VOLUME 1:
DRAFT EIR



THE LANDING PASO ROBLES

DRAFT ENVIRONMENTAL IMPACT REPORT

PREPARED FOR

City of El Paso de Robles
Community Development Department
1000 Spring Street
Paso Robles, CA 93446

SCH NO. 2021050487

June 2023

PREPARED BY

SWCA Environmental Consultants
3426 Empresa Drive, Suite 100
San Luis Obispo, CA 93401

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SWCA Project No. 64872

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Acronyms and Abbreviations

Acronym	Term
°F	degrees Fahrenheit
2001 CAP	2001 Clean Air Plan
2013 CAP	2013 City of Paso Robles Climate Action Plan
3CE	Central Coast Community Energy
AB	Assembly Bill
ACM	asbestos containing material
ADL	aerially deposited lead
AFY	acre-feet-per-year
AG	Agriculture
ALUC	San Luis Obispo County Airport Land Use Commission
ALUP	Paso Robles Municipal Airport Airport Land Use Plan
Ambient	Ambient Air Quality and Noise Consulting
ANSI	American National Standards Institute
AOA	air operations area
AP	Airport
APN	Assessor's Parcel Number
Applicant	Majestic Realty Co.
APS	Alternative Planning Strategy
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
AT&T	American Telephone and Telegraph Company
ATCM	Airborne Toxic Control Measure
ATP	Active Transportation Program
BACT	Best Available Control Technology
Basin Plan	Water Quality Control Plan for the Central Coast Basin
BLS	U.S. Bureau of Labor Statistics
BMP	best management practice
BOD_5	biochemical oxygen demand
BP	Business Park
BUG	backlight, uplight, glare
CAAQS	California Ambient Air Quality Standards
CAC	California Administrative Code
CAFE	Corporate Average Fuel Economy [standards]
CAL FIRE	California Department of Forestry and Fire Protection
CalARP	California Accidental Release Prevention
CalEEMod	California Emission Estimator Model
CalGEM	California Department of Conservation Geologic Energy Management Division

Acronym	Term
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAMP	Construction Activity Management Plan
CAP	San Luis Obispo Air Pollution Control District San Luis Obispo County 2001 Clean Air Plan
CARB	California Air Resources Board
CASGEM	California Statewide Groundwater Elevation Monitoring
CBC	California Building Code
CBSC	California Building Standards Commission
CCAC	Climate and Clean Air Coalition
CCIC	Central Coast Information Center
CCR	California Code of Regulations
CCRWQCB	Central Coast Regional Water Quality Control Board
CCTC	Central Coast Transportation Consulting
CDCR	California Department of Corrections and Rehabilitation
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFD	Community Facilities District
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
cfs	cubic-feet-per-second
CGS	California Geological Survey
CH_4	methane
CHRIS	California Historical Resources Information System
City	City of El Paso de Robles
CMRS	Cultural Resource Management Services
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNG	compressed natural gas
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
County	County of San Luis Obispo
COVID-19	Coronavirus Disease 2019
CREC	controlled recognized environmental condition
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CSD	Community Services District

Acronym	Term
CUPA	Certified Unified Program Agency
CUPs	Conditional Use Permits
CWA	Clean Water Act
cy	cubic yards
CYA	California Youth Authority
d/D	depth over sewer diameter
dB	decibel
dBA	a-weighted decibels
dbh	diameter breast height
DNL	Day-Night Average Noise Level
DOC	California Department of Conservation
DOF	California Department of Finance
DOI	U.S. Department of the Interior
DPM	diesel particulate matter
DPR	California Department of Park and Recreation
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources
EDD	California Employment Development Department
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act
Emergency Services	The City of Paso Robles Fire and Emergency Services
EMFAC	EMission FACtors [model]
EO	Executive Order
ESA	Environmental Assessment
ESFR	early suppression fast response
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FESA	Federal Endangered Species Act
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FPE	Fire Protection Engineer
FPPA	Farmland Protection Policy Act
FTA	Federal Transit Association
Galbestos	galvanized asbestos
GHG	greenhouse gas
GPA	General Plan Amendment

Acronym	Term
GPD	gallons per day
GPM	gallons per minute
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
HCD	California Department of Housing and Community Development
HCP	Habitat Conservation Plan
HFC	hydrofluorocarbon
HMMP	Habitat Mitigation Monitoring Plan
HRA	health risk assessment
HREC	historical recognized environmental condition
HRER	Historical Resources Evaluation Report
HRI	California Historic Resources Inventory
HVAC	heating, ventilation, and air conditioning
Hz	Hertz
IEPR	integrated energy policy report
IESNA	Illuminating Engineering Society of North America
IIAR	International Institute of Ammonia Refrigeration
in/sec	Inches per second
IRWM	Integrated Regional Water Management
IS	Initial Study
ITP	Incidental Take Permit
JPA	Joint Powers Agreement
kBTU	kilo British thermal units
kV	kilovolt
KVAs	key viewing areas
kWh	kilowatt-hours
LBP	lead-based paint
lbs/day	pounds per day
Ldn	day-night average sound level
LED	light-emitting diode
Leq	energy-equivalent noise level
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
Lmax	Maximum Noise Level
Lmin	Minimum Noise Level
LNG	liquefied natural gas
LOS	level of service
LRA	Local Responsibility Area
LUE	*City of Paso Robles General Plan Land Use Element*

Acronym	Term
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
MGD	million gallons per day
MLRA	Major Land Resource Area
MMBTU	million British thermal units
$MMTCO_2e$	million metric tons of carbon dioxide emissions
mph	miles per hour
MPR	Multi-Purpose Room
MS4	Municipal Separate Storm Sewer System
msl	mean sea level
n.d.	no date
N/A	not available
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	California Native American Graves Protection and Repatriation Act
NAHC	California Native American Heritage Commission
NF_3	nitrogen trifluoride
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NHSTA	National Highway Traffic Safety Administration
NO	nitrogen oxide
NO_2	nitrogen dioxide
NOA	naturally occurring asbestos
NOP	Notice of Preparation
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetland Inventory
O_3	ozone
OEF	other environmental features
OHP	Office of Historic Preservation
OPR	California Governor's Office of Planning and Research
OSHA	U.S. Occupational Safety and Health Administration
PA&ED	Project Approval and Environmental Determination
PCBs	polychlorinated biphenyls

Acronym	Term
PCRs	Post Construction Stormwater Requirements
PD	Planned Development
PF	Public Facilities
PFC	perfluorocarbon
PG&E	Pacific Gas and Electric Company
PIA	Planning Impact Area
PM	particulate matter
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
Porter-Cologne Act	Porter-Cologne Water Quality Control Act
PPCB	Palo Prieto Conservation Bank
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PRJUSD	Paso Robles Joint Unified School District
PRMP	Paleontological Resources Management Plan
project	The Landing Paso Robles
PRPD	Paso Robles Police Department
PVC	polyvinyl chloride
Qoa	older alluvial sediments
QTp	Paso Robles Formation
RA	Residential Agriculture
REC	recognized environmental condition
RFS	Renewable Fuel Standard
RHNA	Regional Housing Needs Assessment
RMP	Risk Management Plan
RMS	Representative Monitoring Site
RNG	renewable natural gas
ROG	reactive organic gasses
ROW	right-of-way
RPS	Renewables Portfolio Standard
RTA	San Luis Obispo Regional Transit Authority
RTP	San Luis Obispo Council of Governments 2019 Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAF	State Alternative Fuels
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCCAB	South Central Coast Air Basin
SCH	State Clearinghouse

Acronym	Term
SCS	San Luis Obispo Council of Governments 2019 Regional Transportation Plan Sustainable Communities Strategy
sf	square feet
SF_6	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SHPO	State Historic Preservation Officer
SLOAPCD	San Luis Obispo County Air Pollution Control District
SLOCOG	San Luis Obispo Council of Governments
SLOEHD	San Luis Obispo Environmental Health Department
SO_2	sulfur dioxide
SoCalGas	Southern California Gas Company
SOD	Sudden Oak Death
SOI	sphere of influence
SP	service population
SPCC	Spill Prevention, Control, and Countermeasure
SR 1	State Route 1
SR 41	State Route 41
SR 46	State Route 46
SR 46E	State Route 46 East
SRA	State Responsibility Area
SSC	Species of Special Concern
SVP	Society of Vertebrate Paleontology
SWCA	SWCA Environmental Consultants
SWMP	Stormwater Management Plan
SWPPP	Stormwater Pollution and Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TBB	Townsend's big-eared bat
TDM	Travel Demand Model
TDMP	Transportation Demand Management Plan
TDS	total dissolved solids
TIAG	City of Paso Robles 2013 Transportation Impact Analysis Guidelines
TMDL	Total Maximum Daily Load
TOAR	Traffic Operations Analysis Report
TPH-d	total petroleum hydrocarbons as diesel
TRU	transport refrigeration unit
TSS	total suspended solids
US 101	U.S. Route 101
USACE	U.S. Army Corps of Engineers

Acronym	Term
USDA	U.S. Department of Agriculture
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UTCSP	Uptown Town Center S.P. Area
UWMP	Urban Water Management Plan
VC	vitrified clay
VMT	vehicle miles traveled
VOC	volatile organic compounds
VTTM	Vesting Tentative Tract Map
WDR	waste discharge requirement
WMZ	Watershed Management Zone
WSA	Water Supply Analysis
WUI	wildland-urban interface
WWTP	wastewater treatment plant
µg/m3	micrograms per cubic meter

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EXECUTIVE SUMMARY

1. PURPOSE OF THE EIR

The City of El Paso de Robles (City), as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared this Environmental Impact Report (EIR) to assess the impacts that may result from the approval of the proposed The Landing Paso Robles (project; see *Chapter 2, Project Description*, for the full description of the proposed project). This EIR will serve as a public information document to be used by the general public, responsible and trustee agencies, and decision-making bodies to review and evaluate the environmental effects associated with the project and potential mitigation measures recommended to address or minimize those effects. The review process gives both agencies and individuals an opportunity to share expertise, discuss agency analyses, check for accuracy, detect omissions, discover public concerns, and solicit mitigation measures and alternatives capable of avoiding or reducing the significant effects of the project while still attaining most of the basic objectives of the project.

The remainder of the Executive Summary consists of the following sections:

- A brief description of the project location;
- A summary of the project background;
- The project objectives; and
- A summary of key impacts and mitigation measures associated with the project.

A detailed evaluation of project alternatives and the environmentally superior alternative is provided in Chapter 6 of this EIR. Therefore, a discussion of project alternatives is not included in this executive summary.

2. PROJECT LOCATION

The city of Paso Robles has an area of approximately 20 square miles and is located in San Luis Obispo County, approximately mid-way between Los Angeles and San Francisco. The project site is located in the northeastern portion of the city. The project site is located along the west side of Airport Road, west of the Paso Robles Municipal Airport.

3. PROJECT BACKGROUND AND OVERVIEW

The project site originally was part of the Estrella Army Airfield, which was used by the United States (U.S.) Marine Corps during World War II as a bomber base from 1942 to 1944. In 1947 the U.S. Government sold the project site to the State of California for use as a correctional facility (City of Paso Robles no date [n.d.]). The Estrella Youth Correctional Facility, also known as the Paso Robles Boys School, was founded in 1947 by the California Youth Authority and originally operated in the existing Estrella Army Airfield structures; new facilities were constructed in May 1951 (Ascent Environmental 2014). The project site operated as a youth correctional facility until July 31, 2008, when it was permanently closed. The project site has sat vacant since 2008, and on December 14, 2020, the California Department of General Services issued a Request for Written Offers to purchase the property.

Majestic Realty (the Applicant) seeks entitlements for the 140.75-acre project site to allow for the construction and operation of The Landing Paso Robles, a warehouse and business park center, as part of the redevelopment of the former Paso Robles Boys School site (project). The project would include a warehouse and a mix of employment and visitor-serving uses, including but not limited to, industrial flex space, maker spaces[1], offices, retail uses, a restaurant, a market hall, a hotel, a winery, and passive park and green spaces with agricultural elements. A summary of proposed project components is provided in Table ES-1 below. Table ES-2 provides a detailed overview of project construction and operation.

Table ES-1. Summary of Project Components

Land Use Type	Maximum Gross Floor Area[1]	Acreage[2]
Western Area – Phase 1		
Warehouse[3]	1,330,356 sf	76.87 acres
Stormwater Detention Basin	n/a	
Maintenance Building	38,000 sf (21,808 sf existing)	
Offsite Improvements	n/a	17.31 acres
Eastern Area – Phase 2		
Industrial Flex	60,000 sf	63.88 acres
Office	250,000 sf	
Maker Spaces	154,000 sf	
Market Hall	57,000 sf	
Retail (Food and Beverage)	29,400 sf	
Restaurant	6,500 sf	
Hotel	57,500 sf; 120 rooms	
Winery	16,500 sf	
Passive Park-Pedestrian Plaza-Green Spaces	n/a	
Total	1,999,256 sf; 120 hotel rooms	158.06 acres

[1] sf = square feet

[2] Acreages subject to survey verification.

[3] Gross Floor Area for the warehouse building is defined as the sum of the gross horizontal areas of all floors, mezzanines, and lofts of the building, excluding stairwells, elevator shafts, equipment rooms, and mezzanine areas used as catwalks and platforms for conveyers, equipment, and related

[1] A maker space is a collaborative workspace containing tools and equipment and is used to create or manufacture goods.

Table ES-2. Detailed Project Components

	Phase 1	Phase 2	Offsite	Project Total
Characteristics				
Site Size	76.87 acres	63.88 acres	17.31 acres	158.06 acres
Building Footprint	Warehouse: 1,080,289 sf Maintenance Building: 38,000 sf	Industrial Flex: 60,000 sf Office: 83,333–125,000 sf (*estimated)* Maker Space: 154,000 sf Hotel: 19,167 sf (*estimated)* Retail, Food & Beverage: 29,400 sf Market Hall: 57,000 sf Restaurant: 3,250 sf (*estimated)* Winery: 8,250 sf (*estimated)*	n/a	1,494,689–1,536,356 sf
Building Gross Structural Area (GSA)	Warehouse: 1,330,356 sf Maintenance Building: 38,000 sf	Industrial Flex: 60,000 sf Office: 250,000 sf Maker Space: 154,000 sf Hotel: 57,500 sf Retail, Food & Beverage: 29,400 sf Market Hall: 57,000 sf Restaurant: 6,500 sf Winery: 16,500 sf	n/a	1,999,256 sf
Lot Coverage	Warehouse: 39.6% Maintenance Building: 19.7%	14.89% - 16.39%	n/a	24.38%–25.06%
Floor Area Ratio (FAR)	Warehouse (Lot 32): 0.49 Maintenance Building (Lot 33): 0.20	0.23	n/a	0.33 (entire parcel)
Landscaping	17.58 acres (22.8%)	13.08 acres (20.5%)	n/a	30.66 acres (21. 8%)
Impervious Surface	69.5 acres	42.6 acres	1.8 acres	114.6 acres
Stormwater Basins and Retention Areas	5.38 acres	2.71 acres	n/a	8.09 acres
Parking	Warehouse: 1,347 vehicle 98 loading docks 236 truck trailer Maintenance Building: 40	Industrial Flex: 159 Office: 537 Maker Space: 313 Hotel, Retail, Food & Beverage, and Market Hall: 409 Restaurant and Winery: 74	n/a	2,879 vehicle 98 loading docks 236 truck trailer

	Phase 1	Phase 2	Offsite	Project Total
Construction				
Initiation	November 2023	April 2024 (18 months)	November 2023	November 2023
Completion (Duration)	November 2024 (most-intensive scenario)	November 2029 (5 years)	November 2024	November 2029
Area of Disturbance	76.87 acres (onsite)	63.88 acres (disturbed from Phase 1)	17.31 acres (offsite)	158.06 acres
Demolition Floor Area	279,706 sf	n/a	n/a	279,706 sf
Earthwork (Grading)	299,300 cubic yards (cut) 223,100 cubic yards (fill) 252,400 cubic yards (total)	53,900 cubic yards (cut) 68,075 cubic yards (fill) 121,975 cubic yards (total)	28,756 cubic yards (cut) 2,630 cubic yards (fill) 31,386 cubic yards (total)	379,891 cubic yards (cut) 337,405 cubic yards (fill) 717,296 cubic yards (total)
Fuel Consumption (total)	356,989 gallons	27,190 gallons	n/a	384,179 gallons
Operation				
Employees (Construction)	539	513	Part of Phase 1 employees	1,052
Employees (Permanent)	1,220	2,361	n/a	3,561
Average Daily Trips	4,453 daily trips	10,832 daily trips	n/a	14,895 daily trips
Water Demand	22.6 AFY	123.4 AFY	n/a	146 AFY
Wastewater Generation	12,000 GPD	105,626 GPD	n/a	117,626 GPD
Energy Demand (annual)	6,893,705 kWh	8,828,961 kWh	n/a	15,722,666 kWh
Natural Gas Demand (annual)	4,644,289 kBTU	13,012,046 kBTU	n/a	17,656,335 kBTU
Fuel Consumption (vehicles and trucks, annual)	2,234,803 gallons	824,267 gallons	n/a	3,059,070 gallons
Solid Waste Generation	3,027 tons per year	3,240 tons per year	n/a	6,267 tons per year

Notes: sf = square feet; AFY = acre-feet per year; GPD = gallons per day; kWh = kilowatt hours; kBTU = one thousand British Thermal Units

Average daily trips include truck trips reported as passenger car equivalent.

4. PROJECT OBJECTIVES

Pursuant to State CEQA Guidelines Section 15124(b), this statement of objectives sought by the proposed project includes the underlying purpose of the project and will guide the development of reasonable alternatives that will be evaluated in this EIR. The purpose and goal of the proposed project is to accomplish the redevelopment of the former Paso Robles Boys School site with employment-generating uses that are compatible with the adjacent airport and will complement the existing development and character of the city of Paso Robles and surrounding areas. This underlying goal aligns with the goals of the City to increase employment opportunities and provide new development that will serve the need of the city and its residents. The following objectives are intended to achieve these underlying purposes:

1. To eliminate deferred maintenance issues on the former Paso Robles Boys School property by reusing the property for a productive, new use.
2. To redevelop the former Paso Robles Boys School property with uses that are compatible with the adjacent Paso Robles Municipal Airport and that maximize the development potential of the property.
3. To expand economic development, facilitate job creation, and increase the tax base for the City by establishing new industrial, retail, and visitor-serving land uses near the Paso Robles Municipal Airport.
4. To attract new employment-generating businesses to the city of Paso Robles, thereby growing the economy and providing a more equal jobs-housing balance.
5. To attract a large warehouse to the city that can expedite the delivery of essential goods to consumers and businesses in and adjacent to the city.
6. To develop a warehouse facility that is designed to meet contemporary industry standards and be similar to other facilities in the region.
7. To establish visitor-serving uses near the Paso Robles Municipal Airport to help meet the growing demand for lodging, shopping, and leisure activities to support the larger winery and tourist industries.
8. To develop uses along Airport Road that have architectural design characteristics that complement and enhance the city's wine country character and visually express the area's history and culture.

5. SIGNIFICANT ENVIRONMENTAL IMPACTS IDENTIFIED

Impacts of the proposed project and alternatives have been classified using the categories described below:

- **Class I: Significant, unavoidable, adverse impacts:** Significant impacts that cannot be fully and effectively mitigated. No measures could be taken to avoid or reduce these adverse effects to insignificant or negligible levels.
- **Class II: Significant, but mitigable impacts:** These impacts are potentially similar in significance to those of significant, unavoidable, adverse impacts, but can be reduced or avoided by the implementation of mitigation measures.
- **Class III: Less than significant impacts:** Mitigation measures may still be required for these impacts as long as there is rough proportionality between the environmental impacts caused by the project and the mitigation measures imposed on the project.

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

The impacts and associated mitigation measures are shown in the Summary of Impacts and Mitigation Measures (Table ES-2). The table includes significant impacts, which are identified with an impact number (e.g., AQ Impact 1). The table also includes less than significant impacts. The impact summary table describes and classifies each impact, lists recommended mitigation when applicable, and states the level of residual impact (i.e., impact after implementation of mitigation).

Table ES-2. Summary of Impacts and Mitigation Measures

Impacts	Mitigation Measures	Residual Impacts
Aesthetics		
AES Impact 1: The project would not have a substantial adverse impact on scenic vistas.	Mitigation is not required.	Less than Significant
AES Impact 2: The project is not within the view corridor of a state scenic highway and does not propose offsite improvements that would be within the view corridor of a state scenic highway.	Mitigation is not required.	Less than Significant
AES Impact 3: Although visual quality and rural character would be adversely affected by removal of large trees, this would be offset by an improvement in visual character in terms of alteration from institutional to retail-commercial and would visually unify the site and complement the airport area development.	Implement Mitigation Measure **BIO/mm-7.1**.	Less than Significant
AES Impact 4: The airport area, surroundings, and project site currently have a moderate amount of nighttime lighting. The project proposes lighting design and fixtures that would minimize light-source effect and would not spill over onto adjacent properties. As a result, the project would create a less-than-significant new source of nighttime or daytime light or glare into the surrounding area.	**AES/mm-4.1:** Prior to issuance of building permits in either phase, the Applicant shall provide a lighting plan for the lot affected by the building permit and any areas outside of the lot that are subject to associated offsite improvements that demonstrates that the selected light fixtures, locations, and optical distribution patterns comply with the California Green Building Code standards. Specifically, the plan shall evaluate the light fixture selection against the lighting zone that is appropriate. Backlight, uplight, and glare (BUG) ratings provided by the manufacturer of the proposed fixtures shall be provided for each fixture type proposed. The lighting plans shall be prepared by a qualified engineer who is an active member of the Illuminating Engineering Society of North America (IESNA) using guidance and best practices endorsed by the International Dark Sky Association. All fixtures shall meet or exceed the standards of the California Green Building Code Maximum Allowable BUG Rating (Table 5.106.8 in the 2019 version). The plan shall also include the following to meet this requirement: 1. In order to prevent “hot spots” onto the structures, wall-mounted fixtures shall be positioned for lighting at the ground level and around the building for safety using appropriate IESNA uniformity ratings and shall not shed light back onto the building. To achieve this, the plan shall consider use of house side shields to minimize glare that may be observed from the vertical surface of the building walls. Wall-mounted light fixtures shall use nonreflective materials, including nonreflective glass. 2. The project shall include lighting controls and dimming capabilities for both building-related lighting and pedestrian/parking-related lighting, based on the IESNA, California Green Building Code, and California Energy Code minimums. Occupancy sensors shall be utilized so that lighting is dimmed or turned off when an area is unoccupied.	Less than Significant

Impacts	Mitigation Measures	Residual Impacts
	3. Lighting in parking areas and along drive aisles shall be the minimum level necessary to provide appropriate visibility of pedestrians and vehicles. 4. Lighting fixtures located in parking areas or drive aisles shall not be located adjacent to or above trees that will obscure lighting beyond safe levels as the trees mature. 5. Any exterior lighting, including lighting for signs, shall be "warm-white" or filtered (correlated color temperature of < 3,000 Kelvin; scotopic/photopic ratio of < 1.2) to minimize blue emissions. 6. All exterior lighting fixtures shall be International Dark Sky Association approved (Fixture Seal of Approval program) and shall be installed so that they are shielded and directed downwards.	
AES Cumulative Impacts: The project's incremental contribution to potential cumulative impacts would be substantially reduced through project design and adherence with the General Plan, Municipal Code, and other City guidelines.	Implement Mitigation Measures **AES/mm-4.1 and BIO/mm-7.1**.	Less than Cumulatively Considerable
Agriculture and Forestry Resources		
AG Impact 1: The project may or may not construct an extension of Rollie Gates Drive, which if constructed would convert approximately 2.53 acres of Farmland of Statewide Importance to non-agricultural use.	**AG/mm-1.1:** If the street improvement plans for an extension of Rollie Gates Drive are submitted for City of Paso Robles (City) approval, the Applicant shall provide a calculation of the acreage of Farmland Mapping and Monitoring Program designated Farmland that would be converted to non-agricultural use as a result of the roadway extension, based on detailed design plans for the roadway extension, including road shoulders and right-of-way areas that could not be used for agricultural uses in the future. Upon City verification of the acreage calculation and prior to City of approval of roadway construction, the Applicant shall contribute monetarily at a 1:1 ratio to the California Farmland Trust, or a similar established conservation program in the State of California as accepted by the City, for the conservation of Farmland. The Trust or other conservation program would be responsible for maintaining conserved Farmland in perpetuity. The Applicant shall provide satisfactory evidence to the City that the mitigation has been satisfied.	Significant and Unavoidable
AG Impact 2: The project would not result in other environmental changes that could result in the conversion of Farmland to non-agricultural uses.	Implement Mitigation Measures **AQ/mm-1.3 and AQ/mm-2.1**.	Less than Significant
AG Cumulative Impacts: The project, along with other foreseeable future projects located on or near Farmland, would result in the direct conversion of Farmland to non-agricultural uses.	Implement Mitigation Measure **AG/mm-1.1, AQ/mm-1.3, and AQ/mm-2.1**.	Significant and Unavoidable

Impacts	Mitigation Measures	Residual Impacts
Air Quality and Greenhouse Gas Emissions		
AQ Impact 1: The project would conflict with or obstruct implementation of the SLOAPCD 2001 Clean Air Plan San Luis Obispo County and Particulate Matter Report.	**AQ/mm-1.1:** The Applicant shall prepare and implement a Traffic Demand Management Plan (TDMP), which shall be reviewed and approved by the City Engineer prior to implementation. The plan shall identify the strategies to be implemented and methods for monitoring the effectiveness of the strategies and include strategies and/or payment of traffic mitigation fees sufficient to achieve the City of Paso Robles's significance threshold of 15% below the existing County of San Luis Obispo average vehicle miles traveled per service population (VMT/SP) of 19.18. At a minimum, based on the Transportation Impact Study prepared for this project, the following strategies shall be implemented (Central Coast Transportation Consulting 2023): 1. Implement a Commute Trip Reduction program through SLO Regional Rideshare and become a Gold Employer in the Back 'N' Forth Club program. This program, operated by the San Luis Obispo Council of Governments (SLOCOG), helps employers develop and implement transportation demand management measures for employees. 2. Offer financial incentives to employees who carpool, take transit, walk, or bike. 3. Implement a shuttle system from centralized locations, including transit centers, mobility hubs, and park-and-ride lots. 4. Provide a fair-share contribution towards the City of Paso Robles's Theater Drive Mobility Hub project. 5. Implement a vanpool program and subsidize a portion of the vanpool expenses to increase adoption. 6. Modify shift change schedules and restrict truck trips to avoid peak period congestion on nearby roadways. Restricting truck trips between 10:00 a.m. and 2:00 p.m. on Sundays and 2:00 p.m. and 6:00 p.m. on Fridays would limit exposure during the busiest times on State Route 46 East (SR 46E). Modifying shift changes to occur at or after 7:00 p.m. would also reduce congestion and conflicts on SR 46E. 7. Construct onsite bicycle and pedestrian facilities connecting to the project entry points or comparable routes. Provide onsite bicycle amenities including bicycle lockers, secure bicycle parking, showers, and bicycle repair stations. 8. Coordinate with San Luis Obispo Regional Transit Authority to accommodate future transit service to the project site. 9. Modify shift change schedules and restrict truck trips to avoid peak period congestion on nearby roadways. Shift changes shall occur after 7:00 p.m. and before 10:00 a.m. Truck trips shall be restricted	Significant and Unavoidable

Impacts	Mitigation Measures	Residual Impacts

between 10:00 a.m. and 2:00 p.m. on Sundays and 2:00 p.m. and 6:00 p.m. on Fridays.

10. All outbound and inbound truck traffic from the west shall use the Huer Huero Creek bridge to/from Golden Hill Road. (See Mitigation Measure TR/mm-3.1.)

Separate TDMPs may be prepared for Phase 1 and Phase 2 (or partial subphases thereof). The Applicant shall monitor the TDMP(s) on an annual basis to determine its effectiveness at reducing project VMT. If the TDMP(s) does not achieve a 14.98% reduction in VMT (19.18 VMT/SP), the Applicant shall work with the City of Paso Robles to update the TDMP(s) to achieve VMT reduction.

AQ/mm-1.2: The following San Luis Obispo County Air Pollution Control District (SLOAPCD) recommended measures shall be implemented to reduce the operational emissions generated by the project. City of Paso Robles (City) staff shall evaluate each application submitted for implementing development and determine from the following list of measures which are applicable:

1. Provide a pedestrian-friendly and interconnected streetscape with good access to/from the development for pedestrians, bicyclists, and transit users to make alternative transportation more convenient, comfortable, and safe.
2. Incorporate traffic calming modifications to project roads to reduce vehicle speeds and increase pedestrian and bicycle usage and safety.
3. Meet or exceed 2022 California Green Building Standards Code (CALGreen) nonresidential voluntary measures for the provision of changing/shower facilities for building tenants.
4. Provide employee lockers and showers to promote bicycle and pedestrian use. One shower and five lockers for every 25 new employees is recommended.
5. Increase bicycle accessibility and safety in the vicinity of the project; for example, provide interconnected bicycle routes/lanes or construction of bikeways.
6. Meet or exceed CALGreen standards for providing onsite bicycle parking—both short-term racks and long-term lockers, or a locked room with standard racks and access limited to bicyclists only.
7. Provide shade over parking spaces to the extent feasible and allowable per building code requirements to reduce evaporative emissions from parked vehicles and reduce heat-island effect.
8. Reduce fugitive dust from roads and parking areas with the use of paving or other materials.
9. Install legible, durable, weather-proof signs at truck access gates, loading dock areas, and truck parking areas that identify anti-idling

Impacts	Mitigation Measures	Residual Impacts
	regulations and state that diesel engine idling shall be limited to 3 minutes or less. 10. Meet or exceed CALGreen Tier 2 standards for providing electric vehicle charging infrastructure. 11. Meet or exceed CALGreen Tier 2 standards for building energy efficiency. 12. Meet or exceed CALGreen Tier 2 standards for utilizing recycled content materials. 13. Meet or exceed CALGreen building standards at the time of development for water conservation (e.g., use of low flow water fixtures, water efficient water irrigation systems, and drought tolerant landscaping). 14. All built-in appliances shall be Energy Star certified or equivalent. 15. Utilize onsite renewable energy systems (e.g., solar, wind, geothermal, biomass, and/or bio-gas) to offset at least 10% of the project's energy use. 16. Meet or exceed 2022 CALGreen standards for the use of greywater, rainwater, or recycled water where applicable/available. 17. Meet or exceed 2022 CALGreen standards for using shading, trees, plants, cool roofs, etc. to reduce "heat island" effect. 18. Design roof trusses to handle dead weight loads of standard solar-heated water systems and/or photovoltaic panels. **AQ/mm-1.3:** The following mitigation measures shall be implemented to reduce construction-generated fugitive dust and shall be shown on grading and building plans: 1. Reduce the amount of disturbed area where possible. 2. Use water trucks, San Luis Obispo County Air Pollution Control District (SLOAPCD)-approved dust suppressants (see Section 4.3 in the *CEQA Air Quality Handbook*), or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the SLOAPCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency would be required whenever wind speeds exceed 15 miles per hour. Reclaimed (non-potable) water should be used whenever possible. Please note that since water use is a concern due to drought conditions, the contractor or builder shall consider the use of a SLOAPCD-approved dust suppressant where possible to reduce the amount of water used for dust control. For a list of suppressants, see Section 4.3 of the *CEQA Air Quality Handbook*. 3. All dirt stockpile areas should be sprayed daily or covered with tarps or other dust barriers as needed.	

Impacts	Mitigation Measures	Residual Impacts
	4. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used. 5. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard (minimum vertical distance between the top of load and top of trailer) in accordance with California Vehicle Code Section 23114. 6. "Track-Out" is defined as sand or soil that adheres to and/or agglomerates on the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto any highway or street as described in California Vehicle Code Section 23113 and California Water Code 13304. To prevent track-out, designate access points and require all employees, subcontractors, and others to use them. Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can be any device or combination of devices that are effective at preventing track out, located at the point of intersection of an unpaved area and a paved road. Rumble strips or steel plate devices need periodic cleaning to be effective. If paved roadways accumulate tracked out soils, the track-out prevention device may need to be modified. 7. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil-disturbing activities. 8. Exposed ground areas that are planned to be reworked at dates greater than 1 month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established. 9. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD. 10. Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site. 11. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where possible. Roads shall be pre-wetted prior to sweeping when possible. 12. The burning of vegetative material shall be prohibited. Effective February 25, 2000, the SLOAPCD prohibited developmental burning of vegetative material within San Luis Obispo County. If you have any questions regarding these requirements, contact the SLOAPCD Engineering and Compliance Division at (805) 781-5912.	

Impacts	Mitigation Measures	Residual Impacts
	13. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20% opacity, and to prevent the transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Engineering and Compliance Division prior to the start of any grading, earthwork, or demolition.	
AQ Impact 2: The project would result in a cumulatively considerable net increase of criteria pollutants that would exceed applicable SLOAPCD thresholds.	Implement Mitigation Measures **AQ/mm-1.1, AQ/mm-1.2, and AQ/mm-1.3**. **AQ/mm-2.1:** The following measures shall be implemented to reduce construction emissions from on and off-road construction equipment (nitrogen oxides, reactive organic gases, and diesel particulate matter) and area sources and shown on grading and building plans. Construction contracts shall be obligated to comply with these measures and permit inspection of the construction site by the City of Paso Robles or its designee and San Luis Obispo County Air Pollution Control District (SLOAPCD) to confirm compliance: 1. Maintain all construction equipment in proper tune according to manufacturer's specifications. 2. Fuel all off-road and portable diesel-powered equipment with California Air Resources Board (CARB)-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road). 3. Heavy-duty (50 horsepower or greater) diesel-fueled construction equipment shall meet, at a minimum, the CARB's Tier 3 certified engines, or cleaner, off-road heavy-duty diesel engines; be fitted with diesel exhaust particulate filters in accordance with manufacturer recommendations; and comply with the State Off-Road Regulation. Heavy-duty equipment with Tier 4 engines shall be used to the extent locally available (within 50 miles). Where Tier 3, or cleaner, equipment is not available, incorporate diesel emission control strategies/retrofits, such that emission reductions achieved equal or exceed that of a Tier 3 engine. Installing California Verified Diesel Emission Control Strategies. Verified diesel emissions control strategies can be found at: https://ww2.arb.ca.gov/diesel/verdev/vt/cvt.htm. 4. When applicable, portable equipment, 50 horsepower or greater, used during construction activities shall be registered with the California statewide portable equipment registration program (issued by the CARB) or be permitted by the San Luis Obispo Air Pollution Control District (SLOAPCD). Such equipment may include power screens, conveyors, internal combustion engines, crushers, portable generators, tub grinders, trammel screens, and portable plants (e.g., aggregate plant, asphalt plant, concrete	Significant and Unavoidable

Impacts	Mitigation Measures	Residual Impacts
	plant). For more information, contact the SLOAPCD Engineering and Compliance Division at (805) 781-5912. 5. Use on-road heavy-duty trucks that meet the CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines and comply with the State On-Road Regulation. 6. All on- and off-road diesel equipment shall not idle when not in use. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5-minute idling limit. 7. Construction equipment staging areas shall be located at the farthest reasonable distance possible from nearby sensitive land uses, or at a minimum distance of 300 feet. 8. Stationary noise sources such as generators, pumps, and pavement crushers shall be located at the farthest distance possible from noise-sensitive uses, or at a minimum distance of 300 feet. 9. To the extent locally available, electrified or alternatively powered construction equipment shall be used. 10. Substitute gasoline-powered in place of diesel-powered equipment, where possible. 11. Use alternative-fueled construction equipment onsite where possible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel. 12. Construction of the proposed project shall use low volatile organic compound content paints not exceeding 50 grams per liter. 13. To the extent locally available, use prefinished building materials or materials that do not require the application of architectural coatings. 14. The proposed screening wall to be located along the western boundary of the project site shall be constructed after the completion of onsite demolition, site preparation, and site grading activities for the Phase 1 Warehouse (Lot 32) and prior to the issuance of construction permits for the Phase 1 Warehouse building (Lot 32). **AQ/mm-2.2:** Prior to installation of stationary emission sources (e.g., emergency back-up power generators), the San Luis Obispo County Air Pollution Control District (SLOAPCD) shall be consulted to identify applicable permitting limitations and requirements. A Permit to Operate (PTO) shall be obtained from the SLOAPCD prior to installation. At a minimum, emergency back-up power generators shall meet U.S. Environmental Protection Agency (USEPA) Tier 4 emission standards. Additional limitations, such as hourly operational limitations and/or alternative fuel sources, may also be required as part of the PTO.	

Impacts	Mitigation Measures	Residual Impacts
	AQ/mm-2.3: The following additional mitigation measures shall apply specific to the proposed warehouse: 1. Loading docks that service chilled, refrigerated, or freezer warehouse space shall be equipped with electrical hookups for trucks with transport refrigeration units or auxiliary power units to minimize truck idling. 2. Electrical service conduit shall be designed to accommodate future electric charging stations for haul trucks. 3. Service equipment (e.g., yard hostlers, yard equipment, forklifts, pallet jacks) shall be zero emission or natural gas if zero emission is not available. **AQ/mm-2.4:** The project shall develop an Operational Activity Management Plan (OAMP) for proposed warehouse operations. The plan shall be developed in coordination with the San Luis Obispo County Air Pollution Control District (SLOAPCD) and shall identify mitigation measures and, if necessary, offsets to be implemented to reduce reactive organic gases and nitrogen oxides ($ROG+NO_x$) operational emissions in comparison to SLOAPCD's annual significance threshold of 25 tons per year for $ROG+NO_x$. Such measures may include, but are not limited to, those identified in Mitigation Measures AQ/mm-1.1, AQ/mm-1.2, and AQ/mm-2.2.	
AQ Impact 3: Project demolition and construction activities would not have the potential to expose sensitive receptors to substantial concentrations of naturally occurring asbestos.	Mitigation is not required.	Less than Significant
AQ Impact 4: Project demolition and construction activities would have the potential to expose sensitive receptors to substantial concentrations of asbestos-containing materials and lead-coated materials.	**AQ/mm-4.1:** The following mitigation measures shall be implemented to reduce the disturbance of asbestos and lead. Strategies include but are not limited to the following: 1. Demolition of onsite structures shall comply with the National Emission Standards for Hazardous Air Emissions requirements (Title 40, Code of Federal Regulations, Part 61, Subpart M) for the demolition of existing structures. The San Luis Obispo Air Pollution Control District (SLOAPCD) is delegated authority by the U.S. Environmental Protection Agency to implement the Federal Asbestos National Emission Standards for Hazardous Air Pollutants. Prior to demolition of onsite structures, the SLOAPCD shall be notified, per National Emission Standards for Hazardous Air Pollutants requirements. SLOAPCD notification form and reporting requirements are included in Appendix C of the project environmental impact report. Additional information may be obtained at: http://slocleanair.org/business/asbestos.php. 2. If during the demolition of existing structures, paint is separated from the construction materials (e.g., chemically or physically), the paint waste will be evaluated independently from the building material by a qualified hazardous materials inspector to determine	Less than Significant

Impacts	Mitigation Measures	Residual Impacts
	its proper management. All hazardous materials shall be handled and disposed of in accordance with federal, state, and local regulations. According to the California Department of Toxic Substances Control (DTSC), if the paint is not removed from the building material during demolition (and is not chipping or peeling), the material can be disposed of as construction debris (a non-hazardous waste). The landfill operator will be contacted prior to disposal of building material debris to determine any specific requirements the landfill may have regarding the disposal of lead-based paint materials. The disposal of demolition debris shall comply with any such requirements. Contact the SLOAPCD Enforcement Division at (805) 781-5912 for more information. Approval of a lead work plan and permit may be required. Lead work plans, if required, will need to be submitted to SLOAPCD 10 days prior to the start of demolition. 3. Prior to any grading activities, a geologic evaluation shall be conducted to determine if naturally occurring asbestos (NOA) is present within the area that will be disturbed. If NOA is not present, an exemption request must be filed with the SLOAPCD. If NOA is found at the site, the Applicant must comply with all requirements outlined in the Asbestos Airborne Toxic Control Measure. These requirements may include but are not limited to: a. Development of an Asbestos Dust Mitigation Plan which must be approved by the SLOAPCD before operations begin, and b. Development and approval of an Asbestos Health and Safety Program (required for some projects).	
AQ Impact 5: Project demolition and construction activities would have the potential to expose sensitive receptors to substantial localized concentrations of particulate matter.	Implement Mitigation Measure **AQ/mm-1.3**.	Less than Significant
AQ Impact 6: Project demolition and construction activities would have the potential to expose sensitive receptors to health hazards associated with valley fever.	Implement Mitigation Measure **AQ/mm-1.3**. **AQ/mm-6.1:** The Applicant and contractor(s) shall implement the following measures during construction activities to reduce potential impacts associated with valley fever: 1. If peak daily wind speeds exceed 15 miles per hour (mph) or peak daily temperatures exceed 95 degrees Fahrenheit (ºF) for 3 consecutive days, additional dust suppression measures shall be implemented prior to and immediately following ground-disturbing activities. These measures shall include, at a minimum, use of additional water or the application of additional soil stabilizer on areas of disturbance and stockpiles. The additional dust suppression measures shall continue to be implemented until peak daily wind speeds are 10 mph or less and outdoor air	Less than Significant

Impacts	Mitigation Measures	Residual Impacts
	temperatures are below a peak daily temperature of 90ºF for at least 2 consecutive days. 2. Heavy construction equipment traveling on unpaved roads within the project site shall be preceded by a water truck to dampen roadways and reduce dust from transportation along such roads. 3. The Applicant or contractor(s) shall notify the City of Paso Robles no more than 60 nor less than 30 days before initiation of site-disturbing construction activities to allow the City of Paso Robles the opportunity to provide education outreach to community members and medical providers, as well as enhanced disease surveillance in the area both during and after construction activities involving grading. 4. Prior to any project grading activity, the project construction contractor(s) shall prepare and implement a worker training program that describes potential health hazards associated with valley fever, common symptoms, proper safety procedures to minimize health hazards, and notification procedures if suspected work-related symptoms are identified during construction, including the fact that certain ethnic groups and immune-compromised persons are at greater risk of becoming ill with valley fever. The objective of the training shall be to ensure the workers are aware of the danger associated with valley fever. The worker training program shall be included in the standard in-person training for project workers and shall identify safety measures to be implemented by construction contractors during construction. Prior to initiating any grading, the Applicant shall provide the City of Paso Robles with copies of all educational training material for review and approval. No later than 30 days after any new employee or employees begin work, the Applicant shall submit evidence to the City of Paso Robles that each employee has acknowledged receipt of the training (e.g., sign-in sheets with a statement verifying receipt and understanding of the training). 5. The Applicant shall work with a medical professional, in consultation with the City of Paso Robles and the County of San Luis Obispo Public Health Department, to develop an educational handout for onsite workers and surrounding residents within 3 miles of the project site that includes the following information on valley fever: a. Potential sources/causes; b. Common symptoms; c. Options or remedies available should someone be experiencing these symptoms; and d. The location of available testing for infection.	

