size, scale and character of the historic schoolhouse. It is recommended that new buildings to the south and west of the schoolhouse structure not exceed the height of the schoolhouse and that adequate space be provided so that new development does not encroach on its visual space. A buffer of no less than 25 feet on the south and west sides of the schoolhouse building is recommended by the project historian. The open area on the north side of the schoolhouse should not be modified in such a way as to obstruct views of the front (north-facing) façade of the schoolhouse building or compromise its historic setting.

CR-6 Prior to issuance of construction permit/ tract improvement plan, the applicant shall submit to the Environmental Coordinator, a structural stabilization plan for the Avila Schoolhouse. The purpose of the plan is to identify the actions necessary to stabilize and arrest the decay of the Avila Schoolhouse so that restoration and re-use are possible in the future. The plan should focus on those measures that are necessary and it is not intended to act as a full restoration plan. The plan shall be prepared by a qualified professional and shall be reviewed by a qualified historical professional approved by the Environmental Coordinator

CR-7 For Development Options 2 and 3 of the Avila Schoolhouse where the schoolhouse building is proposed to be relocated, HABS/HAER Level III documentation shall be prepared prior to moving and relocating the schoolhouse within Phase II of project development. Level III documentation includes a sketch plan (drawing) of the structure, photographs with large-scale negatives of exterior and interior views and written data.

CR-8 For Development Options 2, 3, 4 and 5 of the Avila Schoolhouse, the existing schoolhouse structure shall be rehabilitated within Phase II of project development, in conformance with the Guidelines for Rehabilitating Historic Buildings in the Secretary of Interior's Standards for Treatment of Historic Properties and the detailed design criteria contained within Chapter 8 of the Historic Structure Report for the Avila Schoolhouse. The following measures were determined to be necessary in order to achieve conformance with these standards:

a. In order to retain and preserve the character-defining features of the schoolhouse building, new site features should be as unobtrusive as possible. The open area on the north side of the schoolhouse building should not be modified in such a way as to obstruct views of the front (north-facing) façade of the building or compromise its historic setting.

b. The character-defining elements of the schoolhouse building should be retained and preserved. These elements include its Neoclassical design involving the hipped roof with a ridge, planciers (eave soffits) enclosed with mitered bead board, wood drop-board siding, a wide colonaded porch, scuppers and ornate vents. These existing character-defining elements shall be protected from alterations during project construction and care should be taken to use materials that relate to and conform with the historic identity of the building.

c. It is recommended that non-historic materials on or within the schoolhouse building be removed and replaced with materials that conform to the historic fabric of the building. These more recent alterations include modern replacement doors and windows, boarded-up windows, in-fill areas on the porch and removable additions since they are not historic and

are not consistent with the Neoclassical architectural design and construction materials introduced in 1913. More recent changes to the interior, such as the drop acoustical ceiling tiles and wall and floor upgrades should be removed to expose the original surfaces. All work should be performed using in-kind materials and techniques to match the original 1913 design.

d. During building reinforcement and stabilization, all exterior siding and moldings should be repaired and repainted with deteriorated or missing features repaired or replaced.

e. Modifications to the interior and exterior of the building, plus any additions required for adaptive re-use should not drastically alter, obscure, or obliterate the character-defining forms, spaces or materials. Alterations such as doors, windows, atriums, and/or skylights may be added to the proposed second level of the schoolhouse in order to allow natural light into the building. These alterations should be implemented in a manner that preserves the structural system and character-defining forms, spaces, and materials.

f. Historic features of the schoolhouse building that are now absent shall be replaced. These features include the former belfry and bell which are now missing from the structure. The design of the recently-replaced belfry at the Santa Fe School structure may provide an architectural model for this replaced feature.

g. Any new modifications to the schoolhouse building should correspond to its original visual expression as evidenced in original architectural renditions and historic photographs. If corresponding features of the structure are absent and documentation is not available, new designs should be compatible with character-defining historic features.

h. In the event that it is decided to clean the existing architectural details of the schoolhouse building, chemical or physical treatments such as sandblasting can damage historic materials. Prior to such activities, a qualified conservator shall be involved in order to insure the use of non-invasive cleaning techniques.