Impacts	Mitigation Measures	Residual Impacts
	Prior to grading permit issuance, this handout shall have been created by the Applicant and reviewed by the City of Paso Robles. No less than 30 days prior to any surface disturbance (e.g., grading, filling, trenching) work commencing, this handout shall be mailed to all existing residences within three miles of the project site. The Applicant or developer(s) shall submit proof that the County of San Luis Obispo Public Health Department has been consulted prior to commencement of construction activities, a worker training program has been conducted, and the educational handout has been mailed to existing residences within 3 miles of the project area to the City of Paso Robles.	
AQ Impact 7: The long-term operation of the project would not expose sensitive receptors to substantial localized concentrations of carbon monoxide.	Implement Mitigation Measures **AQ/mm-1.1, TR/mm-3.1, and TR/mm-4.1**.	Less than Significant
AQ Impact 8: The long-term operation of the project would have the potential to expose sensitive receptors to harmful localized concentrations of diesel particulate matter.	Implement Mitigation Measure **AQ/mm-2.3**.	Significant and Unavoidable
AQ Impact 9: The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	Mitigation is not required.	Less than Significant
AQ Cumulative Impacts: The project would result in cumulatively considerable impacts associated with exposure of sensitive receptors to substantial pollutant emissions.	Implement Mitigation Measures **AQ/mm-1.1 through AQ/1.3 and AQ/mm-2.1 through AQ/mm-2.4**.	Cumulatively Considerable
GHG Impact 1: The project would generate greenhouse gas emissions, directly and indirectly, that would have a significant impact on the environment.	**GHG/mm-1.1:** A Greenhouse Gas (GHG) Reduction Plan shall be prepared for the proposed project. The GHG Reduction Plan shall include a menu of possible onsite GHG reduction measures sufficient to reduce operational emissions to below the GHG efficiency significance threshold identified in *The Land Paso Robles Final Environmental Impact Report* of 2.0 metric tons of carbon dioxide equivalents ($MTCO_2e$) per service population per year (SP/year). In the event that the City of Paso Robles (City) adopts an updated Climate Action Plan that addresses future-year 2030 GHG emissions reductions, the GHG-Reduction Plan shall be evaluated in comparison to the GHG thresholds and reduction measures identified in the Climate Action Plan or the San Luis Obispo Air Pollution Control District (SLOAPCD) releases updated recommended GHG significance thresholds and adjusted if an efficiency threshold of 2.0 $MTCO_2e$/SP/year is no longer necessary in order for the project to be in compliance with the Climate Action Plan or those identified by the SLOAPCD. The GHG Reduction plan shall be approved by the City prior to issuance of building construction permits. The list of GHG-reduction measures to be included in the GHG Reduction Plan shall include, but not be limited to, those identified in Mitigation Measures	Significant and Unavoidable

Impacts	Mitigation Measures	Residual Impacts
	AQ/mm-1.1, AQ/mm-1.2, and AQ/mm-2.1 through AQ/mm-2.4, as well as the following: 1. Up to the extent allowed by the building code at the time of development, incorporate natural lighting in buildings to minimize daytime lighting demand. 2. Design outdoor lighting shall be designed to minimize electrical demand, such as the use of solar-powered lighting and lighting controlled by motion sensors. 3. Meet or exceed building code requirements for solar installation. 4. Elect to receive electricity from Central Coast Community Energy (3CE). 5. To the extent possible, install electrically powered appliances and building mechanical equipment in place of natural-gas fueled equipment. 6. Provide organic waste pick up and the appropriate onsite enclosures consistent with the provisions of the City of Paso Robles Development Standards for Solid Waste Services. A GHG emissions calculation per SP shall be submitted by the Applicant with each building permit application. If the emissions exceed the efficiency threshold identified in the GHG Reduction Plan, under California Environmental Quality Act Guidelines Section 15126.4(c)(3) and (c)(4), respectively, a project's GHG emissions can be reduced by offsite measures, including offsets that are not otherwise required and measures that sequester GHGs. In the event that feasible onsite GHG-reduction measures are insufficient to reduce operational GHG emissions to below the City of Paso Robles's threshold of significance, offsite mitigation measures may be included. Offsite mitigation measures may include "Direct Reduction Activities" or the purchase of "Carbon Offset Credits" and discussed further, as follows: 1. **Direct Reduction Activities.** Directly undertake or fund activities that will reduce or sequester GHG emissions. GHG reduction credits shall achieve GHG emission reductions that are real, permanent, quantifiable, verifiable, enforceable, in accordance with the criteria set forth in the most recent California Air Resources Board (CARB) Process for the Review and Approval of Compliance Offset Protocols in Support of the Cap-and-Trade Regulation (2013). GHG reduction credits shall be undertaken for the specific purpose of reduction project-generated GHG emissions and shall not include reductions that would otherwise be required by law. All Direct Reduction Activities and associated reduction credits shall be confirmed by an independent, qualified third party. The "Direct Reduction Activity" shall be registered with a CARB-approved registry and in compliance with CARB-approved protocols. In accordance with the applicable Registry	

Impacts	Mitigation Measures	Residual Impacts
	requirements, the Applicant (or its designee) will retain an independent, qualified third-party to confirm the GHG emissions reduction or sequestration achieved by the Direct GHG Reduction Activities against the applicable Registry protocol or methodology. The Applicant (or its designee) will then apply for issuance of carbon credits in accordance with the applicable registry rules. 2. **Carbon Offsets.** Obtain and retire "Carbon Offsets." Carbon offsets shall achieve GHG reductions that are real, permanent, quantifiable, verifiable, and enforceable. Carbon offsets shall be purchased from CARB-approved registries and shall comply with CARB-approved protocols to ensure that offset credits accurately and reliably represent actual emissions reductions. If the purchase of carbon offsets is selected, offsets shall be purchased according to the following preference: (1) within the City of Paso Robles; (2) within the SLOAPCD jurisdictional area; (3) within the State of California; (4) elsewhere in the United States; and then (5) through a United Nations approved offset program. In the event that a project or program providing offsets to the Applicant loses its accreditation, the Applicant shall comply with the rules and procedures of retiring offsets specific to the registry involved and shall purchase an equivalent number of credits to recoup the loss.	
GHG Impact 2: The project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions.	Implement Mitigation Measures **AQ/mm-1.1, AQ/mm-1.2, AQ/mm-2.4, and AQ/mm-2.5, and GHG/mm-1.1**.	Significant and Unavoidable
GHG Cumulative Impacts: Implementation of mitigation measures identified above would reduce all project-level impacts associated with greenhouse gas emissions to less than cumulatively considerable.	Implement Mitigation Measures **AQ/mm-1.1 through AQ/mm-1.3, and AQ/mm-2.1 through AQ/mm-2.4, and GHG/mm-1.1**.	Less than Cumulatively Considerable
Biological Resources		
BIO Impact 1: Construction and grading activities would not result in an adverse substantial impact on a candidate, sensitive, or special-status plant species.	Mitigation is not required.	Less than Significant
BIO Impact 2: Construction and grading activities would not result in direct impacts to vernal pool fairy shrimp individuals, a federally threatened species, and would not remove vernal pool fairy shrimp habitat.	Mitigation is not required.	Less than Significant
BIO Impact 3: Construction and grading activities would result in direct and indirect impacts and habitat modifications to several sensitive and special-status wildlife species that have the potential to occur onsite and in offsite improvement areas.	**BIO/mm-3.1:** Prior to issuance of grading, demolition, or tract improvement permits, or prior to any vegetation removal or ground disturbance activities in or within 100 feet of Huer Huero Creek or oak woodland habitat, the Applicant shall retain a City of Paso Robles (City)-approved biologist to monitor grading/ground-disturbing activities located within and directly	Less than Significant with Mitigation

Impacts	Mitigation Measures	Residual Impacts
	adjacent to Huer Huero Creek and oak woodlands to ensure the avoidance of significant indirect impacts, such as sedimentation and invasive plant material introduction. The requirement for biological monitoring and the implementation of best management practices (BMPs) to avoid significant indirect impacts shall be noted on all grading, demolition, tract improvement, and other permits that authorize construction activities in or within 100 feet of Huer Huero Creek or oak woodlands. The biological monitor will verify that mitigation measures and construction BMPs are properly implemented. The biological monitor shall actively communicate observations and information with the construction supervisor as necessary for maintenance of mitigation and BMPs. The construction supervisor shall keep the biological monitor apprised of the project schedule. The biological monitor shall prepare a post-construction report that documents completion of ground-disturbing activities adjacent to natural resources that are to be retained onsite, and progress of mitigation measures implemented. Reports shall be furnished to the construction supervisor and the City of Paso Robles Community Development Department. Within 30 days of initiating ground-disturbing construction activities, the biological monitor retained by the Applicant shall provide a Worker Education Training Program to all personnel associated with vegetation removal and ground-disturbing construction activities, with instructions on BMPs, to avoid or reduce impacts to biological resources. At a minimum, the training shall include information on the protection of riparian and oak woodland habitats, Huer Huero Creek, special-status wildlife with potential to occur, and all mitigation measures specified by the City of Paso Robles, as well as any related biological report(s) prepared for the project. The Applicant shall notify the City of Paso Robles Community Development Department 1 week prior to this meeting. A fact sheet shall also be developed prior to the training program, and distributed at the training program to all contractors, employers, and other personnel involved with the construction of the project. **BIO/mm-3.2:** Immediately prior to vegetation removal, ground-disturbing activities, and/or grading, a focused preconstruction survey for coast horned lizards shall be conducted by a City of Paso Robles (City)-approved qualified biologist with a valid scientific collecting permit from the California Department of Fish and Wildlife (CDFW) in proposed work areas that would affect potentially suitable habitat; these areas include sandy loamy substrate in annual grassland habitat or within the sandy wash of Huer Huero Creek, as determined by the City-approved project biologist. The scope of the survey shall be determined by the qualified biologist and shall be sufficient to determine presence or absence of the species in the project areas proposed for ground disturbance. If the focused survey results are negative, a letter report shall be submitted to the City Community Development Department, and no further action shall be required. If coast horned lizards are found to be present in the proposed work areas the following steps shall be taken: 1. Coast horned lizards shall be captured by hand by the City-approved qualified biologist with a valid CDFW scientific collecting	

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	permit and relocated to an appropriate offsite location an appropriate distance away from the project area to prevent the species from repopulating the site during construction activity, as determined by the City-approved project biologist. 2. Construction monitoring by the City-approved qualified biologist shall be required for all new ground-breaking activities located within coast horned lizard habitat. Construction monitors shall capture and relocate lizards as specified above. 3. A letter report shall be submitted to the City Department of Community Development within 30 days of coast horned lizard relocation. 4. A final letter report shall be submitted to the City Department of Community Development within 30 days of completion of construction activities in coast horned lizard habitat and shall document the project's compliance with this measure. **BIO/mm-3.3:** Prior to commencement of ground-disturbing construction activities during the breeding season of western spadefoot toad (February–May), a seasonally appropriate survey (per California Department of Fish and Wildlife [CDFW] guidelines) shall be conducted within 3 weeks of saturating winter rainfall to determine the presence or absence of spadefoot toads in the project area. If spadefoot toads are detected in the project area, a mitigation plan shall be developed to ensure direct impacts are minimized. The mitigation plan shall address the potential for impacts to aquatic breeding habitat and upland non-breeding habitat and include recommendations to minimize direct mortality of individuals by implementation of avoidance and/or relocation measures. For ground-disturbing construction activities outside of the breeding season, a City of Paso Robles (City)-approved qualified biologist with a valid scientific collecting permit from CDFW shall capture by hand and relocate any uncovered spadefoot toads an appropriate distance away from the project area to prevent the species from repopulating the site during construction activity, as determined by the City-approved project biologist. **BIO/mm-3.4:** Prior to commencement of any vegetation removal or construction activities, the project biologist shall survey trees within 1 mile of the project site, including offsite improvement areas, for eagle nests, including the known nesting site in the Huer Huero Creek where golden eagles and two large stick nests were detected during 2020 and 2021 biological surveys for the Huer Huero Bridge and Roundabout Project. If the project biologist identifies a nest that is in use, meaning it has eggs, dependent young, or adult eagles, then the Applicant shall consult with the U.S. Fish and Wildlife Service (USFWS) regarding the necessity for a take permit under the Bald and Golden Eagle Protection Act. Should a take permit be required, the Applicant shall obtain the permit and implement all requirements and recommendations of the USFWS prior to any vegetation	

Impacts	Mitigation Measures	Residual Impacts
	removal or construction activities and shall provide written evidence to the City of Paso Robles Community Development Department that such actions have been completed. **BIO/mm-3.5:** Within 1 week of vegetation removal or any construction activities other than demolition activities located entirely within a building, that commence between February 1 and August 15, nesting bird surveys shall be conducted in the area proposed for disturbance and a 500-foot buffer. If surveys do not locate nesting birds, construction activities may be conducted with no further action needed. If work lapses for more than 2 weeks, new surveys shall be conducted. If nesting birds are located, no construction activities shall occur within 100 feet of nests (or other setback distance determined by a qualified biologist). Occupied nests of special-status bird species within project work areas shall be mapped using the Global Positioning System (GPS) or survey equipment. Work shall not be allowed within a 300-foot buffer (for special-status non-raptors) or 500-foot buffer (for raptors) while the nest is in use. The buffer zone shall be delineated on the ground with highly visible fencing or rope barriers where it overlaps work areas. The project biologist conducting the nesting survey shall have the authority to reduce or increase the recommended buffer depending upon site conditions and the species. Occupied nests of special-status bird species shall be monitored at least every 2 weeks through the nesting season to document nest success and check for project compliance with buffer zones. Once nests are deemed inactive and/or chicks have fledged and are no longer dependent on the nest, work may commence in these areas. A preconstruction survey report shall be submitted to the City of Paso Robles Community Development Department immediately upon completion of the survey. The report shall detail appropriate fencing or flagging of the buffer zone and make recommendations on additional monitoring requirements, where applicable. A map of the project site and nest locations shall be included with the report. **BIO/mm-3.6:** Within 30 days of commencement of interior or exterior building demolition or tree removal activities, a focused survey shall be conducted by a qualified biologist to determine if roosting bats are present in and near construction, vegetation removal, and demolition areas. The survey shall include complete visual inspection of buildings and structures to be demolished and evaluation of large trees for potential roosts. An acoustic survey combined with a visual bat emergence survey shall be conducted. If a bat roost is located in the planned disturbance area and cannot be avoided, a Bat Habitat Mitigation and Monitoring Plan (BHMMP) shall be prepared, specific to the observed conditions. The BHMMP shall contain specific details regarding exclusion efforts for the existing roosting habitat to be removed, details on the type and placement of alternative roosting habitat, and protection measures for roost habitat to remain if feasible. If a maternity colony is identified during the breeding season (generally April–October) and it cannot be avoided, the Applicant's qualified biologist shall consult with the	

Impacts	Mitigation Measures	Residual Impacts
	California Department of Fish and Wildlife (CDFW) for guidance and shall implement all requirements and recommendations provided by the CDFW. **BIO/mm-3.7:** Prior to commencement of vegetation removal or grading, a City of Paso Robles (City)-approved qualified biologist with a valid scientific collecting permit from California Department of Fish and Wildlife (CDFW) for Salinas pocket mouse shall be retained by the Applicant. The qualified biologist shall be present during all ground-disturbing construction activities associated with developing the project, including, but not limited to, grading, excavations, and tilling. The biologist shall conduct a morning clearance survey of the project area each day that ground-disturbing activities are proposed. Salinas pocket mouse captured during surveys or during construction monitoring shall be relocated to the nearest suitable habitat outside of the project area. A letter report shall be submitted to the City Department of Community Development within 30 days of Salinas pocket mouse relocation. **BIO/mm-3.8:** American badger preconstruction surveys shall be conducted within 30 days of any ground-disturbing construction activity on the project site to identify if badgers are present. The results of the survey shall be sent to the City of Paso Robles Community Development Department. If the preconstruction survey finds potential badger dens, they shall be inspected to determine whether they are occupied. The survey shall cover the entire impact area and examine both old and new dens. If potential badger dens are too long to completely inspect from the entrance, a fiber optic scope shall be used to examine the den to the end. Inactive dens may be excavated by hand with a shovel to prevent reuse of dens during construction. If badgers are found in dens on the property between February and July, nursing young may be present. To avoid disturbance and the possibility of direct take of adults and nursing young, and to prevent badgers from becoming trapped in burrows during construction activity, no grading shall occur within 100 feet of active badger dens between February and July. Between July 1 and February 1 all potential badger dens shall be inspected to determine if badgers are present. During the winter, badgers do not truly hibernate but are inactive and asleep in their dens for several days at a time. Because they can be torpid during the winter, they are vulnerable to disturbances that may collapse their dens before they rouse and emerge. Therefore, surveys shall be conducted for badger dens throughout the year. Exclusion of badgers from dens may only be done during the non-breeding season by a qualified biologist experienced in den exclusions. Dens shall be fully excavated and backfilled after eviction is complete. **BIO/mm-3.9:** The proposed project occurs within a 3:1 San Joaquin kit fox mitigation zone. Prior to issuance of grading and/or construction permits that authorize ground disturbance, the Applicant shall submit evidence to the City of Paso Robles (City) Community Development Department and California Department of Fish and Wildlife (CDFW) that satisfactorily demonstrates one or a combination of the following three San Joaquin kit fox mitigation	

Impacts	Mitigation Measures	Residual Impacts
	measures has been implemented to offset the project's calculated compensatory impacts at 3:1 ratio: 1. **Habitat Set Aside:** Provide for the protection in perpetuity, through acquisition of fee or a conservation easement, the number of acres of required mitigation of suitable habitat in the kit fox corridor area, as determined by the CDFW (e.g., within the San Luis Obispo County kit fox habitat area), either onsite or offsite, and provide for a non-wasting endowment to provide for management and monitoring of the property in perpetuity. Lands conserved shall be subject to the review and approval of the CDFW and the County of San Luis Obispo (County). Mitigation alternative 1 requires that all aspects if this program must be in place before City permit issuance or initiation of any ground-disturbing activities. 2. **In-Lieu Fee:** Deposit funds into an approved in-lieu fee program, which would provide for the protection in perpetuity of suitable habitat in the kit fox corridor area within San Luis Obispo County and provide for a non-wasting endowment for management and monitoring of the property in perpetuity. Mitigation alternative 2 can be completed by providing funds to The Nature Conservancy (TNC) pursuant to the Voluntary Fee-Based Compensatory Mitigation Program (Program). The Program was established in agreement between the CFDW and TNC to preserve San Joaquin kit fox habitat, and to provide a voluntary mitigation alternative to project proponents who must mitigate the impacts of projects in accordance with the California Environmental Quality Act (CEQA). This fee is calculated based on the current cost-per-unit of $2,500 per acre of mitigation, which is scheduled to be adjusted to address the increasing cost of property in San Luis Obispo County; the actual cost may increase depending on the timing of payment. This fee shall be paid after the CDFW provides written notification about mitigation options but prior to City permit issuance and initiation of any ground-disturbing activities. 3. **Conservation Bank Credit:** Purchase the number of credits required by the CDFW in a CDFW-approved conservation bank, which would provide for the protection in perpetuity of suitable habitat within the kit fox corridor area and provide for a non-wasting endowment for management and monitoring of the property in perpetuity. Mitigation alternative 3 can be completed by purchasing credits from the Palo Prieto Conservation Bank. The Palo Prieto Conservation Bank was established to preserve San Joaquin kit fox habitat, and to provide a voluntary mitigation alternative to project proponents who must mitigate the impacts of projects in accordance with CEQA. This fee is calculated based on the	

Impacts	Mitigation Measures	Residual Impacts
	current cost-per-credit of $2,500 per acre of mitigation. The fee is established by the conservation bank owner and may change at any time. The actual cost may increase depending on the timing of payment. Purchase of credits must be completed prior to County permit issuance and initiation of any ground-disturbing activities. **BIO/mm-3.10:** Prior to issuance of grading and/or construction permits that authorize ground disturbance, the project biologist (BIO-mm/3.1) shall perform the following monitoring activities: 1. Prior to issuance of grading and/or construction permits that authorize ground disturbance and within 30 days prior to initiation of site disturbance and/or construction, the project biologist shall conduct a pre-activity (i.e. preconstruction) survey for known or potential kit fox dens and submit a letter to the City of Paso Robles (City) Community Development Department reporting the date the survey was conducted, the survey protocol, survey results, and what measures were necessary (and completed), as applicable, to address any kit fox activity within the project limits. 2. The project biologist shall conduct weekly site visits during site-disturbance activities (e.g., grading, disking, excavation, stock piling of dirt or gravel, etc.) that proceed longer than 14 days, for the purpose of monitoring compliance. Site disturbance activities lasting up to 14 days do not require weekly monitoring by the biologist unless observations of kit fox or their dens are made onsite, or the qualified biologist recommends monitoring for some other reason. When weekly monitoring is required, the biologist shall submit weekly monitoring reports to the City Community Development Department. 3. Prior to or during project construction activities, if any observations are made of San Joaquin Kit fox, or any known or potential San Joaquin kit fox dens are discovered within the project limits, the project biologist shall re-assess the probability of incidental take (e.g., harm or death) to kit fox. At the time a den is discovered, the project biologist shall contact the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) for guidance on possible additional kit fox protection measures to implement and whether or not a federal and/or state incidental take permit is needed. If a potential den is encountered during construction, work shall stop until such time the USFWS determines it is appropriate to resume work. If incidental take of kit fox during project activities is possible, before project activities commence, the Applicant must consult with the USFWS. The results of this consultation may require the Applicant to obtain a federal and/or state permit for incidental take during project activities. The Applicant should be aware that the presence of kit foxes or known or potential kit fox dens at the project site could result in further delays of project activities.	

Impacts	Mitigation Measures	Residual Impacts
	4. In addition, the project biologist shall implement the following measures: a. Within 30 days prior to initiation of site disturbance and/or construction, fenced exclusion zones shall be established around all known and potential kit fox dens. Exclusion zone fencing shall consist of either large, flagged stakes connected by rope or cord, or survey laths or wooden stakes prominently flagged with survey ribbon. Each exclusion zone shall be roughly circular in configuration with a radius of the following distance measured outward from the den or burrow entrances: i. Potential kit fox den: 50 feet ii. Known or active kit fox den: 100 feet iii. Kit fox pupping den: 150 feet b. All foot and vehicle traffic, as well as all construction activities, including storage of supplies and equipment, shall remain outside of exclusion zones. Exclusion zones shall be maintained until all project-related disturbances have been terminated, and then shall be removed. If kit foxes or known or potential kit fox dens are found onsite, daily monitoring by the project biologist shall be required during ground-disturbing activities. **BIO/mm-3.11:** The following measures shall be implemented during all construction activities other than interior building demolition: 1. Grading and construction activities after dusk shall be prohibited unless coordinated through the City of Paso Robles. 2. To prevent entrapment of the San Joaquin kit fox, all excavations, steep-walled holes and trenches in excess of two feet in depth shall be covered at the close of each working day by plywood or similar materials or provided with one or more escape ramps constructed of earth fill or wooden planks. Trenches shall also be inspected for entrapped kit fox each morning prior to onset of field activities and immediately prior to covering with plywood at the end of each working day. Before such holes or trenches are filled, they shall be thoroughly inspected for entrapped kit fox. Any kit fox so discovered shall be allowed to escape before field activities resume or removed from the trench or hole by the project biologist and allowed to escape unimpeded. In addition, any pipes, culverts, or similar structures with a diameter of 4 inches or greater, stored overnight at the project site shall be thoroughly inspected for trapped San Joaquin kit foxes before the subject pipe is subsequently buried, capped, or otherwise used or moved in any way. If during the construction phase a kit fox is discovered inside a pipe, that section of pipe will	

Impacts	Mitigation Measures	Residual Impacts
	not be moved. If necessary, the pipe may be moved only once to remove it from the path of activity, until the kit fox has escaped. 3. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of only in closed containers. These containers shall be regularly removed from the site. Food items may attract San Joaquin kit fox onto the project site, consequently exposing such animals to increased risk of injury or mortality. No deliberate feeding of wildlife shall be allowed. 4. Prior to, during, and after the site-disturbance and/or construction phase, use of pesticides or herbicides shall be in compliance with all federal, state, and local regulations. This is necessary to minimize the probability of primary or secondary poisoning of endangered species utilizing adjacent habitats, and the depletion of prey upon which San Joaquin kit fox depends. **BIO/mm-3.12:** During all construction activities, any contractor or employee that inadvertently kills or injures a San Joaquin kit fox or who finds any such animal either dead, injured, or entrapped shall be required to report the incident immediately to the City of Paso Robles Community Development Department. In the event that any observations are made of injured or dead kit fox, the Applicant shall immediately notify the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) by telephone. In addition, formal notification shall be provided in writing within 3 working days of the finding of any such animal(s). Notification shall include the date, time, location, and circumstances of the incident. Any threatened or endangered species found dead or injured shall be turned over immediately to the CDFW for care, analysis, or disposition. **BIO/mm-3.13:** Prior to issuance of a building permit or other permit that authorizes the installation of fencing, all proposed fencing shall be installed to provide for kit fox passage and 8- by 12-inch openings near the ground shall be provided every 100 yards. Upon fence installation, the Applicant shall notify the City of Paso Robles (City) Community Development Department to verify proper installation. Any fencing constructed after issuance of a final permit shall follow the above guidelines and shall be inspected during quarterly monitoring by the City.	
BIO Impact 4: The project would impact approximately 0.3 acre of non-wetland waters of the United States and 0.5 acre of non-wetland waters of the state that are protected under the Clean Water Act.	**BIO/mm-4.1:** Prior to construction activities for the stormwater outfall in Huer Huero Creek or construction of the modified Class I Multiuse Trail low water crossing for temporary vehicular use, the Applicant shall comply with all state and federal permitting requirements, including those of the U.S. Army Corps of Engineers and Central Coast Regional Water Quality Control Board, including requirements for riverine habitat creation and/or enhancement specified in BIO/mm-4.2. The Applicant shall provide the City of Paso Robles Community Development Department copies of the federal and state permits and with written evidence of compliance with the jurisdictional agencies' requirements.	Less than Significant with Mitigation

Impacts	Mitigation Measures	Residual Impacts
	BIO/mm-4.2: To minimize impacts to riverine habitat and non-wetland jurisdictional waters, prior to commencement of construction activities for the stormwater outfall in Huer Huero Creek or construction of the modified Class I Multiuse Trail low water crossing for temporary vehicular use, the project biologist (BIO/mm-3.1) shall prepare and implement a Riverine Habitat Mitigation and Monitoring Plan (HMMP). Impacted areas shall be restored at a 1:1 ratio (habitat restored to habitat impacted) according to the plan immediately following disturbance. Appropriate restoration and enhancement activities shall include planting native species, correcting bank stabilization issues, and providing habitat enhancements by reducing non-native invasive species. Success criteria shall include, at a minimum, at least 80% survival of container plants and 80% relative cover by vegetation type.	
BIO Impact 5: The project would impact, through removal, approximately 0.1 acre of freshwater emergent wetland.	**BIO/mm-5.1:** Prior to construction activities that would impact the emergent wetlands identified as HBC 20 and HBC 2 in *Delineation of Potentially Jurisdictional Wetlands and Waters for The Landing Paso Robles* prepared by Althouse and Meade for the project, the Applicant shall comply with all federal permitting requirements, including those of the U.S. Army Corps of Engineers, including requirements for wetland creation and/or habitat enhancement specified in BIO/mm-5.2. The Applicant shall provide the City of Paso Robles Community Development Department copies of the state and federal permits and written evidence of compliance with the jurisdictional agencies' requirements. **BIO/mm-5.2:** Prior to grading or site disturbance of the two identified freshwater emergent wetlands, the Applicant shall prepare and implement a Wetland Habitat Mitigation and Monitoring Plan (HMMP) for review and approval by the City of Paso Robles Community Development Department. Because wetlands in the project area are manmade and low quality, mitigation for temporary and permanent impacts shall be at a 1:1 ratio (wetlands impacted to wetlands restored), unless a greater ratio is required by the U.S. Army Corps of Engineers and shall consist of onsite enhancement of existing wetlands or creation of replacement wetlands. Appropriate restoration and enhancement activities include planting native species, correcting bank stabilization issues, and providing habitat enhancements by reducing non-native invasive species.	Less than Significant
BIO Impact 6: The project site may interfere with movement of populations or subpopulations of San Joaquin kit fox.	Implement Mitigation Measures **BIO/mm-3.9 through BIO/mm-3.13**.	Less than Significant
BIO Impact 7: The project would remove up to 54 native oak trees that are protected under the City's Oak Tree Preservation Ordinance.	**BIO/mm-7.1:** An Oak Tree Mitigation and Protection Plan shall be prepared and approved by the City of Paso Robles (City) Community Development Department prior to the issuance of a grading permit, at a construction level of detail. 1. Tree canopies and trunks within 50 feet of proposed disturbance zones have been mapped and numbered by a qualified biologist and a licensed land surveyor. Data for each tree includes date, species, number of stems, diameter at breast height (dbh) of each	Less than Significant

Impacts	Mitigation Measures	Residual Impacts
	stem, critical root zone (CRZ) diameter, canopy diameter, tree height, health, habitat notes, and nests observed. This information shall be indicated on the grading plan prior to the issuance of a grading permit. 2. Impacts to the oak canopy or CRZ should be avoided where practicable. Impacts include pruning, any ground disturbance within the dripline or CRZ of the tree (whichever distance is greater), and trunk damage. 3. Replacement oaks for impacted trees would be at a 1:1 ratio for impacts less than 50 percent and 2:1 ratio for impacts to more than 50% of the CRZ. Replacement trees shall be indicated on a landscaping plan subject to City approval. 4. Replacement oaks for removed trees must be equivalent to 25% of the diameter of the removed tree(s). For example, if a 16-inch dbh tree is removed, 4 inches total caliper of replacement trees is required. A 1-inch caliper tree is generally in a 15-gallon container, and approximately 8 to 10 feet tall—four of these would be required. Smaller caliper trees may be planted at a ratio of 5:1 for each tree removed. Replacement trees shall be indicated on a landscaping plan subject to City approval. 5. Replacement trees should be seasonally maintained (browse protection, weed reduction, and irrigation, as needed) and monitored annually for at least 7 years after initial planting by an arborist retained by the Applicant. 6. Upon issuance of the Oak Tree Removal permit, it is the responsibility of the owner or project manager to provide a copy of the Oak Tree Mitigation and Protection Plan to any and all contractors and subcontractors that work within the CRZ of any native tree and confirm they are trained in maintaining fencing, protecting root zones, and conforming to all tree protection goals. It is highly recommended that each contractor sign and acknowledge the Oak Tree Mitigation and Protection Plan. Any future changes (within the CRZ) will need an arborist review and implementation of potential mitigation measures before proceeding. 7. Any future changes (within the CRZ) in the project will need an arborist review and implementation of potential mitigation measures before any said changes can proceed. 8. The proposed fencing around existing oak trees to be protected shall be shown on the grading plan. It must be a minimum of 4-foot-high chain link, snow, or safety fence staked (with t-posts 8 feet on center) at the edge of the CRZ or line of encroachment for each tree or group of trees. The fence shall be up before any construction or earth moving begins. The owner shall be responsible for maintaining an erect fence throughout the construction period. The arborist(s), upon notification, will inspect	

Impacts	Mitigation Measures	Residual Impacts
	the fence placement once it is erected. After this time, fencing shall not be moved without arborist inspection/approval. If the orange plastic fencing is used, a minimum of four zip ties shall be used on each stake to secure the fence. All efforts shall be made to maximize the distance from each saved tree. Weatherproof signs shall be permanently posted on the fences every 50 feet, with the following information: "Tree Protection Zone: No personnel, equipment, materials, or vehicles allowed." 9. Soils within the CRZ that have been compacted by heavy equipment and/or construction activities must be returned to their original state before all grading work is completed. Methods include water jetting, adding organic matter, and boring small holes with an auger (18 inches deep, 2–3 feet apart with a 2–4-inch auger) and the application of moderate amounts of nitrogen fertilizer. The arborist(s) shall advise. 10. All areas within the CRZ of the trees that can be fenced shall receive a 4- to 6-inch layer of chip mulch to retain moisture, preserve soil structure, and reduce the effects of soil compaction. 11. All trenching within the CRZ of native trees shall be hand dug. All major roots shall be avoided whenever possible. All exposed roots larger than 1 inch in diameter shall be clean cut with sharp pruning tools and not left ragged. A mandatory meeting between the arborists and grading contractor(s) must take place prior to work start. 12. Grading shall not encroach within the CRZ unless authorized. Grading shall not disrupt the normal drainage pattern around the trees. Fills shall not create a ponding condition and excavations shall not leave the tree on a rapidly draining mound. Any exposed roots shall be covered the same day they were exposed if possible. If they cannot, they must be covered with burlap or another suitable material and wetted down two times per day until reburied. 13. Vehicles and all heavy equipment shall not be driven under the trees, as this will contribute to soil compaction. Also, there is to be no parking of equipment or personal vehicles in these areas. All areas behind fencing are off limits unless pre-approved by the arborist. 14. The existing ground surface within the CRZ of all oak trees shall not be cut, filled, compacted, or pared unless shown on the grading plans and approved by the arborist. 15. No liquid or solid construction waste shall be dumped on the ground within the CRZ of any native tree. The CRZ areas are not for storage of materials. 16. An arborist shall be present for soil disturbance work within the CRZ of oak trees. Monitoring does not necessarily have to be	

Impacts	Mitigation Measures	Residual Impacts
	continuous but observational at times during these activities. All monitoring will be documented on the field report form which will be forwarded to the project manager and the City Community Development Department. 17. Roots impacted during construction (e.g., trenching or grading operations) shall be treated by the arborist on a case-by-case basis using best practices such as clean cuts accompanied by application of appropriate fungicides and insecticides by a licensed pest control applicator. 18. An onsite preconstruction meeting with the arborist(s), the owner(s), Planning Staff, and the earth-moving team shall be required for this project. Prior to final occupancy, a letter from the arborist(s) shall be required verifying the health/condition of all impacted trees and providing any recommendations for any additional mitigation. The letter shall verify that the arborist(s) were onsite for all grading and/or trenching activity that encroached into the CRZ of the selected native trees, and that all work done in these areas was completed to the standards set forth above. 19. Class 1 pruning has emphasis on aesthetics, removal of dead, dying, decaying weak branches and selective thinning to lesson wind resistance. Class 2 pruning is recommended where aesthetic conditions are secondary to structural integrity and tree health concerns. It shall consist of removal of dead, dying, decaying, interfering, obstructing and weak branches as well as selective thinning to lesson wind resistance. Class 3 pruning includes removal of dead, diseased, decayed, and weak branches where safety considerations and hazardous conditions are the highest priority. Class 4 pruning, including crown reduction pruning, shall consist of reduction of tops, sides or individual limbs. A certified arborist shall direct all pruning. No pruning shall take more than 25% of the live crown of any native tree. Any trees that may need pruning for road/home clearance shall be pruned prior to any grading activities to avoid any branch tearing. 20. All landscape within the CRZ shall consist of drought-tolerant or native varieties. Lawns shall be avoided. All irrigation trenching shall be routed around CRZs; otherwise, aboveground drip irrigation shall be used. It is the owner's responsibility to notify the landscape contractor regarding this mitigation. For this site, it is strongly recommended that drought-tolerant native landscape is used with the approval of the arborist. This includes all City sidewalk/greenbelt areas. 21. All utilities, sewer, and storm drains shall be placed down the roads and driveways and when possible, outside of the CRZ. The arborist shall supervise trenching within the CRZ. All trenches in these areas shall be exposed by air spade or hand dug with utilities routed under/over roots larger than 3 inches in diameter.	

Impacts	Mitigation Measures	Residual Impacts
	22. As the project moves toward completion, the arborist(s) may suggest either fertilization and/or mycorrhizal inoculation applications that will benefit tree health. Application of mycorrhizal inoculum offers several benefits to the host plant, including faster growth, improved nutrition, greater drought resistance, and protection from pathogens.	
BIO Impact 8: There are no adopted habitat conservation plans, natural community conservation plans, or other adopted or approved local, regional, or state habitat conservation plans applicable to the project site.	Mitigation is not required.	Less than Significant
BIO Cumulative Impacts: Implementation of mitigation measures identified above would reduce all project-level impacts to biological resources to less than cumulatively considerable.	Implement Mitigation Measures **BIO/mm-2.1, BIO/mm-3.1 through BIO/mm-3.13, BIO/mm-4.1, BIO/mm-5.1, and BIO/mm-7.1**.	Less than Cumulatively Considerable
Cultural Resources and Tribal Cultural Resources		
CUL Impact 1: The project would not have the potential to result in a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5.	Mitigation is not required.	Less than Significant
CUL Impact 2: There are no known archaeological resources within the project impact area based on previous surveys and records searches, but project construction and grading activities may result in adverse impacts to undiscovered subsurface archaeological resources.	**CUL/mm-2.1:** Prior to any subsurface ground-disturbing activities, a City of Paso Robles (City)-approved archaeologist shall be retained by the Applicant to conduct a Workers Environmental Awareness Program training for all project personnel involved in ground-disturbing activities, such as grading, excavation, trenching, and other earthwork. The training shall describe applicable laws and regulations regarding archaeological and tribal cultural resources, types of resources that may be found in the project impact area, and the required procedures in the event of an inadvertent discovery. All ground-disturbing activities, including equipment staging, within 100 feet of the recorded site boundaries of CA-SLO-2826 and CA-SLO-2827 shall be monitored by the City-approved archaeologist. The monitoring shall be guided by a Cultural Resource Monitoring Plan written by the archaeologist and approved by the City. The Cultural Resource Monitoring Plan shall include, but not be limited to, the following: 1. A list of personnel involved in the monitoring activities; 2. Description of Native American involvement, including a requirement that a tribal representative from the yak titᵛu titᵛu yak tiłhini Northern Chumash Tribe be present for all monitoring; 3. Description of how the monitoring shall occur; 4. Description of frequency of monitoring (e.g., full time, part time, spot checking); 5. Description of what resources are expected to be encountered;	Less than Significant

Impacts	Mitigation Measures	Residual Impacts
	6. Description of circumstances that would result in the halting of work at the project site; 7. Description of procedures for halting work on the site and notification procedures; 8. Description of monitoring reporting procedures; and 9. Provide specific, detailed protocols for what to do in the event of the discovery of human remains. **CUL/mm-2.2:** During construction, in the event of any inadvertent discovery of archaeological or tribal cultural resources, all work within 100 feet of the discovery shall immediately cease. The Applicant and/or contractor shall immediately contact a City of Paso Robles (City)-approved archaeologist and notify the City Community Development Department. The City-approved archaeologist shall evaluate the significance of the discovery pursuant to California Environmental Quality Act Guidelines Section 15064.5 and Public Resources Code Section 21083.2. Should the discovery be determined to not be significant, the City-approved archaeologist, in consultation with the City, shall determine what, if any, measures are appropriate. Work may resume in the area upon approval of the City-approved archaeologist. Should the City-approved archaeologist determine the discovery to be significant, CUL/mm-2.3 shall apply. **CUL/mm-2.3:** Pursuant to CUL/mm-2.2, should the City of Paso Robles (City)-approved archaeologist determine an inadvertent discovery is significant, the Applicant, in discussion with the City and the City-approved archeologist, shall determine if avoidance of the discovery is feasible through site design measures or alternative construction techniques. If avoidance is not feasible, a Data Recovery Plan shall be prepared by the City-approved archaeologist and submitted to the City for review. The Data Recovery Plan shall include, at a minimum: 1. Mapping of the resource boundary; 2. Quantification of the volume of impact to the resource; 3. Excavation of a sample of the resource to characterize the nature of the site and retrieve a representative sample of artifacts within the impacted area; 4. Monitoring of excavations by a tribal representative; 5. Technical analysis of the recovered samples, including radiocarbon dating, typological and technical analysis of tools and debris, identification and analysis of preserved faunal and floral remains, and other studied appropriate to research questions outlined in the research design; 6. Cataloguing and curation of all artifacts and records detailing the results of the investigations at a City-approved curation facility or to a Native American Tribe; and 7. Submission of a final technical report detailing the results of the investigations.	

Impacts	Mitigation Measures	Residual Impacts
CUL Impact 3: Grading and construction activities have low potential to impact previously undiscovered human remains that are outside a formal cemetery, and existing California Health and Safety Code regulations identify protocol in the event human remains are discovered.	Mitigation is not required.	Less than Significant
CUL Cumulative Impacts: Implementation of mitigation measures would reduce all project-level impacts to cultural resources to less than cumulatively considerable.	Implement Mitigation Measures **CUL/mm-2.1 through CUL/mm-2.3**.	Less than Cumulatively Considerable
TCR Impact 1: The project would not impact the significance of a tribal cultural resource that is listed in or is eligible for listing in the CRHR or local register of historic resources.	Mitigation is not required.	Less than Significant
TCR Impact 2: The project would not impact any known tribal cultural resources determined by the City to be a significant resource to a California Native American tribe.	Mitigation is not required.	Less than Significant
TCR Cumulative Impacts: Project impacts associated with tribal cultural resources would be less than cumulatively considerable.	Mitigation is not required.	Less than Cumulatively Considerable
Geology and Soils		
GEO Impact 1: The project would not cause substantial adverse effects due to seismic-related conditions.	Mitigation is not required.	Less than Significant
GEO Impact 2: Project grading and vegetation clearance would result in approximately 158.06 acres of ground disturbance, which would have the potential to result in substantial soil erosion or the loss of topsoil, and the modified Class I Multiuse Trail low water crossing has the potential to result in scouring around the crossing's piles.	Implement Mitigation Measure **HYD/mm-1.1**. **GEO/mm-2.1:** The final modified Class I Multiuse Trail low water crossing design for vehicular use shall include armoring or protection of the driven piles to prevent scouring during periods of surface flow. Armoring or protection shall include riprap, tetraprons, grout filled bags, concrete blocks, grouted rock slope protection, or functional equivalent as determined by civil engineer responsible for the design of the low water crossing and the City of Paso Robles Engineer. These specifications shall be noted on all applicable construction documents and shall be inspected by the City of Paso Robles Engineer to confirm appropriate installation during the construction process.	Less than Significant
GEO Impact 3: The project site is not located in an area susceptible to land failure events and the project would not increase the potential to induce land failure.	Mitigation is not required.	Less than Significant
GEO Impact 4: The project would be located on moderately expansive soils and would be required to adhere to the requirements of the California Building Code regarding foundation design, which are based on the Uniform Building Code.	Mitigation is not required.	Less than Significant

Impacts	Mitigation Measures	Residual Impacts
GEO Impact 5: Grading and subsurface construction activity would disturb native geological formations that are known to have high paleontological sensitivity and could therefore destroy paleontological resources.	**GEO/mm-5.1:** A City of Paso Robles (City)-approved paleontologist shall be retained by the Applicant that meets the qualifications of a Qualified Professional Paleontologist as defined by the Society of Vertebrate Paleontology to develop and conduct a Workers Environmental Awareness Program training for project personnel involved in ground-disturbing activities, such as grading, excavation, trenching, and other earthwork. The training shall describe applicable laws and regulations regarding paleontological resources, types of resources that may be found in the project area, and the required procedures in the event of an inadvertent discovery. **GEO/mm-5.2:** The City of Paso Robles (City)-approved paleontologist shall develop and submit a Paleontological Resources Management Plan (PRMP) to the City for review and approval. The approved PRMP shall be implemented during all construction activities. The PRMP shall include provisions for documenting the site according to the standards developed by the National Research Council (1987) and shall include, at a minimum: 1. All ground disturbances greater than or equal to 5 feet below ground surface, or that impact older alluvium or Paso Robles Formation regardless of depth, shall be monitored by the City-approved paleontologist; 2. A map, based on final grading plans, showing the areas where monitoring shall occur; 3. Processes and procedures for paleontological monitoring, fossil salvaging, reporting, and curation; 4. In the event paleontological resources are identified during construction, all work within 50 feet of the discovery shall immediately cease so that the City-approved paleontologist can evaluate the significance of the discovery; 5. Preservation of significant fossils found during construction by prompt removal and/or stabilization whenever feasible; and 6. Cataloguing and curation of all artifacts and records detailing the results of the investigations at a recognized, nonprofit paleontological specimen repository with permanent curator, such as a museum or university, or at the discretion of the paleontologist, at a City-approved facility. At the conclusion of paleontological monitoring, the City-approved paleontologist shall prepare a final Paleontological Resources Monitoring Report that documents the implementation of the PRMP, as well as any paleontological resources discoveries, and submit the final report to the City.	Less than Significant
GEO Cumulative Impacts: Implementation of mitigation measures would reduce all project-level impacts to geological resources to less than cumulatively considerable.	Implement GEO/mm-5.1 and GEO/mm-5.2.	Less than Cumulatively Considerable

Impacts	Mitigation Measures	Residual Impacts
Hazards, Hazardous Materials, and Wildfire		
HAZ Impact 1: The project may involve the transport and use of hazardous materials, but compliance with mandatory regulatory requirements pertaining to these activities would ensure that this would not create a significant hazard to the public or the environment.	Mitigation is not required.	Less than Significant
HAZ Impact 2: Construction demolition, grading, and trenching activities would have the potential to create a significant hazard to workers and the public and/or the environment through the accidental release of asbestos containing materials, lead-based paint, and/or contaminated soils.	Implement Mitigation Measure **AQ/mm-4.1**. **HAZ/mm-2.1:** Prior to demolition and removal of the existing boiler plant facility, the Applicant shall prepare and submit a contaminated soil removal and disposal plan to be reviewed and approved by the City of Paso Robles and the County of San Luis Obispo Environmental Health Services (SLOEHS) and/or State Water Resources Control Board (SWRCB) or California Department of Toxic Substance Control (DTSC), as directed by the SLOEHS. The plan shall describe the volume and extent of all diesel-impacted soils with contamination levels exceeding Department of Toxic Substances Control Screening Levels to be fully excavated and disposed of at a solid waste facility approved to accept it. Should the regulatory agency(ies) require additional soil vapor testing before or after removal of contaminated soils, the Applicant shall use the 2020 Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion prepared by DTSC and the SWRCB, unless directed otherwise by the regulatory agency(ies), and if warranted address vapor conditions to the satisfaction of regulatory agencies prior to the issuance of a building permit in affected areas. **HAZ/mm-2.2:** Prior to use of the maintenance building, the City of Paso Robles shall evaluate the indoor soil vapor concentrations using the 2020 Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion prepared by California Department of Toxic Substance Control (DTSC) and the State Water Resources Control Board (SWRCB). Specifically, the evaluation shall use an attenuation factor of 0.03 and shall include soil sample location within the area of the spray booth, and if warranted address vapor conditions to the satisfaction of regulatory agencies prior to the issuance of a building permit in affected areas. **HAZ/mm-2.3:** Prior to demolition of any structure, the Applicant shall retain a qualified contractor to survey all electrical transformers onsite either in use or in storage. The contractor shall determine the polychlorinated biphenyl (PCB) content using name plate information, or through sampling if name-plate data does not provide adequate information regarding the PCB content of the dielectric equipment. The Applicant shall retain a qualified contractor to remove and dispose of all transformers in accordance with the requirements of Title 40 of the Code Federal of Regulations, Section 761.60 and the Title 22 of the California Code of Regulations, Section 66261.24 or related regulations in effect at the time of demolition. The removal shall be completed in advance of any building demolition.	Less than Significant

Impacts	Mitigation Measures	Residual Impacts
	HAZ/mm-2.4: In the event that leakage is observed in the vicinity of a transformer containing greater than 50 parts per million polychlorinated biphenyls (PCBs) (determined in accordance with Title 40 of the Code of Federal Regulations [CFR], Section 761.61(a)), or the leakage has resulted in visible staining of the building materials or surrounding surface areas, the Applicant shall retain a qualified professional to obtain samples of the building materials for the analysis of PCBs in accordance with 40 CFR Part 761. If PCBs are identified at a concentration of 1 part per million, then the Applicant shall retain a contractor to clean the surface to a concentration of 1 part per million or less in accordance with 40 CFR Section 761.61(a) or related regulations in effect at the time of demolition. The sampling and cleaning shall be completed in advance of any building demolition activities in areas containing electrical transformers. **HAZ/mm-2.5:** In the event that leakage is observed in the vicinity of a polychlorinated biphenyl (PCB)-containing transformer that has resulted in visible staining of the surrounding soil (determined in accordance with Title 40 of the Code of Federal Regulations [CFR], Section 761.61(a)), the Applicant shall retain a qualified professional to obtain soil samples for the analysis of PCBs in accordance with 40 CFR Part 761. If PCBs are identified at a concentration less than the commercial/industrial Environmental Screening Level of 0.94 milligrams per kilogram, then no further action shall be required. If PCBs are identified at a concentration greater than or equal to the commercial/industrial Environmental Screening Level of 0.94 milligrams per kilogram, then the Applicant shall prepare and submit a contaminated soil removal and disposal plan to be reviewed and approved by the City of Paso Robles and County of San Luis Obispo Environmental Health Services (SLOEHS). The plan shall describe the volume and extent of all PCB-impacted soils to be fully excavated and disposed of at a solid waste facility approved to accept it. **HAZ/mm-2.6:** Prior to grading or trenching activities in areas of potentially contaminated groundwater, the Applicant shall obtain current shallow-zone groundwater monitoring readings from the onsite groundwater monitoring wells. The readings shall be provided to the City of Paso Robles (City) and the County of San Luis Obispo Environmental Health Services (SLOEHS) and/or State Water Resources Control Board (SWRCB) or California Department of Toxic Substance Control (DTSC), as directed by the SLOEHS for evaluation. The readings shall include concentration numbers for both TPH compounds and total dissolved solids, including concentrations of calcium, magnesium, sodium, chloride. The Applicant shall implement all requirements and recommendations of the regulatory agency(ies), if any, related to remediation of contaminated groundwater. Remediation, if required by the regulatory agency(ies) shall occur prior to grading or trenching activities, unless an alternative timeframe is specified by the regulatory agency(ies). The Applicant shall provide written documentation to the City showing that either no remediation is needed as confirmed by the regulatory	

Impacts	Mitigation Measures	Residual Impacts
	agency(ies) or the site cleanup has been approved by the regulatory agency(ies). **HAZ/mm-2.7:** Prior to grading, trenching, or excavation of soils within 10 feet of Airport Road, Dry Creek Road, or Landing Lane, the City of Paso Robles (City) shall retain a qualified consultant to determine the lead concentrations of soil that would be disturbed. Soils with lead concentrations less than 80 mg/kg may be excavated and/or reused without restrictions. If soils are encountered with lead concentrations greater than or equal to 80 mg/kg, the Applicant shall request written approval from California Department of Toxic Substance Control (DTSC) prior to reuse of the soils and shall comply with all requirements requested from DTSC. Alternatively, if soils are encountered with lead concentrations greater than or equal to 80 mg/kg, the Applicant may elect to excavate and dispose of such soils at a waste facility approved to accept it. The Applicant shall prepare and submit a contaminated soil removal and disposal plan to be reviewed and approved by the City and the County of San Luis Obispo Environmental Health Services (SLOEHS). The plan shall describe the volume and extent of all lead-impacted soils with contamination levels exceeding Department of Toxic Substances Control Screening Levels to be fully excavated and disposed of at a solid waste facility approved to accept it.	
HAZ Impact 3: The project may require the use of anhydrous ammonia if cold storage in the warehouse occurs.	Mitigation is not required.	Less than Significant
HAZ Impact 4: The project would not be located on a site that is included on a list of hazardous materials sites creating a significant hazard to the public or the environment.	Mitigation is not required.	Less than Significant
HAZ Impact 5: The project would have the potential to result in an increased potential for wildlife collision hazards associated with the proposed detention basin and proximity to the Paso Robles Municipal Airport.	**HAZ/mm-5.1:** The proposed detention basin shall be designed, engineered, constructed, and maintained for a maximum 48-hour detention period after the design storm and to remain completely dry between storms. To reduce wildlife attraction to the basin, the basin shall be steep sided, concrete (or rip rap) lined, and linear shaped. The City of Paso Robles Engineer shall review and approve the basin design prior to issuance of a permit to construct the basin. The Applicant or its successor in interest shall be required to maintain the detention basin so that it is free of standing water, emergent vegetation, and submergent vegetation.	Less than Significant
HAZ Impact 6: The project would not result in excessive airport noise for people working or residing in the project area.	Mitigation is not required.	Less than Significant
HAZ Impact 7: The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Mitigation is not required.	Less than Significant
HAZ Impact 8: The project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.	Mitigation is not required.	Less than Significant

Impacts	Mitigation Measures	Residual Impacts
HAZ Cumulative Impacts: Implementation of mitigation measures would reduce all project-level impacts to hazards to less than cumulatively considerable	Implement Mitigation Measures **HAZ/mm-2.1 through HAZ/mm-2.4**.	Less than Cumulatively Considerable
Hydrology and Water Quality		
HYD Impact 1: Construction and operation of the project may have the potential to result in new sources of pollutants that may lead to degradation of water quality within the project area.	**HYD/mm-1:** Prior to the issuance of tract improvement plans, grading permits, or building permits, the Applicant shall prepare and submit a Stormwater Pollution Prevention Plan (SWPPP) according to General Permit Order 2009-0009 for approval by the City of Paso Robles (City) Public Works Department and the Central Coast Regional Water Quality Control Board (RWQCB). The SWPPP shall include best management practices (BMPs) to reduce erosive and polluted runoff during all phases of project construction. BMPs shall be approved by the City and Central Coast RWQCB along with the SWPPP. BMPs may include, but are not limited to, erosion and sediment controls and vehicle and equipment monitoring and maintenance, as identified below: 1. Erosion and sediment controls, including silt fences, straw wattles, berms, sediment basins, runoff diversions, or other erosion control measures approved by the Central Coast RWQCB shall be installed properly to increase effectiveness of the SWPPP and shall be maintained regularly during the project's construction. 2. Construction equipment and vehicles shall be checked and maintained daily by the construction contractors to prevent spills of fuel, oil, and other hazardous materials. A designated staging area shall be established on the project site for construction vehicle and equipment parking and storage of fuel, lubricants, and solvents. Any staging areas for the offsite improvements that cannot be accommodated onsite shall be located a minimum of 50-feet from Huer Huero Creek. All fueling and maintenance activities shall take place in the designated staging area(s). Compliance with the SWPPP during project construction shall be monitored by the City's Public Works Department during all construction phases.	Less than Significant
HYD Impact 2: Implementation of the project would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	Mitigation is not required.	Less than Significant
HYD Impact 3: Implementation of the project may alter existing drainage patterns or result in new impervious surfaces onsite, in a manner that may result in erosion or siltation on- or offsite.	Implement Mitigation Measures **HYD/mm-1.1 and GEO/mm-2.1**.	Less than Significant with Mitigation
HYD Impact 4: Implementation of the project may alter existing drainage patterns or result in new impervious surfaces onsite, in a manner that may result in flooding onsite or offsite.	Mitigation is not required.	Less than Significant

Impacts	Mitigation Measures	Residual Impacts
HYD Impact 5: Implementation of the project may alter existing drainage patterns or result in new impervious surfaces onsite, in a manner that may exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff.	Mitigation is not required.	Less than Significant
HYD Impact 6: Implementation of the project may alter existing drainage patterns or result in new impervious surfaces onsite, in a manner that would impede or redirect flood flows.	Mitigation is not required.	Less than Significant
HYD Impact 7: The project would not be located in a flood hazard, tsunami, or seiche zones, that would put the project at risk of release of pollutants due to project inundation.	Mitigation is not required.	Less than Significant
HYD Impact 8: The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Implement Mitigation Measure **HYD/mm-1.1**.	Less than Significant
HYD Cumulative Impacts: The project, in combination with approved, pending, and other proposed development within the city, has the potential to result in cumulative water quality impacts to the Huer Huero Creek watershed and other watersheds within the city and to decrease groundwater recharge within the city. Implementation of mitigation measures would reduce all project-level impacts to hydrology and water quality to less than cumulatively considerable	Implement Mitigation Measures **HYD/mm-1.1** and **GEO/mm-2.1**.	Less than Cumulatively Considerable
Land Use and Planning		
LUP Impact 1: The project would be inconsistent with land use plans, policies, and regulations related to noise and VMT. The inconsistencies related to VMT policies would result in significant environmental impacts.	Implement the mitigation measures identified in this EIR.	Significant and Unavoidable
LUP Cumulative Impacts: The project would result in cumulatively considerable impacts associated with inconsistency with applicable land use and planning policies.	Implement the mitigation measures identified in this EIR.	Cumulatively Considerable
Noise		
N Impact 1: Construction activities for the proposed project would generate a substantial temporary increase in ambient noise levels and operation of the project would result in a permanent increase in ambient noise levels from warehouse and loading dock activities and an increase in roadway and vehicle traffic.	**N/mm-1.1:** The following measures shall be implemented to reduce short-term construction noise impacts: 1. The proposed screening wall to be located along the western boundary of the project site shall be constructed after the completion of onsite demolition, site preparation, and site grading activities for the Phase 1 Warehouse (Lot 32) and prior to the	Significant and Unavoidable

Impacts	Mitigation Measures	Residual Impacts
	issuance of building permits for the Phase 1 Warehouse (Lot 32). (Note: per N/mm-1.2(3), if the loading docks are adjacent to the western property line, the wall shall be constructed to a minimum height of 12 feet above ground level as measured from the inside face of the wall and shall be constructed of concrete, masonry block, or material of similar density and usage.) 2. Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday, where possible. Construction activities are prohibited on Sundays and legal holidays. In the event concrete pouring is necessitated during nighttime hours due to ambient air temperatures that are too hot to cure the concrete during daytime hours, the Applicant shall inform the occupants of the nearest offsite residence to the west a minimum of 30 days before nighttime construction commences and shall provide for alternative overnight accommodations (e.g., hotel room) for the occupants of the offsite residence to the west over the course of the nighttime work. Whether the occupants choose to accept the alternative overnight accommodations or not is beyond the control of the Applicant. 3. Construction equipment shall be properly maintained and equipped with exhaust mufflers and engine shrouds in accordance with manufacturers' recommendations. 4. To the extent locally available, electrified or alternatively powered construction equipment shall be used. 5. Construction equipment staging areas shall be located at the furthest distance possible on the construction site from nearby noise-sensitive land uses. 6. Stationary construction noise sources such as generators, pumps, and pavement crushers, shall be located at the furthest distance possible from noise sensitive uses. **N/mm-1.2:** The following measures shall be implemented to reduce long-term exposure of sensitive receptors to stationary-source noise levels associated with the Phase 1 Warehouse: 1. Warehouse loading docks shall be fitted with door seals and bumpers, which the City of Paso Robles (City) shall verify are included as part of the building permits issues for the warehouse. When loading docks are not in use, loading dock doors shall remain closed, which shall be made a requirement of the warehouse operator(s) lease agreement. 2. Loading docks that service refrigerated warehouse space shall be equipped with electrical hookups for trailers equipped with transport refrigeration units (TRU) or auxiliary power units to	

Impacts	Mitigation Measures	Residual Impacts
	minimize truck idling, which the City shall verify will be included as part of the building permit issuance process. 3. If loading docks are located adjacent to the western property line, or face the western property line without intervening development, the proposed screening wall shall be constructed to a minimum height of 12 feet above ground level. The proposed screening wall shall be constructed of concrete, masonry block, or material of similar density and usage. 4. The proposed trash compactors and diesel pump motor shall be enclosed. 5. The City shall require the preparation of acoustical assessments for the installation of major stationary noise sources (e.g., back-up power generators, air conditioning condensers) to be located within exterior areas and within 600 feet of a sensitive receptor. The acoustical assessments shall evaluate potential noise impacts to nearby noise-sensitive land uses. Where the acoustical analysis determines that stationary-source noise levels would exceed applicable noise standards of 50 A weighted decibel (dBA) energy-equivalent noise level (Leq) during the daytime and 45-dBA Leq during the nighttime at the project site property line, site-design features/noise-reduction measures shall be incorporated sufficient to reduce operational noise levels to below these applicable noise standards. Such measures may include, but are not limited to, the incorporation of setbacks of from the property line to the stationary noise source, installation of sound barriers, the imposition of operation limitations on equipment producing stationary source noise during nighttime hours, or the provisions of equipment enclosures. **N/mm-1.3:** The following measures shall be implemented to reduce long-term exposure to stationary-source noise levels associated with the Phase 2 Commercial Office, Hotel, and Retail Uses: 1. For development proposed within 150 feet of the hotel planned in the Phase 2 area, the City of Paso Robles (City) shall require acoustical assessments to be prepared and submitted for City review and approval as part of the land use or building permit approval process. The acoustical assessments shall evaluate potential noise impacts to the hotel if it exists or the planned hotel site if the hotel has not yet been constructed. Where the acoustical analysis determines that stationary source noise levels would exceed applicable noise standards, site-design features/noise-reduction measures shall be incorporated sufficient to reduce operational noise levels to below applicable noise standards. Such measures may include but are not limited to, the incorporation of setbacks from the hotel to the stationary noise source, the installation of sound barriers, the imposition of operational limitations on equipment producing stationary source noise during	

Impacts	Mitigation Measures	Residual Impacts
	nighttime hours, or the provision of equipment enclosures. The emphasis of such measures shall be placed upon site planning and project design.	
N Impact 2: The project would not result in the generation of excessive short- or long-term groundborne vibration or noise levels.	Mitigation is not required.	Less than Significant
N Impact 3: The project is located within the vicinity of an airport; however, aircraft noise levels would be below the established exposure threshold for interior and exterior areas for noise-sensitive land uses and implementation of the proposed project would not expose people residing or working in the project area to excessive noise levels.	Mitigation is not required.	Less than Significant
N Cumulative Impacts: Project impacts associated with increased ambient noise levels would be cumulatively considerable.	Implement Mitigation Measures **N/mm-1.1 through N/mm-1.3**.	Significant and Unavoidable
Population and Housing		
PH Impact 1: The project would not result in direct unplanned population growth.	Mitigation is not required.	Less than Significant
PH Impact 2: Construction-related activities would necessitate up to 1,052 construction workers. These workers would not induce substantial unplanned population growth because their duration at the project site would be short-term and/or temporary.	Mitigation is not required.	Less than Significant
PH Impact 3: The project would increase the City's job-to-housing ratio by creating more permanent jobs and not creating new housing units. The increase in the job-to-housing ratio would not result in adverse physical changes to the environment or unplanned population growth.	Mitigation is not required.	Less than Significant
PH Cumulative Impacts: Project impacts associated with population and housing would be less than cumulatively considerable.	Mitigation is not required.	Less than Cumulatively Considerable
Public Services and Recreation		
PS Impact 1: The project would increase demand on Paso Robles Emergency Services for fire protection services, but new or expanded facilities would not be needed.	Mitigation is not required.	Less than Significant
PS Impact 2: The project would increase demand on the Paso Robles Police Department for police protection services, but new or expanded facilities would not be needed.	Mitigation is not required.	Less than Significant

Impacts	Mitigation Measures	Residual Impacts
PS Impact 3: The project would not significantly increase demand on school facilities, new or expanded facilities would not be needed, and impacts would be offset by collection of state-mandated Development Impact Fees.	Mitigation is not required.	Less than Significant
PS Impact 4: The project would not significantly increase demand on public park facilities and new or expanded facilities would not be needed.	Mitigation is not required.	Less than Significant
PS Impact 5: The project would increase demand for library services, but new or expanded facilities would not be needed.	Mitigation is not required.	Less than Significant
PS Cumulative Impacts: Project impacts associated with public services would be less than cumulatively considerable.	Mitigation is not required.	Less than Cumulatively Considerable
REC Impact 1: The project would not significantly increase demand on the public park and recreation facilities resulting in substantial physical deterioration of such facilities.	Mitigation is not required.	Less than Significant
REC Impact 2: The project would not require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.	Mitigation is not required.	Less than Significant
REC Cumulative Impacts: Project impacts associated with recreation would be less than cumulatively considerable.	Mitigation is not required.	Less than Cumulatively Considerable
Traffic and Transportation		
TR Impact 1: The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	**TR/mm-1.1:** Prior to the issuance of any permit or approval that authorizes road construction in the project site, the following design features shall be indicated on the plans and shall be installed as part of road construction. 1. Internal intersections shall be designed to reduce skew angles and provide adequate sight distance consistent with the California Department of Transportation (Caltrans) Highway Design Manual. Roads shall intersect as close to 90 degrees as possible and shall not be less than 75 degrees. 2. Direct sidewalk connections shall be accommodated between all buildings and along the internal roadway network. Crosswalks at roadway intersections internal to the project site shall be required to be marked at delineated crosswalks. The marking type (by paint or other material) shall be approved by the City of Paso Robles (City). 3. The City shall review and approve turning templates at intersections to confirm that two-way truck traffic with the largest anticipated truck size can be accommodated without overlapping turning movements.	Less than Significant with Mitigation

Impacts	Mitigation Measures	Residual Impacts
	4. A north–south roadway shall be installed at the border of Phase 1 and 2 to connect to Landing Lane to provide an improved connection to Hughes Parkway to the south. 5. A connection to the Winery Row/Hughes Parkway intersection shall be provided for. 6. Outbound left turns shall be restricted at project driveways except the northernmost driveway and Dry Creek Road (Landing Lane). 7. Two outbound lanes shall be provided at the northernmost east/west driveway. 8. A traffic signal or roundabout shall be installed at the intersection of Airport Road/Dry Creek Road (Landing Lane) that will accommodate cumulative traffic volumes with project traffic. The Applicant shall be responsible for the installation of the signal or roundabout prior to the issuance of an occupancy permit for the Phase 1 warehouse or for any other building that would take driveway access from Dry Creek Road.	
TR Impact 2: The Phase 2 retail and hotel uses would result in a net increase in regional vehicle miles traveled (VMT) and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b). Additionally, a substantial number of Phase 1 warehouse employees are anticipated to live outside of Paso Robles, which would result in long commute trips.	Implement Mitigation Measure **AQ/mm-1.1**.	Significant and Unavoidable
TR Impact 3: The project would introduce additional unprotected left-turning truck and vehicle traffic onto State Route 46 East (SR 46E), which has high speeds and collision rates greater than the state average.	**TR/mm-3.1:** Prior to occupancy of any use on the project site, except the existing maintenance building, that would cause more than 30 PM weekday peak hour outbound trips to be generated by uses on the project site, the parallel route north of State Route 46 East (SR 46E) (Huer Huero Creek Bridge and New Airport Road) or functional equivalent shall be constructed. Southbound left turns at the Airport Road and SR 46E intersection shall be restricted. **TR/mm-3.2:** The Applicant shall install improvements at the Airport Road intersection restricting southbound left turns onto State Route 46 East (SR 46E). The southbound left turn restrictions shall be operational prior to issuance of occupancy for any building except the existing maintenance building. The Applicant is responsible for design, permitting, and construction of the improvements. An encroachment permit shall be obtained from the California Department of Transportation (Caltrans) prior to construction. The Applicant may submit a request to the City of Paso Robles (City) City Council to approve a reimbursement agreement for the installation of the left turn restriction improvements, which the City Council may approve or deny at their sole discretion. The reimbursement agreement will apply to other development projects benefiting from the improvements. The reimbursement agreement cost allocation shall be based on total building square footage, or another appropriate cost allocation method, as determined by the City	Significant and Unavoidable

Impacts	Mitigation Measures	Residual Impacts
	Engineer. The City Engineer has evaluated the proposed and pending projects in the area and building square footage is a reasonable means of determining traffic payments as the square footage correlates reasonably to those project's trip generation derived from the Institute of Transportation Engineers (ITE) trip estimates for similar sizes and uses. The Applicant is responsible for all costs associated design and construction of the identified and constructed improvement. If the intersection improvements are constructed by others, the Applicant shall be responsible for payment of any reimbursement agreement cost allocation in place, prior to occupancy for any building except the existing maintenance building.	
TR Impact 4: The project would exacerbate queuing deficiencies and create new queuing deficiencies at intersections during peak travel hours. The queuing deficiencies would exceed the storage capacity of the intersections and would create safety issues from queuing spillover into through lanes or into deceleration areas.	**TR/mm-4.1:** The Applicant shall prepare a focused traffic evaluation that evaluates the State Route 46 East (SR 46E) corridor between Golden Hill Road and Jardine Road, the Golden Hill Road corridor from Wisteria Lane to Union Road, and the Airport Road corridor between the project site and SR 46E. The Applicant shall prepare the focused traffic evaluation once any of the following occur: 1. After construction and completion of the modified Class I Multiuse Trail low water crossing or Huer Huero Creek Bridge (TR/mm-3.1), whichever occurs first, and occupancy of the Phase 1 Warehouse. 2. After construction and completion of the modified Class I Multiuse Trail low water crossing for vehicular use or the Huer Huero Creek Bridge (TR/mm-3.1) and issuance of any building permit(s) that would cumulatively exceed 965 weekday PM peak hour trips based on the Transportation Impact Study prepared by Central Coast Transportation Consulting and used for evaluation in the Environmental Impact Report for the project. For purposes of the focused traffic evaluation, PM peak hour trips shall include PM peak hour trips from truck traffic, which shall be converted to passenger car equivalents. The focused traffic evaluation shall collect, at a minimum, 24-hour driveway counts to determine trip generation numbers for the uses already constructed and in operation. The evaluation shall identify whether any additional development may be constructed and operated, based upon the above noted threshold levels and pursuant to City of Paso Robles (City) and California Department of Transportation (Caltrans) standards. The focused traffic evaluation shall also evaluate: 1. SR 46E/Union Road: evaluate operations and implement left turn lane restrictions if storage capacity is exceeded. 2. SR 46E/Golden Hill Road: evaluate signal timing, reflective backplates, additional dynamic signage, overlap phases, turn lane extensions, and additional lanes. The analysis shall include added traffic from SR 46E/Union Road turn restrictions (see 1., above).	Significant and Unavoidable

Impacts	Mitigation Measures	Residual Impacts
	3. SR 46E/Airport Road: evaluate intersection operations and implement left turn lane restrictions if storage capacity is exceeded. 4. SR 46E/Jardine Road: evaluate intersection operations and implement intersection control changes or turn restrictions if storage capacity is exceeded. 5. Golden Hill Road/Golden Hill Plaza: evaluate signal timing and phasing and consider turn restrictions. 6. Golden Hill Road/Tractor Street: evaluate operations and traffic signal warrants. 7. Golden Hill Road/Tractor Street and Golden Hill Road/Wisteria: evaluate operations and all-way stop control and traffic signal warrants. 8. Golden Hill Road/Union Road: evaluate operations and determine if a dual lane roundabout is needed with future project traffic. 9. Airport Road/Dry Creek Road (Landing Lane): evaluate intersection operations and restrict eastbound left turns on Winery Road if needed. Determine if intersection improvements will accommodate future project traffic. 10. SR 46E Overcrossing (Traffic Operations Analysis Report [TOAR] Alternative 1 or functional equivalent as determined by Caltrans and the City Engineer): evaluate if queuing on SR 46 E, Golden Hill Road, and/or Airport Road can be accommodated with intersection improvements. If queuing cannot be accommodated with intersection improvement, construct TOAR Alternative 1 or a functional equivalent. If the City Engineer finds that the focused traffic evaluation determines that additional uses may be constructed and operational without additional circulation system improvements, the occupancy permit may be issued. If additional circulation system improvements are needed, the occupancy permit shall not be issued until subsequent additional focused traffic evaluations are prepared for each successive use and the Applicant either contributes fair share funding for the needed improvements or constructs the improvements. The City Engineer shall be responsible for determining which improvements are subject to fair share payments or construction.	
TR Impact 5: The project would not result in inadequate emergency access.	Mitigation is not required.	Less than Significant
TR Cumulative Impacts: Project impacts associated with the increase of VMT and safety impacts associated with queuing deficiencies would be cumulatively considerable.	Implement Mitigation Measures **AQ/mm-1.1**, **TR/mm-1.1**, **TR/mm-3.1**, **TR/mm-3.2**, and **TR/mm-4.1**.	Significant and Unavoidable

Impacts	Mitigation Measures	Residual Impacts
Utilities, Service Systems, and Energy		
USS Impact 1: The project would not require relocation or construction of new or expanded City water facilities.	Mitigation is not required.	Less than Significant
USS Impact 2: The project would require installation of a new, increased capacity wastewater line from the project site to City Lift Station #12.	Implement Mitigation Measures **AQ/mm-1.3**, **AQ/mm-2.1**, **AQ/mm-2.2**, **AQ/mm-6.1**, **BIO/mm-3.1** through **BIO/mm-3.5**, **BIO/mm-3.7**, **BIO/mm-3.8**, **BIO/mm-3.10** through **BIO/mm-3.13**, **CUL/mm-2.1** through **CUL/mm-2.3**, **GEO/mm-5.1**, **GEO/mm-5.2**, **HAZ/mm-2.4**, and **N/mm-1.1**.	Less than Significant
USS Impact 3: The project would require installation of a storm drain line from the project site's stormwater basin to a new outfall within the Huer Huero Creek.	Implement Mitigation Measures **AQ/mm-1.3**, **AQ/mm-2.1**, **AQ/mm-2.2**, **AQ/mm-6.1**, **BIO/mm-3.1** through **BIO/mm-3.5**, **BIO/mm-3.7**, **BIO/mm-3.8**, **BIO/mm-3.10** through **BIO/mm-3.13**, **CUL/mm-2.1** through **CUL/mm-2.3**, **GEO/mm-5.1**, **GEO/mm-5.2**, **HAZ/mm-2.4**, and **N/mm-1.1**.	Less than Significant
USS Impact 4: The project would not require the installation of new or expanded electric power, natural gas, or telecommunication facilities.	Mitigation is not required.	Less than Significant
USS Impact 5: The City has sufficient water supplies available to serve the project during both normal and drought years.	Mitigation is not required.	Less than Significant
USS Impact 6: The City Wastewater Treatment Plant has adequate capacity to serve the project's wastewater demands.	Mitigation is not required.	Less than Significant
USS Impact 7: The project would not generate waste in excess of the capacity of local landfills.	Mitigation is not required.	Less than Significant
USS Impact 8: The project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	Mitigation is not required.	Less than Significant
USS Cumulative Impacts: Project impacts associated with utilities and service systems would be less than cumulatively considerable.	Mitigation is not required.	Less than Cumulatively Considerable
ENG Impact 1: The project would result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources.	Implement Mitigation Measure **AQ/mm-2.1** and **GHG/mm-1.1**.	Less than Significant
ENG Impact 2: The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	Mitigation is not required.	Less than Significant
ENG Cumulative Impacts: Project impacts associated with energy would be less than cumulatively considerable.	Mitigation is not required.	Less than Cumulatively Considerable

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CHAPTER 1. INTRODUCTION

The City of El Paso de Robles (City), as the Lead Agency, has determined, based on the preliminary analysis of the Initial Study (IS; *Appendix A, Initial Study and Notice of Preparation*), that an Environmental Impact Report (EIR) is the appropriate environmental document pursuant to the California Environmental Quality Act (CEQA) for The Landing Paso Robles (project). This EIR examines the potential environmental effects of planning, constructing, and operating the proposed project, which involves the phased redevelopment of the former California Department of Corrections and Rehabilitation (CDCR) Estrella Youth Correctional Facility (Paso Robles Boys School). The project includes the demolition of the existing uses on the project site and redevelopment of the property with a warehouse distribution center (Phase 1) and a mix of other uses, including offices, industrial-flex space, a hotel, retail uses, food and beverage spaces, a restaurant, maker spaces, a market hall, a winery, vineyard-agriculture spaces, and park spaces (Phase 2), in addition to the expansion of a maintenance facility that currently exists on the property for City use. Offsite infrastructure to service the project also is included as part of the project evaluated herein. The City prepared this EIR with assistance from their environmental planning consultant—SWCA Environmental Consultants (SWCA)—and the content of the document reflects the independent judgment of the City.

Majestic Realty Co. (Applicant) is seeking entitlements for a General Plan Amendment (GPA); a Zone Change; a Vesting Tentative Tract Map (VTTM); a Conceptual Master Development Plan, including Design Guidelines; a specific Development Plan for Phase 1 of the project; an Oak Tree Removal permit; and a Development Agreement between the Applicant and the City. Future entitlements would include individual Conditional Use Permits (CUPs) or Planned Development applications, as appropriate, for the individual developments envisioned for Phase 2 of the Conceptual Master Development Plan. The project is described in further detail in *Chapter 2, Project Description*.

1.1 PURPOSE OF THE EIR

An EIR is a public informational document used in the planning and decision-making process for discretionary projects. Several of the proposed project's entitlements are discretionary and require approval by the City Council; therefore, the project is subject to the requirements of CEQA. This project-level EIR analyze the environmental impacts of the proposed project (see *Chapter 2, Project Description*, for the full description of the proposed project). The City Planning Commission and City Council will consider the information in this EIR, including the public comments and the City's responses to those comments, during the public hearing process. The final decision is made by the City Council, which may approve, conditionally approve, or deny the project.

The purpose of an EIR is to:

- identify a project's potential impacts on the environment and indicate the manner in which those significant impacts can be avoided or mitigated;
- identify any unavoidable impacts of the project that cannot be mitigated; and
- identify reasonable and feasible alternatives to the project that would eliminate any significant environmental impacts or reduce the impacts to a less-than-significant level.

An EIR also discloses the potential for growth-inducing impacts, impacts found not to be significant, and significant cumulative impacts of past, present, and reasonably foreseeable future projects. CEQA requires an EIR to reflect the independent judgment of the lead agency with respect to impacts, disclose the level of significance of the impacts both with and without mitigation, and describe mitigation measures proposed to reduce the impacts. An EIR is circulated to responsible agencies, trustee agencies

with resources affected by the project, and interested agencies and individuals. The review process gives both agencies and individuals an opportunity to share expertise, discuss agency analyses, check for accuracy, detect omissions, discover public concerns, and solicit mitigation measures and alternatives capable of avoiding or reducing the significant effects of the project while still attaining most of the basic objectives of the project.

Reviewers of an EIR are requested to focus on the sufficiency of the document (i.e., the thoroughness of its identification and analysis of possible impacts on the environment as well as ways to avoid or mitigate such impacts). Comments are most helpful when they suggest better ways to avoid or mitigate significant environmental impacts (e.g., through additional alternatives or mitigation measures).

1.2 SCOPING AND NOTICE OF PREPARATION PROCESS

Pursuant to State CEQA Guidelines Section 15082, as amended, the City circulated a Notice of Preparation (NOP)/IS to responsible, trustee, and affected agencies and other interested parties for a 30-day public review period that began on May 21, 2021, and ended on June 21, 2021. The NOP/IS was also posted in the County of San Luis Obispo (County) Clerk-Recorder's office for 30 days and sent to the State Clearinghouse at the Governor's Office of Planning and Research to solicit statewide agency participation in determining the scope of the EIR. The purpose of the NOP/IS was to formally convey that the City, as the Lead Agency under CEQA, solicited input regarding the scope and proposed content of the EIR. The NOP/IS and all comment letters are provided in Appendix A of this EIR.

Pursuant to State CEQA Guidelines Section 15082 (c)(1), for projects of statewide, regional, or areawide significance, the lead agency is required to conduct at least one scoping meeting. The scoping meeting is for jurisdictional agencies and interested persons or groups to provide comments regarding, but not limited to, the range of actions, alternatives, mitigation measures, and environmental effects to be analyzed. The City hosted a scoping meeting at 6:30 p.m. on May 25, 2021, via teleconference and telephone, and at 6:30 p.m. on June 15, 2021, via teleconference and telephone. Verbal comments were received at both scoping meetings. The NOP/IS and all comments received are included in Appendix A.

Section 15123 of the CEQA Guidelines states that an EIR shall identify areas of controversy known to the Lead Agency, including issues raised by the agency and the public. Based on comments received during the public hearings and NOP comment period, the following issues are known to be of concern and may be controversial. Each issue is discussed further in the EIR:

- General increase of traffic and congestion from vehicles and trucks, especially on Airport Road, Golden Hill Road, and State Route 46 East (SR 46E);
- Increase of airplanes, especially over residential areas (note that although this was brought up as an issue during scoping, the project does not propose the use of airplanes and use of airplanes is not analyzed in the EIR);
- Safety related to turning movements onto and from SR 46E;
- Parking availability and heat magnification from unshaded parking areas;
- Light pollution and loss of the relatively dark sky in the project vicinity;
- Height of the proposed structures;
- Air pollution related to increased traffic and truck idling;
- Adequacy of utility infrastructure and dependent resources, including water supply and the availability of water resources for continued farming activities, and sewer capacity;

- Indirect population increases and the associated need for additional educational facilities, specifically a second high school;
- Existing site hazards and soil contamination from the previous military and institutional uses on the site;
- Stormwater runoff;
- Energy use; and
- The need for amenities for employees, such as daycares.

Substantive items raised in response to the NOP and during the scoping meetings are summarized below in Table 1-1. The purpose of this table is to present a summary of the comments and is not intended to list every comment received by the City during the NOP review period. Regardless of whether or not an environmental or CEQA-related comment is listed in the table, all relevant comments received in response to the NOP and during the EIR scoping meetings are addressed in this EIR.

Table 1-1. NOP Comments and Area in the EIR where Comment is Addressed

Commentor Name	Summary of Comment	Area in EIR Comment is Addressed
Federal Emergency Management Agency	• Information regarding constructing within a floodplain	• Information on floodplain impacts can be found in *Section 4.8, Hydrology/Water Quality*
California Department of Conservation Geologic Energy Management Division	• Informational comment regarding no known oil/gas wells and information regarding the Division's authority	• N/A (no environmental issues raised)
California Department of Toxic Substances Control	• Information about known hazards related to the former Estrella Airfield and comments about unknown hazards at the project site	• Information on impacts related to hazards and hazardous materials can be found in *Section 4.7, Hazards/Hazardous Materials*
California Department of Transportation	• Information regarding metric for identifying transportation impacts and policy on collecting traffic data	• Information on traffic impacts, including methodology for the Transportation Impact Study, can be found in *Section 4.13, Transportation*
California Native American Heritage Commission	• Informational comment regarding tribal consultation and preparation of cultural resource assessments	• N/A (no environmental issues raised)
San Luis Obispo County Air Pollution Control District	• Comments regarding air quality emissions, sensitive receptors, cumulative impacts, alternatives • Comments regarding greenhouse gas emissions, including modeling, interim guidance, consistency with the City's Climate Action Plan	• Information on air quality impacts and greenhouse gas emissions can be found in *Section 4.3, Air Quality/Greenhouse Gas Emissions*
N/A	• Excited for project and increased safety.	• N/A (no environmental issues raised)
N/A	• Increase in airport (airplane) traffic	• The project does not propose to use airplanes
B G	• Water supply and impacts on the basin	• Information on impacts to the water supply can be found in *Section 4.14, Utilities/Service Systems/Energy*
James	• Increase in airport (airplane) traffic and truck traffic	• Information on traffic impacts can be found in *Section 4.13, Transportation* • The project does not propose to use airplanes
Karen	• Increase in airport (airplane) traffic and truck traffic	• Information on traffic impacts can be found in *Section 4.13, Transportation* • The project does not propose to use airplanes

Commentor Name	Summary of Comment	Area in EIR Comment is Addressed
Rich	• Occupants and use unknown • Unknown auto/truck/air traffic without a defined user	• Information on the proposed uses can be found in *Chapter 2, Project Description* • Information on traffic impacts can be found in *Section 4.13, Transportation*
Serena	• Height of buildings • Congestion on Golden Hill Road and egress to SR 46 from Tractor Way • Safety on SR 46E in both directions • Parking adequacy	• Information on aesthetic impacts, including those related to building heights, can be found in *Section 4.1, Aesthetics* • Information on traffic impacts, including roadway safety, can be found in *Section 4.13, Transportation*
Carol Eorio	• Impacts to existing airport runways and airport traffic • Financial responsibility of roadway improvements • Signal at Airport Road and Highway 46 East • Water supply and impacts on the basin • Sewer capacity • Clarity on the project description	• The project does not propose to use airplanes • Information on traffic impacts, including roadway improvements, can be found in *Section 4.13, Transportation* • Information on impacts to the water supply and sewer capacity can be found in *Section 4.14, Utilities/Service Systems/Energy* • Information on the proposed uses can be found in *Chapter 2, Project Description*
Isiah Gomer	• Access between the site and compressed natural gas filling station at Paso Robles Waste and Recycle	• Information on proposed circulation can be found in *Section 4.13, Transportation*
Huw Morris	• Water supply and impacts on the basin	• Information on impacts to the water supply can be found in *Section 4.14, Utilities/Service Systems/Energy*
John Reynolds	• Financial responsibility of the City	• N/A (no environmental issues raised)
Arlyn Sharpe	• Night lighting impacts • Inclusion of amenities for workers • Air quality/emissions from engine idling • Stormwater runoff • Energy Use	• Information on aesthetic impacts, including those related to lighting and glare, can be found in *Section 4.1, Aesthetics* • Information on the proposed use and any amenities can be found in *Chapter 2, Project Description* • Information on air quality impacts can be found in *Section 4.3, Air Quality/Greenhouse Gas Emissions* • Information on stormwater impacts can be found in *Section 4.8, Hydrology/Water Quality* and *Section 4.14, Utilities/Service Systems/Energy* • Information on energy use can be found in *Section 4.14, Utilities/Service Systems/Energy*
Megan Tannehill	• Increased traffic on SR 46E and Airport Road • Water supply and impacts on the basin • Impacts on the high school	• Information on traffic impacts can be found in *Section 4.13, Transportation* • Information on impacts to the water supply can be found in *Section 4.14, Utilities/Service Systems/Energy* • Information on impacts to public schools can be found in *Section 4.12, Public Services/Recreation*
Julie Tumamait-Stenslie	• Deferral of tribal consultation to a local tribe	• Information on impacts to tribal resources can be found in *Section 4.5, Cultural/Tribal Cultural Resources*
Martie Wilson	• Include youth amenities	• Information on the proposed use and any amenities can be found in *Chapter 2, Project Description*

1.3 EIR CONTENTS AND ORGANIZATION

The scope of the EIR includes issues identified by the lead agency during the preparation of the NOP/IS for the proposed project, as well as environmental issues raised by agencies and the general public in response to the NOP/IS and at the scoping meetings. Through the NOP/IS and scoping process, the City determined that there was no substantial evidence that the project would cause or otherwise result in significant environmental effects on Mineral Resources. The evidence for determining that effects related to this resource area would result in no impact, or a less-than-significant impact, is summarized in *Chapter 5, Other CEQA Considerations*. The EIR is divided into the following major sections:

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

Chapter 1: Introduction. Provides the purpose of an EIR, as well as scope, content, and the use of the document.

Chapter 2: Project Description. Provides the general background of the project, objectives, a detailed description of the project characteristics, and a listing of necessary permits and government approvals.

Chapter 3: Environmental Setting. Describes the physical setting and surrounding land uses.

Chapter 4: Environmental Impacts Analysis. Discusses the environmental setting as it relates to the various issue areas, regulatory settings, thresholds of significance, impact assessment and methodology, project-specific impacts and mitigation measures, cumulative impacts, and secondary impacts. The EIR analyzes the potentially significant impacts to the following resource areas, as identified during the preparation of the NOP:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality and Greenhouse Gas Emissions
- Biological Resources
- Cultural and Tribal Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials and Wildfire
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation
- Utilities, Service Systems, and Energy

Chapter 5: Other CEQA Considerations. Identifies potential growth-inducing impacts and a discussion of long-term/short-term productivity and irreversible environmental changes.

Chapter 6: Alternatives. Summarizes the environmental advantages and disadvantages associated with the project and alternatives. As required, the "No Project" alternative is included among the alternatives considered. An "Environmentally Superior Alternative" is identified.

Chapter 7: Mitigation Monitoring and Reporting Program. This section contains a matrix of all mitigation measures contained in the EIR, the requirements of the mitigation measures, the Applicant's responsibility and timing for implementation of these measures, the party responsible for verification, the method of verification, and verification timing.

Chapter 8: References and EIR Preparers. This section provides a list of all references used within the EIR and the individuals involved in the preparation of this EIR.

1.4 PROJECT CONTACTS

Lead Agency:	City of El Paso de Robles Community Development Department 1000 Spring Street Paso Robles, CA 93446 *Warren Frace, Director*
Project Applicant:	Majestic Realty Co. 13191 Crossroads Parkway North, 6th Floor City of Industry, CA, 91746 *Taylor Talt, Senior Vice President*
Environmental Consultant:	SWCA Environmental Consultants 3426 Empresa Drive, Suite 100 San Luis Obispo, California 93401 *Brandi Cummings, Project Manager*

1.5 REVIEW OF THE DRAFT EIR

This Draft EIR was distributed to responsible and trustee agencies, other affected agencies, surrounding cities, interested parties, and all parties requesting a copy of the Draft EIR in accordance with Public Resources Code (PRC) Section 21092(b)(3). The Notice of Completion and Notice of Availability of the Draft EIR were distributed and posted as required by CEQA. During this 45-day period, the EIR and all technical appendices are available for review at the following locations:

Paso Robles City Library
1000 Spring Street
Paso Robles, CA 93446

https://prcity.com/357/CEQA-Documents

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

City of El Paso de Robles
ATTN: Brandi Cummings, Project Manager
Community Development Department
1000 Spring Street
Paso Robles, CA 93446
Or via email to brandi.cummings@swca.com

The public review period is 45 days. Written responses to all significant environmental issues raised will be prepared and will be included as part of the Final EIR and the environmental record for consideration by decision makers for the project.

CHAPTER 2. PROJECT DESCRIPTION

2.1 INTRODUCTION

Majestic Realty Co. (Applicant) proposes the redevelopment of the former California Department of Corrections and Rehabilitation (CDCR) Estrella Youth Correctional Facility (Paso Robles Boys School). The proposed The Landing Paso Robles (project) includes a request for a General Plan Amendment (GPA) to allow for a land use designation change of the project site from Public Facilities (PF) to Business Park (BP); a Zone Change to change the zoning of the project site from Public Facilities (PF) to Airport (AP) with a Planned Development (PD) overlay; a Vesting Tentative Tract Map (VTTM); a Conceptual Master Development Plan, including Design Guidelines; a specific Development Plan for Phase 1 of the project; an Oak Tree Removal permit; and a Development Agreement between the Applicant and the City of El Paso de Robles (City). The City Council authorized City staff to initiate processing and environmental review of the GPA, other planning entitlements, and development agreement on June 15, 2021.

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15124, this chapter provides the information required of an Environmental Impact Report (EIR) project description, including a description of the project's precise location and boundaries; a statement of the project's objectives; a description of the project's technical, economic, and environmental characteristics; a description of the intended uses of this EIR (including a list of the government agencies that are expected to use this EIR in their decision-making processes); a list of the permits and approvals that are required to implement the project; and a list of related environmental review and consultation requirements.

2.2 PROJECT LOCATION

The city of Paso Robles has an area of approximately 20 square miles and is located in San Luis Obispo County, approximately mid-way between Los Angeles and San Francisco. The project site is in the northeastern portion of the city, as shown in Figures 2-1 and 2-2. The project site is located along the west side of Airport Road, north of Dry Creek Road, and west of the Paso Robles Municipal Airport.