CR-9 For Development Options 2, 3, 4, and 5 of the Avila Schoolhouse, a permanent interpretive display for public use within the schoolhouse building shall be provided within Phase II of project development. This interpretive display will include details and historic information about the Avila Beach community and Avila School and important individuals associated with the school. Prior to preparing the display, a qualified historian will perform research regarding the role of the building and the events for which it is significant and conduct oral history interviews. This approach will impart knowledge of the history of Avila Beach to the general public and will compensate for any loss to the local community's heritage.

CR-10 For Development Options 2, 3, 4, and 5 of the Avila Schoolhouse within Phase II of project development, the project applicant shall assist in the organizing of local individuals with an interest in developing a historical society and use of the Avila School as a repository for documents and materials related to the history of Avila Beach.

Geology and Soils

GS-1 Prior to the issuance of grading permits, a Sedimentation and Erosion Control Plan shall be submitted to the County Department of Public Works for review and approval. The plan shall indicate methods to control erosion which may include, but are not limited to, erosion fencing, hay bales, temporary siltation basins, erosion control blankets, etc. This plan, to be prepared by a registered civil engineer, shall conform to requirements within the County Land Use Ordinance.

GS-2 Any required replacement vegetation/landscaping shall be planted well in advance of October 15th in order to provide sufficient time prior to the rainy season for roots to establish and effectively hold soil together.

Hazardous Materials

HM-1 Exposure and/or disposal of lead-based paint or lead-based painted materials must be conducted in accordance with applicable Health and Safety Code requirements.

Public Services/Utilities

PS- 1 Public facility (County) and school (State Government Code Section 65995 et sec) fee programs have been adopted to address the project's direct and cumulative impacts upon public services serving the project area.

Recreation

R- 1 Quimby Act fees have been adopted to address the project's direct and cumulative impacts upon existing parks and recreation facilities serving the project area.

Transportation/Circulation

TC- 1. The proposed project is subject to the fees identified within the Avila Circulation Fee Program. These fees contribute towards areawide circulation improvements and will respond to the project's cumulative circulation impacts.

DATE: December 17, 2008

DEVELOPER'S STATEMENT FOR SLOCUSD LOT LINE ADJUSTMENT SUB2007-00192 COAL 07-0079 ED05-039

The applicant agrees to incorporate the following measures into the project. These measures become a part of the project description and therefore become a part of the record of action upon which the environmental determination is based. All development activity must occur in strict compliance with the following mitigation measures. These measures shall be perpetual and run with the land. These measures are binding on all successors in interest of the subject property.

Note: The items contained in the boxes labeled "Monitoring" describe the County procedures to be used to ensure compliance with the mitigation measures.

The following mitigation measures apply to the proposed Lot Line Adjustment:

Aesthetics

A-1 **At the time of application for building permits**, the applicant shall submit a refined site plan, grading plan and set of building elevations to the County Department of Planning and Building for review and approval. This review shall insure that building site locations and elevations have not changed significantly from the previously-submitted preliminary plans and the proposed structures reflect and incorporate the design of the existing schoolhouse structure.

A-2 **At the time of application for building permits**, the applicant shall provide a Lighting Management Plan. The plan shall include the height, location and intensity of all exterior lighting. All light fixtures shall be shielded so that neither the lamp nor the reflective interior surface is visible from areas outside the project site. All light poles, fixtures and hoods shall be dark (non-reflective) colored. All exterior lighting sources shall be low-level and adjusted so that light is directed into the project site. Security lighting shall be shielded so as not to create glare when viewed outside the project boundaries.

Monitoring: Department of Planning and Building will verify inclusion of required elements on plans. Building inspector will verify compliance with approved plans.

Air Quality

AQ-1 Water trucks or sprinkler systems shall be used in sufficient quantities to prevent airborne dust from leaving the site. All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust. Watering shall occur at least twice a day with complete coverage, preferably in the late morning and after work is done for the day. Increased watering frequency will be required whenever wind speeds exceed 15 mph. Reclaimed water shall be used for dust control and other construction-related purposes during project construction.

AQ-2 All dirt stock-pile areas shall be sprayed daily as needed.