Surrounding land uses include vineyards to the west; vineyards, wineries, and the Paso Robles Horse Park to the south; Airport Road and the Paso Robles Municipal Airport to the east; and a California Department of Forestry and Fire Protection (CAL FIRE) Station, rural residential, and agricultural uses to the north. State Route 46 East (SR 46E) is located 1.3 miles south of the project site and U.S. Highway 101 (US 101) is located 2.5 miles west of the project site. The approximately 140.75-acre project site includes a portion of one legal parcel identified as Assessor's Parcel Number (APN) 025-434-001.

2.3 PROJECT SITE BACKGROUND

The project site was formerly part of the Estrella Army Airfield, which was used by the U.S. Marine Corps during World War II as a bomber base from 1942–1944. In 1947 the U.S. Government sold the project site to the State of California for use as a correctional facility (City of Paso Robles no date [n.d.]). The Estrella Youth Correctional Facility, also known as the Paso Robles Boys School, was founded in 1947 by the California Youth Authority and originally operated in the existing Estrella Army Airfield structures; new facilities were constructed in May 1951 (Ascent Environmental 2014). The project site operated as a youth correctional facility until July 31, 2008, when it was permanently closed. The project site has sat vacant since 2008, and on December 14, 2020, the California Department of General Services issued a Request for Written Offers to purchase the property.

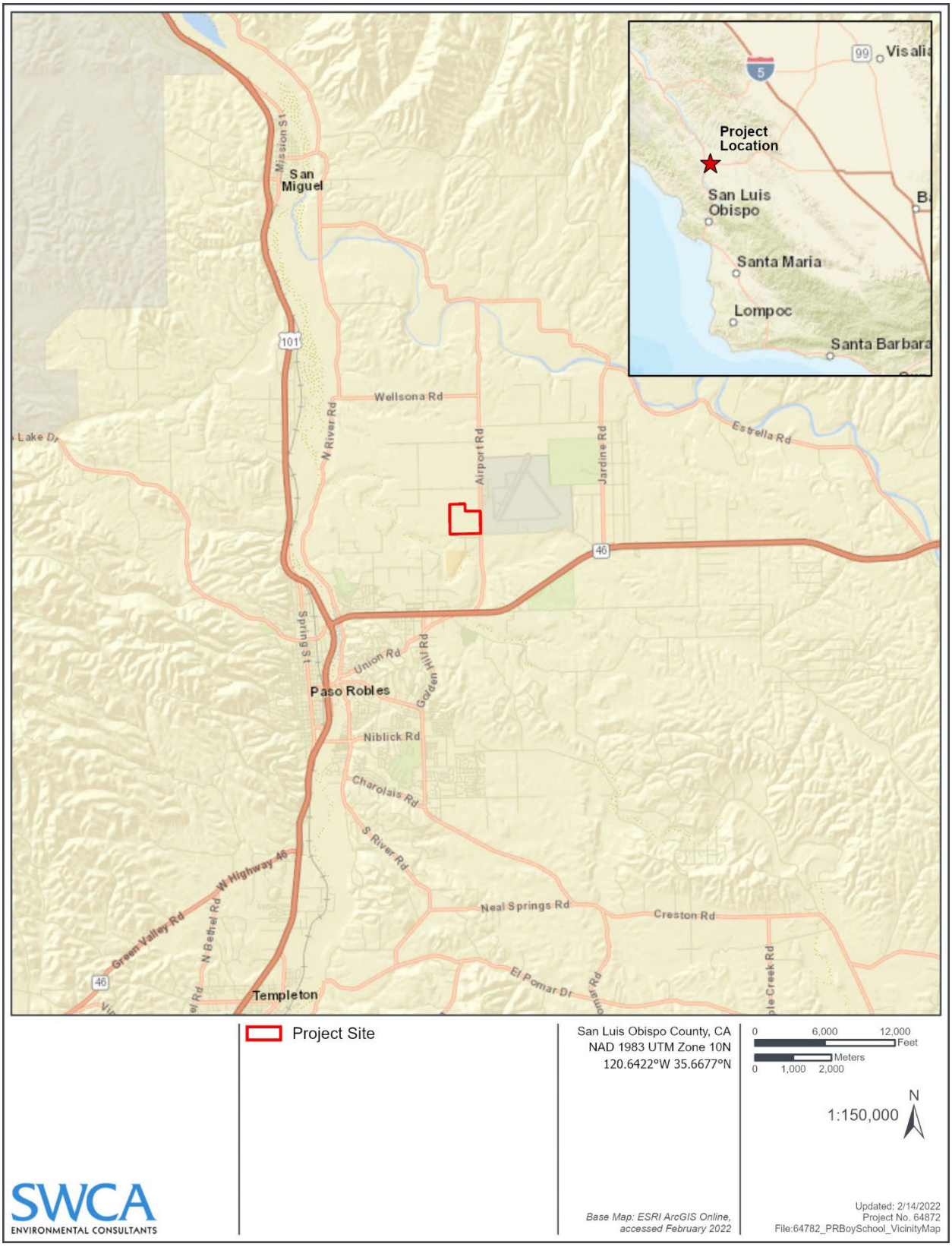


Figure 2-1. Project Vicinity Map.

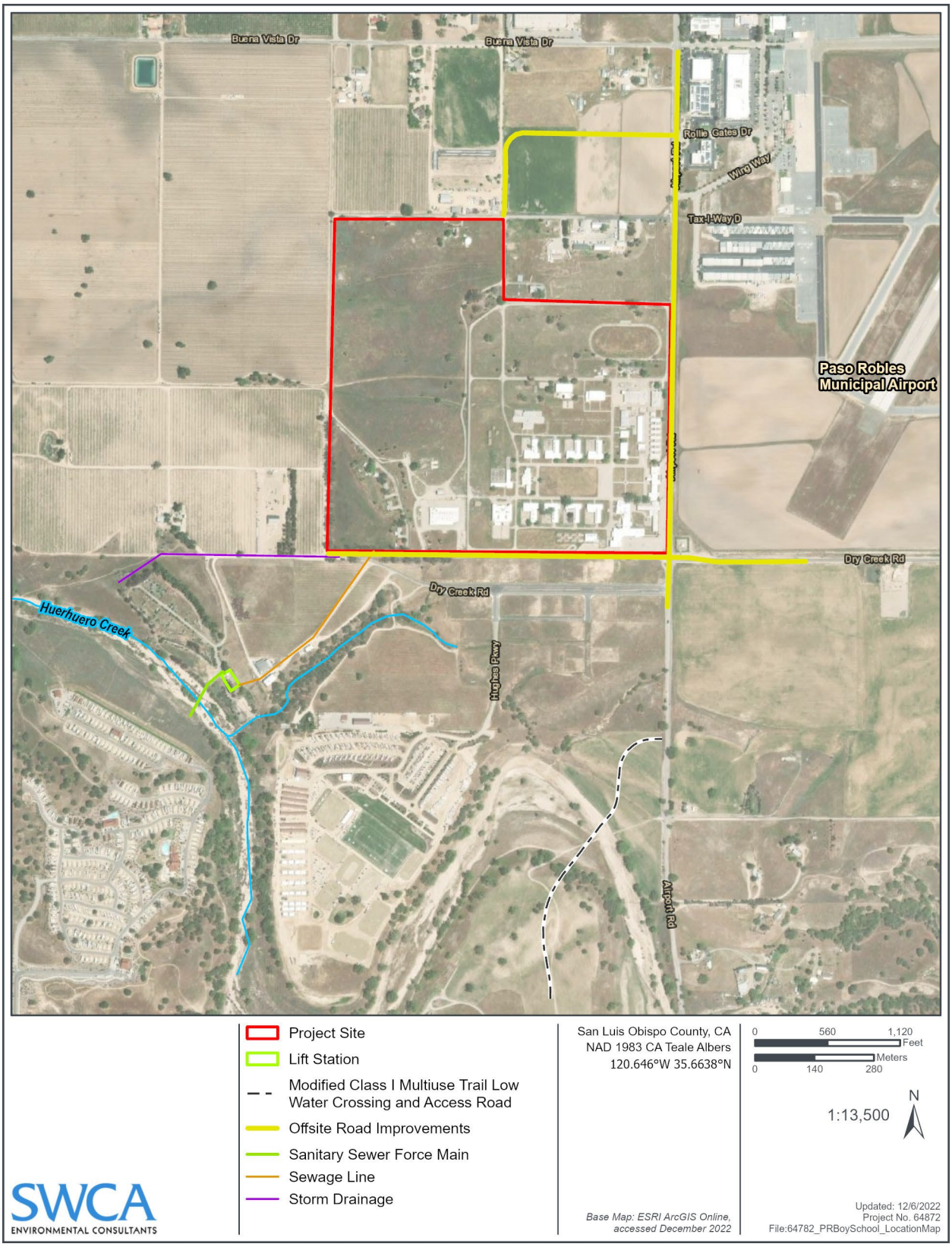


Figure 2-2. Project Location Aerial.

The Applicant was selected by the State to purchase the property and is in process of completing the purchase. For more details about the existing condition of the project site, see *Section 3.1.2, Local Setting*.

2.4 PROJECT OBJECTIVES

Pursuant to State CEQA Guidelines Section 15124(b), this statement of objectives sought by the proposed project includes the underlying purpose of the project and will guide the development of reasonable alternatives that will be evaluated in this EIR. The purpose and goal of the proposed project are to accomplish the redevelopment of the former Paso Robles Boys School site with employment-generating uses that are compatible with the adjacent airport and will complement the existing development and character of the city of Paso Robles and surrounding areas. This underlying goal aligns with the goals of the City to increase employment opportunities and provide new development that will serve the need of the city and its residents. The following objectives are intended to achieve these underlying purposes:

1. To eliminate deferred maintenance issues on the former Paso Robles Boys School property by removing all existing uses except for an existing maintenance facility and redeveloping the property for productive new uses.
2. To redevelop the former Paso Robles Boys School property with uses that are compatible with the adjacent Paso Robles Municipal Airport and that maximize the development potential of the property.
3. To expand economic development, facilitate job creation, and increase the tax base for the City by establishing new industrial, retail, and visitor-serving land uses near the Paso Robles Municipal Airport.
4. To attract new employment-generating businesses to the city of Paso Robles, thereby growing the economy and providing a more equal jobs-housing balance.
5. To attract a large warehouse to the city that can expedite the delivery of essential goods to consumers and businesses in and adjacent to the city.
6. To develop a warehouse facility that is designed to meet contemporary industry standards and be similar to other facilities in the region.
7. To establish visitor-serving uses near the Paso Robles Municipal Airport to help meet the growing demand for lodging, shopping, and leisure activities to support the larger winery and tourist industries.
8. To develop uses along Airport Road that have architectural design characteristics that complement and enhance the city's wine country character and visually express the area's history and culture.

2.5 PROJECT CHARACTERISTICS

The Applicant seeks entitlements for the 140.75-acre project site to allow for the demolition of existing onsite improvements and the construction and operation of The Landing Paso Robles, a warehouse and business park center, as part of the redevelopment of the former Paso Robles Boys School site. The Applicant is seeking entitlements for a GPA; a Zone Change; a VTTM; a Conceptual Master Development Plan, including Design Guidelines; a specific Development Plan for Phase 1 of the project (the warehouse); an Oak Tree Removal permit; and a Development Agreement between the Applicant and the City. Future entitlements would include Conditional Use Permits (CUPs), Development Plans, or Planned Development applications, as appropriate, for the entitlement of individual developments in Phase 2 that are within the scope of the Conceptual Master Development Plan.

The project would include a warehouse and a mix of employment and visitor-serving uses, including, but not limited to, industrial flex space, maker spaces,[1] offices, retail uses, a restaurant, a market hall, a hotel, a winery, and passive park and green spaces with agricultural elements (Figure 2-3). Offsite infrastructure improvements are also proposed to support the project.

The project is expected to be constructed in two phases. Phase 1 would be developed first and would encompass the western 76.87 acres of the project site. This phase would be developed with a 1,330,356-square-foot warehouse and a 5.38-acre stormwater basin. The existing 21,808-square-foot maintenance building and yard would be subdivided from the rest of the project and expanded by the City up to 38,000 square feet for use as a City-owned maintenance yard. Phase 2 would include development on the eastern 63.88 acres of the project site of up to 630,900 square feet of commercial, light industrial, office, and other uses with an emphasis on visitor-serving uses, and up to 120 rooms of transient lodging. Table 2-1 identifies the maximum development potential of The Landing Paso Robles. See Appendix B for project plans.

Table 2-1. Proposed Development

Land Use Type	Maximum Gross Floor Area[1]	Acreage[2]
Western Area – Phase 1		
Warehouse[3]	1,330,356 sf	76.87 acres
Stormwater Detention Basin	n/a	
Maintenance Building	38,000 sf (21,808 sf existing)	
Offsite Improvements	n/a	17.31 acres
Eastern Area – Phase 2		
Industrial Flex	60,000 sf	6.91 acres
Office	250,000 sf	13.5 acres
Maker Spaces	154,000 sf	16.99 acres
Market Hall	57,000 sf	2.58 acres
Retail (Food and Beverage)	29,400 sf	3.32 acres
Restaurant	6,500 sf	4.41 acres
Winery	16,500 sf	
Hotel	57,500 sf; 120 rooms	4.3 acres
Passive Park-Pedestrian Plaza-Green Spaces	n/a	10.26 acres
Total	1,999,256 sf; 120 hotel rooms	158.06 acres

[1] sf = square feet

[2] Acreages approximate; subject to survey verification.

[3] Gross Floor Area for the warehouse building is defined as the sum of the gross horizontal areas of all floors, mezzanines, and lofts of the building, excluding stairwells, elevator shafts, equipment rooms, and mezzanine areas used as catwalks and platforms for conveyors, equipment, and related workstations.

2.5.1 Phase 1: Warehouse

The western 76.87 acres of the project site would be developed during the first phase of construction and would primarily include a warehouse facility with a maximum of 1,330,556 square feet of floor space and a 5.38-acre stormwater detention basin that would serve the entire site (Figure 2-4).

[1] A maker space is a collaborative workspace containing tools and equipment and is used to create or manufacture goods.



Figure 2-3. Master Site Plan.

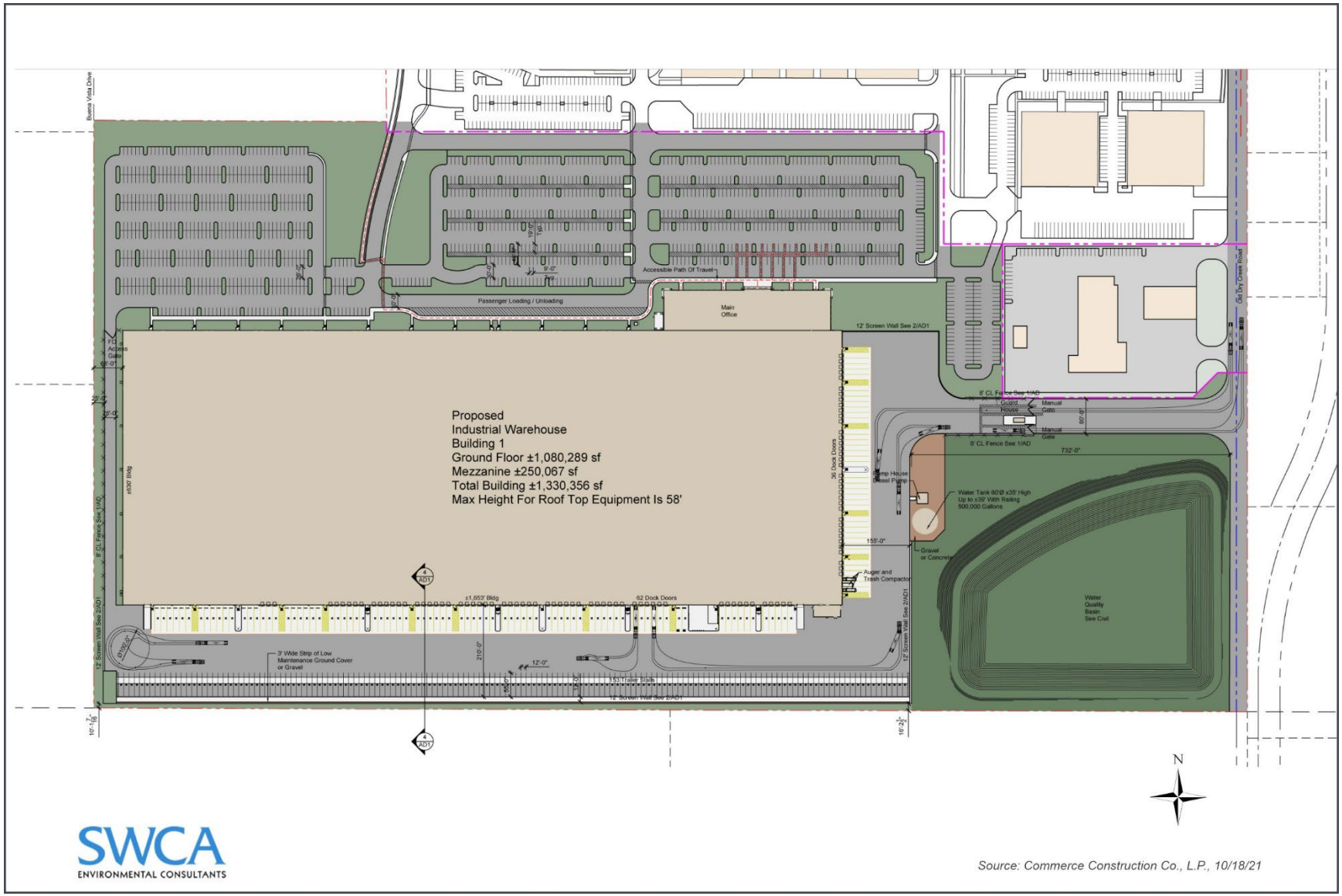


Figure 2-4. Warehouse Site Plan (Lot 32).

2.5.1.1 Warehouse

2.5.1.1.1 PHYSICAL CHARACTERISTICS

The warehouse is proposed as a single warehouse building designed to be occupied by a single user but that could also be devised for more than one user. The warehouse building is designed to be used as a fulfillment center and would be approximately 1,653 feet in length by approximately 630 feet in width constructed with concrete tilt-up panels and a flat solar-ready roof. The building would be approximately 52 feet tall, and the addition of rooftop mechanical equipment, parapets to screen the equipment, and potential future solar panels (not currently proposed) would reach a maximum of 58 feet. The building interior would include a large warehouse space, mezzanine space, supporting administrative office space, and an employee break area. A majority of the interior space would be used for warehousing, with approximately 50,000 square feet of interior office designed to support the administrative and employee lounge functions of the building's operation (see Figure 2-4). Building statistics are shown in Table 2-2.

Table 2-2. Warehouse Statistics

Component	Size
Site Area	62.63 acres (Lot 32 of Tract 3175)
Building Footprint	1,080,289 square feet (39.6% lot coverage)
Building Mezzanine	250,067 square feet
Building Gross Structural Floor Area	1,330,256 square feet
Site Landscaping	674,163 square feet (24.7% of the lot)
Trailer Loading Docks	98 docks
Trailer Parking (12 × 55 feet)	±236 spaces
Passenger Vehicle (9 × 19 feet)	±1,347 spaces

The proposed building is designed in a rectangular shape with the long sides of the building facing east and west and the shorter sides of the building facing north and south. Exterior colors are anticipated to be shades of beige with brown, dark grey, and burgundy accents. Parapets would be constructed on the roof to conceal rooftop mechanical equipment. Trucks would generally enter from Airport Road and Dry Creek Road (proposed to be renamed Landing Lane) and circulate around the building using interior drive aisles and truck courts positioned at the loading dock areas. If the Rollie Gates Drive extension is constructed offsite to the north, trucks may enter on Landing Lane and exit at Rollie Gates Drive. The truck trailer parking areas, truck courts, and loading dock areas would be secured by a combination of solid walls and fencing, and trucks would need to pass through a check-in gate or security booth upon entry to the facility. Employee and visitor parking would occur in an unenclosed surface parking lot to the east of the warehouse and would be accessed from three entries off Airport Road and a fourth entry off Landing Lane.

The project proposes exterior lighting to illuminate exterior loading and parking areas at night. Per the Photometric Study provided by the Applicant (PMD Engineering 2021), parking lot lighting would consist of light-emitting diode (LED) lights mounted on aluminum poles. The warehouse building would include down-cast wall-mounted LED lights around the perimeter of the building. Bollard lights would be utilized in the pedestrian plaza area.

The warehouse space would utilize an early suppression fast response (ESFR) fire sprinkler system. These systems are specifically designed for high-cube storage uses and have a higher water output and quicker response time than conventional sprinkler systems. A 500,000-gallon water tank and pump house

would be located on the property to gain ±4,000 gallons per minute (GPM) for fire flow. It is anticipated that a maximum of 15% of the warehouse space may also be allocated for the potential accommodation of cold storage (chilled, cooled, or freezer space). If a portion of the warehouse is ultimately refrigerated, the refrigeration system is anticipated to be cooled by a closed-circuit ammonia-based system. The design and size of this system are not known at this time, but, based on other similar warehouses, it could contain approximately 30,000 pounds of ammonia (approximately 5,266 gallons).

2.5.1.1.2 OPERATIONAL CHARACTERISTICS

The end user(s) and exact operational characteristics of the proposed warehouse are not known at this time. For the purposes of impact assessment, operational activities are assumed to be consistent with typical large warehouse and distribution (fulfillment) facilities. These warehouses are primarily intended for storing manufactured goods (and to a lesser extent, raw goods) before their distribution to the local market. For the purposes of this EIR, the warehouse is assumed to have a maximum daily trip generation rate of 3,910 vehicles and 766 trucks, with a maximum of 965 PM peak hour trips. PM peak hour trips are determined using the truck passenger car equivalent of 2,028.

For the purposes of this EIR, it is assumed that the warehouse would operate 24 hours a day, 7 days per week, and would require approximately 1,200 employees who would work in overlapping shifts. All warehouse operations would occur within the warehouse structure, apart from vehicle movement in the drive isles, parking lots, and truck courts and docking of trailers in the loading docks. Pedestrian and bicycle activity is expected in the passenger vehicle parking areas, near pedestrian entries to the warehouse, and in the outdoor employee break areas. Generally, trucks and delivery vehicles would be expected to arrive at the site via Landing Lane in the early morning (e.g., 5:00 a.m.) and early afternoon (e.g., 2:00 p.m.) and enter the facility at an access point adjacent to the stormwater basin. Trucks would be stopped at an entry gate/security booth and then proceed to a loading dock, where they would back into docking position. Due to regulations by the California Air Resources Board (CARB), diesel vehicles and trucks are prohibited from idling for more than 5 minutes and are required to turn off their engines after 5 minutes. Because the warehouse user(s) is not known at this time, and some users may require chilled, cooled, or freezer space to accommodate the storage of items requiring temperature control (examples include food products, medicines and other pharmaceuticals, wax products, beauty supplies, etc.), a maximum of 15% of the warehouse space is studied in this EIR as temperature-controlled space (commonly called “cold storage”). If any portion of the warehouse is ultimately constructed for cold storage, the loading docks servicing the cold warehouse spaces would be equipped with plug-in capabilities so that the refrigerated trailer unit can plug into the warehouse’s electrical system to keep the transport refrigeration unit (TRU) powered and allow the truck to turn off its engine.

The warehouse is designed to include more loading docks than would be occupied at any one time. This is to allow the trucks to dock in a position relative to the interior storage location of the goods it is carrying. After docking, trucks would be unloaded by employees in the warehouse. Goods would be unloaded using both manual and non-diesel-powered equipment, including power pallet trucks, pallet jacks, forklifts, cranes, conveyors, hand trucks, electric tugs, hoists, etc. The loading of trailers at dock positions would be done in the same, but reverse manner.

The warehouse would require the use of 20.28 acre-feet-per-year (AFY) of water (13.4 AFY for the warehouse operation and 6.9 AFY for landscaping) based on the Water Supply Assessment prepared for the project (Todd Groundwater 2021). The warehouse operation would generate 12,000 gallons per day (GPD) of sewage (Wallace Group 2022) and would generate approximately 3,027 tons of solid waste per year (CalRecycle 2021). Based on the *Transportation Impact Study* prepared for the project (Central Coast Transportation Consulting [CCTC] 2023), the warehouse would generate approximately 766 daily trips from trucks and 3,910 from passenger vehicles.

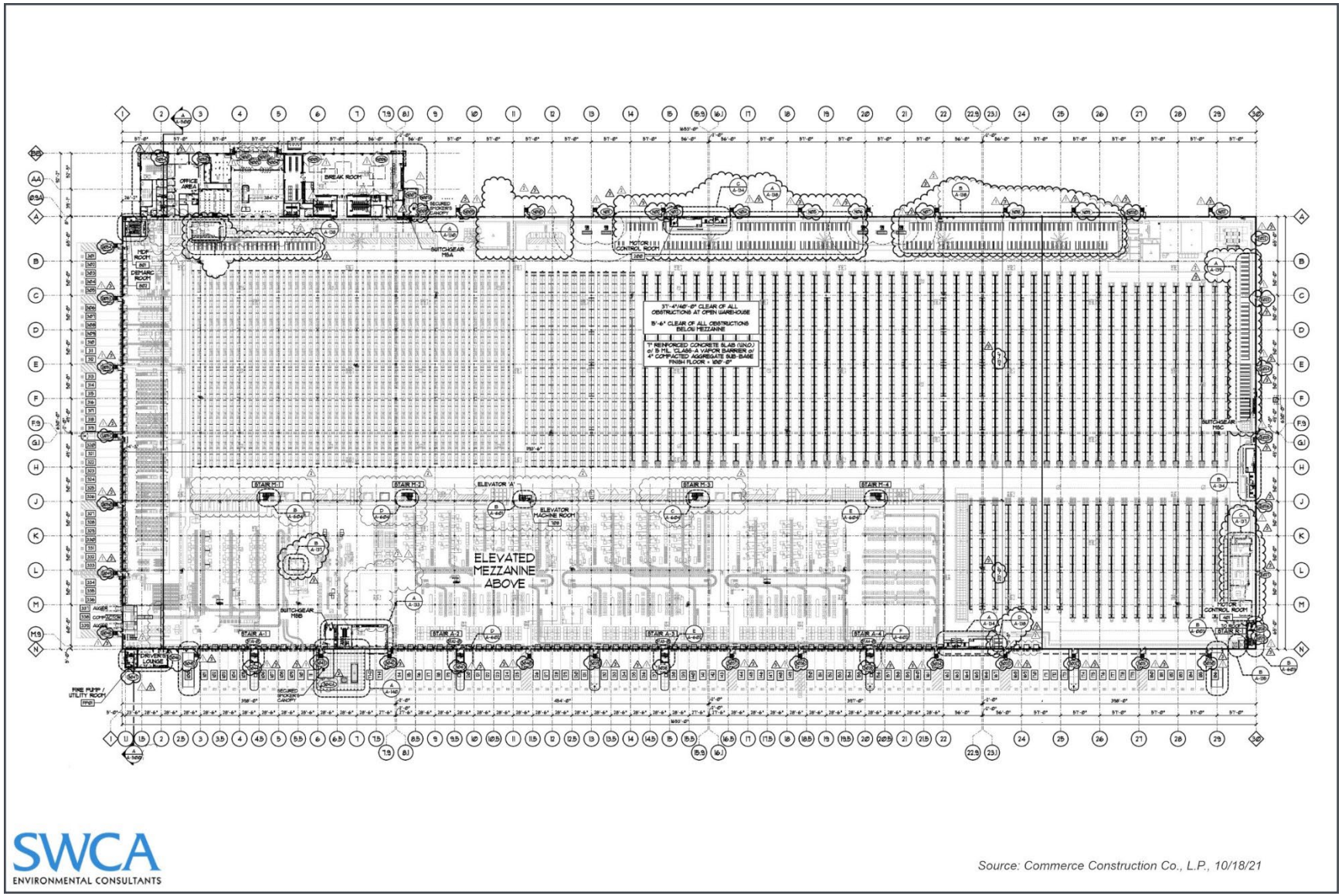


Figure 2-5. Warehouse Floor Plan.



Figure 2-6. Warehouse Conceptual View.

2.5.1.2 Stormwater Management

A 5.38-acre stormwater detention basin would be located in the southwestern portion of the property, south of the warehouse building, on a 9.82-acre parcel (Lot 34). A series of underground stormwater inlets, pipes, and infiltration chambers would collect and transport stormwater runoff from impervious areas to a stormwater detention basin. The basin would collect and treat stormwater runoff from the entire project site (Phases 1 and 2), which would be discharged offsite to an outfall within Huer Huero Creek during periods of high runoff. The basin would be approximately 15 feet deep and designed to retain the 95th percentile runoff, up to 5.01 acre-feet of water, and would also have the capacity to retain a 100-year 24-hour storm. The stormwater basin would be landscaped with trees and shrubs around the perimeter. An 8-foot-tall concrete screen wall would be located on the north side of the basin parcel, and an 8-foot-tall chain-link fence would continue from the eastern terminus of the wall and connect to the warehouse's guard house/entry gate. The remaining perimeter would remain unfenced.

Phase 1 of the project would create more than 25,000 square feet of net impervious area and therefore would be required to meet Central Coast Regional Water Quality Control Board (CCRWQCB) Post Construction Stormwater Requirements (PCRs) 1, 2, 3, and 4.

2.5.1.3 Expanded Maintenance Facility

There is an existing 21,808-square-foot maintenance facility located on the western portion of the property that would remain in place and ultimately be owned by the City for use as a Public Works maintenance yard. The City is proposing to develop an addition to the maintenance building, or the addition of additional separate structures, to accommodate their needs for use of the facility as a maintenance yard. The maximum potential expansion of the maintenance facility would be 16,192 square feet, for a total floor area of 38,000 square feet. This facility would serve as a full-service garage and workshop to perform preventative maintenance and repairs on City equipment and vehicles. This facility would also serve to house the Maintenance Services Division of the Public Works Department and would be the primary office space for the 18 employees of the division.

2.5.2 Phase 2: Business Park

The eastern 63.88 acres of the project site would be developed with commercial, office, and visitor-serving uses. This portion of the project site is conceptually designed pursuant to the proposed Conceptual Development Plan and Design Guidelines entitlements, which provide specificity about the expected building sizes, types, and locations in order to allow comprehensive analysis in this EIR. For the purposes of this EIR, it is assumed that the Phase 2 land uses could employ up to 2,361 employees. In the future when specific buildings are proposed for implementation in Phase 2, City staff would conduct a review of the proposed buildings to ensure they substantially conform to the Conceptual Development Plan and Design Guidelines.

Phase 2 buildings would be a maximum of 50 feet tall, including parapets, architectural projections, and rooftop decks, in compliance with the City Zoning Code and the Paso Robles Municipal Airport's Airport Land Use Plan (ALUP). The Phase 2 development would include the following land uses, and would require subsequent Development Plan, Planned Development, and/or CUP entitlements from the City, in addition to review to ensure consistency with the Conceptual Master Development Plan. As subsequent Development Plans, Planned Developments, and/or CUP entitlements are proposed, the City would determine whether the proposal has been adequately evaluated in this EIR, or whether additional environmental review is required.

2.5.2.1 Industrial Flex and Maker Space

These land uses are proposed as a transitional use between the warehouse in the western portion of the project site and visitor-serving uses on the eastern portion of the site. These land use types would accommodate up to 214,000 square feet of small industrial trades, which may include workshops, start-up/incubator businesses, winemakers, artisans, craftsmen, culinary artists, and comparable vocations. Buildings are expected to be one or two stories and are envisioned as a series of multiple smaller buildings, rather than a single large structure.

The industrial flex and maker spaces uses are anticipated to require the use of 40.5 AFY of water, generate approximately 55,760 GPD of sewage, and generate approximately 2,441 tons of solid waste per year (Todd Groundwater 2021; Wallace Group 2022; CalRecycle 2021).

Although the building designs can be modified and refined when proposed for implementation, the Design Guidelines call for the Maker Spaces to be steel-frame buildings with large entries that include simple low-pitch roofs with a sliding door on each end of the pitched roof. Brick, metal, and wood are the three primary materials envisioned for these uses, with pops of accent colors used in signs and graphics.

The Design Guidelines call for small and medium-sized spaces for the industrial flex uses with light industrial, assembly, light manufacturing, small warehouse, and similar occupancies. Concrete, siding, and metal are the envisioned materials, with primarily light earth tones and darker accent colors around focal areas. Building façades would be accentuated by variations in wall height, depth, and pattern.

2.5.2.2 Loft-Style Offices

Up to 250,000 square feet of loft-style offices would be placed in the northeastern and southeastern portions of the site, ranging from one to three stories. The buildings would include loft-style architecture, with open workspaces that can be customized with user-specific interior design. The Conceptual Master Development Plan envisions this use within three medium-sized buildings, though the final design could result in an alternate building configuration.

The offices are anticipated to require the use of 22.4 AFY of water, generate approximately 20,000 GPD of sewage, and generate approximately 274 tons of solid waste per year (Todd Groundwater 2021; Wallace Group 2022; CalRecycle 2021).

The Design Guidelines propose these structures with sweeping roof forms, repetitive bay windows to maximize daylight, and a variety of covered outdoor spaces. Wood, metal, and glass are the primary materials envisioned for these uses, with pops of accent colors used in signs and graphics.

2.5.2.3 Commercial Retail (Market Hall, Retail, and Restaurants)

Commercial retail would be focused on providing walk-up consumer goods and services and could include uses such as specialty food and beverage, clothing stores, and personal services, including beauty shops. A restaurant is envisioned in the southeastern portion of the site, near the winery. These uses would consist of several smaller buildings along the eastern portion of the project site, which are expected to be one or two stories with a cumulative maximum floor area of 92,900 square feet.

The commercial retails uses are anticipated to require the use of 8.5 AFY of water, generate approximately 5,420 GPD of sewage, and generate approximately 293 tons of solid waste per year (Todd Groundwater 2021; Wallace Group 2022; CalRecycle 2021).

The market hall is intended to be the focal point of the Phase 2 development. The Design Guidelines picture this structure as a long linear structure adjacent to green space. The structure would be a box form with numerous trellises, canopies, and other passive shade design elements. Concrete block would be accented by wood and metal details.

The retail buildings are envisioned as simple buildings with low-pitched roofs and large glass storefronts. Entrances would be the focal point of the individual uses, identified by trellises, patios, awnings, and large glass windows. The Design Guidelines imagine structures would be concrete block and metal, with wood patios and trellis elements.

The Design Guidelines propose that the restaurant would be similar to the winery buildings, with sloping roofs, darker and more modern metal finishes, and glass along the short ends of buildings. The sloping roofs could collect both rainwater and solar energy, and the buildings would be oriented to moderate light and heat exposure.

2.5.2.4 Winery

A winery up to 16,500 square feet is anticipated with spaces that would include a possible winemaker's area, demonstration area, tasting room, storage, and sales. The main building is expected to be one or two stories, and accessory structures may vary based on the ultimate winery design. Vineyards are proposed between the industrial flex/maker space and the commercial retail uses on the site.

The winery is anticipated to require the use of 2.2 AFY of water (not including irrigation for the vineyard, which is included in 2.5.2.6 below), generate approximately 52,000 GPD of sewage, and generate approximately 188 tons of solid waste per year (Todd Groundwater 2021; Wallace Group 2022; CalRecycle 2021).

The Design Guidelines propose that the winery would be similar in style to the restaurant buildings, with sloping roofs, darker and more modern metal finishes, and glass along the short ends of buildings. The sloping roofs could collect both rainwater and solar energy, and the buildings would be oriented to moderate light and heat exposure.

2.5.2.5 Hotel

A hotel is planned that would be up to 57,500 square feet, containing up to 120 rooms, and likely be three stories tall. In addition to the guest rooms, the hotel is anticipated to include a lobby, meeting and conference space, a bar and restaurant, and a pool. Options for surface parking and/or structured parking are being considered and both options are analyzed in this EIR.

The hotel is anticipated to require the use of 10.2 AFY of water, generate approximately 9,126 GPD of sewage, and generate approximately 43.8 tons of solid waste per year (Todd Groundwater 2021; Wallace Group 2022; CalRecycle 2021).

The Design Guidelines imagine a long, sweeping, metal roof to define this building, supported by metal columns. Smooth concrete block is envisioned as the primary material, used to create solid vertical planes and define the hotel entry.

2.5.2.6 Passive Park, Pedestrian Plaza, and Landscaping

Green spaces, some with agricultural elements, including vineyards, are planned to support and complement the mix of uses in the eastern portion of the property. These areas would be linked by multi-modal trails and would be connected to development by patios, trellises, and other outdoor furnishings. Landscaping is envisioned to include a mix of trees, shrubs, and other plantings to provide for shading, screening, and visual interest. Irrigated turf would be limited to two areas meant for events and activities.

These uses are anticipated to require the use of 30.8 AFY of water and generate approximately 7,875 GPD of wastewater (Todd Groundwater 2021; Wallace Group 2022).

2.5.3 Demolition and Construction

The project would be constructed in two phases. All demolition would occur first, followed by the immediate construction of Phase 1 and the onsite and offsite utilities and infrastructure necessary to support Phase 1. These utilities and infrastructure would be constructed in a manner that would allow them to be tied into the subsequent Phase 2 development. Phase 2 would be constructed as users for the Phase 2 buildings are identified and Development Plans, Planned Developments, and/or CUPs for those buildings are brought forward to the City for approval. For the purposes of this analysis, the EIR assumes that demolition would occur in 2023, Phase 1 would be constructed between 2023 and 2024, and Phase 2 would be built out over the next several years, between 2024 and 2029, with full occupancy expected by 2029. At the time of construction, each phase and building in the project would be subject to Development Plan, Planned Development, and/or CUP review to ensure conformity with the approved Conceptual Master Development Plan and Design Guidelines and consistency with applicable regulations.

Each phase of the project would generally follow these general stages of construction: site preparation, grading, building construction, architectural coatings/finishing, paving, and final landscaping. Some of these stages may occur concurrently, in the event multiple buildings are under construction at the same time. According to the Applicant, construction activities would generally occur Monday through Saturday, from 7:00 a.m. to 3:00 p.m.; however, City Zoning Regulations provide a noise exemption to construction activities occurring between the hours of 7:00 a.m. to 7:00 p.m. (Section 21.60.100). Therefore, for the purposes of this EIR, it is assumed project construction may be conducted for any 8-hour period between 7:00 a.m. and 7:00 p.m. The warehouse building is proposed for concrete tilt-up construction, meaning that the building slab and walls are formed by pouring concrete slabs, with the walls tilted up and placed into position by a crane. If air temperatures are too hot to cure concrete, concrete pouring activities relative to the warehouse may occur during night-time hours, estimated by the Applicant to occur over a maximum period of approximately 65 nights. Construction equipment that is anticipated to be used is shown in Table 2-3.

Table 2-3. Anticipated Construction Equipment

Construction Activity	Equipment Type	Maximum Quantity in Use	Average Hours of Use per Day
Demolition	Concrete Crushing Plant	1	8
	Water Truck	3	8
	Bobcats	4	8
	Loader	3	8
	Backhoe	1	8
Site Preparation	Excavators	2	8
	Water Truck	1	8
	Blade	1	8
	Loader	1	8
	Water Pull	1	8
	Tractor	2	8
Grading	Scraper	7	8
	Water Pull	2	8
	Wheel Dozer	1	8
	Track Dozer	1	8
	Motor Grader	1	8
Offsite Underground Utilities	Scraper	1	8
	Loader	1	8
	Water Truck	1	8
	Blade	1	8
Building Construction	Crane	1	8
	Forklift	4	8
	Generator Set	5	8
	Tractor, Loader, Backhoe	5	8
	Welder	3	8
Paving	Scraper	2	8
	Water Pull	1	8
	Blade	1	8
	Water Truck	1	8
	Paver	2	8
	Paving Equipment	2	8
	Roller	4	8

2.5.3.1 Phase 1

Phase 1 construction is expected to cover a period of approximately 18 months, commencing in Summer 2023. The anticipated construction schedule for Phase 1 is shown in Table 2-4. The demolition activities would mostly occur on the eastern portion of the project site where existing structures are present, and some site preparation and grading activities on the western portion of the site and offsite utility work may occur concurrently with the demolition activities.

Table 2-4. Phase 1 Construction Schedule

Construction Stage	Duration
Demolition	7 months
Site Preparation	1 month
Grading	3 months
Underground Offsite Utilities	5 months
Warehouse Building Construction and Road Improvements	10 months

2.5.3.1.1 DEMOLITION, SITE PREPARATION, AND GRADING

The Applicant proposes to demolish all existing facilities and infrastructure of the former Paso Robles Boys School (except for the existing maintenance facility). Structures to be demolished total 279,706 square feet and could result in up to 50,000 cubic yards of demolished material that would be hauled offsite (AMBIENT Air Quality & Noise Consulting 2022).

Demolition of the existing structures and site infrastructure would last approximately 7 months and may occur concurrently with site preparation, grading, and underground utility work required to support construction of the warehouse.

A diesel-powered crusher is planned to be located onsite and would be used to crush demolished concrete materials and paved surfaces in order to salvage and repurpose the material as a subbase for proposed construction activities. Other salvageable materials from the Paso Robles Boys School would be sold, donated, or recycled to the extent possible. Material that cannot be repurposed or recycled would be hauled offsite for disposal at the Paso Robles Municipal Landfill, located at 9000 SR 46E, approximately 8 miles east of the project site.

Once demolition is complete or concurrent with demolition activities in the eastern portion of the property, the western portion of the project site would be graded and prepared for Phase 1 development. Grading for Phase 1, including all offsite improvements, would require approximately 328,056 cubic yards of cut and 226,730 cubic yards of fill. The stormwater detention basin would be excavated during the proposed Phase 1 rough grading activities and the excavated (cut) soil may be temporarily stockpiled until it can be balanced onsite. If excess soil is available, it would be spread in the eastern portion of the site, with potentially a portion hauled offsite. Hydroseed or another soil stabilizer would be applied to areas not immediately planned for development.

Activities during this stage would include:

- Establishment of construction staging and material storage areas;
- Delivery, staging, and storage of materials and equipment to the site;
- Installation of protective fencing, including erosion and sedimentation control devices for the entire project site;
- Demolition of onsite buildings and infrastructure, including removal of existing utilities on the entire project site;
- Tree and vegetation removal for the entire project site (note that some trees would not be removed);
- Rough grading of the Phase 1 area, including dewatering;
- Excavation for the proposed stormwater basin in the southwest portion of the site; and
- Monitoring, including dust control and construction stormwater runoff.

2.5.3.1.2 INFRASTRUCTURE IMPROVEMENTS

After completion of site preparation and rough grading on the Phase 1 portion of the site, infrastructure would be installed, and finish grading would be completed. The stormwater detention basin would be excavated during the proposed Phase 1 rough-grading activities and soil may be temporarily stockpiled until it can be balanced onsite. New water, sewer, and stormwater lines would be installed beneath the internal circulation system. Electrical, natural gas, and fiber optic lines would also be undergrounded beneath the internal circulation system and would connect to existing connections beneath Airport Road.

Activities during this stage would include the following onsite improvements and the off-site improvements necessary to support the development in Phase 1:

- Trenching and installation of underground wet and dry utilities for the Phase 1 portion of the site (water, sewer, stormwater, natural gas, electric, telephone, cable, and irrigation) and water and sewer main lines within roadways constructed as part of the Phase 1 development;
- Trenching and installation of 12-inch polyvinyl chloride (PVC) replacement sewer pipe between the western terminus of Landing Lane and Lift Station #12;
- Installation of new pumps and mechanical equipment at Lift Station #12;
- Finish grading for the Phase 1 area;
- Over-excavation and compaction of soils at the Phase 1 warehouse building pad;
- Installation of the proposed stormwater basin in the southwest portion of the site;
- Trenching and installation of stormwater lines and installation of a new offsite stormwater outfall;
- Widening of Airport Road, including traffic control and lane closures on an intermittent basis;
- Widening of Landing Way, including traffic control and lane closures on an intermittent basis;
- Potential construction of the Rollie Gates Drive extension from Airport Road to the warehouse;
- Realignment of the Dry Creek Road/Landing Lane intersection with Airport Road;
- Installation of a low water crossing over Huer Huero Creek and construction of connecting access roadways;
- Grading and compaction of soils for Phase 1 interior roadways, including dewatering;
- Installation of curb, gutters, and sidewalks for Phase 1 roadways;
- Asphalt paving of Phase 1 interior roadways and parking areas;
- Road striping and installation of signage; and
- Monitoring, including dust control and construction stormwater runoff;

2.5.3.1.3 WAREHOUSE CONSTRUCTION

Construction of the warehouse facility would occur following land preparation of the Phase 1 portion of the project site. The floor slab and walls would be composed of poured concrete and the walls would then be tilted up by a crane. The roof would be installed, asphalt and concrete surface areas (drive isles, truck courts, and parking areas) finished, the building would be painted, and light fixtures, landscaping, and signage would be installed. Once a building user has been identified, interior tenant improvements would occur, including installation of partition walls, interior technology, machinery, etc.