AQ-3 Exposed ground areas that are planned to be reworked at dates greater than one month shall be sown with a fast-germinating native grass seed and watered until vegetation is established.

Cultural Resources

CR-1 **Prior to issuance of construction permit/ tract improvement plan**, the applicant shall submit to the Environmental Coordinator (and possibly subject to peer review) for the review and approval, an archaeological Testing, Mitigation & Monitoring Program shall be prepared by a subsurface qualified archaeologist approved by the Environmental Coordinator. The consulting archaeologist responsible for the program shall be provided with a copy of the previous archaeological investigations (Cultural Resource Surface Survey, Bertrando & Bertrando, September 25, 2003; Phase II Cultural Resource Survey, Bertrando & Bertrando, February 10, 2004; Historic Structure Report of the Avila Schoolhouse, Garcia and Associates, July, 2008). The program shall provide for testing the archaeological resources present on the site determine distribution and concentration, and to mitigate for any impacts to these resources if they will be impacted by the proposed development. The program shall include at least the following:

A. standard archaeological testing and data recovery practices, taking into consideration the resource distribution, existing fill placed on the site and the proposed project;
B. recommendation of sample size adequate to mitigate for impacts to archaeological site, including basis and justification of the recommended sample size if necessary
C. identification of location of sample sites/test units;
D. detailed description of sampling/testing 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 collected materials, including timeline of final analysis results;
G. list of personnel involved in sampling and analysis.

The monitoring plan shall include at a minimum:

H. List of personnel involved in the monitoring activities;
I. Description of how the monitoring shall occur;
J. Description of frequency of monitoring (e.g. full-time, part time, spot checking);
K. Description of what resources are expected to be encountered;
L. Description of circumstances that would result in the halting of work at the project site (e.g. What is considered "significant" archaeological resources?);
M. Description of procedures for halting work on the site and notification procedures; Description of monitoring reporting procedures.

Once approved, these measures shall be shown on all applicable plans and implemented during construction.

CR-2 **Prior to commencement of map improvement construction or 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 testing and mitigation program has been completed.

CR-3 **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-4 **Upon completion of all monitoring/mitigation activities, and prior to occupancy or final inspection (whichever occurs first) or final approval of tract improvements,** 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].

CR-5 The proposed new buildings on the subject property shall reinforce the established design of the Avila Schoolhouse in a way that new designs do not conflict with or detract from the character of the existing structure. Their design should be compatible with the size, scale and character of the historic schoolhouse. It is recommended that new buildings to the south and west of the schoolhouse structure not exceed the height of the schoolhouse and that adequate space be provided so that new development does not encroach on its visual space. A buffer of no less than 25 feet on the south and west sides of the schoolhouse building is recommended by the project historian. The open area on the north side of the schoolhouse should not be modified in such a way as to obstruct views of the front (north-facing) façade of the schoolhouse building or compromise its historic setting.

CR-6 **Prior to issuance of construction permit/ tract improvement plan,** the applicant shall submit to the Environmental Coordinator, a structural stabilization plan for the Avila Schoolhouse. The purpose of the plan is to identify the actions necessary to stabilize and arrest the decay of the Avila Schoolhouse so that restoration and re-use are possible in the future. The plan should focus on those measures that are necessary and it is not intended to act as a full restoration plan. The plan shall be prepared by a qualified professional and shall be reviewed by a qualified historical professional approved by the Environmental Coordinator.

Monitoring: Monitoring report, architectural stabilization plan, and any construction plans shall be submitted to the county for review and approval with above conditions. Compliance will be verified by the Department of Planning and Building through site inspections.

Geology and Soils

GS-1 **Prior to the issuance of grading permits**, a Sedimentation and Erosion Control Plan shall be submitted to the County Department of Public Works for review and approval. The plan shall indicate methods to control erosion which may include, but are not limited to, erosion fencing, hay bales, temporary siltation basins, erosion control blankets, etc. This plan, to be prepared by a registered civil engineer, shall conform to requirements within the County Land Use Ordinance.

GS-2 Any required replacement vegetation/landscaping shall be planted well in advance of October 15th in order to provide sufficient time prior to the rainy season for roots to establish and effectively hold soil together.

Monitoring: Department of Planning and Building will verify inclusion of required elements on plans. Building inspector will verify compliance with approved plans.

AQ-4 All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting or other methods approved in advance by the APCD.

AQ-5 All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible. In addition, building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

AQ-6 All dust control measures required must be included on grading and building plans. In addition, the contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, in order to prevent transport of dust off-site. These monitoring 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 issuance of grading permits.

AQ-7 The project applicant shall require that all construction equipment be properly maintained and tuned according to manufacturer's specifications.

AQ-8 The project applicant shall require that all off-road and portable, diesel-powered equipment, including, but not limited to, bulldozers, grading equipment, cranes, loaders, scrapers, backhoes, generators, compressors or auxiliary power units, be fueled exclusively with CARB motor vehicle diesel fuel.

AQ-9 Where possible, diesel powered equipment should be replaced with gasoline, electrical, CNG or LPG powered equipment.

AQ-10 The use of diesel equipment meeting the California Air Resource Board's 1996 certification for off-road heavy-duty diesel engines shall be maximized.

AQ-11 **Prior to issuance of any construction permit** to remove or demolish any building or utility pipes on the subject property, the applicant shall provide evidence they have contacted APCD to determine: a) what regulatory jurisdictions apply to proposed demolition, such as National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M – Asbestos NESHAP); b) APCD notification requirements; c) the need for an asbestos survey conducted by a Certified Asbestos Inspector and d) applicable removal and disposal requirements of the asbestos-containing material.

AQ-12 Only the following types of wood-burning devices shall be allowed (based on District Rule 504):

a) EPA-Certified Phase II wood burning devices;

b) catalytic wood burning devices emitting less than or equal to 4.1 grams per hour of particulate matter, as verified by a nationally-recognized testing lab;

c) non catalytic wood burning devices which emit less than or equal to 7.5 grams per hour of particulate matter, as verified by a nationally recognized testing lab;

d) pellet-fueled wood heaters;

e) or dedicated gas-fired fireplaces. Prior to construction permit issuance, such devices shall be shown on all applicable plans.

Monitoring: Department of Planning and Building will verify inclusion of required elements on plans. Building Inspector will verify compliance with approved plans.

Hazardous Materials

HM-1 Exposure and/or disposal of lead-based paint or lead-based painted materials must be conducted in accordance with applicable Health and Safety Code requirements.

Monitoring: Department of Planning and Building will verify inclusion of required elements on plans. Building inspector will verify compliance with approved plans.

Public Services/Utilities

PS- 1 Public facility (County) and school (State Government Code Section 65995 et sec) fee programs have been adopted to address the project's direct and cumulative impacts upon public services serving the project area.

Monitoring: Department of Planning and Building will require payment of applicable fees prior to issuance of construction permits.

Recreation

R- 1 Quimby Act fees have been adopted to address the project's direct and cumulative impacts upon existing parks and recreation facilities serving the project area.

Monitoring: Department of Planning and Building will require payment of applicable fees prior to issuance of construction permits.