Activities during this stage would include:

- Forming, rebar, and concrete pouring of the warehouse foundation;
- Forming, rebar, and concrete pouring of concrete wall panels;
- Tilt-up of the concrete wall panels with a crane;
- Installation of the roof;
- Installation of doors, windows, and exterior trim;
- Installation of the ESFR sprinkler system and water storage tank;
- Installation of interior electrical, mechanical, and plumbing;
- Architectural finishes, such as painting; and
- Installation of building user-specific equipment, such as warehouse racking and a potential refrigeration system.

2.5.3.1.4 MAINTENANCE BUILDING EXPANSION

Exact details regarding the construction of the maintenance building expansion are unknown at this time. It is expected that construction of this component would be similar to construction of the Phase 2 buildings and would have an approximately 5-month-long construction period. No additional grading is anticipated as this portion of the project site has been previously graded and is nearly level. Infrastructure improvements, such as connection to stormwater and sewer lines, would be completed by the Applicant during the other Phase 1 construction up to the property line of the new parcel (Lot 33). The City would be responsible for installation of onsite infrastructure to connect to the new main lines.

Maintenance building construction activities would include:

- Establishment of construction staging and material storage areas;
- Delivery, staging, and storage of materials and equipment to the site;
- Over-excavation and compaction of soils at the building pad;
- Trenching and installation of stormwater lines;
- Asphalt paving of interior drive aisles and parking areas;
- Monitoring, including dust control and construction stormwater runoff;
- Construction of the expansion, including, foundation, framing, electrical, mechanical, plumbing, and architectural finishes;
- Landscaping; and
- Installation of user-specific equipment.

2.5.3.2 Phase 2

Construction of the Phase 2 portion of the project site would occur following Phase 1. The warehouse is expected to be in operation prior to the start of construction on Phase 2. However, there is a possibility that some of the uses on the eastern portion of the property could commence construction before the warehouse building is operational if market demand for the uses on the Phase 2 portion of the site supports concurrent construction. In any event, construction on Phase 2 is expected to begin no later than April 2024. Each building would have an approximately 5-month-long construction period and full

buildout is expected to take 5 years. This EIR analyzes the most intensive construction scenario for Phase 2, which includes construction concurrent with Phase 1.

Grading for Phase 2 would require approximately 53,900 cubic yards of cut and 68,075 cubic yards of fill. If excess soil is available, it would be hauled offsite. After completion of site preparation and rough grading on the Phase 2 portion of the site, infrastructure would be installed, and finish grading would be completed. New water, sewer, and stormwater lines would be installed beneath the internal circulation system. Electrical, natural gas, fiber optic lines would also be undergrounded beneath the internal circulation system and would connect to existing connections beneath Airport Road.

Phase 2 construction activities would include:

- Establishment of construction staging and material storage areas;
- Delivery, staging, and storage of materials and equipment to the site;
- Rough and finish grading for the Phase 2 area, including dewatering;
- Over-excavation and compaction of soils at the Phase 2 building pads;
- Trenching and installation of underground wet and dry utilities (water, sewer, stormwater, natural gas, electric, telephone, cable, and irrigation) for the Phase 2 portion of the site;
- Trenching and installation of stormwater lines;
- Grading and compaction of soils for Phase 2 interior roadways, including dewatering;
- Installation of curbs, gutters, and sidewalks for Phase 2 roadways;
- Asphalt paving of Phase 2 interior roadways and parking areas;
- Road striping and installation of signage;
- Monitoring, including dust control and construction stormwater runoff;
- Construction of Phase 2 buildings, including, foundation, framing, electrical, mechanical, plumbing, and architectural finishes;
- Landscaping; and
- Installation of building user-specific equipment.

2.5.4 Project Design

The Conceptual Master Development Plan includes Design Guidelines, and all development in Phases 1 and 2 of the project would be required to be consistent with the Conceptual Master Development Plan and Design Guidelines. The Design Guidelines were developed to be used in conjunction with the City's existing Commercial and Industrial Design Guidelines. Generally, the design style presented in the Design Guidelines is a combination of modern agricultural-, industrial-, and aviation-inspired themes. Concrete block, metal, and wood are the primary materials that tie the various uses together, along with liberal amounts of glass and passive shading elements, such as trellises. Colors generally are neutral, including greys and browns, with pops of yellows, oranges, and blues. See Appendix B for the complete Design Guidelines.

2.5.5 Circulation

The project site (specifically the Phase 2 development) fronts Airport Road to the east and a remnant portion of the abandoned Dry Creek Road (Landing Lane) to the southwest. Phase 1 of the project includes improvements to all project site frontage streets and the construction of a new internal circulation

system to service the Phase 1 portion of the site. The remaining internal circulation system improvements on the Phase 2 portion of the site would occur during Phase 2 construction.

Access to the project site would be provided via Airport Road, Landing Lane, and a potential extension of Rollie Gates Drive that would extend west of Airport Road to provide access to the proposed warehouse building (Figure 2-7). Proposed offsite road improvements include widening Airport Road from just south of Dry Creek Road (east) to Buena Vista Drive, Landing Lane from just east of Airport Road to the project site's southwest corner, construction of a low water crossing over Huer Huero Creek by modifying a planned non-vehicular crossing to a vehicular crossing (further described below) and connecting access roads, and potentially the construction of a new segment of Rollie Gates Drive extending west from Airport Road and curving south to meet the northeastern corner of the proposed warehouse building site. As part of the widening of Dry Creek Road (east), the eastern intersection connection would be relocated to align with Landing Lane to the west. Offsite road improvements, including the potential Rollie Gates Drive extension, would total 17.31 acres.

Truck access for the proposed warehouse building would be provided via a north/south driveway extending north from Landing Lane to the warehouse building. A potentially new segment of Rollie Gate Drive west of Airport Road may be constructed to serve as a secondary or alternative access to the warehouse building. Access to the uses proposed in the eastern 63.88 acres of the project site would be provided from driveways extending from Airport Road and Landing Lane.

2.5.5.1 Airport Road

Airport Road along the project frontage is currently improved as a two-lane, undivided arterial roadway with 12-foot-wide asphalt travel lanes and 2-foot-wide unimproved shoulders. The roadway is within a 75-foot public right-of-way (ROW) and does not include bike lanes or sidewalks. Travel lanes along the entire project site frontage would be widened to 12 feet wide and would include a new center left-turn lane or planted median along the project site frontage and 5-foot-wide paved shoulders. A new 12-foot-wide Class I bikeway would be constructed along the project frontage on the west side of Airport Road, separated from the roadway and shoulder by a 6-foot-wide parkway. New 200-foot northbound left-turn lanes would be constructed south of the project site to support turns onto Landing Lane (to the Winery Row Industrial Tract) and along the northern project site frontage to support turns onto a new northern access driveway south of the CAL FIRE station. A 105-foot southbound left-turn lane onto Dry Creek Road would be installed along the southern project site frontage. If northern access at a new Rollie Gates Drive extension is constructed, a 200-foot southbound left-turn lane onto Rollie Gates Drive into the Airport would also be constructed. As part of the Airport Road widening, an existing drainage ditch along the east side of Airport Road would be relocated further east onto City-owned property (Figure 2-8).

2.5.5.2 Landing Lane

The remnant portion of Dry Creek Road is a local road that has historically only provided access to the Paso Robles Boys School facility and adjacent landowners. A majority of the ROW is abandoned and only a remnant piece remains. The project would abandon the remaining ROW and would use the alignment for the project access road, which would be renamed Landing Lane (Figure 2-9).

2.5.5.3 Landing Lane and Dry Creek Road Intersection

The existing intersection at the abandoned remnant portion of Dry Creek Road (Landing Lane) and Dry Creek Road (east) is offset by approximately 50 feet. The project would realign the intersection by relocating Dry Creek Road (east) to the north to align with Landing Lane. In addition, a new approximately 580-foot left-turn lane onto Airport Road from Dry Creek Road would be constructed. The realignment would be located entirely within existing ROW or on City (airport) property (Figure 2-10).

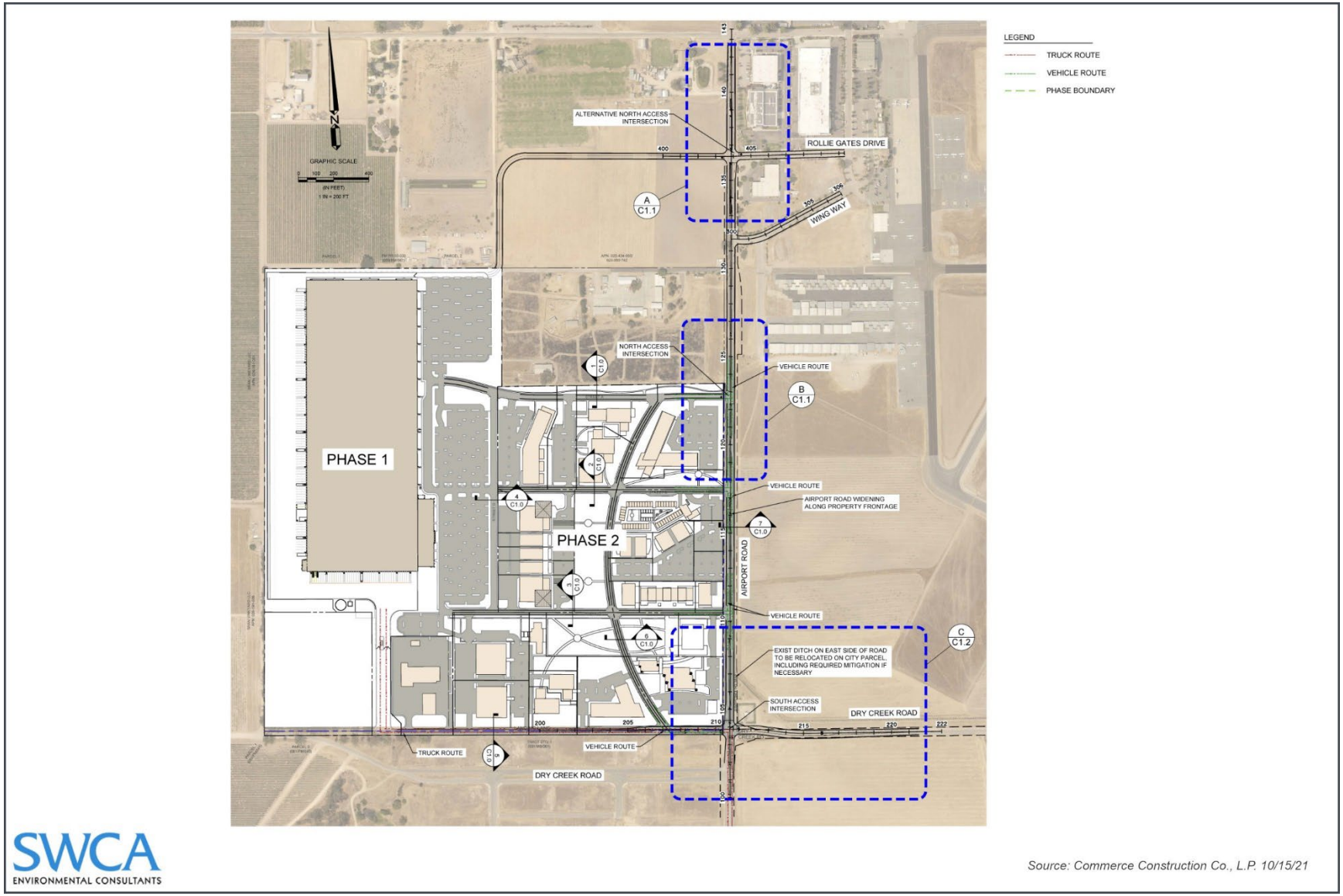


Figure 2-7. Circulation Plan.

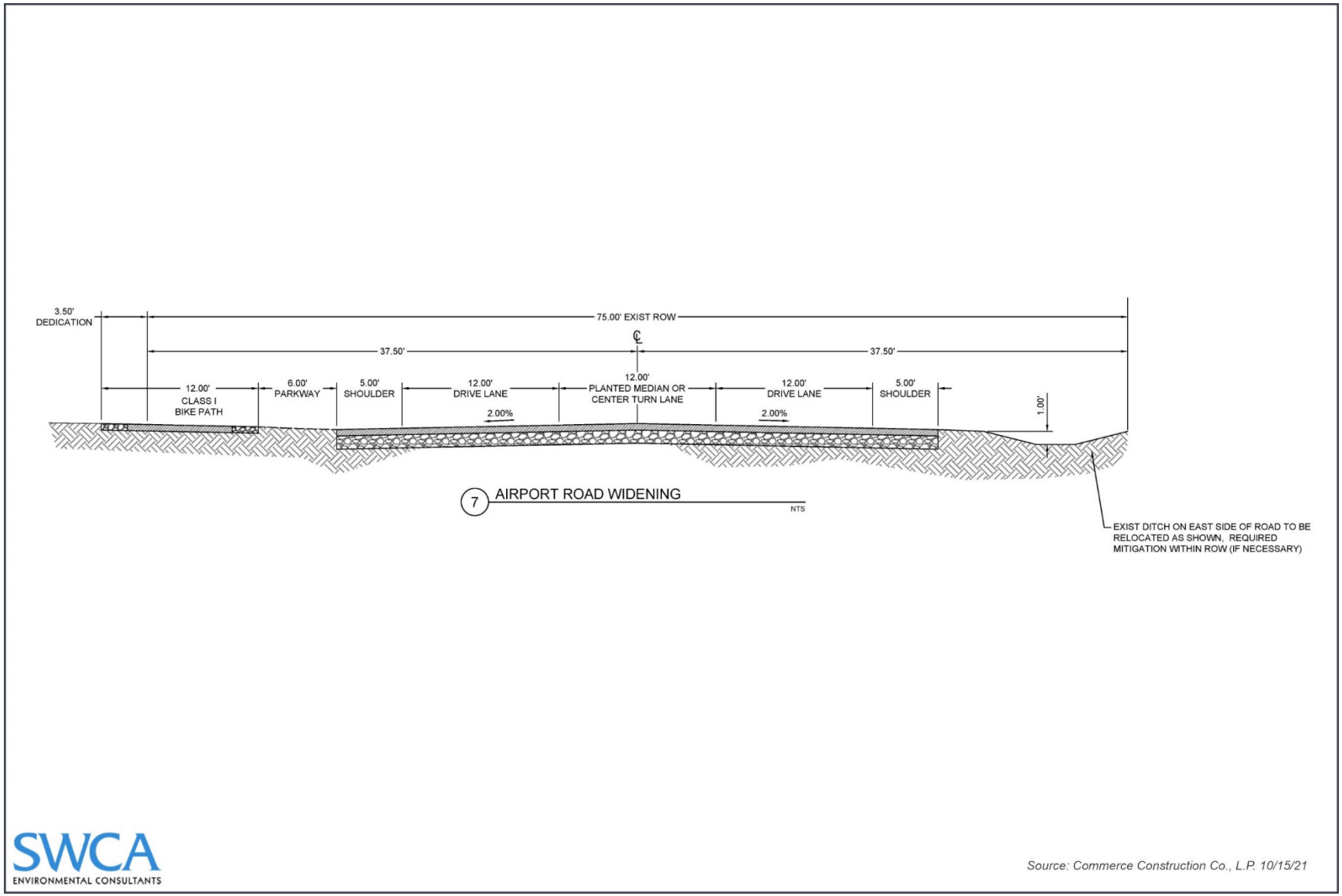


Figure 2-8. Airport Road Improvements.

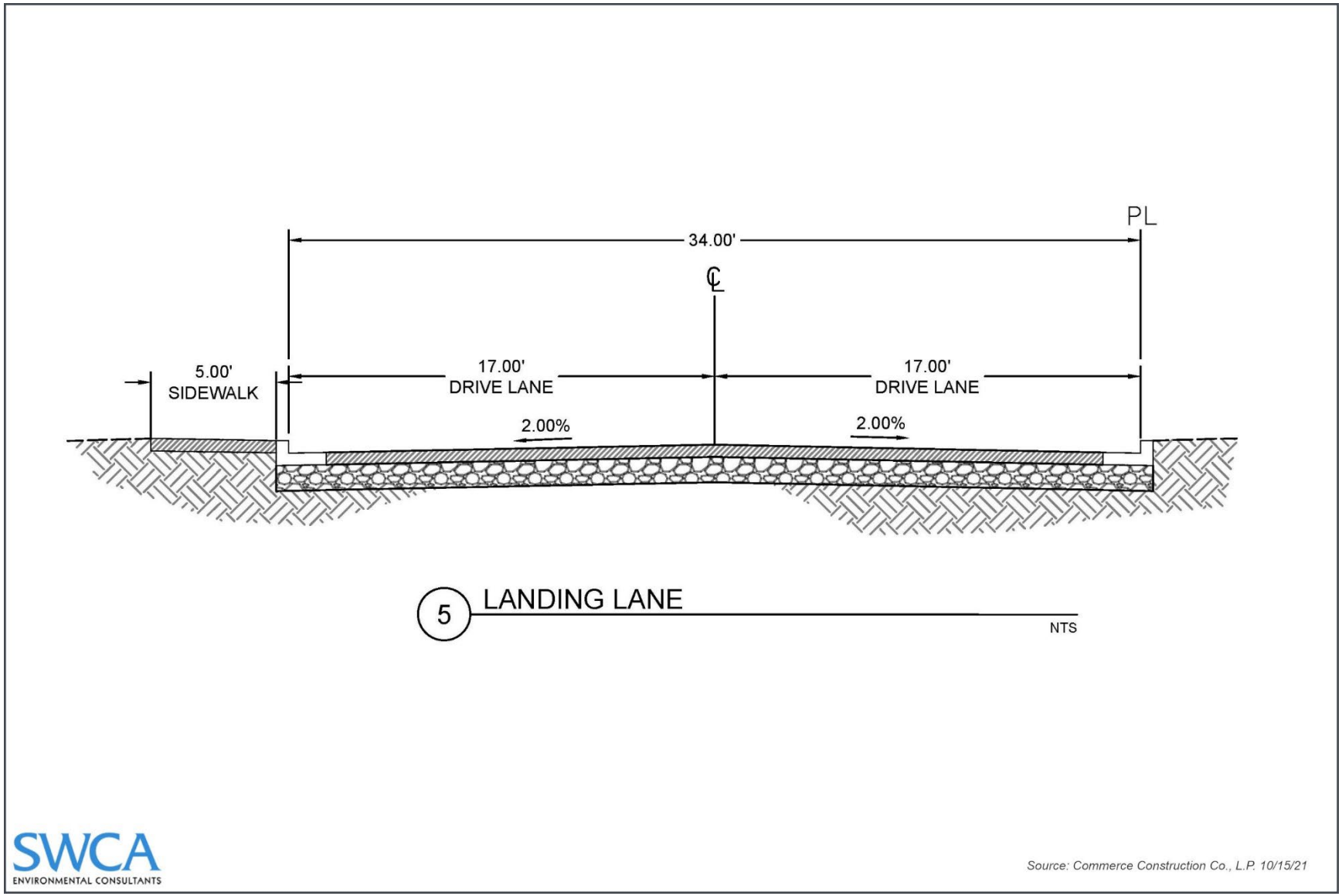


Figure 2-9. Landing Lane Improvements.

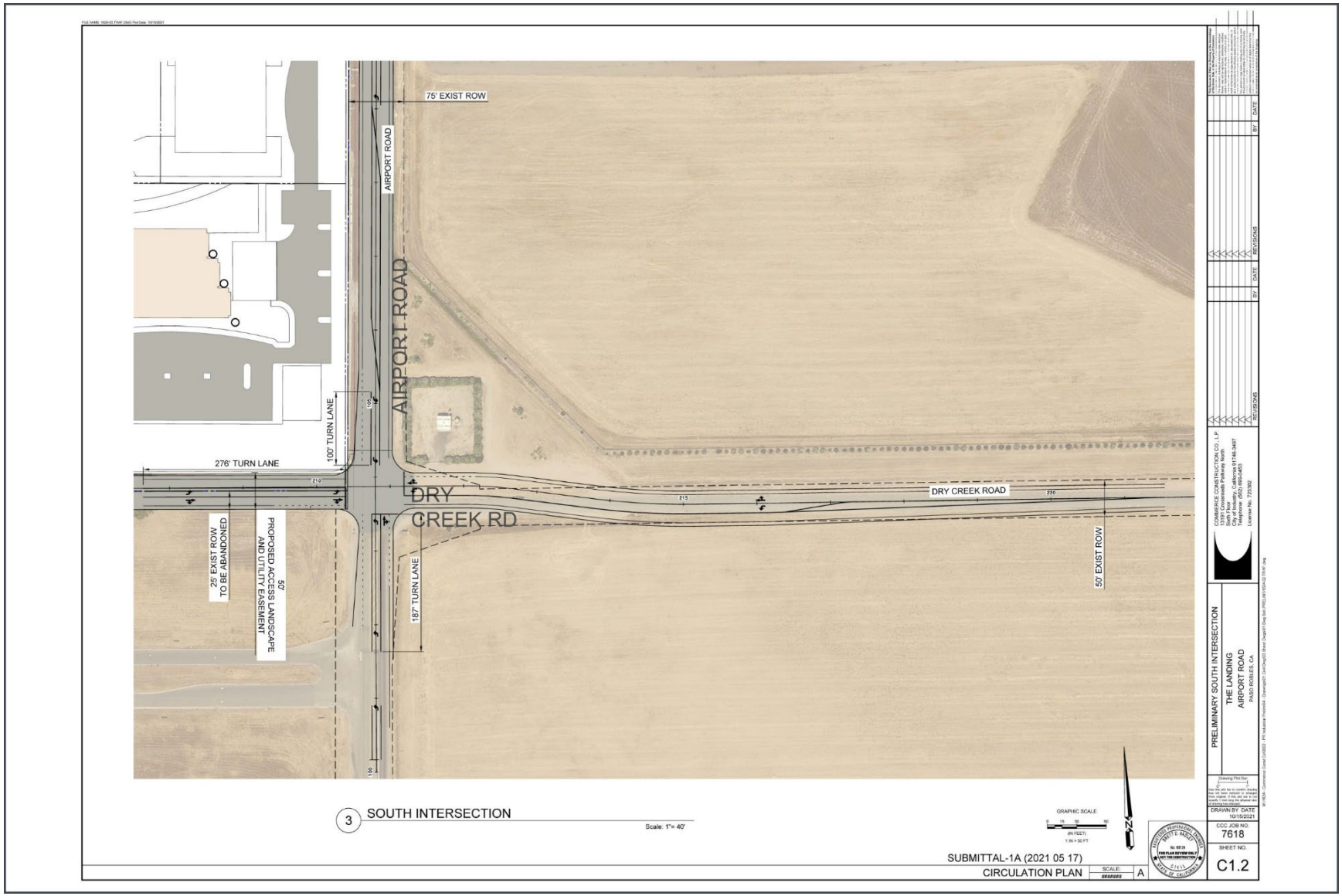


Figure 2-10. Landing Lane and Dry Creek Road Intersection Improvements.

2.5.5.4 Rollie Gates Drive

As an alternative access option for vehicle and truck traffic, an extension of Rollie Gates Drive may be constructed for use of trucks exiting the facility and for vehicles entering the surface parking lot. This extension would align with the existing Rollie Gates Drive that leads into the Paso Robles Municipal Airport (Figure 2-11).

2.5.5.5 Modified Class I Multiuse Trail Low Water Crossing Over Huer Huero Creek

The Phase 1 warehouse use is expected to generate 3,910 daily passenger vehicle and 766 daily truck trips, which would add additional traffic on the SR 46E corridor. To address transportation safety for southbound to eastbound left-turning trucks onto SR 46E leaving the project site, and eastbound to northbound left-turning trucks traveling to the project site, the Applicant proposes to temporarily route left-turning trucks to the signalized intersection at SR 46E and Golden Hill Road to limit truck traffic using the current Airport Road and SR 46E intersection. Trucks would travel south from the project site, west on Wisteria Lane, and south on Golden Hill Road, and in the reverse pattern when traveling toward the project site. At the intersection of Wisteria Lane and Golden Hill Road, lane striping revisions would be made to accommodate truck turns, and parking restrictions would occur on Wisteria Lane.

For the past several years, the City has been in the process of designing and conducting environmental review for vehicular and multi-use infrastructure improvements that would reduce traffic on SR 46E near Airport Road (Huer Huero Bridge and Roundabout Project). The proposed New Airport Road extension and bridge over Huer Huero Creek would connect businesses and residences west of the creek with the Paso Robles Municipal Airport, businesses, and residences east of the creek and allow traffic to access the signalized intersection at Golden Hill Road. The Huer Huero Bridge and Roundabout Project, which is a separate and independent project irrespective of the proposed project evaluated in this EIR, consists of three main components located within a project area of approximately 13.3 acres: the New Airport Road extension and bridge across Huer Huero Creek, realignment of a portion of Airport Road and a new roundabout intersection with New Airport Road, and a Class I multiuse trail extending from Union Road at Barney Schwartz Park to the Cava Robles RV Resort. A Mitigated Negative Declaration (MND) pursuant to CEQA was adopted for the Huer Huero Bridge and Roundabout Project by the City Council on September 30, 2022 (State Clearinghouse [SCH] Number 2022060295).[2] Mitigation measures were adopted to reduce impacts related to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Hydrology and Water Quality, and Tribal Cultural Resources.

Due to the unknown timing of the funding and construction of Huer Huero Creek Bridge, the Applicant is proposing to construct or fund the construction of the Class I Multiuse Trail low water crossing as previously planned and approved by the City as part of the Huer Huero Bridge and Roundabout Project, but with a modified design to accommodate project truck traffic on a temporary basis until such a time that Huer Huero Creek Bridge is constructed and operational. The modified Class I Multiuse Trail low water crossing would be located in the location currently approved for the segment of the Class I trail associated with the permanent Huer Huero Creek Bridge that is planned to generally run parallel to and across Huer Huero Creek, with at-grade creek crossings. The modifications would accommodate vehicular use of the low water crossing are analyzed in this EIR.

[2] The Huer Huero Bridge and Roundabout Project MND, approved by the City Council on September 30, 2022, is herein incorporated by reference and available for public review on the City's website at: https://www.prcity.com/357/CEQA-Documents.

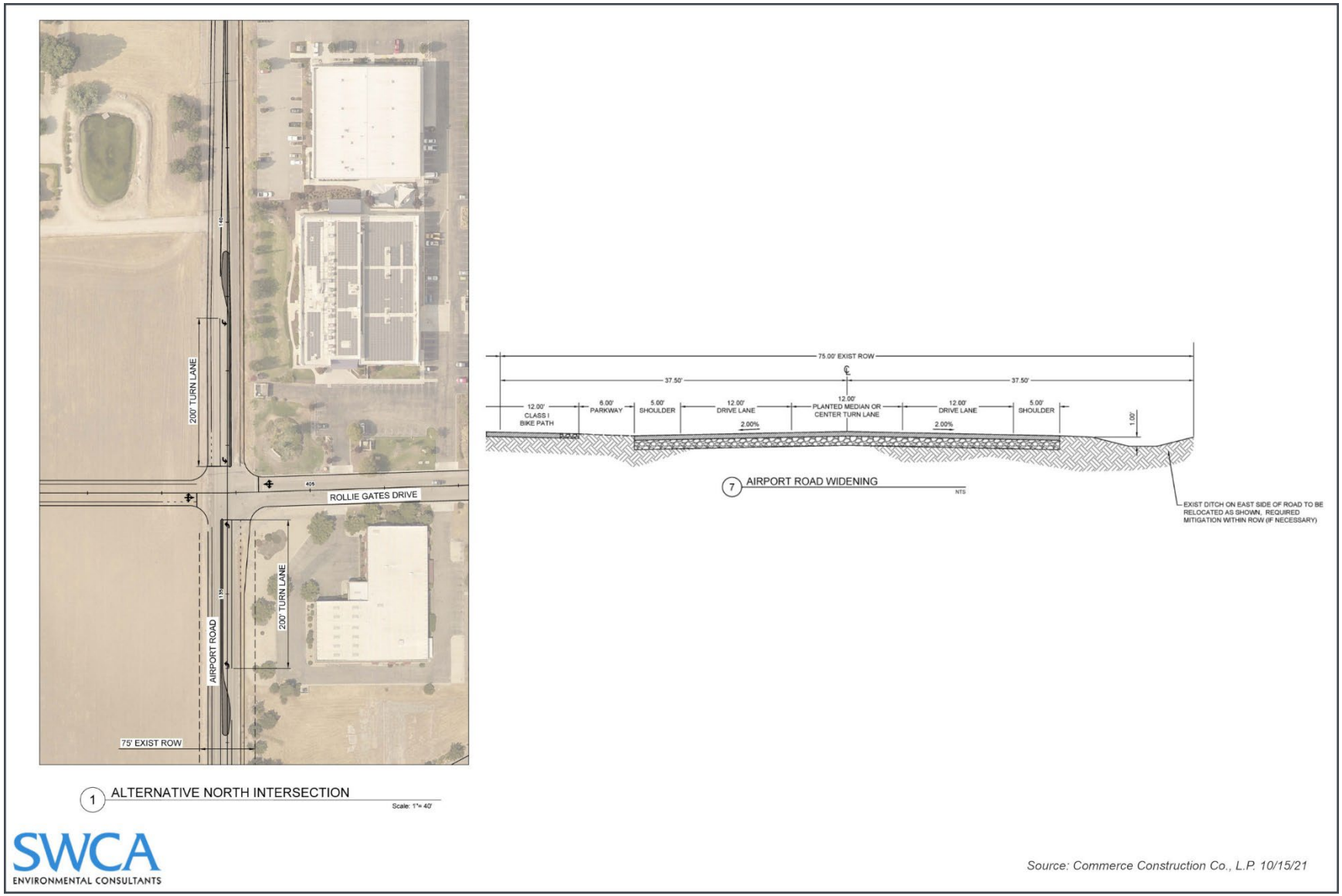


Figure 2-11. Rollie Gates Drive Improvements.

Also analyzed in this EIR are proposed connecting roadways from Airport Road to the modified Class I Multiuse Trail low water crossing and from the modified Class I Multiuse Trail low water crossing to New Airport Road. The modified Class I Multiuse Trail low water crossing is proposed as a two-lane, 32-foot-wide, 200-foot-long, at-grade crossing so as to not obstruct significant flood flows. (Note that water flow in this portion of Huer Huero Creek is typically subterranean.) The modified Class I Multiuse Trail low water crossing is anticipated to be a precast prestressed concrete slab with driven steel pipe piles. Compared to the low water crossing that was previously approved and analyzed by the City in the Huer Huero Bridge and Roundabout Project MND, the modifications proposed are to widen the planned crossing to allow temporary use by vehicular traffic include a 32-foot-wide bridge instead of an 18-foot-wide bridge. The bridge length (span) of approximately 200 feet would remain the same and the need for piles would remain the same. The bridge would span approximately one foot above the low flow channel of the Huer Huero Creek, supported by five driven steel pipe piles.

After completion of Huer Huero Creek Bridge, project traffic would use the new Huer Huero Creek Bridge to Golden Hill Road. The modified Class I Multiuse Trail low water crossing and connecting roadways that were installed to temporarily accommodate vehicles from The Landing Paso Robles would cease to be used by vehicular traffic and would be converted for use as the originally planned Class I trail. At that time, the City, in conjunction with regulatory permitting agencies, would decide if the 32-foot-wide bridge would remain or if it would be partially deconstructed and reduced in width to its originally planned 18-foot width. If partially deconstructed, the Applicant would be required to deconstruct or fund the deconstruction of the modified Class I Multiuse Trail low water crossing.

2.5.6 Utilities and Services

2.5.6.1 Electrical and Natural Gas

The Applicant proposes to underground existing aboveground electrical facilities. Electricity would be provided by Pacific Gas and Electric Company (PG&E). Natural gas service would be extended to the eastern portion of the project site within Airport Road and would be provided by the Southern California Gas Company (SoCalGas).

2.5.6.2 Water

During Phase 1 demolition activities, the project would abandon the existing water lines and a private onsite well in place and install new infrastructure that would connect to the City's existing water system. During Phase 1 construction, within Landing Lane, a 12-inch water main would be installed and connected to the existing 16-inch city main within Airport Road. This main line would be extended throughout the project area within the internal access roads during Phase 1. Smaller 1- to 3-inch domestic water lines would be extended to individual lots during Phases 1 and 2, with the exception of Lots 6, 12, 21–23, and 34, which would only receive irrigation and/or stormwater lines (Figure 2-18). The fire suppression water system would have a dedicated private main line routed through the project site within the internal access roads and would be connected to the water storage tank and pump house. A double-check assembly[3] would protect the main water system from cross contamination. To serve landscaping, each lot would be provided 3/4- to 2-inch irrigation water lines. In anticipation of future recycled (purple) water from the City, the project anticipates that the City would install a 4-inch recycled water main within Airport Road at some point in the future and therefore, during Phase 1 construction, the project would stub a recycled water connection to the property from Airport Road for future service.

[3] A double-check assembly is a type of backflow prevention that is meant to protect the potable water supply from cross contamination or pollution from the fire system, including from stagnant water that sits in fire lines, back pressure from fire line pumps, and leaks in the fire line.

2.5.6.3 Wastewater

During Phase 1 demolition activities, the project would abandon a portion of the existing sewer line and a new sewer network would be constructed onsite that would convey flows to the City's existing sewer system. An existing 8-inch sewer line exists from the CAL FIRE property to the center of the project site and would be partially abandoned during Phase 1 construction and reconnected to the project's new sewer network. New sewer main lines would be installed within Landing Lane and with the footprint of internal access roads during Phase 1 construction. Smaller 4- to 8-inch sewer lines would be extended to each individual lot during Phases 1 and 2 construction, with the exception of Lots 6, 12, 21–23, and 34, which would only receive irrigation and/or stormwater lines (Figure 2-18). In addition to sewer lines, during Phase 2 construction, the project would install a new wastewater line to convey processing-relating wastewater from the winery to a recycling plant near the stormwater basin that would treat the water used from the fermentation process and generate recycled water for irrigation.

An existing 8-inch vitrified clay City sewer main is located at the western terminus of Landing Lane, and continues southwest to Lift Station #12, located just east of Huer Huero Creek. Due to the project's anticipated peak flow rate of 450 GPM, the project would necessitate the installation of a new, increased capacity wastewater line (12-inch PVC pipe) to convey wastewater from the project site to Lift Station #12. This sewer line installation would occur during Phase 1 construction and would result in approximately 0.48 acre of site disturbance within an existing 30-foot-wide by 1,600-foot-long agricultural road corridor. Additionally, Lift Station #12 would be upgraded as part of the project, during Phase 1 construction, with new pumps and mechanical equipment, but no physical expansion of the lift station would be required.

2.5.6.4 Stormwater

As noted in *Section 2.5, Project Characteristics*, Phase 1 of the project would include construction of a new stormwater basin in the southwestern corner of the property. Stormwater main lines would be installed within Landing Lane, the internal circulation system, and parking lot areas and would lead to the new stormwater basin. A new storm drain line would be installed in City ROW from the stormwater basin to a new outfall location within the Huer Huero Creek channel. Trenching for the storm drain line would impact approximately 2,200 linear feet by 50 linear feet within the ROW and would result in approximately 1.37 acres of disturbance during Phase 1 construction.

2.5.6.5 Internet and Phone

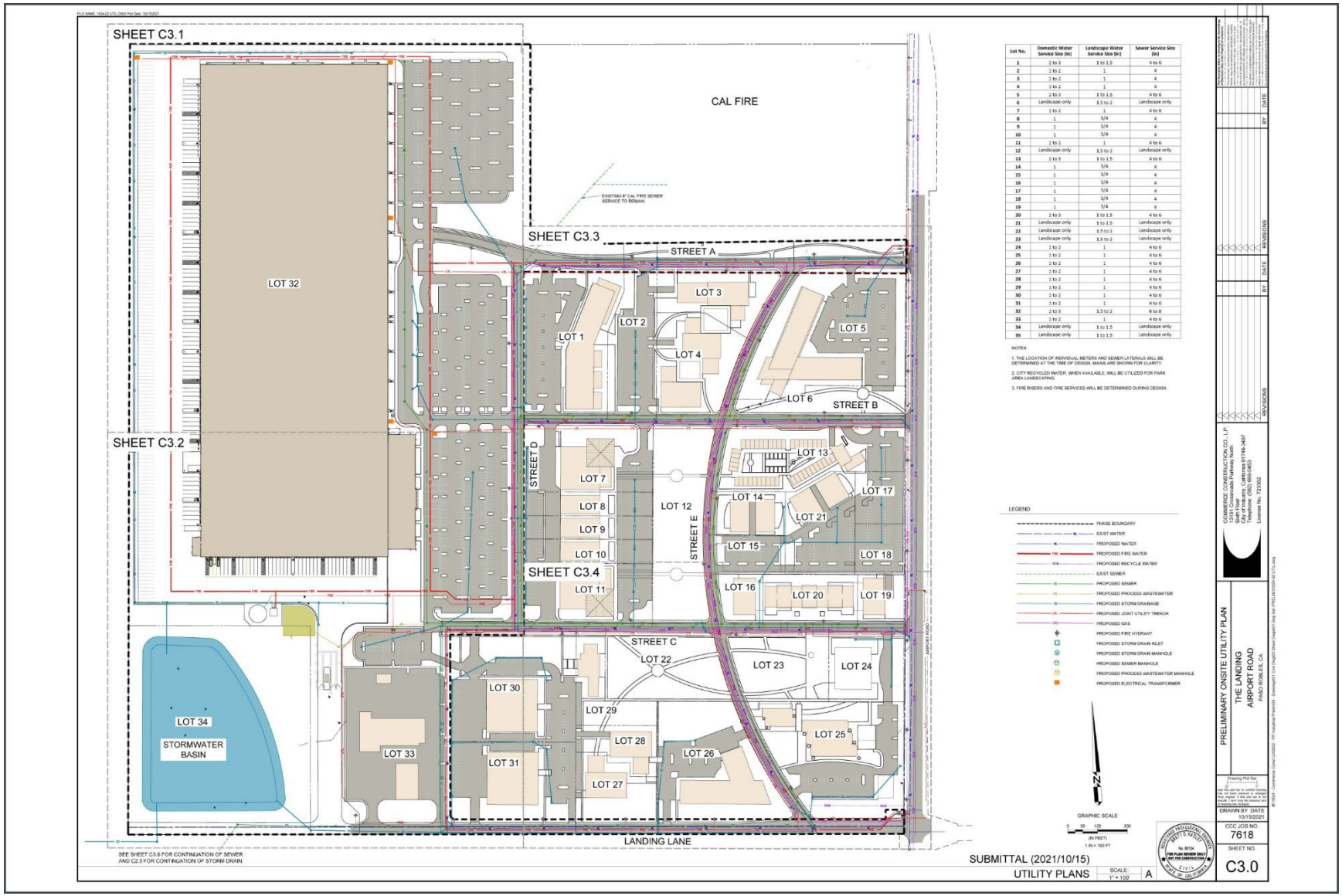
All new internet, telephone, and cable lines would be undergrounded within proposed internal roadways. Charter Communications would provide internet and television services. American Telephone and Telegraph Company (AT&T) would provide telephone services.

2.5.6.6 Garbage and Recycling

Centralized solid waste facilities would be provided throughout the project site. Solid waste would be picked up and hauled off by Paso Robles Waste Disposal.

2.5.7 Sign Program

The project proposes a Master Sign Program that would include various sign types (Figure 2-14). A larger, horizontal freestanding monument sign would provide the primary identity marker for the site and be located at the intersection of Airport Road and Landing Lane. This sign would be approximately 6 feet tall; constructed primarily of concrete, wood, and aluminum; and externally illuminated (Figure 2-15).



Lot No.	Domestic Water Service Size (in)	Landscape Water Service Size (in)	Sewer Service Size (in)
1	2 to 3	1 to 1.5	4 to 6
2	1 to 2	1	4
3	1 to 2	1	4
4	1 to 2	1	4
5	2 to 3	1 to 1.5	4 to 6
6	Landscape only	1.5 to 2	Landscape only
7	1 to 2	1	4 to 6
8	1	3/4	4
9	1	3/4	4
10	1	3/4	4
11	1 to 2	1	4 to 6
12	Landscape only	1.5 to 2	Landscape only
13	2 to 3	1 to 1.5	4 to 6
14	1	3/4	4
15	1	3/4	4
16	1	3/4	4
17	1	3/4	4
18	1	3/4	4
19	1	3/4	4
20	2 to 3	1 to 1.5	4 to 6
21	Landscape only	1 to 1.5	Landscape only
22	Landscape only	1.5 to 2	Landscape only
23	Landscape only	1.5 to 2	Landscape only
24	1 to 2	1	4 to 6
25	1 to 2	1	4 to 6
26	1 to 2	1	4 to 6
27	1 to 2	1	4 to 6
28	1 to 2	1	4 to 6
29	1 to 2	1	4 to 6
30	1 to 2	1	4 to 6
31	1 to 2	1	4 to 6
32	2 to 3	1.5 to 2	4 to 8
33	1 to 2	1	4 to 6
34	Landscape only	1 to 1.5	Landscape only
35	Landscape only	1 to 1.5	Landscape only

Figure 2-12. Utilities Plan.

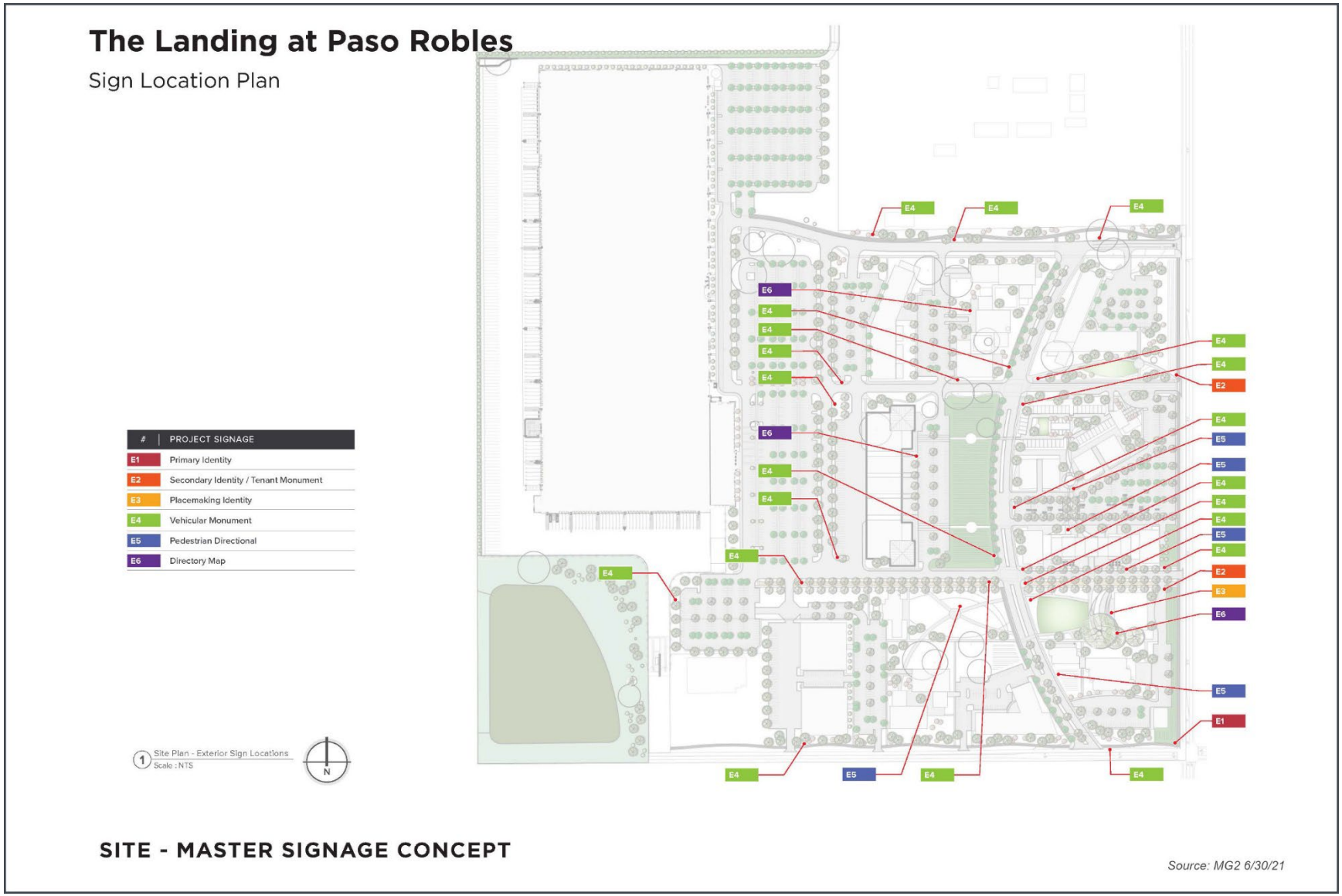


Figure 2-13. Project Master Sign Plan.