Transportation/Circulation

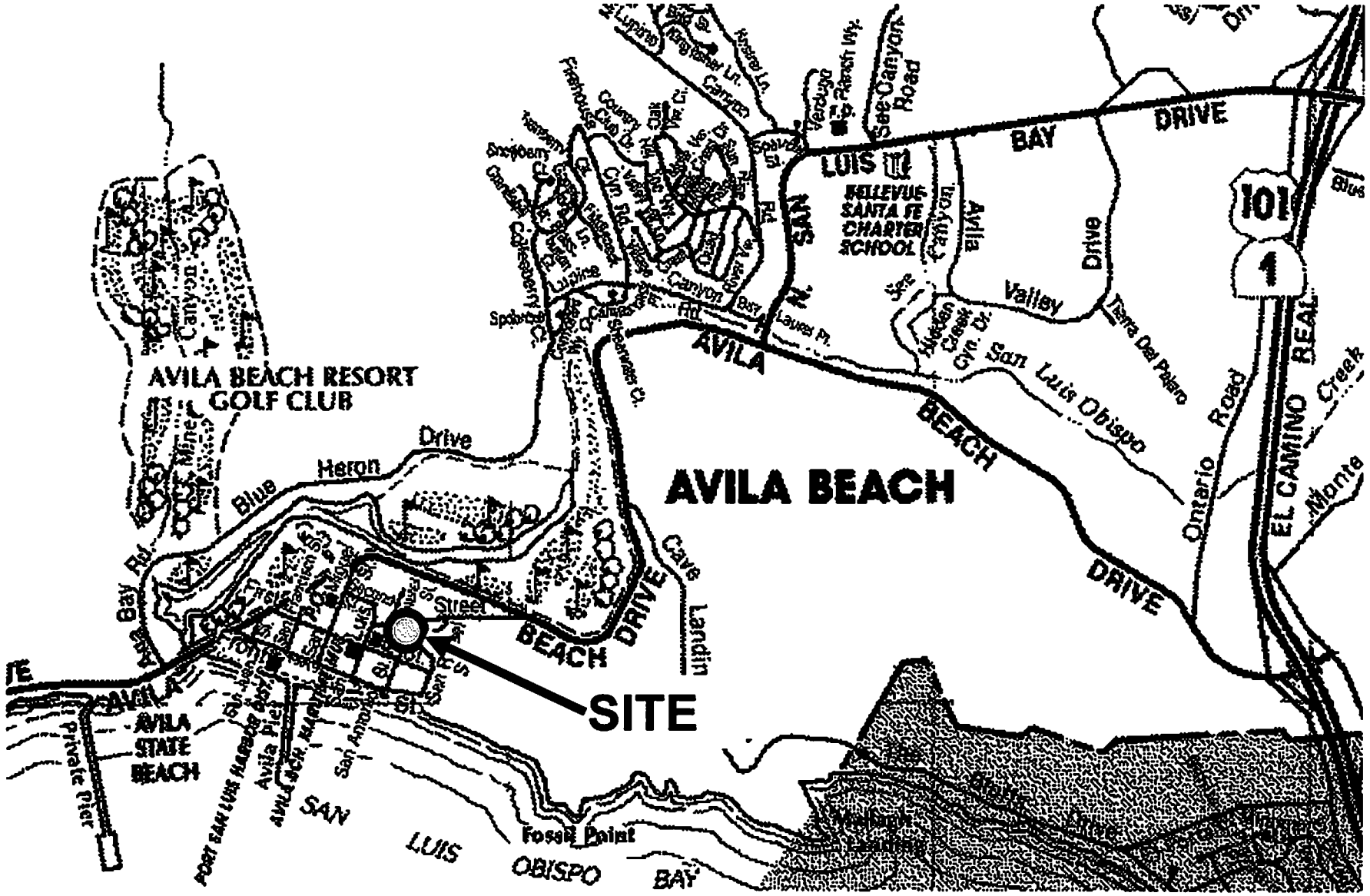
TC- 1 The proposed project is subject to the fees identified within the Avila Circulation Fee Program. These fees contribute towards areawide circulation improvements and will respond to the project's cumulative circulation impact.

Monitoring: Department of Planning and Building will require payment of applicable fees prior to issuance of construction permits.

The applicant understands that any changes made to the project description subsequent to this environmental determination must be reviewed by the Environmental Coordinator and may require a new environmental determination for the project. By signing this agreement, the owner(s) agrees to and accepts the incorporation of the above measures into the proposed project description.

Signature of Owner(s)	MICHAEL HOOSE Name (Print)	12-18-08 Date

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING


AVILA BEACH RESORT
GOLF CLUB
AVILA BEACH
SITE
SAN LUIS OBISPO BAY
Fossil Point
AVILA STATE BEACH
Avila Pier
Private Pier
Port San Luis Harbor
Avila Bay Rd
Blue Heron Drive
Cave Landing
Beach Drive
Avila Beach Drive
San Luis Obispo Creek
Ontario Road
El Camino Real
San Luis Bay Drive
Bellevue-Santa Fe Charter School
Avila Valley
Tiera Del Palero
Broad Street
Cave Street
Front Street
Harford Pier
Avila Pier
Avila Beach
Avila Valley
Avila Canyon
Avila Valley Drive
Bay Drive
See Canyon Road
Avila Beach Resort
Golf Club
Avila Beach
Avila State Beach
Fossil Point
San Luis Obispo Bay
Port San Luis Harbor
Avila Pier
Private Pier

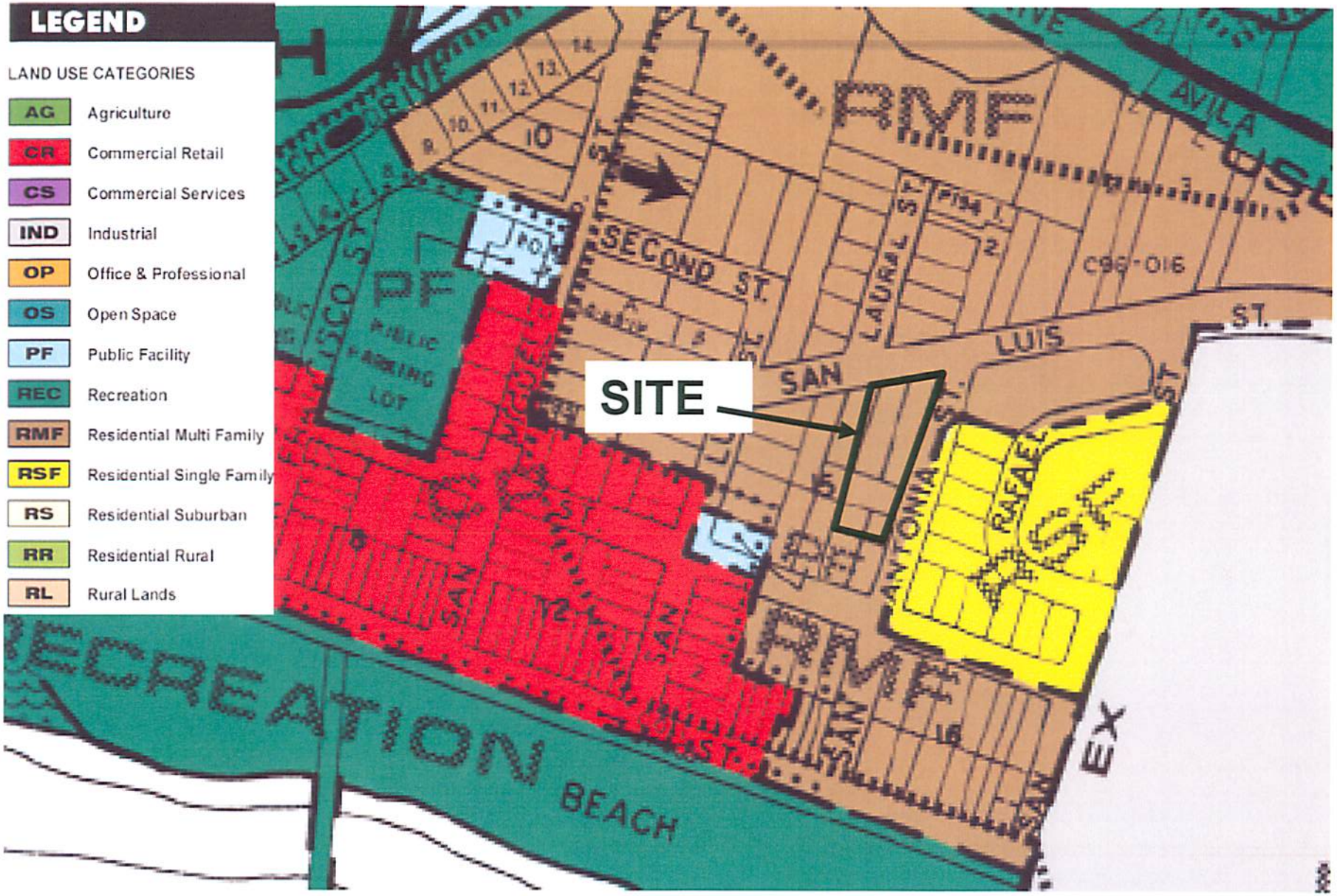
SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING