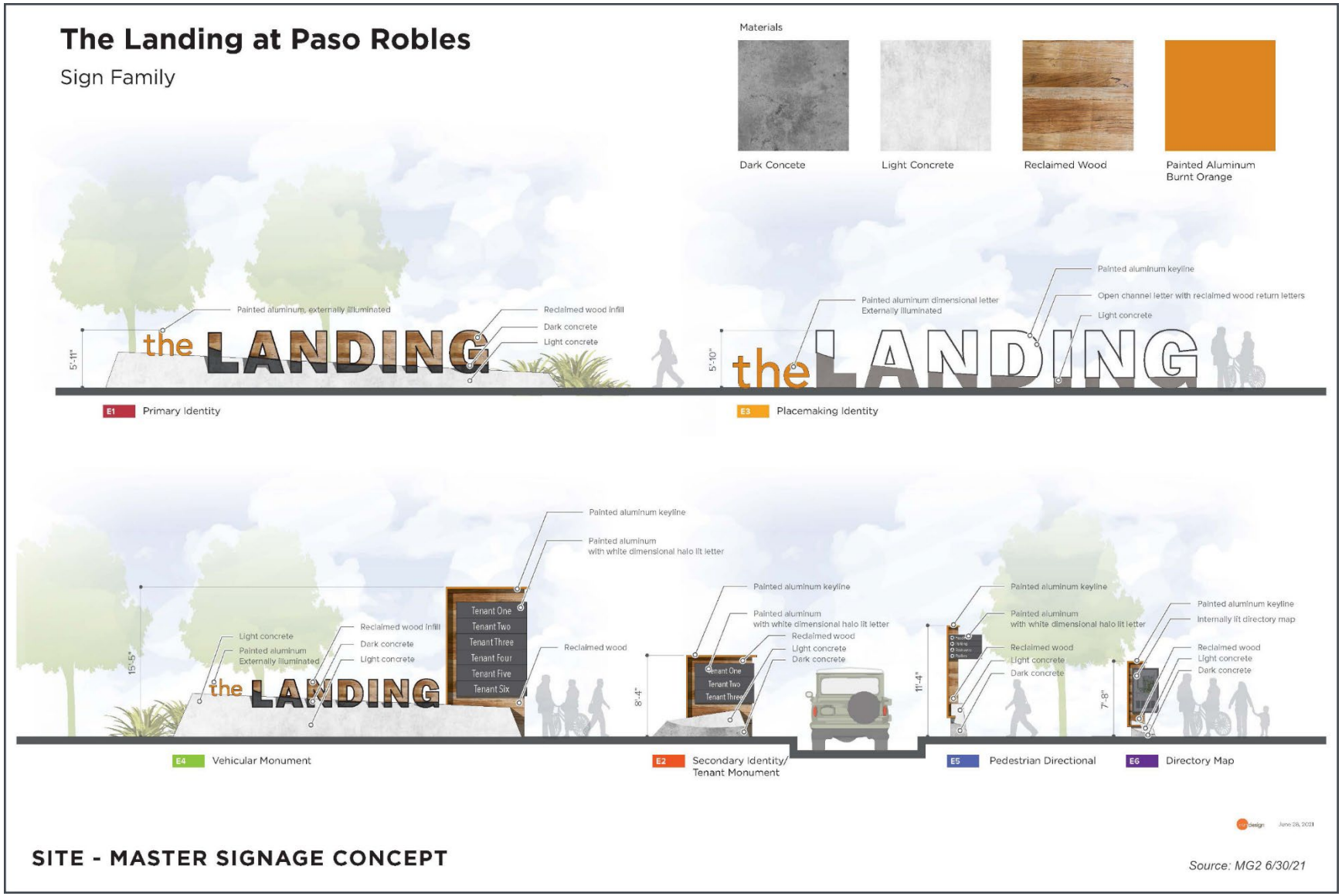


Figure 2-14. Conceptual Sign Renderings.

A similar sign would be provided internal of the site near the pedestrian plaza. Vertical monument signs, up to 15.5 feet tall, would provide for vehicular wayfinding throughout the project interior, primarily at roadway or drive aisle intersections. These signs would be constructed primarily of concrete, wood, and aluminum and would be externally illuminated. Smaller, vertical monument signs, pedestrian directional signs, and directory maps would be placed throughout Phase 2 areas of the site and would be between 7 and 11.5 feet tall. These signs would be constructed primarily of concrete, wood, and aluminum and either internally illuminated or illuminated with halo-lit lettering.

2.6 ENTITLEMENTS

2.6.1 General Plan Amendment (GPA)

The *City of El Paso de Robles General Plan 2003 Land Use Element* (LUE) designates the entire property for PF uses. The proposed GPA would change the land use designation of the site from PF to BP (Figure 2-16). In addition to the designation change, a text amendment to LUE Table LU-4 is proposed to amend the description of BP land use type to include specific visitor-serving uses:

> Business Park (BP): Areas for clean and attractive businesses and industries, in which all activities are conducted indoors (some limited outdoor storage may be permitted via approval of a conditional use permit and if completely screened). Manufacturing, fabrication, assembly, research and development, industrial services, warehousing, wholesale, and convenience commercial uses, particularly those that support industrial uses (e.g., copy/blueprint services, coffee shops, convenience markets, gasoline sales). Additional use types not listed above, such as visitor-serving specialty retail are only allowed where a Zoning Code Section 21.13.030 zone overlay specifically allows these uses.

2.6.2 Zone Change

The project site is zoned for PF uses in the City's Zoning Code (Title 21 of the Municipal Code). The project would change the zoning designation of the site from PF to AP with a PD overlay to allow for the development of uses that comply with the requirements of the ALUP (City of El Paso de Robles 2007). In addition, a special condition overlay (Section 21.13.030.K) is proposed to be placed on the property to provide site-specific development standards for the entire project site, where a mixture of employment and visitor-serving uses are proposed (Figure 2-17).

2.6.3 Vesting Tentative Tract Map

The Applicant is requesting a VTTM (Tract 3175) to subdivide the property into 34 lots to facilitate development of the project and to convey the maintenance building lot to the City (Figure 2-18). The VTTM includes preliminary grading and drainage plans, preliminary utility plans, and proposed road sections.

Lot sizes would range in size from 0.63 acre to 62.63 acres for the warehouse lot; however, most lots would be between 0.63 acre and 5.42 acres.

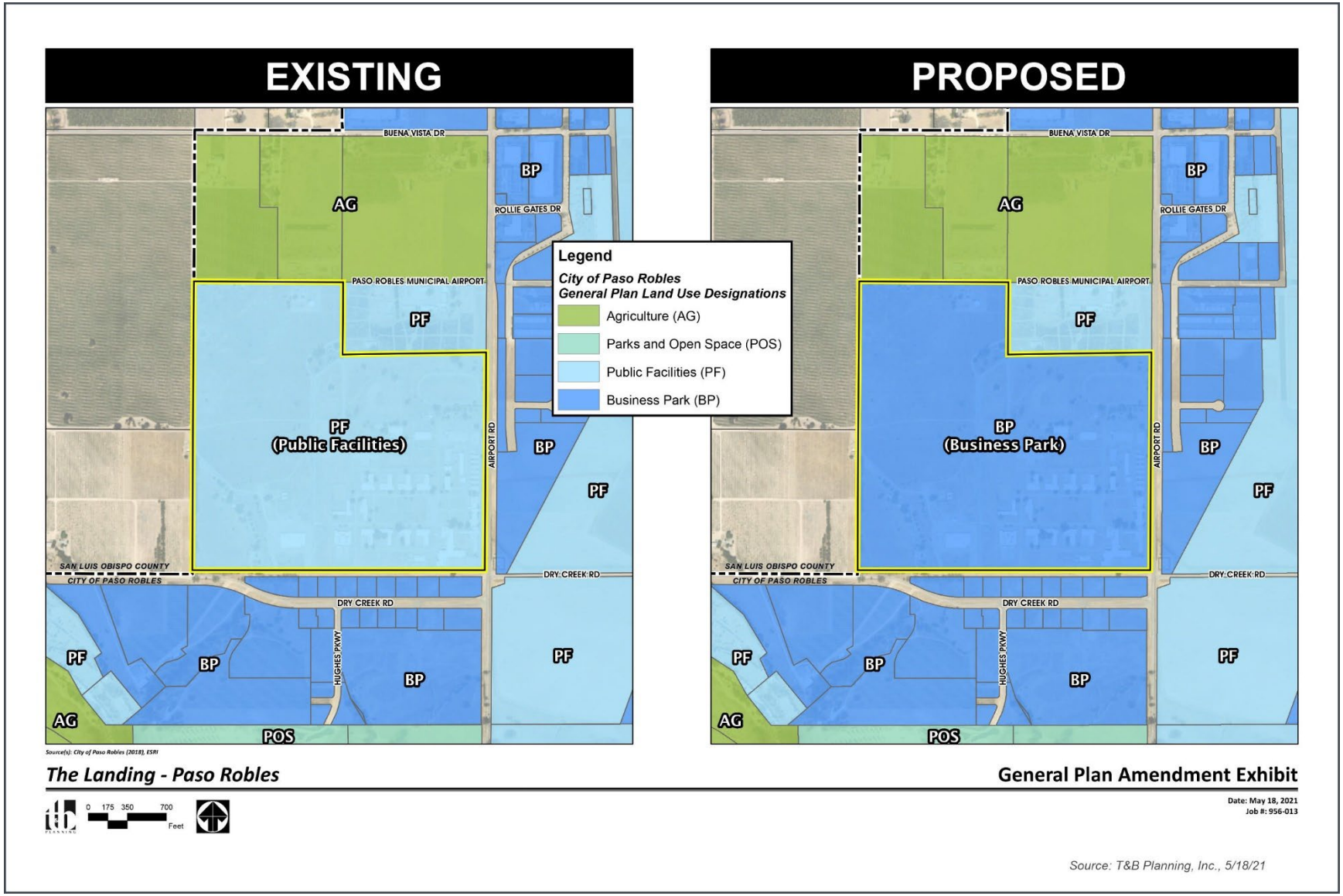


Figure 2-15. General Plan Amendment.

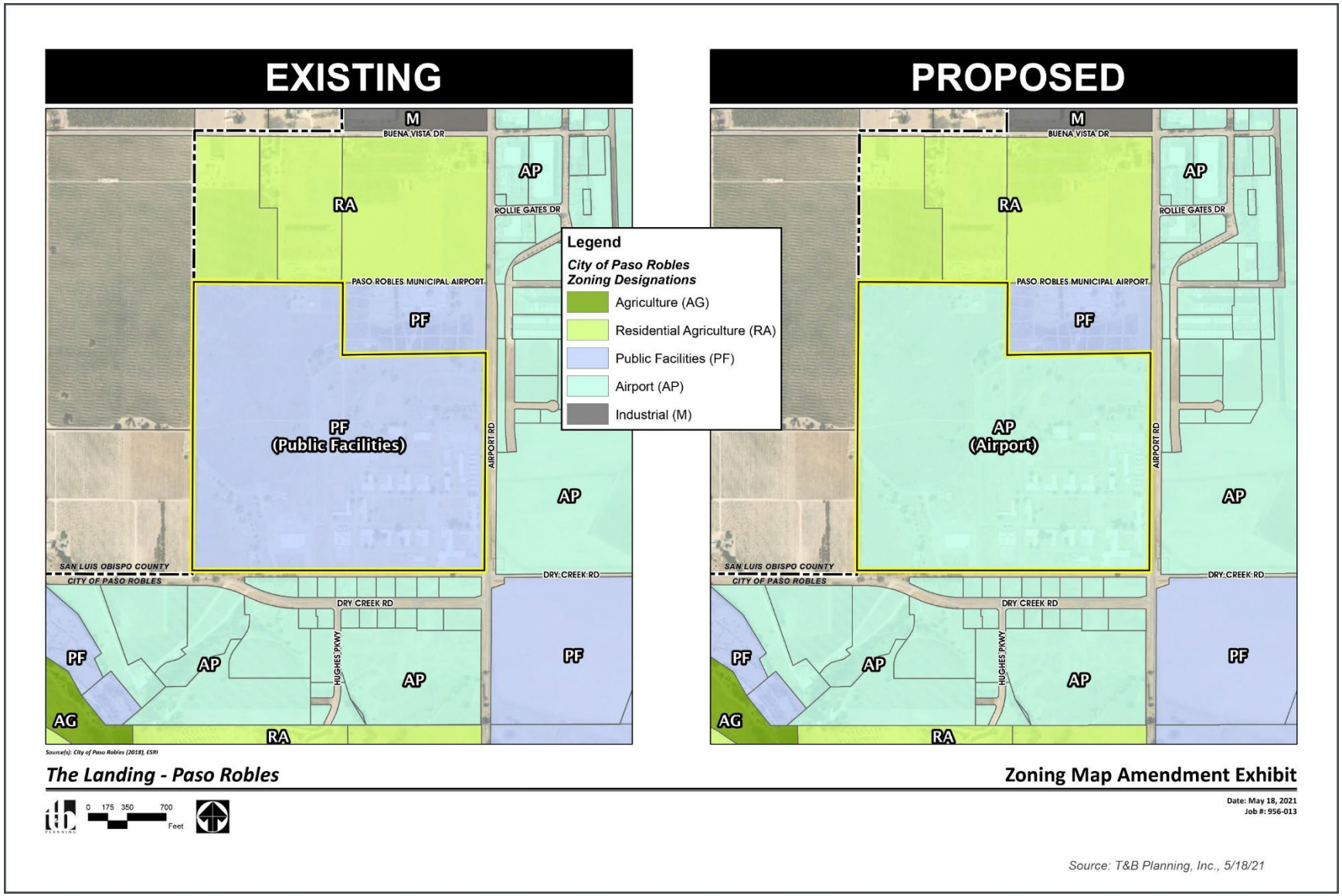


Figure 2-16. Zone Change.

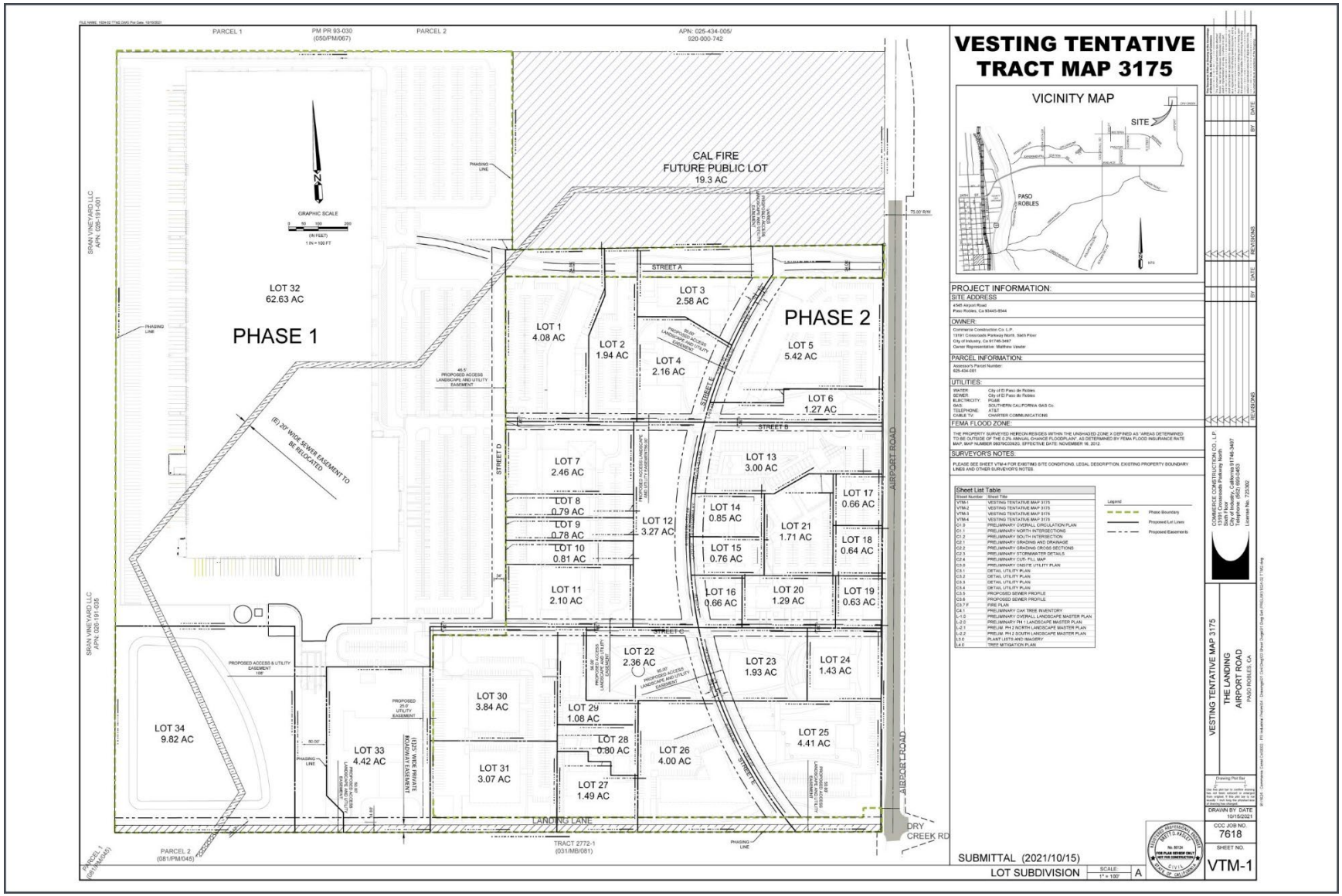


Figure 2-17. Vesting Tentative Tract Map.

2.6.4 Conceptual Master Development Plan

A Conceptual Master Development Plan is proposed to identify a conceptual site plan for the site and guide future uses, building types and sizes, and architectural character of the 140.75-acre property. The Conceptual Master Development Plan includes exhibits and illustrations accompanied by design guidelines to ensure the site is redeveloped consistent with the project objectives and the City's expectation for the property. Future CUP, Planned Development, and/or Development Plan application packages would be required for future proposed individual project developments, which would be required to be reviewed by the City for compliance with the Conceptual Master Development Plan. Future applications for specific development would include project-specific details that are not available at this time and would include architecture, landscaping, color boards, parking, refined circulation, trash enclosures, fencing, etc. Approval of future Development Plans, Planned Developments, and/or CUPs would require findings of consistency with the guidelines and intent of the Conceptual Master Development Plan.

Design Guidelines are proposed that accompany the project's Conceptual Master Development Plan and address aesthetic elements of the project, including, but not limited to, site planning, architecture, lighting, energy efficiency, signage, screening, and landscape/hardscape design. The Design Guidelines are intended to allow flexibility for future implementation while providing policies, guidelines, and standards to ensure the site is redeveloped with the quality, character, and theme consistent with the City's expectation for the property.

2.6.5 Phase 1 Development Plan

Concurrent with the Conceptual Master Development Plan, a Phase 1 Development Plan is proposed for the proposed development on the western portion of the of the project site. This development plan is designed to be consistent with the Conceptual Master Development Plan and includes one warehouse facility and a stormwater basin. The Phase 1 Development Plan provides specific details about the physical design of proposed Phase 1 project components, including a site plan, architectural elevations, a basic floor plan, and a landscaping plan, as previously described in detail in this chapter.

2.6.6 Future Phase 2 Development

The remaining 63.88-acre eastern portion of the project site would include a variety of commercial, office, and visitor-serving uses in a business park setting. Pursuant the Conceptual Master Development Plan, the Applicant would be required to submit one or multiple CUP, Planned Development, and/or Development Plan application packages for City review and approval prior to development of the Phase 2 components.

2.6.7 Oak Tree Removal Permit

The project site and offsite improvement areas currently include 110 oak trees, including Valley Oak, Blue Oak, Coast Live Oak, Canyon Oak, and Cork Oak species, ranging in size from 3 inches at diameter breast height (dbh) to 69 inches at dbh. Project design would involve the removal of up to 41 oak trees onsite, during Phases 1 and 2 site preparation activities, which requires an Oak Tree Removal Permit from the City. Additionally, the modified Class I Multiuse Trail low water crossing over Huer Huero Creek offsite would require the removal of up to 13 additional oak trees, which would be included in the Oak Tree Removal Permit from the City.

2.6.8 Development Agreement

The Applicant has requested the City process a development agreement for the project. Development agreements are legally binding contracts negotiated between a local jurisdiction and a project applicant to delineate the terms and conditions of a proposed development project. Since large developments often take many years to complete, a development agreement provides assurance to the Applicant that the project entitlements remain valid for the term of the agreement. In exchange for providing this assurance, a development agreement typically benefits the jurisdiction by strengthening the public planning process, facilitating comprehensive planning, reducing the economic costs of the development, and coming to agreement on conditions and requirements for the development to better meet community goals and needs.

2.7 INTENDED USES OF THE EIR

2.7.1 Required Agency Actions and Permits

Various permitting requirements would need to be met prior to implementation of the proposed project. Table 2-5 summarizes federal, state, and local permits that may be required for the project and the agencies that are expected to use the EIR in their decision-making and permitting processes. The City, as the CEQA lead agency, is responsible for administering the preparation of this EIR and will be responsible for certifying the Final EIR. Lead agency decision makers (i.e., the City Planning Commission and City Council) will use the EIR as an informational document to assist in the decision-making process, ultimately resulting in the approval, denial, or assignment of conditions to the project. The City Community Development Department will be responsible for ensuring compliance with the mitigation measures certified in the Final EIR.

Table 2-5. Discretionary Agency Permit Requirements

Agency	Approval/Permit Required
City of Paso Robles *(Lead Agency)*	General Plan Text and Map Amendment Zoning Text and Map Amendment Vesting Tentative Tract Map Conceptual Master Development Plan and Design Guidelines Phase 1 Development Plan Future Planned Developments and/or CUPs Oak Tree Removal Permit Development Agreement
U.S. Army Corps of Engineers (USACE) *(Responsible Agency)*	Section 404 Permit (Standard Nationwide Permit for wetland impacts)
U.S. Fish and Wildlife Service (USFWS) *(Responsible Agency)*	Incidental Take Permit and Biological Assessment (for impacts to vernal pool fairy shrimp); Eagle Incidental Take Permit (for impacts to nesting eagles if eagles are found to be nesting prior to/during construction)
California Department of Fish and Wildlife (CDFW) *(Responsible and Trustee Agency)*	Section 1600 Permit (Lake and Streambed Alteration Permit)
California Department of Transportation (Caltrans) *(Responsible Agency)*	Encroachment permits for mitigation-related improvements to SR 46E
Central Coast Regional Water Quality Control Board (CCRWQCB) *(Responsible Agency)*	Section 401 Permit (Water Quality Certification for wetland impacts)

Agency	Approval/Permit Required
San Luis Obispo County Air Pollution Control District (SLOAPCD) *(Responsible Agency)*	Permit to Operate
San Luis Obispo County Department of Environmental Health *(Responsible Agency)*	California Accidental Release Prevention Program Risk Management Plan Hazardous Materials Business Plan Underground Storage Tank Removal Well Deconstruction Permit

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CHAPTER 3. ENVIRONMENTAL SETTING

This section of the Environmental Impact Report (EIR) describes The Landing Paso Robles (project) environmental setting, including the physical conditions of the project vicinity, an overview of relevant plans and policies applicable to the proposed project, and a discussion of the cumulative development scenario and cumulative study area for the project. More detailed descriptions of the environmental setting for each environmental issue area can be found in *Chapter 4, Environmental Impact Analysis*.

3.1 PHYSICAL SETTING

3.1.1 Regional Setting

The project is located within the city of Paso Robles, located in northern San Luis Obispo County, and encompasses approximately 19.9 square miles with an estimated population of 31,073 residents (California Department of Finance [DOF] 2021). The city is located along the Salinas River, approximately 25 miles north of the city of San Luis Obispo and approximately 91 miles southeast of the city of Salinas. The unincorporated community of Templeton is located approximately 5 miles to the south, and the unincorporated community of San Miguel is located approximately 8 miles to the north. State Route 46 East (SR 46E) is located 1.3 miles south of the project site, and U.S. Route 101 (US 101) is located 2.5 miles west of the project site. The project site's regional location is shown in *Figure 2-1, Project Vicinity Map*, in *Chapter 2, Project Description.*

Most areas of the city are located within the Paso Robles Creek and Huer Huero Creek watersheds. The Paso Robles Creek watershed is an extensive watershed that covers approximately 143,654 acres ("Lower Salinas – Paso Robles Creek Area"). The Huer Huero Creek watershed includes approximately 103,496 acres. Both watersheds flow to the Salinas River and finally to the Pacific Ocean. The project site itself is located in the southeastern portion of the city, within the Neals Spring subwatershed of the Paso Robles Creek watershed.

The city of Paso Robles experiences a Mediterranean climate, which provides a wet season in winter and a dry season in the summer (U.S. Department of Agriculture [USDA] 1983). The average summer temperatures range from 54 degrees Fahrenheit (ºF) to 94ºF, and the average winter temperatures range from 34ºF to 60ºF (County of San Luis Obispo 2014). The annual average maximum temperature is 76°F, and the annual average minimum temperature is 44°F (U.S. Climate Data 2022). Rainfall averages 12.78 inches per year, with most rainfall occurring between late October and early April (U.S. Climate Data 2022).

3.1.2 Local Setting

The project site is located on a previously developed, 140.75-acre parcel in the northeastern portion of the city, at the northwest corner of the Airport Road and Old Dry Creek Road intersection. The project site includes a portion of one legal parcel identified as Assessor Parcel Number (APN) 025-434-001. The remaining portion of the legal parcel is a 19.3-acre piece at the northeast corner of the site, which is in the process of being conveyed separately by the state as a public lot for continued use by the state as a California Department of Forestry and Fire Protection (CAL FIRE) station.

Surrounding land uses include vineyards to the west; vineyards, wineries, and the Paso Robles Horse Park to the south; Airport Road and the Paso Robles Municipal Airport to the east; and a CAL FIRE station, rural residential uses, and agricultural uses to the north.

The eastern portion of the project site consists of the former California Department of Corrections and Rehabilitation (CDCR) Estrella Youth Correctional Facility (Paso Robles Boys School). Development associated with the Paso Robles Boys School includes 42 buildings and structures, which include 12 buildings for housing, a school auditorium, two gymnasiums (one with a pool), a visitor center, a library, a fire drill station with truck garage, a large boiler room, a central kitchen, a medical and dental building, workshops, an administration building, maintenance facilities, and recreational facilities. The project site also includes two sally ports into the secured facility, previous fuel stations, a car wash, exterior lighting, chain-link fencing of varying heights with coils of razor wire attached to the top, and aboveground and belowground utility lines. Buildings on the site total approximately 279,706 square feet. The western portion of the site is generally vacant except for six residential homes formerly occupied by CDCR staff members, a maintenance building, and remnant infrastructure. The project site's location is shown in *Figure 2-2, Project Location Aerial*, in *Chapter 2, Project Description.* As discussed further in *Section 4.5, Cultural Resources and Tribal Cultural Resources*, the project site and resources on the project site do not meet the eligibility criteria for listing (either individually or as a potential historic district) on the National Register of Historic Places (NRHP) or as a California Historic Landmark.

The project site is slightly sloping, ranging from 808 feet above mean sea level (msl) along the eastern property line to 775 feet above msl along the western property line. The eastern developed portion of the site is fairly level, while the southwest corner of the site slopes into a lower terrace behind the existing residences, and the northwest corner of the site gently rises.

The project site and offsite improvement areas support approximately 110 native oak trees and 12 large sycamores. Other vegetation on the site is primarily characterized by non-native annual weedy grasses and forbs. Two wetlands are present within the project area: one along Airport Road formed by a stormwater drainage ditch, and the other on the project site, in a stormwater drainage ditch that traverses east-to-west along the western portion of the site. Additionally, the project proposes improvements within the Huer Huero Creek channel, located approximately 0.28 mile south of the project site.

3.2 REGULATORY SETTING

California Environmental Quality Act (CEQA) Guidelines Section 15125(d) states, "the EIR shall discuss any inconsistencies between the proposed project and applicable general plans and regional plans." While CEQA requires a discussion of consistency with public plans, inconsistency does not necessarily lead to a significant impact. Inconsistency with public plans creates significant impacts under CEQA only when an adverse physical effect on the environment would result from the inconsistency. This section generally describes the plans and policies applicable to the proposed project. A detailed consistency analysis is provided in Table 4.9-1 in *Section 4.9, Land Use and Planning*. Although a preliminary determination regarding project consistency is made, it is the responsibility of the City of El Paso de Robles (City) Planning Commission and City Council, the lead CEQA decision makers, to make the final determination regarding consistency issues.

3.2.1 Applicable Plans and Policies

The following plans and policies are applicable to the proposed project and are described in the following sections:

- *City of El Paso de Robles General Plan*
- City of El Paso de Robles Zoning Code
- *Airport Land Use Plan for the Paso Robles Municipal Airport*

- *San Luis Obispo Council of Governments (SLOCOG)2019 Regional Transportation Plan*
- *City of Paso Robles Climate Action Plan*
- *Paso Robles Purple Belt Action Plan*
- City of El Paso de Robles Code of Ordinances (Municipal Code)
- *Paso Robles Economic Strategy*
- *City of Paso Robles Bicycle and Pedestrian Master Plan*

A preliminary consistency analysis with local plans and policies is provided in *Section 4.9, Land Use and Planning.* Additional and more detailed analysis is included in *Chapter 4, Environmental Impacts Analysis*, of this EIR. For example, *Section 4.3, Air Quality and Greenhouse Gas Emissions*, includes an assessment of the project's consistency with the California Air Resources Board (CARB) *California's 2017 Climate Change Scoping Plan* (CARB 2017) and San Luis Obispo County Air Pollution Control District (SLOAPCD) *Clean Air Plan* (SLOAPCD 2001). All adverse physical effects resulting from any inconsistency are discussed in the appropriate environmental analysis sections in *Chapter 4* of this EIR.

3.2.1.1 City of El Paso de Robles General Plan

The City's primary planning document is the *City of El Paso de Robles General Plan*, which consists of the Open Space (2003a), Parks and Recreation (2003b), Conservation (2014a), Land Use (2014b), Safety (2014c), Circulation (2019a), Noise (2019b), and Housing (2021) Elements. The project includes a General Plan Amendment (GPA) request to change the land use designation of the project site from Public Facilities (PF) to Business Park (BP); BP uses would allow for businesses, industries, and visitor-serving uses for properties with a Special Conditions Zoning Code overlay.

3.2.1.2 City of El Paso de Robles Zoning Code

The City's Zoning Code is included in the City's Municipal Code (Title 21), with the purpose of promoting and protecting public health, safety, comfort, and general welfare. The Zoning Code establishes various districts within the city and identifies various regulations for uses within those districts. The project includes a request to change the zoning of the project site from PF to Airport (AP) with a Planned Development (PD) overlay and a Special Conditions overlay (new Section 21.13.030.K) to allow for the development of uses that comply with the requirements of the *Airport Land Use Plan for the Paso Robles Municipal Airport* (ALUP) (City of Paso Robles 2007).

3.2.1.3 Airport Land Use Plan for the Paso Robles Municipal Airport

The ALUP sets forth land use compatibility policies related to future development in the vicinity of the Paso Robles Municipal Airport. The purpose of the ALUP policies is to ensure that future land uses in the vicinity of the airport will be compatible with realistically foreseeable, ultimate potential aircraft activity at the airport. In addition, it provides the basis by which the County of San Luis Obispo (County) Airport Land Use Commission (ALUC) can carry out its land use development review responsibilities in accordance with Section 21670 et seq. of the California Public Utilities Code.

3.2.1.4 SLOCOG 2019 Regional Transportation Plan

The *SLOCOG 2019 Regional Transportation Plan* (RTP) (SLOCOG 2019) is the region's blueprint for a transportation system that enhances the quality of life and meets the mobility needs of residents and visitors of the region. The blueprint includes a mix of mobility options for people and goods while committing to the creation of sustainable transportation.

3.2.1.5 City of Paso Robles Climate Action Plan

The *City of Paso Robles Climate Action Plan* is a long-range plan to reduce greenhouse gas (GHG) emissions from City government operations and community activities. The Climate Action Plan will also help achieve multiple community goals such as lowering energy costs, reducing air pollution, and supporting local economic development. The Climate Action Plan includes measures to reduce community-wide GHG emissions by 15% below 2005 levels by 2020.

3.2.1.6 Paso Robles Purple Belt Action Plan

As part of the 2003 General Plan Update, the City included a goal to establish the Purple Belt Program. The purpose of the Purple Belt Program is to provide tools and support to assist property owners that want to continue their agricultural operations; support the region's agricultural economy; and maintain the rural, agrarian landscape around the city. The purpose of the *Paso Robles Purple Belt Action Plan* is to establish, with stakeholder input, a preferred set of methods and tools to create and implement the Purple Belt (City of Paso Robles 2009). Primary components of the Purple Belt Action Plan include implementing entity selection, outreach and partnerships, policies and programs, and acquisition guidelines and criteria.

3.2.1.7 City of El Paso de Robles Code of Ordinances

The City's Code of Ordinances (Municipal Code) is organized to make the laws of the City accessible for City officials, City employees, and private citizens. The Municipal Code was originally published in 1963 and has been updated to reflect the City's needs as necessary.

3.2.1.8 Paso Robles Economic Strategy

The *Paso Robles Economic Strategy* was updated in 2006 to outline a new vision and strategy for increasing and sustaining economic vitality in the city (City of Paso Robles 2006). The strategy was developed through collaboration between City representatives, the Chamber of Commerce, and other key public and private stakeholders. The main goal of the City's Economic Strategy is to improve livability and quality of life in the city through economic growth. Strategies identified to meet this goal include building on and promoting community assets, addressing barriers to progress, and mobilizing public and private resources.

3.2.1.9 City of Paso Robles Bicycle and Pedestrian Master Plan

The *City of Paso Robles Bicycle and Pedestrian Master Plan* is a comprehensive plan that addresses the needs of both recreational and commuter bicyclists and walkers of all ages and abilities (City of Paso Robles 2018). The goal of the plan is to continue to improve the bicycle and pedestrian facilities to continue to grow as a bicycle- and walk-friendly city. Goals and strategies identified to meet this goal include establishing better bicycle and pedestrian connections, providing bicycle and pedestrian safety education, and increasing bicycle- and walking-related tourism.

3.3 CUMULATIVE STUDY AREA

3.3.1 CEQA Requirements

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

State CEQA Guidelines Section 15130 indicates that cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable, or if the project's incremental effect is not cumulatively considerable, the lead agency shall identify facts and analyses supporting that conclusion. The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as much detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness. State CEQA Guidelines Section 15130 states the following:

> The following elements are necessary to an adequate discussion of significant cumulative impacts:
>
> (1) Either:
>
> (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
>
> (B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

The discussion shall also include a summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available and a reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project.

3.3.2 Cumulative Development Scenario

Each resource-specific section in *Chapter 4, Environmental Impact Analysis*, of this EIR includes a discussion of potential cumulative effects and the project's contribution towards the cumulative effects. As defined in Section 15355 of the State CEQA Guidelines, a cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. Cumulatively considerable impacts occur when the incremental effects of a particular project or program are significant when viewed in connection with the effects of other past,

current, or probable future projects or programs. According to Section 15130 of the State CEQA Guidelines, the discussion of cumulative impacts must reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects that do not contribute to the cumulative impact. Impacts that do not result in part from the project evaluated in the EIR need not be discussed.

The resource-specific sections of this EIR discuss the potential cumulative environmental impacts resulting from the proposed project in association with other planned, pending, and reasonably foreseeable projects in the vicinity of the project area.

In order to assess cumulative impacts, this EIR uses the list method and a growth approach based on the maximum anticipated buildout in the City's General Plan. A list of past, present, and probable future projects has been provided by the City and is shown in Table 3-1.

Table 3-1. Cumulative Development Scenario Project List

Project Type	Name	Location	Description*	Status (as of 11/24/2021)
Industrial	Daou Winery Campus	Airport Road	Pre-application for the 180,000 sf Daou Winery Campus	Pre-application meeting
School	Paso Robles Youth Arts Foundation Expansion	Spring Street	Pre-application for the 6,000 sf Paso Robles Youth Arts Foundation expansion	Pre-application meeting
Museum	Yanks/Estrella Warbirds Air Museum	Airport Road	200,000 sf to 232,000 sf air museum	Pending planning entitlements
Recreation	Sensorio Discovery Gardens (Phase 1) – Entranada Resort (Phase 2)	SR 46	650,000 sf Sensorio Discovery Gardens (Phase 1) Entranada Resort with 280 lodging rooms (Phase 2)	Pending planning entitlements
Lodging	Hunter Ranch Golf Course Resort	SR 46, Mill Road	Golf Course Resort with 200 lodging rooms	Pending planning entitlements
Industrial	Warehouse Buildings	Combine Street	Two warehouse buildings, 5,000 sf	Pending planning entitlements
Industrial	Appeal - Pasolivo	Rolling Hills Road	27,129 sf Pasolivo commercial building appeal	Pending planning entitlements
Residential Care	Heavenly Home Residential Care Expansion	Union Road	Residential care facility with 40 beds	Pending planning entitlements
Residential	Rolling Hills New Multi-Family Dwellings	Rolling Hills Road, Creston Road	Rolling Hills new multi-family dwellings with 124 dwelling units	Pending planning entitlements
Commercial	Sky River RV Expansion	Theatre Drive	Sky River RV facility expansion (frontage deferral issue)	Pending planning entitlements

Project Type	Name	Location	Description*	Status (as of 11/24/2021)
Lodging	Paso Robles Gateway Annexation	Theatre Drive	Paso Robles Gateway Annexation with 97 dwelling units and 425 lodging rooms	Pending planning entitlements
Residential	Triplex Unit	15th Street, Railroad Street	2,829 sf Triplex Unit with three dwelling units	Pending planning entitlements
Recreation	Tobin's Public Park	Spring Street, 18th Street	Public Park development	Pending planning entitlements
Lodging	Riverside Avenue Boutique Hotel	Riverside Avenue	Boutique hotel with 22 lodging rooms	Pending planning entitlements
Commercial	Erskine GPA/Rezone of 38 acres	SR 46, Paso Robles Boulevard	250,000 sf	Pending planning entitlements
Industrial	Thorndyke Office Building	Wisteria	5,000 sf	Pending planning entitlements
Industrial	ABI Office and Shop Development Plan Map Amendment	Wisteria Lane	6,217 sf office and shop space	Planning entitlements approved
Industrial	Thiessen / Union Road Parcel Map	Union Road	30,000 sf Parcel Map	Planning entitlements approved
Residential	Creston Duplexes Vesting Tentative Tract Map	Creston Road	Creston Duplexes Vesting Tentative Tract Map with five dwelling units	Planning entitlements approved
Lodging	Boutique Hotel	Pine Street, 14th Street	Four-story boutique hotel with 56 rooms	Planning entitlements approved
Commercial	Qwiky Wash	Spring Street, 21st Street	Commercial car wash	Planning entitlements approved
Residential	3445 Park Street Apartments	Park Street	Development of Park Street Apartments with eight dwelling units	Planning entitlements approved
Mixed-Use	Moose Lodge Mixed Use	Spring Street	3,000 sf and 16 dwelling units	Planning entitlements approved
Residential	River Oaks 2 SFR Subdivision	Clubhouse Drive	271 dwelling unit subdivision – 271 lot vesting map	Planning entitlements approved; pending final map
Residential	(TEX) TR 3060 – Elms 7 lot Tentative Tract Map	Montebello Oaks Drive	Tentative Tract Map with seven dwelling units	Planning entitlements approved; pending final map
Residential	Beechwood Specific Plan	Meadowlark Road	Specific Plan with 64,000 sf of residential development, including 911 dwelling units	Planning entitlements approved; pending final map
Residential	Olsen South Chandler Specific Plan	Linne Road	Specific Plan for 1,293 dwelling units	Planning entitlements approved; pending final map
Solar	(TEX) Airport Solar Project	Airport Road	1,462,000 sf, 34 acre / 4 megawatt photovoltaic generation facility	Planning entitlements approved; pending construction permits
Light Industrial	JWC Welding Building (Wright)	Airport Road	11,000 sf welding building	Planning entitlements approved; pending construction permits
Industrial	Warehouse for All About Events	Airport Road	19,500 sf warehouse for All About Events	Planning entitlements approved; pending construction permits

Project Type	Name	Location	Description*	Status (as of 11/24/2021)
Industrial	RV Storage Facility	Dry Creek Road	150,000 sf RV storage facility with covered canopy and office	Planning entitlements approved; pending construction permits
Lodging	Cabernet Links RV Resort	Beacon Road, Links Drive	30,000 sf RV Resort, including 290 RV spaces, 18-hole golf course, and amenities	Planning entitlements approved; pending construction permits
Industrial	Vintner's Vault	Germaine Way	56,000 sf wine processing, storage, and retail building	Planning entitlements approved; pending construction permits
Lodging	(TEX) Destino Hotel Resort Amendment	Airport Road	Hotel Resort Amendment for 291 lodging rooms	Planning entitlements approved; pending construction permits
School	Cuesta College North County Campus Expansion	Dallons Drive / River Oaks Drive	71,000 sf Cuesta College North County Campus Expansion	Planning entitlements approved; pending construction permits
Lodging	Fairfield Inn DP amendment	Union Road	Fairfield Inn with 119 lodging rooms	Planning entitlements approved; pending construction permits
Industrial	Woodlands – Mini Storage, Wine Lockers, and Office	Ardmore Road	64,936 sf industrial space for mini storage, wine lockers, and an office	Planning entitlements approved; pending construction permits
Industrial	Johnboy's Towing Yard	Ardmore Road	60,000 sf towing yard	Planning entitlements approved; pending construction permits
Residential Care	Summerset Senior Living	Rolling Hills Road	140,000 sf residential care facility	Planning entitlements approved; pending construction permits
Residential	Residential Duplex Buildings	Creston Road	Residential Duplex Buildings with 20 dwelling units	Planning entitlements approved; pending construction permits
Residential	Woodlands Apartments	Niblick Road	Apartment complex with 20 units	Planning entitlements approved; pending construction permits
Commercial	SPR Highland Commercial Center	Oak Hill Road, unnamed road	5,750 sf commercial center	Planning entitlements approved; pending construction permits
Lodging	Hyatt Place 2 – Alternative Project	Theatre Drive, SR 46	77,000 sf hotel with 131 lodging rooms	Planning entitlements approved; pending construction permits
Lodging	(TEX) Marriot Residence Inn	Wilmar Place	Four-story hotel with 128 lodging rooms	Planning entitlements approved; pending construction permits
Commercial	Bellissimo Restaurant and Apartments	4th Street	6,000 sf commercial space with four dwelling units and restaurant	Planning entitlements approved; pending construction permits
Residential	New Townhomes	3rd Street	Three new townhomes, site improvements, and parking	Planning entitlements approved; pending construction permits
Industrial	Frogtown Winery	21st Street	4,500 sf winery and oak tree removal permit	Planning entitlements approved; pending construction permits

Project Type	Name	Location	Description*	Status (as of 11/24/2021)
Industrial	Black's Commercial Warehouse	Ysabel Avenue	5,000 sf of commercial warehouse	Planning entitlements approved; pending construction permits
Lodging	Black Oak Lodge Hotel	Black Oak Drive	60,000 sf hotel with 96 lodging rooms	Planning entitlements approved; pending construction permits
Residential	New Triplex Residential Building – Zenobio	Oak Street	New triplex residential building with three dwelling units	Planning entitlements approved; pending construction permits
Residential	Motel 6 – Residential/Emergency Shelter Conversion (HomeKey exemptions)	Black Oak Drive	Residential/emergency shelter conversion with 66 dwelling units	Planning entitlements approved; pending construction permits
Residential	38th Street 14-lot Townhouse Tract	38th Street	Development of 14 townhome units	Planning entitlements approved; pending construction permits
Residential	Spring Street Village Phase 2	Spring Street	Development of Spring Street Village Phase 2 with 74 dwelling units	Planning entitlements approved; pending construction permits
Lodging	Vina Robles Amphitheater/Hotel	SR 46 East	95,000 sf amphitheater and hotel with 80 units	Planning entitlements approved; pending construction permits
Industrial	(TEX) Erskine Industrial GPA/map/WSE	Wisteria Road	622,000 sf	Planning entitlements approved; pending construction permits
Industrial	Steel Building Contractor	Combine Street	3,710 sf	Planning entitlements approved; pending construction permits
Industrial	Paso Rentals	Combine Street	4,814 sf industrial building	Planning entitlements approved; pending construction permits
Recreation	Boys & Girls Club	Oak Street	8,100 sf	Planning entitlements approved; pending construction permits
Industrial	Beavers	Combine Street	4,814 sf industrial building	Planning entitlements approved; pending construction permits
Commercial	Lush Limo	Railroad Street	7,200 sf	Planning entitlements approved; pending construction permits
Lodging	Hotel Alexa	Alexa Court	23,765 sf hotel with 38 lodging rooms	Planning entitlements approved; pending construction permits
Lodging	Hotel Cheval Phase 2	Pine Street	15,625 sf hotel with 20 lodging rooms	Planning entitlements approved; pending construction permits
Industrial	Winery Row Building	Dry Creek Road	8,900 sf Winery Row Building Lot 2 – DP Consistency	Construction permits approved
Recreation	Paso Robles Horse Park/LLA CUP amendment	Airport Road	CUP amendment for 4,000 sf of lodging space with 28 RV spaces	Construction permits approved
Industrial	Capps Construction	Combine Street	4,814 sf metal building	Construction permits approved