PROJECT
Lot Line Adjustment
SLCUSD SUB2007-00192

EXHIBIT
Aerial Photograph

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING



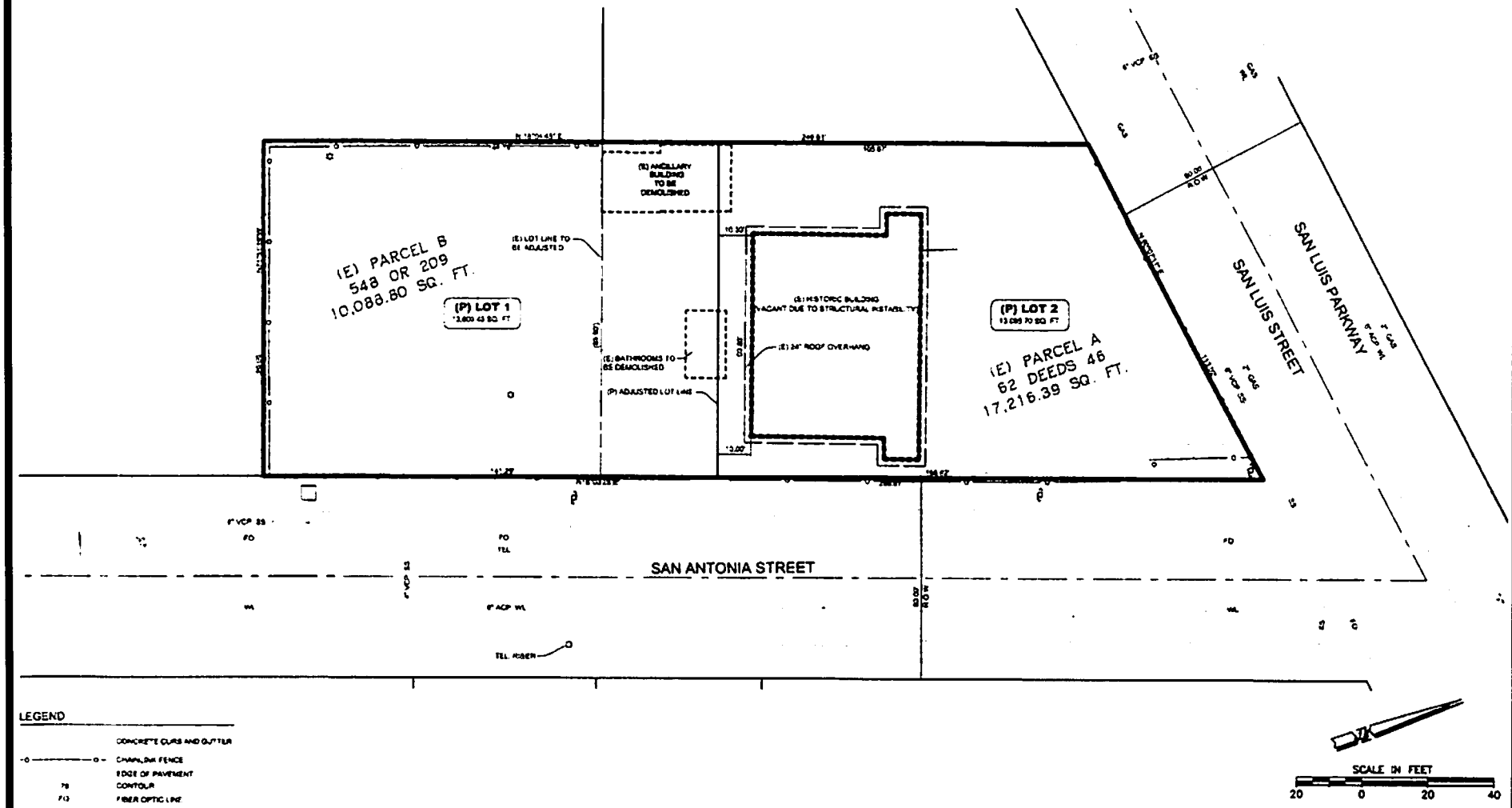
PROJECT

Lot Line Adjustment
SLCUSD SUB2007-00192

EXHIBIT

Land Use Category Map

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING



PROJECT

Lot Line Adjustment
SLCUSD SUB2007-00192

EXHIBIT

Site Plan