Project Type	Name	Location	Description*	Status (as of 11/24/2021)
Commercial	Sonic Burger Drive-Thru/carhop	SR 46	2,000 sf fast food drive-thru/carhop	Construction permits approved
Industrial	AutoCraft Collision Repair	Union Road	31,615 sf automobile repair shop	Construction permits approved
Public	City Fire Station #3	Union Road	Fire Station #3	Construction permits approved
Residential	Tentative Tract Map 3098	Prospect Avenue, Union Road	Tentative Tract Map 3098 with nine dwelling units	Construction permits approved
Residential	Apartment Complex	Golden Hill Road	Apartment Complex with 200 units and Oak Tree Removal Permit for four trees	Construction permits approved
School	Almond Acres K-8 Charter School	Niblick Road	34,156 sf charter school (public 18 rooms)	Construction permits approved
Mixed-Use	4th Street Development	4th Street	40,000 sf of mixed-use development, including 20 dwelling units	Construction permits approved
Lodging	Pine Street Hotel Amendment	Pine Street	Amendment for a 105,000 sf 155-room hotel, restaurant, and retail	Construction permits approved
Residential	Ken Riding Courtyard 8-plex	Park Street, 23rd Street	Residential development with eight dwelling units	Construction permits approved
Commercial	Paso Robles Brewing Company	Spring Street	9,000 sf	Construction permits approved
Industrial	Simplot Outdoor Storage Yard	Airport Road, Propeller Drive	143,000 sf outdoor storage yard	Construction finaled
Industrial	Treana Winery	Dry Creek Road, Second Wind Way	Treana Winery Major Site Plan review	Construction finaled
Lodging	Cava Robles RV Resort	Golden Hill Road	12,000 sf RV Resort with 332 RV spaces	Construction finaled
Industrial	Justin Vineyards Wine Storage Warehouse	Wisteria Lane	109,000 sf storage warehouse	Construction finaled
Industrial	Buttonwillow Product Warehouse (two warehouse buildings)	Wisteria Lane	5,000 sf product warehouse	Construction finaled
Industrial	Gilman/Downer Vineyard Industrial Products	Wisteria Lane, Danley Court	5,000 sf vineyard industrial product space	Construction finaled
Commercial	Mullahey Dodge Parking Lot Expansion	Danley Court	2,800 sf RZ Parking Lot expansion and GPA	Construction finaled
Industrial	Tidwell Contractor Yard – office/maintenance building	Dallons Drive	12,000 sf office/maintenance building	Construction finaled
Industrial	Ewens Warehouse	Combine Street	5,000 sf warehouse	Construction finaled
Industrial	Industrial Building	Combine Street	4,992 sf industrial building	Construction finaled
Industrial	WESTCO Builders	Combine Street	3,948 sf spec industrial building	Construction finaled
Industrial	Ricos Avocados Office and Warehouse	Combine Street	5,000 sf warehouse	Construction finaled
Industrial	Office, Wine Storage, and Ice Cream Production	Combine Street	4,980 sf office, wine storage, and ice cream production space	Construction finaled

Project Type	Name	Location	Description*	Status (as of 11/24/2021)
Industrial	Hubbel Industrial Building	Combine Street	Site Plan for a 6,100 sf industrial building	Construction finaled
Light Industrial	Pineo Building Site Plan	Combine Street	Site Plan for a 4,700 sf industrial building	Construction finaled
Industrial	Boxing and Fitness Gym	Combine Street	4,958 sf boxing and fitness gym	Construction finaled
Industrial	WESTCO Truck Accessory Sales and Installation Facility	Combine Street	4,950 sf truck accessory sales and installation facility	Construction finaled
Commercial	Starbucks Drive-Thru	SR 46	2,000 sf fast food/coffee drive-thru	Construction finaled
Residential	Arjun (Blue Oaks) Apartments	Experimental Station Road	142 dwelling unit apartment complex	Construction finaled
Residential	Golden Hill Storage Mixed Use Rezone	Rolling Hills Road	Rezoning of three dwelling units	Construction finaled
Industrial	Case Pacific Storage Yard	Ardmore Road	160,000 sf storage yard	Construction finaled
Industrial	Spurr Co. Contract Yard/ Parcel Map Review	Ardmore Road	Parcel Map Review for a new 12,900 sf office/maintenance building and contractor yard	Construction finaled
Solar	Centennial City Solar Project	Nickerson Drive	8,300 sf solar facility	Construction finaled
Solar	Sherwood City Solar Project	Via Ramona	18,700 sf solar facility	Construction finaled
Residential	Alder Creek Apartments	Niblick Road	Apartment complex with 16 units	Construction finaled
Solar	Kennedy Club Solar	Oak Hill Road	13,000 sf solar facility	Construction finaled
Residential Care	Oaks Assisted Living	Serenade Drive	89,000 sf residential care facility with 101 beds	Construction finaled
Solar	Firestone Solar Generation Facility	Ramada Drive	516,000 sf solar generation facility	Construction finaled
Industrial	Firestone Brewery Campus Expansion	Vendels Circle, Ramada Drive	516,000 sf brewery campus expansion	Construction finaled
Industrial	Southgate Center (Paris Precision) building and site modifications	Ramada Drive	230,000 of building and other site modifications	Construction finaled
Lodging	Oxford Suite Hotel	4th Street	69,209 sf five-story hotel with 127 lodging rooms	Construction finaled
Commercial	6th Street / Spring Street Retail Building	6th Street	4,600 sf retail building and relocation	Construction finaled
Lodging	Paso Robles Inn Expansion	12th Street	18,000 sf hotel with 23 lodging rooms	Construction finaled
Commercial	Pappy McGregor Expansion	Railroad Avenue	1,500 sf banquet room expansion	Construction finaled
Commercial	Biergarten – The Backyard	Railroad Street	1,000 sf commercial restaurant	Construction finaled
Commercial	California Coast Brewery – Tozzi	Railroad Street	3,600 sf building conversion	Construction finaled

Project Type	Name	Location	Description*	Status (as of 11/24/2021)
Industrial	iTek Wine	Riverside, 15th Street	6,000 sf winery	Construction finaled
Mixed-Use	1518 Spring Street Mixed Use Development	Spring Street	5,200 sf of mixed-use development, including four dwelling units	Construction finaled
Mixed-Use	Paso Robles Public Market	18th Street	16,500 sf of mixed use development, including six dwelling units	Construction finaled
Lodging	Lone Oak Hotel Conversion	24th Street	Hotel with 37 lodging rooms	Construction finaled
Residential	Oak Park Phase 3 Apartments	Pine Street	Development of 75 apartment units with fee deferral	Construction finaled
Industrial	Warehouse for Wine Storage	Riverside Avenue	18,5000 sf warehouse for wine storage	Construction finaled
Residential	Webb Apartments	36th Street, Oak Street	Development of an apartment building with 10 dwelling units and an oak tree removal permit	Construction finaled

Source: City of Paso Robles Project Pipeline Report 21.11.24

* sf = square feet

CHAPTER 4. ENVIRONMENTAL IMPACT ANALYSIS

This chapter of the Environmental Impact Report (EIR) evaluates the potential environmental effects that would result from the construction and operation of The Landing Paso Robles, a warehouse and business park center, as part of the redevelopment of the former Paso Robles Boys School site (project) and identifies mitigation measures for impacts found to be potentially significant.

Consistent with the California Environmental Quality Act (CEQA) and State CEQA Guidelines, the Initial Study/Notice of Preparation (IS/NOP), along with agency and public input received during the IS/NOP circulation period, were used to determine the scope of the analysis for the EIR. Based on review of the project and comments received during the IS/NOP process, the City of Paso Robles (City) determined that the EIR analysis would focus on the following resource areas (Table 4-1). Additional resource areas not included in this EIR were found to be less than significant through the IS/NOP process (see *Section 1.2, Scoping and Notice of Preparation Process*, and *Appendix A, Initial Study and Notice of Preparation*).

Table 4-1. Summary of Environmental Impacts Analysis

Environmental Resource	Significant, Unavoidable Adverse Impacts	Significant, but Mitigable Impacts	Less than Significant Impacts
Aesthetics		X	X
Agriculture and Forestry Resources	X	X	
Air Quality and Greenhouse Gas Emissions	X	X	X
Biological Resources		X	X
Cultural and Tribal Cultural Resources		X	X
Geology and Soils		X	X
Hazards, Hazardous Materials, and Wildfire		X	X
Hydrology and Water Quality		X	X
Land Use and Planning		X	
Noise	X		X
Population and Housing			X
Public Services and Recreation			X
Transportation	X	X	X
Utilities/Service Systems and Energy		X	X

Each environmental issue area discussed in Chapter 4 of this EIR has been divided into subsections, as follows:

Existing Conditions: The description of the physical environmental conditions in the vicinity of the project, as they exist at the time of the established baseline physical conditions.

Regulatory Setting: The regulations in effect at the time the IS/NOP was published. These are the applicable regulations governing each environmental topic, such as the California Endangered Species Act (CESA) and its requirements for protecting rare and endangered species. This is not an exhaustive analysis of the regulations, but rather information to assist the reader in understanding the potential impacts of the project from a regulatory perspective.

Thresholds of Significance: The thresholds used to evaluate each environmental topic based on Appendix G of the State CEQA Guidelines.

Impact Assessment Methodology: The methodology used to determine the impacts associated with the project, such as measurements or field investigative processes.

Impact Assessment and Mitigation Measures: The statement of the level of significance of potential environmental effects of the project. These include the significant environmental effects of the project, as further defined below. The impacts are identified and then followed by mitigation measures that can minimize significant impacts; mitigation measures must be enforceable and feasible. In addition, there must be an essential nexus between the mitigation measure and a legitimate governmental interest, and the mitigation measure also must be "roughly proportional" to the impacts of the project.

Residual Impacts: The statement of the level of impact, significant or insignificant, that would remain after the implementation of identified mitigation.

Cumulative Impacts: The cumulative effects of the project when the project's incremental effect is considered in combination with other closely related past, present, and reasonably foreseeable probable future projects.

Secondary Impacts: If implementation of an identified mitigation measure would cause one or more significant effects in addition to those that would be caused by the project, the effects of the mitigation measure are discussed but in less detail than the significant effects of the project.

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

A *significant and unavoidable impact* would cause a substantial adverse effect on the environment that meets or exceeds the applicable significance criteria thresholds for a particular resource, and no feasible mitigation measures would be available to reduce the impact to a less-than-significant level.

A *less-than-significant impact with mitigation* is an adverse impact that would cause a substantial adverse effect that meets or exceeds the applicable significance criteria thresholds for a particular resource, but can be reduced to a less-than-significant level through successful implementation of identified mitigation measures.

A *less-than-significant impact* is an adverse impact that does not meet or exceed the applicable significance criteria thresholds for a particular resource. Generally, no mitigation measures are required for less-than-significant impacts; only compliance with standard regulatory conditions would be required. However, mitigation may still be recommended should the lead or responsible agencies deem it appropriate to reduce the impact to the maximum extent feasible, as long as there is rough proportionality between the environmental impacts caused by the project and the mitigation measures imposed on the project.

The term "significance" is used throughout the EIR to characterize the magnitude of the projected impact. For the purpose of this EIR, a significant impact is a substantial or potentially substantial change to resources in the project area or the area adjacent to the project. In the discussions of each issue area, thresholds are identified that are used to distinguish between significant and insignificant impacts. To the extent feasible, distinctions are also made between regional and local significance and short-term versus long-term duration.

Where possible, measures have been identified to reduce project impacts to less-than-significant levels. CEQA states that public agencies should not approve projects as proposed if there are feasible mitigation measures available that would substantially lessen the environmental effects of such projects (Public Resources Code [PRC] Section 21002). Included with each mitigation measure are the requirements related to the required timing of the action (e.g., prior to development of final construction plans, prior to commencement of construction, prior to operation, etc.) and the party responsible for verifying implementation of the mitigation measures.

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4.1 AESTHETICS

This section discusses the project's potential impacts relating to aesthetics and visual resources. It incorporates information regarding the regulatory setting and analysis of viewsheds and visual resources in Paso Robles. Regulatory documents include the *City of El Paso de Robles General Plan 2003 Land Use Element* (LUE) and *City of El Paso de Robles General Plan 2003 Conservation Element* (Conservation Element) and the City of El Paso de Robles Municipal Code (Municipal Code). The Municipal Code defines a viewshed as "the geographical area typically visible from a location beyond a project site. The viewshed includes all surrounding points that are in line of sight with that location and excludes points that are beyond the horizon or obstructed by terrain and other features (e.g., buildings, trees)."

The landscape is discussed in terms of "foreground," "middle ground," and "background" views. Foreground views are those immediately presented to the viewer and include objects at close range. Middle ground views occupy the center of the viewshed and typically include objects that dominate the viewshed in normal circumstances. Background views include distant objects and other objects that make up the horizon.

4.1.1 Existing Conditions

4.1.1.1 Visual Context

4.1.1.1.1 REGIONAL

Paso Robles is located in the upper Salinas River valley, with the Salinas River flowing through the center of the city from south to north. The rugged mountain ridges of the Santa Lucia Coastal Range border the Paso Robles area on the south and west, with the low hills of the La Panza and Temblor Ranges to the east. In the north, the city is bounded by the low hills and flat-topped mesas of the Diablo Range.

Between these natural features, Paso Robles is developed with suburban residential, commercial, light industrial, institutional, and agricultural uses, with parks and open spaces scattered throughout the city. On the west side of the Salinas River, Paso Robles features older development, with many buildings of architectural and historical interest. East of the river, the city includes newer development, with a mix of mostly residential and some commercial and industrial uses. Lower-density residential uses occur on all sides of the city.

The city combines a compact urban/suburban form in a rural setting, transitioning from a well-defined urban edge to agricultural uses and open space. Neighborhoods are characterized largely by single-family homes with generous setbacks from the street and a mature tree canopy. Approximately 40,000 acres of vineyards are found in the region surrounding the city.

A limited number of properties within the city limits are designated for agricultural uses and are generally concentrated in the northeastern portion of the city, near the Paso Robles Municipal Airport. Much of the larger industrial, processing, and manufacturing development is found in the northeastern part of the city, in the vicinities of Airport, Buena Vista, and Golden Hill Roads. The commercial development in this area varies greatly in size and density, with much of it occupying large parcels with buildings ranging from single story to more than 45 feet in height. Architectural styles range from simple geometric forms to elaborate European villa-styled resorts.

Land uses surrounding the project site include vineyards, wineries, and the Paso Robles Horse Park to the south and west; Airport Road and the Paso Robles Municipal Airport to the east; a California Department of Forestry and Fire Protection (CAL FIRE) Station, rural residential development, and agricultural uses to the north. State Route 46 East (SR 46E) is located approximately 1.3 miles south of the project site, and U.S. Route 101 (US 101) is located approximately 2.5 miles to the west

Landform variation in the vicinity tends to be more noticeable south of the project site. In this area, the topography rises from Huer Huero Creek with low undulating hills and drainages, and tends to flatten in the vicinity of the project and to the north, providing less visual interest in the short- and mid-range views, but increasing views of the western hills in the distance.

Vegetation plays an important part in defining the region's visual character. Mature oak trees can be seen scattered throughout the area, both in the natural landscape and in many developed locations. Other large trees, typically associated with development, are also part of the setting, contributing to the visual quality of the region.

4.1.1.1.2 PROJECT SITE

The 140.75-acre project site is currently occupied by a discontinued youth correctional facility, the Estrella Youth Correctional Facility, also known as the Paso Robles Boys School, which closed in 2008 and has since been unoccupied. Most of the existing development associated with the facility is located in the southeastern corner of the project site. The former administrative offices and other resident-related buildings are located somewhat close to Airport Road along a portion of the project site's eastern boundary. The existing development facing Dry Creek Road (Landing Lane) to the south is set somewhat back from the road yet still easily visible. The existing development includes numerous one- and two-story unoccupied structures. The buildings, site layout, extensive security fencing, and other elements, seen primarily in the southeast area of the site, create a distinctly institutional visual character.

The northern and eastern portions of the project site show few signs of development other than dirt access roads and a few support buildings. Much of the northeast portion of the project site has limited visibility from Airport and Dry Creek Roads due to viewing distance and intervening development.

The project site is relatively flat, ranging in elevation from approximately 775 to 808 feet above mean sea level (msl). Landscaping throughout the project site includes a variety of ornamental and native species. The project site supports approximately 84 large native oak trees, many of which are seen adjacent to buildings and outdoor gathering areas, and 12 large sycamores. Most of the larger trees are located in the interior of the development. Overall, the larger trees provide aesthetic value to the project site and create a visual continuity with the scattered vegetation seen throughout the area and the region. A windrow of tall eucalyptus trees lines the southwestern corner of the site.

4.1.1.1.3 VISUAL CORRIDORS, SCENIC ROADWAYS, AND GATEWAYS

The project site is located in the northeastern portion of the city approximately 1.3 miles north of SR 46E and 2.5 miles northeast of US 101. US 101 and SR 46E traverse the city from north to south and west to east, respectively. Both routes are listed as "Eligible" for state designation as state scenic highways and the project site is not visible from either of these routes.

The project site is bound by Dry Creek Road (Landing Lane) to the south, Airport Road to the east, and Paso Robles Municipal Airport Road to the north. The Conservation Element identifies Airport Road as a "Gateway to the City" and a "Visual Corridor." The project site may be viewed by travelers heading north or south along Airport Road, as well as other nearby roadways.

4.1.2 Regulatory Setting

4.1.2.1 Federal

There are no applicable federal regulations.

4.1.2.2 State

The California Scenic Highway Program was created by the State Legislature in 1963 with the intention of protecting and enhancing the natural scenic beauty of California highways and adjacent corridors. A highway may be designated scenic depending on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. Scenic Highways within San Luis Obispo County include US 101, SR 46, portions of SR 41, SR 1, and Lake Nacimiento Drive. The project site is not visible from any of these state scenic highways.

4.1.2.3 Local

The City regulates the appearance and size of buildings and public spaces through the implementation of the LUE, *City of Paso Robles General Plan Circulation Element* (Circulation Element), and Conservation Element, and the enforcement of statutes in the Municipal Code related to design guidelines and outdoor lighting and Historic Preservation Guidelines.

4.1.2.3.1 CITY OF EL PASO DE ROBLES GENERAL PLAN 2003

Land Use Element

The LUE guides development in the city and restricts the expansion of the city limits (City of Paso Robles 2014a). The LUE provides goals, policies, and actions to manage visual resources in the city.

Policy LU-1B **Airport Land Use Compatibility.** As a general policy, new residential development is an undesirable land use within the Airport Influence Area.

Action Item 1 Prohibit further subdivision of land within the Airport Land Use Review Area (AP Overlay Area), or changes to land use or zoning, in a manner that would accommodate additional dwelling units. Existing parcels would, however, be entitled to be occupied by existing or new residential dwelling in accordance with current General Plan and Zoning.

Policy LU-2B **Visual Identity.** Promote architectural and design excellence by imposing stringent design and construction standards for commercial, industrial, mixed-use, and multifamily projects.

Action Item 1 Amend/Update the Zoning Ordinance to define standards. Encourage property-owners to upgrade existing buildings and sites to conform to these standards.

Action Item 2 Adopt design standards to clearly articulate how important public views, gateways, and landmarks are to be maintained/enhanced. This is to include, but not be limited to enhancing views along highways, roads, streets, and rail

corridors with landscaping, building setbacks, enhanced architecture, and signage/monuments.

Action Item 3 Require utilities to be placed underground in new development projects, except for those circumstances where this requirement is not reasonably related to the specific project. Voltage lines of 44 KV or greater are excluded from this undergrounding requirement.

Action Item 5 Require new development to mitigate its share of the impacts to the natural and built environment as feasible and appropriate.

Policy LU-2D **Neighborhoods.** Strive to maintain and create livable, vibrant neighborhoods and districts with:

- Attractive streetscapes,
- A pedestrian friendly setting,
- Coordinated site design, architecture, and amenities,
- Adequate public and private spaces; and,
- A recognizable and high quality design

Action Item 5 **(Light/Glare – New Development).** Require all new lighting to be shielded and directed downward in such a manner as to not create off-site glare or adversely impact adjacent properties. The style, location, and height of the lighting fixtures shall be submitted with the building plans and shall be subject to approval by the Development Review Committee prior to issuance of building or grading permits, as appropriate.

Policy LU-2J **Public Art.** Art is in public places is an essential element of the Community's quality of life, contributing to what makes Paso Robles a special place to live, work and shop.

Action Item 1 Public and private development projects shall be required to contribute toward the establishment and maintenance of art in public places, based on a formula and process to be established by the City Council.

Policy LU-2K **Support environmental responsibility.** Manage the natural landscape to preserve the natural beauty and rural identity of the community, which enhances ecological functions and maintains environmental and public health.

Action Item 1 Require new development, either on public or private property, to mitigate its share of impacts from storm water on the natural environment through implementation of Low-Impact Development (LID) storm water management features.

Business Park (BP) Land Use Category. To provide areas for clean and attractive businesses and industries in which all activities are conducted indoors (some limited outdoor storage and/or activities may be permitted via approval of a conditional use permit and if completely screened).

Where appropriate, compatible convenience and highway commercial land uses may be located in the Business Park category.

The Business Park Category is established in the following areas:

- Airport and surrounding areas;
- Commerce Way;
- Ramada Drive, north of Highway 46 West.

Note: Within the Business Park category, nonconforming industrial land uses may be permitted to expand with City Council approval via Planned Development or its equivalent and/or Conditional Use Permit.

Airport (AP) Overlay Designation. This overlay category is established over all property included within the Airport Land Use Plan (ALUP) adopted by the County of San Luis Obispo Airport Land Use Commission (ALUC). Development within an AP Overlay area is subject to special review based on the recommendation of the Airport Land Use Plan (ALUP).

Portions of the Airport Influence Area covered by the ALUP are envisioned as the City's opportunity for future industrial development, particularly business parks and industry associated with the potential future expansion of the Paso Robles Municipal Airport. As a result of safety, noise, and density constraints, residential land uses beyond current entitlements are considered incompatible land uses. In addition to the noted compatibility issues, the ALUP policies address hazards to navigation that would potentially interfere with the takeoff, landing, or maneuvering of aircraft at the airport, including lighting.

Conservation Element

The Conservation Element addresses the preservation of resources in and near the city that contribute to the "quality of life and community image . . . [and that include] the many features that make Paso Robles a special place to live or visit" (City of Paso Robles 2003a).

Oak trees are of particular importance to the heritage and character of Paso Robles, and the City has special provisions in the Conservation Element concerning the preservation of oak trees as an important resource. The following policies and action items relate to visual resources.

Policy C-3 A **Oak Trees.** Preserve existing oak trees and oak woodlands. Promote the planting of new oak trees.

Action Item 3 Encourage and/or require new development to include the planting of new oaks where feasible and appropriate.

Policy C-5A **Visual Gateways and Landmarks.** Identify important visual resources: gateways, corridors, major arterials, natural/open space areas, as shown on Table C-1 and Figure C-3 of the Conservation Element.

Action Item 1 Investigate and implement, as feasible, a variety of alternative funding sources to enhance important visual resources, including but not limited to:

- Mello-Roos and similar infrastructure financing for improvement and potential maintenance of public

landscaping, particularly along streets and other visible public travel routes;

- Bond programs such as property acquisition, improvement, and maintenance for corridor visual improvements; and/or
- Encourage Caltrans to preserve or enhance existing trees and landscaping along the Highway 101 corridor.

Action Item 2 **Coordinated/Complementary Design Standards.** Establish and implement site design, landscaping, architecture, and sign design standards in order to ensure that gateways, corridors, major arterials, and natural areas are identifiable.

Table C-1. Important Visual Resources[1]

Gateways to the City • *May be marked with entrance monument signs* • *Limit range of land uses to preclude those commercial and industrial uses with outside processes and storage* • *Development shall be designed to make a positive visual impression (in terms of design/architecture and landscaping) and incorporate/preserve natural features.* • *Billboards shall be limited in number, shall be located to preserve views of natural features*
Highway 46 East* (between Jardine and Airport Roads)
Highway 101 at North End* (between Mustard Creek and Spring Street)
Highway 101 at South End* (between Highway 46 and Spring Street)
Highway 46 West* (Between Arbor Road and Highway 101)
Creston Road (beginning east of Beechwood Drive to Charolais Road)
Spring Street (North of 36th Street and South of 1st Street)
Airport Road
Union Road
Multi-Modal Transportation Center
Visual Corridors • *Development shall be designed to make a positive visual impression and incorporate/preserve natural features* • *Billboards shall be limited in number, shall be located to preserve views of natural features* • *Architectural design of new development on Spring Street shall be compatible with, and incorporate features identified in adopted design guidelines.*
Highway 46 East* (between Jardine and Airport Roads)

Highway 101* (full length of the City)
Highway 46 West* (Between Arbor Road and Highway 101)
Creston Road
Spring Street (full length of the City)
Airport Road
Union Road
Railroad Corridor (full length of the City)
Natural Landmarks and Open Space Viewsheds
Salinas River
Huerhuero Creek
Field at north end of Ramada Drive (between the railroad and the Salinas River)
Oak-covered hillsides
East Side creeks/riparian corridors (unnamed creeks #1-5 plus Turtle/Oak Creek)
View from Barney Schwartz Park southwest toward and into the Chandler Ranch Area

[1] *From Goal C-5 of the City of El Paso de Robles General Plan Conservation Element*

* *Indicates major gateway or visual corridor*

Policy C-5B **Hillsides.** Protect hillsides as a visual amenity by implementing design standards and grading requirements that call for:

a. Decreasing density as slope increases,

b. Limiting the amount of grading,

c. Providing substantial amounts of landscaping,

d. Incorporating architectural treatment that enhances the form of the hillside rather than conflicting with it,

e. Limiting the number of building sites that may be placed on prominent ridgelines,

f. Preventing development of new buildings that project above the ridgeline unless adequately mitigated with landscaping, and

g. Ensuring sensitive design of development on steep slopes, and on the crest of major ridgelines.

Considerations for development on steep slopes shall include the following:

- Avoid slope stability hazards by restricting development from slopes of 35 percent or greater.
- [Perform] site-specific visual assessments (with and without the project) to thoroughly evaluate the visual effects of development proposals on slopes of 30 percent or greater.
- For new development located on ridges and hills consider providing a substantial building setback from the edge of the downhill slope and/or screening landscaping, where the slope exceeds 15 percent.

4.1.2.3.2 CITY OF EL PASO DE ROBLES MUNICIPAL CODE

The City of Paso Robles Oak Tree Preservation Ordinance (Municipal Code Chapter 10.01) provides policies, regulations, and specifications necessary to govern preservation of oak trees within the city.

10.01.010.A. It is declared that the public interest and welfare requires that the city establish a program for the preservation of oak trees in order to maintain the heritage and character of the City of El Paso de Robles ("The Pass of the Oaks") as well as preserve the beauty and identity of the community.

10.01.010.F. Preservation of existing oak trees and opportunities to promote the establishment of new oak trees shall be a focus of the planning commission and/or city council in conjunction with consideration of any development project or development related entitlement. Public education regarding the value of preserving oaks and other trees shall be promoted by the City of El Paso de Robles.

A discussion of this regulation is also provided in *Section 4.4, Biological Resources*.

4.1.3 Thresholds of Significance

The determinations of significance of project impacts are based on applicable policies, regulations, goals, and guidelines defined by CEQA and the City. In addition to comparing the project to relevant policies and standards, the aesthetic resources assessment identifies which specific criteria contribute most to the existing quality of each view, and if changes would occur to that criterion as a result of the project. If a change in visual condition is identified, this change is analyzed for its potential effect on the existing scenic character. This analysis is combined with the potential number of viewers, their sensitivities, and viewing duration in order to determine the overall level of impact.

City planning documents do not contain specific criteria for determining thresholds of significance regarding aesthetic resources. However, in comparing the project to the State CEQA Guideline thresholds listed below, substantial consideration was given to the project's consistency with City policies, ordinances, plans, goals, and regulations concerning scenic vistas, scenic roadways, visual character, and night lighting. The local goals, policies, and guidelines provide a basis for determining levels of potential impact as well as an indication of aesthetic values and sensitivity to visual change.

4.1.3.1 California Environmental Quality Act Guidelines

State CEQA Guidelines Section 15382 defines a "significant effect" on the environment to mean a "substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."

The State CEQA Guidelines and the City's Environmental Checklist state that a project would normally be considered to have a significant impact if it would:

a. Have a substantial adverse effect on a scenic vista;

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from publicly

accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; or

d. Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area.

Each of these thresholds is discussed under *Section 4.1.5, Project-Specific Impacts and Mitigation Measures*, below.

4.1.4 Impact Assessment and Methodology

The analysis and subsequent determination of impacts is based primarily on a comparison of the proposed project with the visual character and quality of its setting and surrounding vistas. This study also compares the project to the specific visual resource goals of the City. When the stated goals demonstrate that a high degree of value is placed on the visual environment, the standards to which the project is compared are considered equally high. As a result of the project's location relative to public roadways, combined with an awareness of scenic quality as reflected in City planning policy and the project site's Gateway designation, it is anticipated that community and viewer sensitivity to visual changes from public vantage points are moderately high.

The findings of this assessment are based on multiple field visits conducted between August 2021 and March 2022, including review of the entire site, offsite improvement areas, and the surrounding area. Resource inventories were conducted both on foot and from moving vehicles. Existing visual resources and site conditions were photographed and recorded. Assessment of project elements was based on plans and descriptions provided by Majestic Realty Co. (Applicant). Planning documents and previous studies relevant to the surrounding area were referenced to gain an understanding of community aesthetic values.

The project site was viewed from potential viewer group locations in the surrounding area. Representative public viewpoints were identified for further analysis, based on dominance of the site within the view, the relationship to visual resources, duration of views, and expected sensitivity of the viewer group. Of those representative viewpoints, five key viewing areas (KVAs) were selected that best illustrate the visual changes that would occur as a result of the project. Locations of these KVAs are listed below in Table 4.1-1 and shown on Figure 4.1-1. Visual simulations from these KVAs are shown in Figures 4.1-2 through 4.1-6.

Visual simulations were prepared from each of the KVAs to quantify potential project visibility and to assess related visual effects. The accuracy of the Applicant-provided computer-generated visual-simulations (*Appendix B*) was field verified using the known heights and scale of exiting site development and context features in combination with selective story-pole placement. The appearance of structures and landscaping shown in the visual simulations is based on preliminary designs and associated Design Guidelines provided by the Applicant and as identified in the *Chapter 2, Project Description*. To illustrate the maximum potential visual effect, the project is shown at full build-out with landscaping after approximately 5 to 7 years of growth.

Existing trees proposed for removal were identified in the field and their potential visibility considered from each of the KVAs. The removal of these trees was included in the visual assessment and shown as applicable in project visual simulations.

4.1.4.1 Project Visibility

The project would be seen to some extent from several public roads in the area as follows:

Airport Road. The project site fronts Airport Road along approximately 5,000 feet of its eastern boundary. Because of this proximity, the development would be directly visible from that adjacent section of roadway. Approaching from the south, the project would first become visible along Airport Road at a distance of approximately 1,500 feet. South of that location on Airport Road, visibility of the project would be substantially blocked by landform and existing development and/or vegetation. In the northbound direction, the proposed warehouse would have limited visibility due to viewing distance and the other proposed development located elsewhere throughout the site.

Traveling in the southbound direction along Airport Road, the project would first become visible at a distance of approximately 2,000 feet. From this less developed section of roadway north of the project, the proposed Phase 1 warehouse would be somewhat visible to the west, at a viewing distance of approximately 1,800 feet.

Dry Creek Road (Landing Lane). Dry Creek Road (Landing Lane), which is immediately south of the project site, would parallel an approximately 2,700-foot section of the development. Although traffic volumes are generally low along this road, future development in this area would likely increase public views of the project.

East of Airport Road, the southeasternmost portion of the development would be seen to some degree along an approximately 2,500-foot section of westbound Dry Creek Road. Farther to the east, viewing distance and existing development would substantially limit views of the project.

Buena Vista Drive. Buena Vista Drive is located both north and west of the project site. At its closest, Buena Vista is approximately 1,500 feet north of the project site. To the west, Buena Vista is approximately 3,000 feet from the project site. From these viewing areas, the proposed warehouse would be the most noticeable project element, due to its size. This visibility would be somewhat moderated by viewing distance, intervening development, and landform. Where Buena Vista Drive continues farther west and south, views of the project would be very limited and generally unnoticeable in the overall landscape.

Other Roads. The project would have varied visibility from public roadways east of Airport Road. From most of this area the project would have limited to no visibility because of existing development. Portions of the project would be easily seen along sections of Wing Way and Rollie Gates Drive as those streets approach Airport Road. Depending on the specific viewpoint, this visibility may include portions of the development fronting Airport Road, as well as the proposed Phase 1 warehouse area farther to the west.

The project would not be visible from SR 46E or US 101.

Table 4.1-1. KVAs and Visual Simulation Locations

KVA	Viewpoint Location	GPS Coordinates	Figure Number
KVA-1	From the intersection of Airport Road and Dry Creek Road looking northwest	35° 39’ 46” N, 120° 38’ 27” W	2
KVA-2	From Airport Road looking southwest	35° 40’ 7” N, 120° 38’ 27” W	3
KVA-3	From Buena Vista Drive looking south	35° 40’ 26” N, 120° 38’ 37” W	4
KVA-4	From Buena Vista Drive looking southeast	35° 40’ 26” N, 120° 35’ 14” W	5
KVA-5	From Buena Vista Drive looking east	35° 40’ 13” N, 120° 39’ 31” W	6

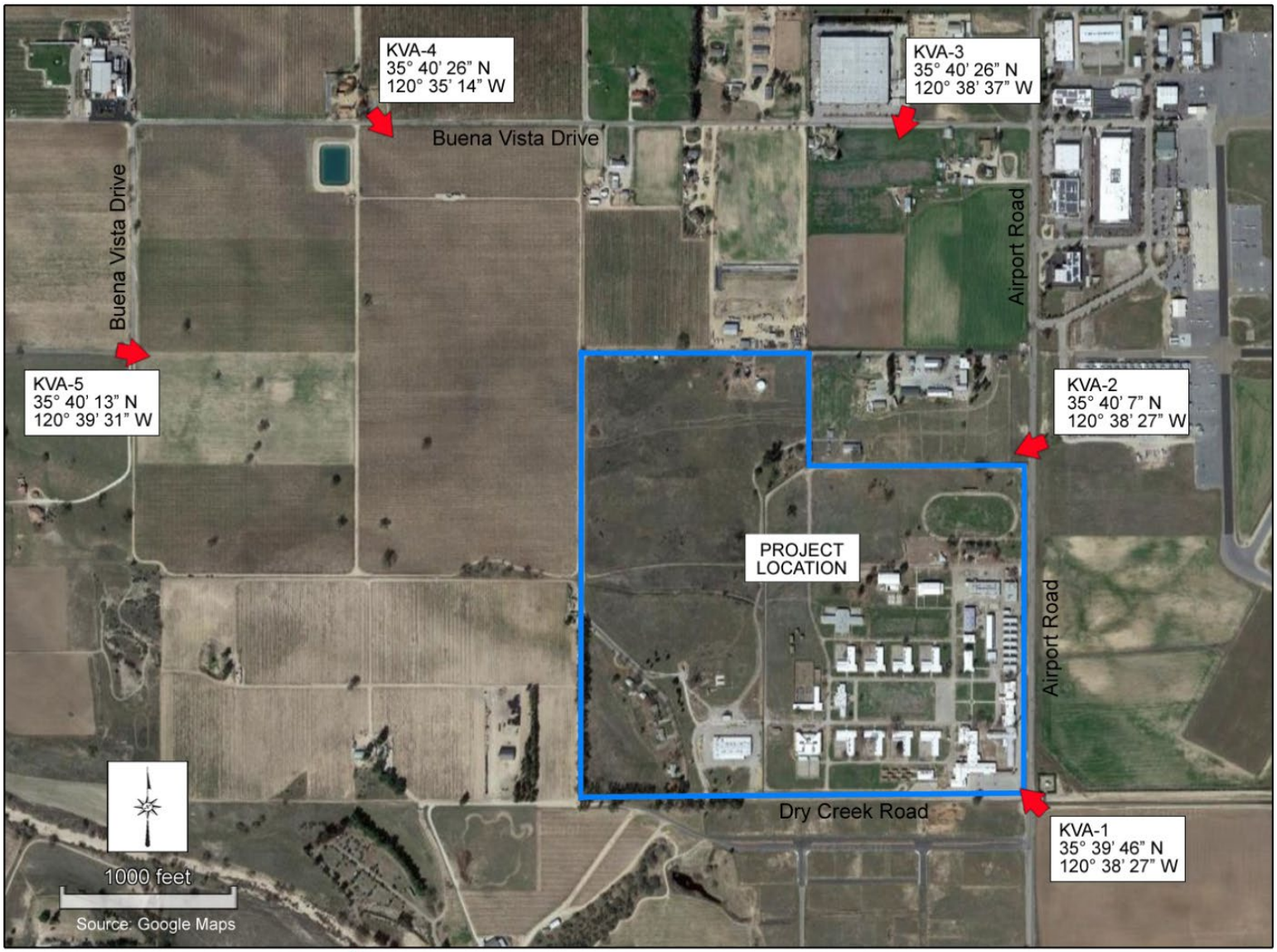


Figure 4.1-1. Key Viewing Area (KVA and Visual Simulation Location) Map.



Figure 4.1-2. Key Viewing Area 1: From the intersection of Airport Road and Dry Creek Road, looking northwest.



Figure 4.1-3. Key Viewing Area 2: From Airport Road, looking southwest.



Figure 4.1-4. Key Viewing Area 3: From Buena Vista Drive, looking south.



Figure 4.1-5. Key Viewing Area 4: From Buena Vista Drive, looking southeast.



Figure 4.1-6. Key Viewing Area 5: From Buena Vista Drive, looking east.

4.1.5 Project-Specific Impacts and Mitigation Measures

WOULD THE PROJECT HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA?

AES Impact 1: The project would not have a substantial adverse impact on scenic vistas. Impacts would be less than significant (Class III).

Scenic vistas are generally defined as high-quality views displaying good aesthetic and compositional value that can be seen from public viewpoints. If the project would substantially degrade the scenic landscape as viewed from public roads or from other public or recreation areas, this would be a potentially significant impact to the scenic vista.

Scenic vistas in the region that are either identified in City planning policy or otherwise meet the quality definition of a scenic vista typically include views of the rolling topography, mature oak trees, creeks and riparian corridors, vineyards, and views of distant hills.

From viewpoints in the immediate vicinity of the project site, scenic vistas include mature oak trees, rolling topography to the south, vineyards to the west and north, and distant views of the Santa Lucia Mountains to the west and southwest. Although these scenic elements are part of the vistas surrounding the project site, none of them particularly dominate the view. From locations in the project vicinity, other than adjacent vineyards, views of these scenic resources tend to be visually limited or obscured by intervening development and/or viewing distance.

Although the project proposes to introduce additional and taller structures to the site, these developments would not substantially affect public access to the elements that comprise scenic vistas in the area. The tallest and largest structure, the Phase 1 warehouse, would be located sufficiently away from public roadways such that it would have little to no effect on surrounding visual resources. Impacts would be *less than significant*.

AES Impact 1 (Class III)
The project would not have a substantial adverse impact on scenic vistas.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts on scenic vistas would be less than significant.

WOULD THE PROJECT SUBSTANTIALLY DAMAGE SCENIC RESOURCES, INCLUDING, BUT NOT LIMITED TO, TREES, ROCK OUTCROPPINGS, AND HISTORIC BUILDINGS WITHIN A STATE SCENIC HIGHWAY?

AES Impact 2: The project is not within the view corridor of a state scenic highway and does not propose offsite improvements that would be within the view corridor of a state scenic highway. Impacts would be less than significant (Class III).

This CEQA threshold does not apply because the project site is not within the view corridor of any Officially Designated State Scenic Highway. SR 46E and US 101 are identified as "Eligible" in the State Scenic Highway Program; however, this CEQA threshold applies only to State of California "Officially Designated" Routes. Impacts would be *less than significant*.

AES Impact 2 (Class III)
The project is not within the view corridor of a state scenic highway and does not propose offsite improvements that would be within the view corridor of a state scenic highway.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts to resources within state scenic highways would be less than significant.

IN NON-URBANIZED AREAS, WOULD THE PROJECT SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF PUBLIC VIEWS OF THE SITE AND ITS SURROUNDINGS? (PUBLIC VIEWS ARE THOSE THAT ARE EXPERIENCED FROM PUBLICLY ACCESSIBLE VANTAGE POINT). IF THE PROJECT IS IN AN URBANIZED AREA, WOULD THE PROJECT CONFLICT WITH APPLICABLE ZONING AND OTHER REGULATIONS GOVERNING SCENIC QUALITY?

AES Impact 3: Although visual quality and rural character would be adversely affected by removal of large trees, this would be offset by an improvement in visual character in terms of alteration from institutional to retail-commercial and would visually unify the site and complement the airport area development. Impacts would be less than significant (Class II).

The project is located in a non-urbanized area as defined by PRC Section 21071. The project would have a significant impact on the visual character of the site and surroundings if it would alter the area in a way that substantially changes, detracts from, or degrades the visual quality of the project site from public viewing areas, or if the project would be inconsistent with City policies regarding visual quality and character. The degree to which that change reflects documented community values and meets viewers' aesthetic expectations is the primary basis for determining the extent of potential visual impact. Visual contrast and compatibility can be used as a measure of the potential impact that the project may have on the visual quality of the site. If a strong contrast occurred where project features or activities alter and dominate the landscape setting, this would be a potentially significant impact on visual character or

quality of the site. Project components that are not compatible with the visual context could result in a significant change in the character of the community. Consideration of potential significance includes analysis of visual character elements such as land use and intensity, visual integrity of the landscape type, and other factors.

The existing visual character of the project site and its surroundings is a product of both built and natural elements, including uses such as agriculture and agriculture processing, rural residential, commercial, industrial, institutional, and recreational development. The project site itself is of moderate to low visual quality, primarily due to its developed character and highly institutional appearance. Existing mature vegetation both on the project site and throughout the surrounding neighborhoods increase the overall visual quality and create a degree of visual continuity in the area.

With implementation of the project, the overall developed character of the site would increase due to the number and scale of proposed buildings and other structures, site features, roadways, and other built elements. Review of the proposed Design Guidelines indicates that most the of new retail/commercial buildings would help visually unify the site and would provide an increased continuity with the existing development to the east (Paso Robles Municipal Airport). As seen from surrounding public viewpoints, the project would bring a higher-quality aesthetic appearance to the site in terms of architectural design, materials and colors, structure massing and adjacencies, site layout, landscaping, and general site amenities than are currently present.

As seen from closer viewpoints within the project site itself, the warehouse building would be visually inconsistent with the other parts of the development in terms of scale and architectural character. However, when seen from the more distant public viewing locations surrounding the project site, the warehouse's inconsistency with the other parts of the project would be less noticeable. Even though the warehouse would be larger in scale than other parts of the proposed development, it would not be unexpected in the regional landscape. Throughout the area, large industrial and agricultural buildings are not uncommon, many of which support the inherent "wine country" production aspect of the region.

Proposed tree removal would reduce the vegetated character and quality of the project site; however, review of the Landscape Master Plan and adherence to the Design Guidelines show that over time the project would gain the appearance of a well-vegetated commercial development. Proposed trees surrounding the warehouse building would not completely hide the structure but would reduce its visual scale and noticeability as seen from surrounding public roadways.

The project would be implemented in two major phases. The timing of the phased development is not certain at this time, but full build-out is expected to occur within 5 to 7 years. During this time period, the project site would inherently appear as a construction zone to some extent. This visual condition would likely be understood as temporary to most viewers and would not affect long-term visual quality or character of the project site.

Implementation of the project would alter the visual character of the project site by changing it from an institutional development to a commercial-retail one. This alteration would not create a more rural appearance; however, it would result in a more unified and visually harmonious look both within the project site and with the surrounding airport development. This generally positive visual change would be tempered by the loss of existing mature oaks and other trees onsite. On balance, the resulting visual effect would be a less-than-significant visual impact on the character and quality of the site and its surroundings.

Offsite improvements would generally not degrade the existing visual character of the area. The modified Class I Multiuse Trail low water crossing would require the removal of additional trees, which may result in a noticeable change in visual resources. Because views from Airport Road are protected by the Conservation Element, the removal of these additional 13 trees could adversely affect the views of this

scenic resource. This impact would be mitigated by the implementation of Mitigation Measure BIO/mm-7.1 (*Section 4.4, Biological Resources*), which requires mitigation for removed and impacted oak trees through an Oak Tree Mitigation and Protection Plan. Impacts would be *less than significant*.

AES Impact 3 (Class II)
Although visual quality and rural character would be adversely affected by removal of large trees, this would be offset by an improvement in visual character in terms of alteration from institutional to retail-commercial and would visually unify the site and complement the airport area development.
Mitigation Measures
Implement Mitigation Measure BIO/mm-7.1
Residual Impacts
Potential impacts on the visual character of the area would be less than significant.

WOULD THE PROJECT CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE WHICH WOULD ADVERSELY AFFECT DAY OR NIGHTTIME VIEWS IN THE AREA?

AES Impact 4: The airport area, surroundings, and project site currently have a moderate amount of nighttime lighting. The project proposes lighting design and fixtures that would minimize light-source effect and would not spill over onto adjacent properties. As a result, the project would create a less-than-significant new source of nighttime or daytime light or glare into the surrounding area. Impacts would be less than significant with mitigation (Class II).

The project would result in a significant impact if it subjected viewers to a substantial amount of new point-source lighting visibility at night, or if the collective illumination of the project resulted in a noticeable spill-over effect into the nighttime sky, increasing the ambient light over the region.

Nighttime lighting conditions vary throughout the northeast portion of the city, from heavily lit areas of commercial development to rural areas with little night lighting. The Paso Robles Municipal Airport is located adjacent to the project site and provides a primary source of nighttime lighting in the area. Additionally, vehicle headlights and streetlights along Airport Road and other roadways generate other sources of nighttime lighting and glare in the vicinity of the project site. Other land uses include agricultural operations to the north and vineyards to the south, which generate minimal, if any, nighttime lighting. Existing nighttime lighting at the project site includes security, safety, and parking lot lighting.

Preliminary photo-metric studies provided by the Applicant show that the proposed lighting would not encroach onto adjacent properties (*Appendix B*). The preliminary lighting plans include fixtures with cut-off lenses and designs that would minimize light trespass and eliminate visibility of the light-source. Light spacing and placement appears to minimize redundancy and excess illumination.

The proposed Phase 1 warehouse would be located adjacent to non-lighted land uses to the west, south, and north, including a single-family residence immediately west of the loading dock area. The Phase 2 project components would be located between the Phase 1 development and Airport Road, with the airport directly to the east, CAL FIRE to the north, and vacant land to the south.

Review of the project lighting plans and descriptions indicates that its implementation in adherence to these objectives and policies and requirements proposed in the project's Design Guideline would result in a less-than-significant effect on night lighting or glare. Impacts would be *less than significant with mitigation*.

AES Impact 4 (Class II)	
The airport area, surroundings, and project site currently have a moderate amount of nighttime lighting. The project proposes lighting design and fixtures that would minimize light-source effect and would not spill over onto adjacent properties. As a result, the project would create a less-than-significant new source of nighttime or daytime light or glare into the surrounding area.	
Mitigation Measures	
AES/mm-4.1	*Prior to issuance of building permits in either phase, the Applicant shall provide a lighting plan for the lot affected by the building permit and any areas outside of the lot that are subject to associated offsite improvements that demonstrates that the selected light fixtures, locations, and optical distribution patterns comply with the California Green Building Code standards. Specifically, the plan shall evaluate the light fixture selection against the lighting zone that is appropriate. Backlight, uplight, and glare (BUG) ratings provided by the manufacturer of the proposed fixtures shall be provided for each fixture type proposed. The lighting plans shall be prepared by a qualified engineer who is an active member of the Illuminating Engineering Society of North America (IESNA) using guidance and best practices endorsed by the International Dark Sky Association. All fixtures shall meet or exceed the standards of the California Green Building Code Maximum Allowable BUG Rating (Table 5.106.8 in the 2019 version). The plan shall also include the following to meet this requirement:* 1. *In order to prevent "hot spots" onto the structures, wall-mounted fixtures shall be positioned for lighting at the ground level and around the building for safety using appropriate IESNA uniformity ratings and shall not shed light back onto the building. To achieve this, the plan shall consider use of house side shields to minimize glare that may be observed from the vertical surface of the building walls. Wall-mounted light fixtures shall use nonreflective materials, including nonreflective glass.* 2. *The project shall include lighting controls and dimming capabilities for both building-related lighting and pedestrian/parking-related lighting, based on the IESNA, California Green Building Code, and California Energy Code minimums. Occupancy sensors shall be utilized so that lighting is dimmed or turned off when an area is unoccupied.* 3. *Lighting in parking areas and along drive aisles shall be the minimum level necessary to provide appropriate visibility of pedestrians and vehicles.* 4. *Lighting fixtures located in parking areas or drive aisles shall not be located adjacent to or above trees that will obscure lighting beyond safe levels as the trees mature.* 5. *Any exterior lighting, including lighting for signs, shall be "warm-white" or filtered (correlated color temperature of < 3,000 Kelvin; scotopic/photopic ratio of < 1.2) to minimize blue emissions.* 6. *All exterior lighting fixtures shall be International Dark Sky Association approved (Fixture Seal of Approval program) and shall be installed so that they are shielded and directed downwards.*
Residual Impacts	
Potential impacts related to light and glare would be less than significant.	

4.1.6 Cumulative Impacts

The discussion of cumulative impacts relates to the potential for the project to contribute to an aggregate change in visual quality from the surrounding public viewing areas, taking into consideration existing and proposed development.

The northeast portion of Paso Robles and adjacent unincorporated San Luis Obispo County has undergone visual changes within the past decade, including new winery, industrial, agricultural, recreational, tourist-commercial, residential, and other development. These changes have resulted in an increased built character throughout the area and in the project vicinity.

Although the project would be seen from surrounding roadways, its architecture, site design, lighting, and landscaping would be visually compatible with the surrounding airport development setting and would likely be consistent with viewers' expectations for the site. The site is currently developed, and the project would likely represent a "higher use" with an improved aesthetic condition for most observers. The project design, in adherence with the General Plan, Municipal Code, and other City guidelines, would substantially reduce potential visual impacts and would ensure that the proposed project's incremental contribution to potential cumulative impacts would be less than significant.

4.2 AGRICULTURE AND FORESTRY RESOURCES

This section evaluates the project's potential to impact agricultural resources within and adjacent to the project area. Potential impacts that are discussed include conversion of Important Farmland to non-agricultural uses through direct conversion or other indirect impacts. The project site does not contain forestry resources; therefore, no further discussion of that issue is necessary.

4.2.1 Existing Conditions

4.2.1.1 *Regional Setting*

Based on the LUE, the city of Paso Robles supports 814 acres of land designated for agricultural use (City of Paso Robles 2014). According to the *City of El Paso de Robles General Plan 2003 Open Space Element* (Open Space Element), historical agricultural uses within the city include cultivated crops and rangeland, including dry farmed grain hay, barley, oats, safflower, wheat, apples, walnuts, pistachios, and almonds. Over the past 20 years, croplands within the city have been converted from dry grain crops and pasture to wine grape vineyards, which now dominate the agricultural landscape. Agricultural lands within the city are concentrated to the north of SR 46E and north of the Paso Robles Municipal Airport (City of Paso Robles 2003). Table 4.2-1 identifies the type and amount of agricultural land within the city and surrounding areas.

Table 4.2-1. Farmland Within and Surrounding Paso Robles (Acres)

Farmland Type	City Limits	Sphere of Influence	Surrounding the City	Total
Prime Farmland	205	~50	3,733	3,988
Farmland of Statewide Importance	481	~50	5,993	6,524
Unique Farmland	304	~75	18,981	19,360
Farmland of Local Importance	3,087	~100	36,259	39,446
Total	**4,077**	**~275**	**64,966**	**69,318**

Source: Paso Robles Purple Belt Action Plan (2009)

Note: Farmland Type is based on Farmland Mapping and Monitoring Program Designations

The Paso Robles region vineyard industry has experienced growth over the last 20 years. According to the Open Space Element, the Paso Robles region (including area outside the city limits) has a total planted wine grape area of approximately 17,500 acres, with approximately 13,000 acres of wine grapes being produced. More than 35 different varieties of wine grape are grown in the Paso Robles area (City of Paso Robles 2003).

4.2.1.1.1 AGRICULTURAL SOILS

According to the Open Space Element, which is based on the Soil Survey of San Luis Obispo County, agriculturally compatible soils within the city include Linne-Calodo complex, Lockwood shaley loam, Hanford and Greenfield gravelly sandy loam, Metz-Tunjunga complex, Metz loamy sand, Arbuckle fine sandy loam, and Cropley clay, as shown in Table 4.2-2.

Table 4.2-2. Soils and Agricultural Capability

Soil Name and Number	Agricultural Capability Subclass
Linne-Calodo complex (152, 153, 154)	Class IVe-1(15) Irrigated Class IVe-1 (15) Nonirrigated
Lockwood shaley loam (158)	Class IIe-4 (14) Irrigated Class IVe-4 (14) Nonirrigated
Hanford and Greenfield gravelly sandy loam (150)	Class IIe-4 (14) Irrigated Class IVe-4 (14) Nonirrigated
Metz-Tujunga complex (167)	Class IVw-4 (14) Nonirrigated
Xerofluvents (riverwash) (212)	Class VIIIw (14) Nonirrigated
Metz loamy sand (166)	Class IIIs-4 (14) Irrigated Class IVs-4 (14) Nonirrigated
Arbuckle fine sandy loam (100)	Class I (14) Irrigated Class IVc-1 (14) Nonirrigated
Cropley clay (132)	Class IIs-5 (14) Irrigated Class IVs-5 (14) Nonirrigated

Source: City of Paso Robles Open Space Element (2003).

[1] Class I soils have few limitations that restrict their use.

[2] Class II soils have moderate limitations that reduce the choice of plants or require special practices.

[3] Class III soils have severe limitations that reduce the choice of plants or require special practices.

[4] Class IV soils have very severe limitations that reduce the choice of plants or require careful management practices.

[5] Class VIII soils and landforms have limitations that nearly preclude their use for commercial crop production.

[6] "c" = too cold or too dry; "e" = erosion; "s" + shallow, droughty, or stony; "w" = water interference

[7] (14) = occur in Central California Coastal Valleys; (15) = occur in the Central California Coastal Range

4.2.1.1.2 PURPLE BELT

In 2009 the City adopted the *Paso Robles Purple Belt Action Plan*, a requirement of General Plan Policy OS-1A and LU-2E, which aims to protect and conserve agricultural lands that surround the city's urban development. The Purple Belt Action Plan identifies low-, moderate-, and high-priority areas that are prioritized for the preservation of agricultural resources around the city that are included in the "Purple Belt" and eventually will establish the "edge" of the city and the city's urban growth boundary. The project site and adjacent parcels are not identified as land within a prioritized area of the Purple Belt as prioritized areas are only located outside of City limits; however, there is designated high-priority land located to the north and west of the project site within unincorporated San Luis Obispo County (City of Paso Robles 2009; Figure 4.2-1).

4.2.1.2 *Project Setting*

4.2.1.2.1 EXISTING USES

According to the City's zoning map, the project site is zoned Public Facilities (PF), land to the south and east is zoned Airport (AP), land to the north is zoned Residential Agriculture (RA), and land to the west is not within the City's sphere of influence (SOI) but is designated as Agriculture (AG) per the County of San Luis Obispo (County). In addition, land located directly north of the designated RA land to the north of the project site is also zoned AG per the County (Figure 4.2-2; City of Paso Robles 2018). The project site supports buildings associated with the former Paso Robles Boys School and does not support agricultural uses. Land to the north and west supports dry farming and row crops and there is a vineyard located to the southwest. The Paso Robles Municipal Airport is located directly east.

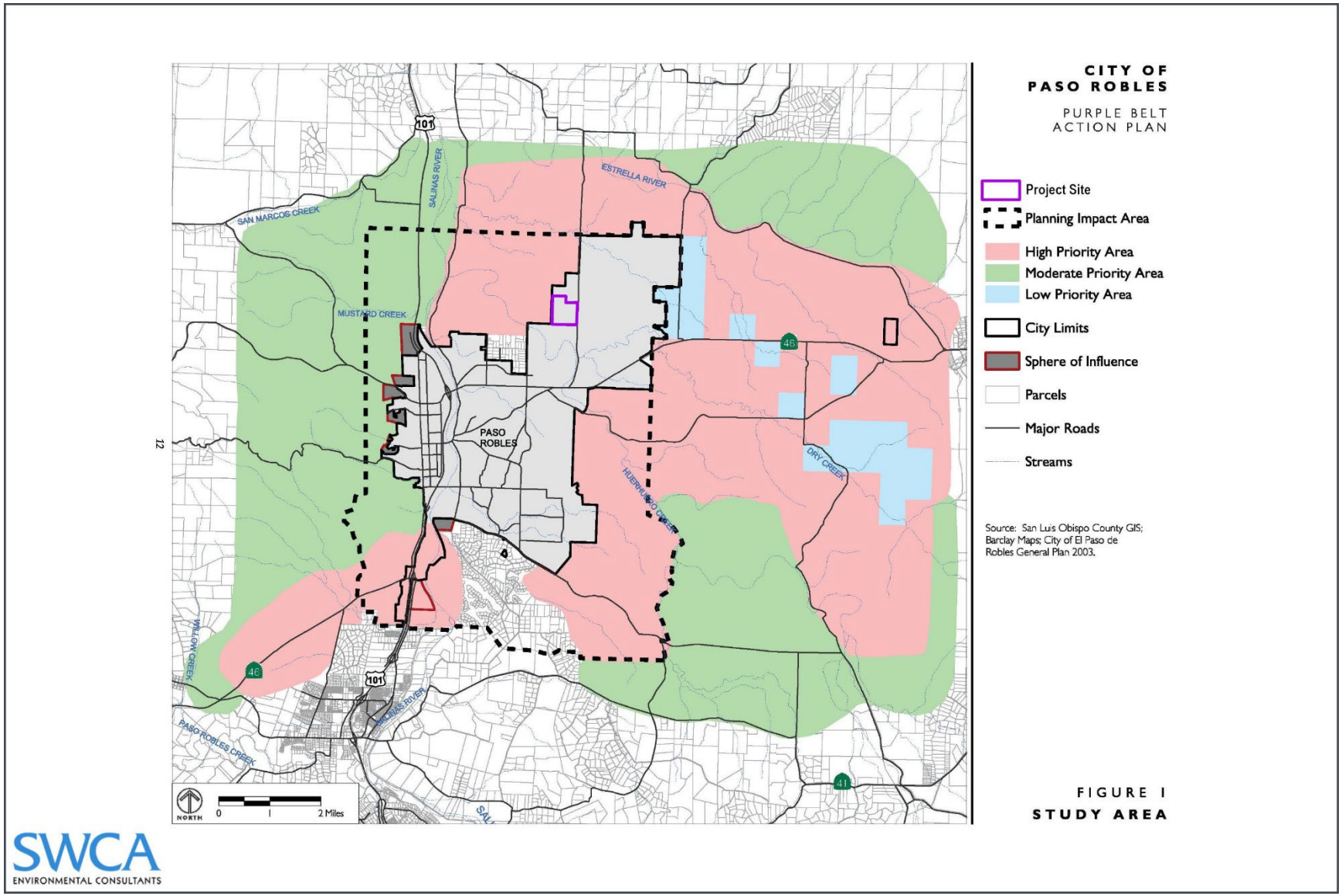


Figure 4.2-1. City of Paso Robles Purple Belt Area.

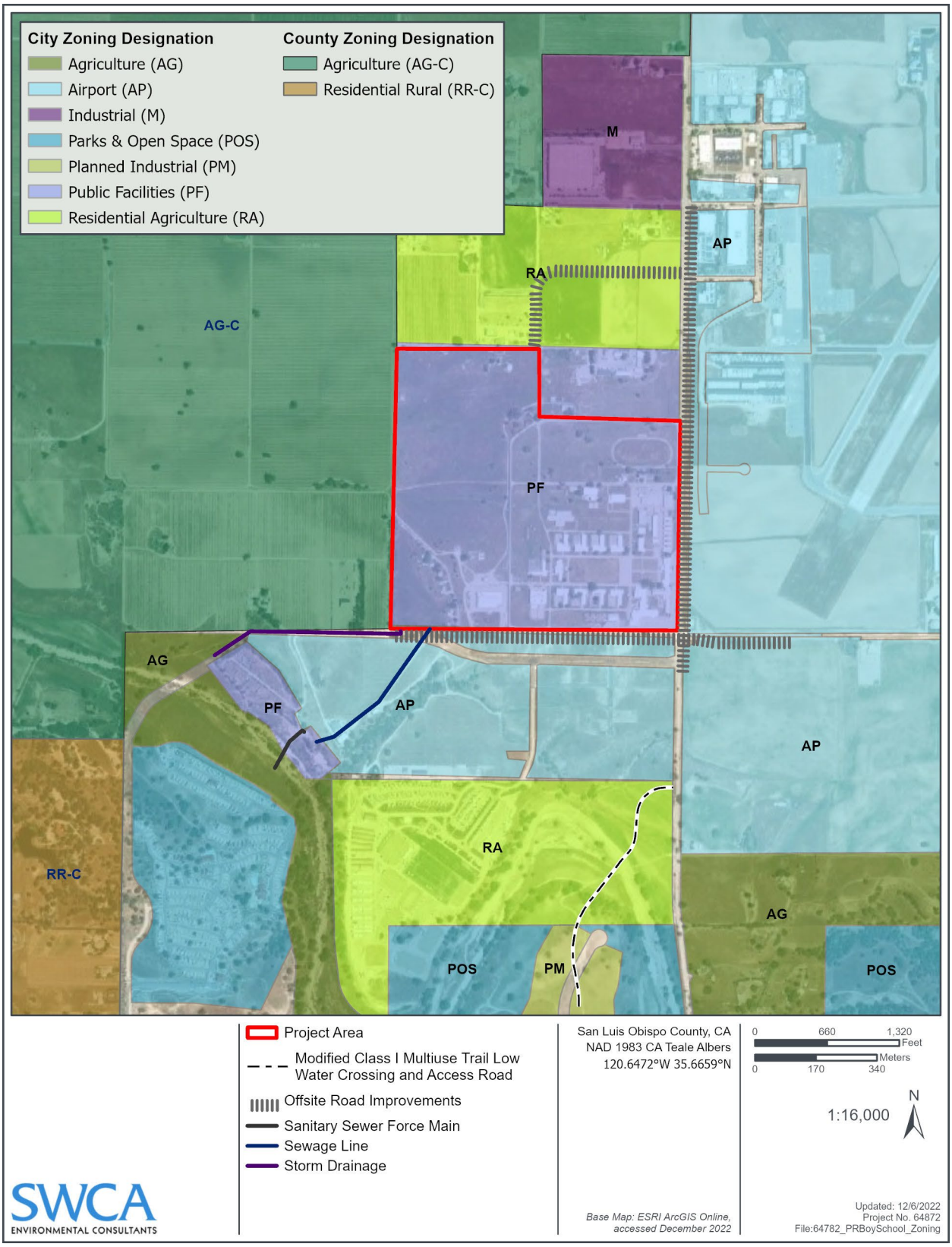


Figure 4.2-2. City and County Zoning Designations.

4.2.1.2.2 PROJECT SOILS

According to the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA 2021a), the project site is underlain by the following soil types (see Figure 4-6.1 in *Section 4.6, Geology and Soils*):

- Arbuckle-San Ysidro complex, 2 to 9 percent slopes;
- Hanford and Greenfield gravelly sandy loams, 0 to 2 percent slopes;
- Hanford and Greenfield gravelly sandy loams, 2 to 9 percent slopes; and
- San Ysidro loam, 0 to 2 percent slopes, Major Land Resource Area (MLRA) 14.

4.2.1.2.3 PROJECT FARMLAND

According to the Farmland Mapping and Monitoring Program (FMMP), the entire eastern portion of the project site is designated as Urban and Built-Up land and the western portion is designated Farmland of Local Potential (California Department of Conservation [CDOC] 2021). The land surrounding the project site is designated as Farmland of Local Importance and Urban and Built-up land to the east; Farmland of Statewide Importance, Farmland of Local Importance, and Farmland of Local Potential to the north; Prime Farmland and Farmland of Statewide importance to the west; and Farmland of Local Potential, Prime Farmland, and Farmland of Statewide Importance to the south (Figure 4.2-3; CDOC 2021). The area of the proposed Dry Creek Road realignment is designated Farmland of Local Potential, and the area of the potential Rollie Gates Drive extension is designated Farmland of Statewide Importance and Farmland of Local Potential (CDOC 2021). The proposed modified Class I Multiuse Trail low water crossing over Huer Huero Creek and temporary connecting roadways are designated as Grazing Land, Farmland of Local Importance, and Farmland of Local Potential. The proposed offsite storm drainage alignment, offsite sewage line, and offsite lift station are designated as Farmland of Local Potential (CDOC 2021).

Neither the project site nor adjacent properties are subject to a Williamson Act Contract. The nearest land under a Williamson Act Contract is within the unincorporated county, approximately 1.5 miles west.

4.2.2 Regulatory Setting

4.2.2.1 *Federal*

4.2.2.1.1 FARMLAND PROTECTION POLICY ACT

The Farmland Protection Policy Act (FPPA) is governed by the USDA NRCS and is intended to minimize the impact federal programs have on the permanent conversion of farmland to non-agricultural land uses. The policy assures that to the extent feasible, federal programs are administered to be compatible with state and local units of government as well as private programs and policies to protect farmland (USDA 2021b). For the purpose of the FPPA, Farmland includes Prime Farmland, Unique Farmland, and Land of Statewide or Local Importance. Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forest land, pastureland, cropland, or other land, but not water or urban built-up land (USDA 2021b).

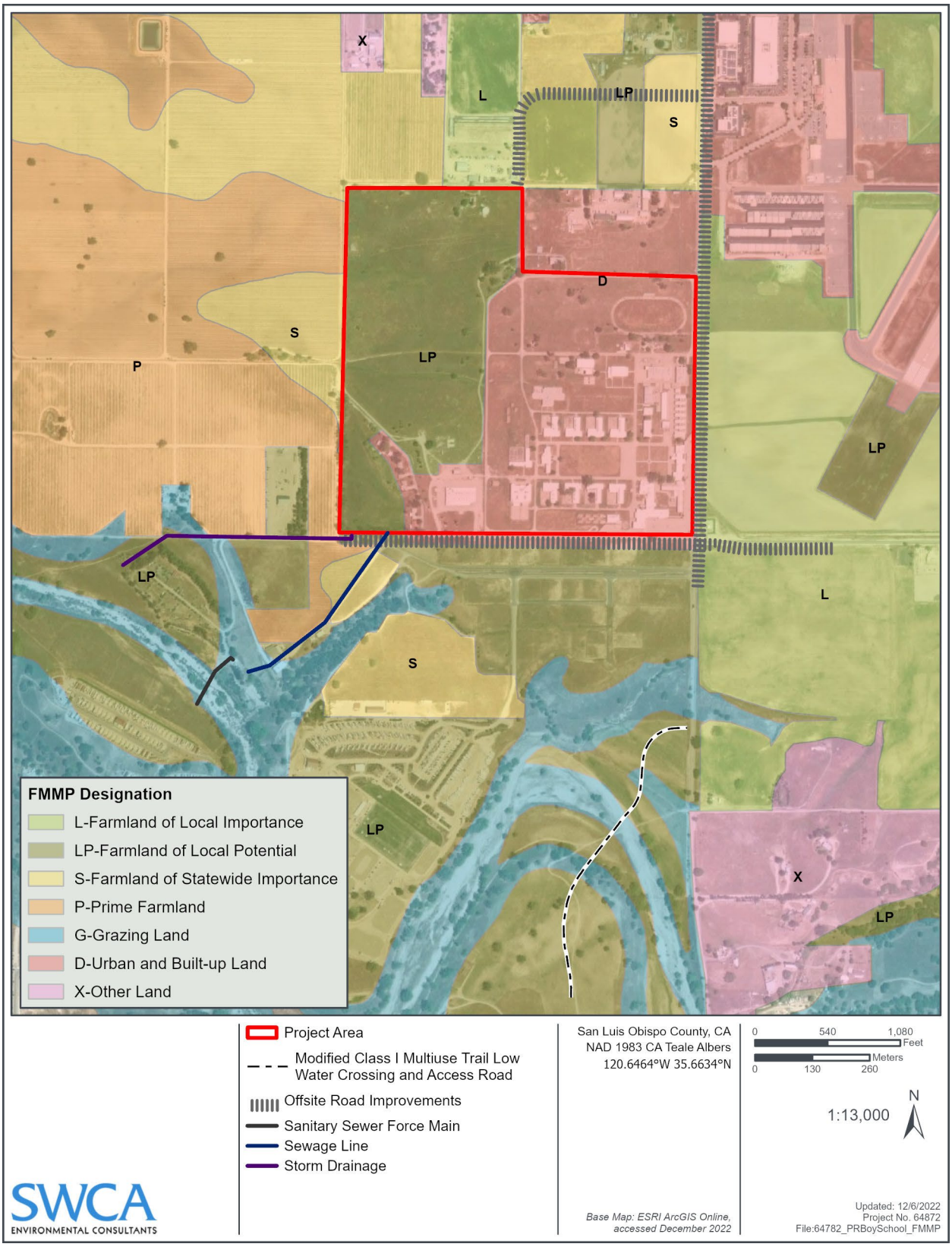


Figure 4.2-3. Farmland Mapping and Monitoring Program Designations.

4.2.2.1.2 AGRICULTURAL CONSERVATION EASEMENT PROGRAM

The USDA NRCS created the Agricultural Conservation Easement Program to help landowners and other entities protect, restore, and enhance wetlands and/or working farms and ranches through conservation easements (USDA 2021c). The USDA NRCS provides financial assistance for purchasing Agricultural Land Easements in order to protect and conserve agricultural land and help keep working farms in agriculture (USDA 2021c).

4.2.2.2 *State*

4.2.2.2.1 FARMLAND MAPPING AND MONITORING PROGRAM

The FMMP is authorized by the CDOC Division of Land Resource Protection. The purpose of the FMMP is to produce maps and statistical data used for analyzing impacts on California's agricultural resources. Through this program, agricultural land is rated according to soil quality, irrigation status, and land use. Maps are updated every 2 years using a computer mapping system, aerial imagery, public review, and field reconnaissance.

The FMMP has several land designations based on the criteria identified above. FMMP designations include, but are not limited to, Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Grazing Land, Farmland of Local Importance, Farmland of Local Potential, and Urban and Built-up Land. The highest rated soil is Prime Farmland. The designations for Prime Farmland, Farmland of Statewide Importance, and Unique Farmland are defined together under the terms "Agricultural Land" and "Farmland" in CEQA (PRC Section 21060.1 and State CEQA Guidelines Appendix G):

- **Prime Farmland (P):** Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.
- **Farmland of Statewide Importance (S):** Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.
- **Unique Farmland (U):** Farmland of lesser-quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include nonirrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the 4 years prior to the mapping date.
- **Farmland of Local Importance (L):** Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. In San Luis Obispo County, Farmland of Local Importance includes areas of soils that meet all the characteristics of Prime Farmland or Farmland of Statewide Importance, with the exception of irrigation. Additional farmlands include dryland field crops of wheat, barley, oats, and safflower.
- **Farmland of Local Potential (LP):** Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. In San Luis Obispo County, Farmland of Local Potential includes lands having the potential for farmland, which have Prime Farmland or Farmland of Statewide Importance characteristics and are not cultivated.
- **Grazing Land (G):** Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, the

University of California Cooperative Extension, and other groups interested in the extent of grazing activities.

- **Urban and Built-up Land (D):** Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.
- **Other Land (X):** Land not included in any other mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and waterbodies smaller than 40 acres. Vacant and non-agricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

4.2.2.2.2 WILLIAMSON ACT

The Williamson Act, also known as the Land Conservation Act of 1965, allows local governments to enter into contracts with private landowners in order to restrict specific parcels of land to agricultural or open space uses. In return, landowners receive property tax assessments that are much lower than normal because they are based on farming and open space uses rather than full market value (CDOC 2019). The CDOC assists all levels of governments and landowners in the interpretation of the Williamson Act.

4.2.2.3 *Local*

4.2.2.3.1 COUNTY OF SAN LUIS OBISPO GENERAL PLAN

Agriculture Element

The *County of San Luis Obispo General Plan Agriculture Element* (County Agriculture Element) includes goals and policies, which do not directly influence land within the city of Paso Robles, but which dictate appropriate development patterns for lands within the unincorporated county adjacent to land within the city (County of San Luis Obispo 2010). The following policies included in the County Agriculture Element are relevant to the proposed project's impact on surrounding agricultural land and cumulative impacts related to agricultural land within the county:

AGP24 **Conversion of Agricultural Land.** Discourage the conversion of agricultural lands to non-agricultural uses through the following actions:

- Work in cooperation with the incorporated cities, service districts, school districts, the County Department of Agriculture, the Agricultural Advisory Liaison Board, Farm Bureau, and affected community advisory groups to establish urban service and urban reserve lines and village reserve lines that will protect agricultural land and will stabilize agriculture at the urban fringe.
- Establish clear criteria in this plan and the Land Use Element for changing the designation of land from Agriculture to non-agricultural designations.
- Avoid land redesignation (rezoning) that would create new rural residential development outside the urban and village reserve lines.

- Avoid locating new public facilities outside urban and village reserve lines unless they serve a rural function or there is no feasible alternative location within the urban and village reserve lines.

4.2.2.3.2 CITY OF EL PASO DE ROBLES GENERAL PLAN 2003

Open Space Element

The Open Space Element identifies goals and policies for the conservation of open space and agricultural land within the city. The following goals and policies are aimed at the preservation of agricultural and open space land:

Policy OS-1A **Open Space/Purple Belt.** Develop an open space plan/program for establishing an open space/purple belt (agricultural preserve area) surrounding the City.

Action Item 4 Review development projects to ensure they complement the natural environment and agricultural lands, as applicable, in their location and design.

Action Item 6 Strive to establish an agricultural buffer between publicly accessible open spaces and bordering agricultural lands.

Action Item 9 Take steps to ensure that the County retains surrounding lands in very low-density rural residential, open space (including natural resource), and agricultural uses. Oppose the creation of new parcels within the County.

Action Item 10 Implement strategies that help preserve or protect agriculture, including:

- Establishment of agricultural buffer easements, berms and/or vegetative screening, on property proposed for urban development as a condition of approval of discretionary development applications.
- Implement the City's adopted "right-to-farm" ordinance.
- Participation in the Williamson Act and other farmland preservation programs.

Action item 11 Require disclosure agreements for new non-agricultural development within 500 feet of an existing agricultural use. Such disclosure agreements should describe potential nuisances (e.g., dust, noise, pesticide spraying, etc.) associated with normal agricultural operations.

Land Use Element

The LUE established land use policies for the city, including land use policies related to the City's Purple Belt. The following LUE policies are related to agricultural land within the city:

Policy LU-2E **"Purple Belt" (Open Space/Conservation Areas Around the City).** Create a distinct "Purple Belt" surrounding the City by taking Actions to retain the rural, open space, and agricultural areas.

Action Item 3 Take steps to ensure that the County retains surrounding lands in very low-density rural residential, open space (including natural resource), and agricultural uses. Oppose the creation of new parcels within the County.

Action Item 4 Implement strategies that help preserve or protect agriculture beyond the City limits, including:

- Establishment of agricultural buffer easements, berms and/or vegetative screening, on property proposed for urban development as a condition of approval of discretionary development applications.
- Implement the City's adopted "right-to-farm" ordinance.
- Participation in the Williamson Act and other farmland preservation programs.

Action Item 5 Require disclosure agreements for new non-agricultural development within 500 feet of an existing agricultural use. Such disclosure agreements should describe potential nuisances (e.g., dust, noise, pesticide spraying, etc.) associated with normal agricultural operations.

4.2.2.3.3 PASO ROBLES PURPLE BELT ACTION PLAN

The Purple Belt Action Plan was created in response to the General Plan policies identified above with the purpose of establishing a permanent agricultural greenbelt (purple belt) around the city in accordance with the City's General Plan. The Purple Belt Action Plan identifies methods and tools for the creation of the Purple Belt and identifies the land surrounding the city as high-, medium-, or moderate-priority areas based on existing and historical agricultural uses, parcel size, and aesthetic value (see Figure 4.2-1). Lands within the city limits are not identified as priority areas in the Purple Belt Action Plan.

While the Purple Belt Action Plan includes implementation tools to pursue and identifies potential funding sources for land conservation, it does not set an implementation timeline and landowner participation is strictly voluntary. Implementation mechanisms include supporting landowners interested in maintaining their land in agricultural perpetuity by assisting with opportunities to sell, donate, or transfer their development rights in exchange for cash, tax credits, and/or other benefits.

4.2.2.3.4 RIGHT TO FARM ORDINANCE

City Municipal Code Section 22.16J.220 includes the City's Right to Farm Ordinance, which aims to enhance and encourage agricultural operations within the city. The policy's purpose is to reduce the City's loss of agricultural resources by clarifying the circumstances under which agricultural operations may be considered a nuisance to surrounding land uses. This intent of this policy is not to modify California Civil Code, Health and Safety Code, Fish and Game Code, Food and Agricultural Code, Division 7 of the Water Code, or any other applicable provision of state law relative to nuisances. Instead, it is to be utilized only in the interpretation and enforcement of the provisions of this code and City regulations.

4.2.3 Thresholds of Significance

The significance determinations of project impacts are based on applicable policies, regulations, goals, and guidelines defined by CEQA. Specifically, the project would be considered to have a significant effect on agriculture and forestry resources if the effects exceed the significance criteria described below:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;

b. Conflict with existing zoning for agricultural use or a Williamson Act contract;

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by California Government Code Section 51104(g));

d. Result in the loss of forest land or conversion of forest land to non-forest use; or

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

As discussed in the IS/NOP, the City determined the proposed project would not result in impacts to forest land since the project site and surrounding areas are not zoned or used for forest land, timberland, or Timberland Production. In addition, the project site is not zoned for agriculture and is not subject to a Williamson Act Contract. Therefore, thresholds (b), (c), and (d) are not discussed further in the EIR; however, Thresholds (a) and (e) are discussed under *Section 4.2.5, Project-Specific Impacts and Mitigation Measures*, below. See *Appendix A, Initial Study and Notice of Preparation*, for more information.

4.2.4 Impact Assessment and Methodology

For purposes of this analysis, relevant database information was reviewed to identify designated Farmland, including Prime Farmland, Unique Farmland, and Farmland of Statewide Importance within the project region. Prime Farmland, Unique Farmland, and Farmland of Statewide Importance is protected under PRC Section 21060.1. Projects that would result in the conversion of designated Farmland would have a significant impact on the environment. In addition, relevant policies were examined to evaluate the project's consistency with preservation of agricultural resources within the city.

4.2.5 Project-Specific Impacts and Mitigation Measures

WOULD THE PROJECT CONVERT PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE (FARMLAND), AS SHOWN ON THE MAPS PREPARED PURSUANT TO THE FARMLAND MAPPING AND MONITORING PROGRAM OF THE CALIFORNIA RESOURCES AGENCY, TO NON-AGRICULTURAL USE?

AG Impact 1: The project may or may not construct an extension of Rollie Gates Drive, which if constructed would convert approximately 2.53 acres of Farmland of Statewide Importance to non-agricultural use. Impacts would be significant and unavoidable (Class I).

According to the FMMP, the entire eastern portion of the project site is designated as Urban and Built-Up land and the western portion is designated Farmland of Local Potential (CDOC 2021). Since the project site is not located on designated Prime Farmland, Farmland of Statewide Importance, or Unique Farmland by the FMMP, project-related development on the project site would not result in the conversion of Farmland to non-agricultural use.

The project also includes offsite improvements, including installation of a storm drain and outfall, a sewer line extension, realignment of Dry Creek Road, construction of a low water crossing over Huer Huero Creek, and potentially an extension of Rollie Gates Drive. The Dry Creek Road realignment would occur in Farmland of Local Potential and Farmland of Local Importance and would not result in the conversion of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland to non-agricultural use.

Construction of the modified Class I Multiuse Trail low water crossing over Huer Huero Creek and temporary connecting roadways would occur in Grazing Land, Farmland of Local Importance, and Farmland of Local Potential and would not result in the conversion of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland to non-agricultural use.

Installation of the sewer line extension would occur in land designated as Prime Farmland, Farmland of Statewide Importance, Farmland of Local Potential, and Grazing Land. Installation of the storm drain and outfall would occur in land designated as Prime Farmland, Farmland of Local Potential, and Grazing Land. While short-term work would occur within the Prime Farmland and Farmland of Statewide Importance, installation of these infrastructure lines would not result in the permanent conversion of Farmland because both lines would be buried, surface soils would be restored to preconstruction conditions to the extent feasible upon the completion of construction, and existing and/or future agricultural operations could persist following installation.

The project may or may not extend Rollie Gates Drive west of Airport Road to connect to the northern portion of the project site to provide for additional site access. This potential road segment extension is identified as an optional improvement and may ultimately not be constructed. Rollie Gates Drive is a local roadway located to the northeast of the project site that primarily provides access to the Paso Robles Municipal Airport. If the optional proposed extension is constructed as part of the project, portions of the proposed extension would occur on land designated Farmland of Statewide Importance and would result in preclusion of agricultural use on 2.53 acres of designated Farmland, which is protected under PRC Section 21060.1. This estimated loss of 2.53 acres is based on an assumed maximum roadway section consisting of a 50-foot right-of-way, which would allow for two 12-foot lanes in each direction and 5-foot bike lanes and sidewalks on each side.

Although it may be possible in some circumstances for impacts to agricultural land to be partially mitigated through the acquisition of off-site properties and placing such properties into permanent agricultural easements (i.e., compensatory mitigation), in this case, such compensatory mitigation does not meet any of the definitions of mitigation as provided by State CEQA Guidelines Section 15370. Specifically, off-site mitigation would not result in an avoidance of the impact by limiting the project's scope (Section 15370[a]) and would not minimize impacts to agriculturally zoned property "by limiting the degree or magnitude of the Project and its implementation" (Section 15370[b]). Placing existing off-site agricultural lands into a conservation easement also would not result in "repairing, rehabilitating, or restoring the impacted environment" (Section 15370[c]), given that such a conservation easement would encompass lands that already are suitable for, if not actively being used for, agricultural production. Similarly, such mitigation also would not meet the definition of State CEQA Guidelines Section 15370(d) by "compensating for the impact by replacing or providing substitute resources or environments or in the form of conservation easements" because conservation easements would encompass lands that already are suitable for, if not actively being used for, agricultural production, and a conservation easement would not result in the compensation of Project impacts to designated Farmland. Finally, because no new agricultural lands would be created, off-site agricultural easements would not result in the replacement or establishment of "substitute resources or environments" (Section 15370[e]).

Mitigation Measure AG/mm-1.1 has been identified to require conservation of Farmland equal to the amount of existing Farmland to be converted by project development. Impacts would be *significant and unavoidable*.

AG Impact 1 (Class I)	
The project may or may not construct an extension of Rollie Gates Drive, which if constructed would convert approximately 2.53 acres of Farmland of Statewide Importance to non-agricultural use.	
Mitigation Measures	
AG/mm-1.1	*If the street improvement plans for an extension of Rollie Gates Drive are submitted for City of Paso Robles (City) approval, the Applicant shall provide a calculation of the acreage of Farmland Mapping and Monitoring Program designated Farmland that would be converted to non-agricultural use as a result of the roadway extension, based on detailed design plans for the roadway extension, including road shoulders and right-of-way areas that could not be used for agricultural uses in the future. Upon City verification of the acreage calculation and prior to City of approval of roadway construction, the Applicant shall contribute monetarily at a 1:1 ratio to the California Farmland Trust, or a similar established conservation program in the State of California as accepted by the City, for the conservation of Farmland. The Trust or other conservation program would be responsible for maintaining conserved Farmland in perpetuity. The Applicant shall provide satisfactory evidence to the City that the mitigation has been satisfied.*
Residual Impacts	
Because the identified mitigation measures would not restore or create new Farmland Mapping and Monitoring Program designated Farmland to replace the loss of those lands impacted by the project, impacts related to conversion of Farmland would remain significant and unavoidable.	
Secondary Impacts	
Impacts associated with farming and the conversion of Farmland could include water use, odors, noise and emissions from operation of heavy agricultural equipment, traffic, and application of herbicides and pesticides. Because of the small size of the needed conservation land (approximately 2.53 acres), impacts would be less than significant.	

WOULD THE PROJECT INVOLVE OTHER CHANGES IN THE EXISTING ENVIRONMENT WHICH, DUE TO THEIR LOCATION OR NATURE, COULD RESULT IN CONVERSION OF FARMLAND, TO NON-AGRICULTURAL USE?

AG Impact 2: The project would not result in other environmental changes that could result in conversion of Farmland to non-agricultural uses. Impacts would be less than significant with mitigation (Class II).

The land surrounding the project site is designated as Farmland of Local Importance and Urban and Built-up land to the east; Farmland of Statewide Importance, Farmland of Local Importance, and Farmland of Local Potential to the north; Prime Farmland and Farmland of Statewide importance to the west; and Farmland of Local Potential, Prime Farmland, and Farmland of Statewide Importance to the south (CDOC 2021). Existing agricultural operations (i.e., row crops, dry crops, and vineyards) occur to the north, east, and southeast.

Due to increasing residential, commercial, and other development near agricultural lands throughout the state, there has been an increase in incompatible land use caused by limitations on pesticide use, nuisance complaints due to dust and odor, vandalism, increased traffic, etc. These incompatible land uses, along with speculative land value increases, have resulted in pressure to encourage additional conversions of agricultural land. The project would not convert or change the zoning of agricultural lands to non-agricultural uses and would not extend utilities of infrastructure to adjacent agricultural lands within the unincorporated county. Additionally, the County's General Plan discourages conversion of agricultural lands to non-agricultural uses through goals and policies of its Agriculture and Land Use Elements. Therefore, the project would not incentivize or facilitate the conversion of nearby agricultural lands to non-agricultural uses.

As discussed in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, construction of the project would result in construction-related emissions, including fugitive dust and other emissions. Construction would occur in two phases—Phase 1 would extend over an approximate 18-month period and Phase 2 would occur over an approximate 5-year period, with the construction of each building lasting approximately 5 months. Implementation of the project would result in the release of air emissions, including fugitive dust (particulate matter less than 10 microns in diameter [PM_{10}]) and diesel particulate matter (DPM) near existing agricultural uses that may result in indirect impacts. Nearby crops may be affected by an increase in dust near the project site because dust has the potential to affect photosynthesis, respiration, transpiration, and allow phytotoxic gaseous pollutants to penetrate crops (Farmer no date [n.d.]). Mitigation Measures AQ/mm-1.3 and AQ/mm-2.1have been included to reduce PM_{10} and DPM emissions during proposed construction activities. Therefore, with implementation of mitigation, the project is not anticipated to result in the significant release of fugitive dust emissions that may affect nearby agricultural operations.

As discussed in *Section 4.14, Utilities/Service Systems and Energy*, there is sufficient municipal water supply to meet the needs of the project. The project is projected to use approximately 146 acre-feet per year (AFY), which is less than the maximum historical average for the project site (247 AFY). Therefore, implementation of the project would not result in the excessive use of water supply resources that may reduce water to other agricultural operations within the city.

Open Space Element Action Item 10 under Policy OS-1A and LUE Action Item 4 under Policy LU-2E require the City to implement strategies to establish agricultural buffer easements, berms, and/or vegetative screening on property proposed for urban development as a condition of approval of discretionary development applications to protect agricultural operations in and beyond the City limits. The project proposes a 12-foot-tall concrete screen wall along the western property line and a portion of

the northern property line, and an 8-foot-tall chain linked fence along a portion of the northern property line, which would partially serve as a buffer between the warehouse and agricultural properties to the west and the northwest. The CAL FIRE property at the northeast property line serves as a buffer to agricultural properties to the northeast. Therefore, the project would be adequately buffered from surrounding agricultural activities. Impacts would be *less than significant with mitigation*.

AG Impact 2 (Class II)
The project would not result in other environmental changes that could result in the conversion of Farmland to non-agricultural uses.
Mitigation Measures
Implement Mitigation Measures AQ/mm-1.3 and AQ/mm-2.1.
Residual Impacts
Potential impacts to surrounding agricultural lands would be less than significant.

4.2.6 Cumulative Impacts

As discussed in *Chapter 3, Environmental Setting*, the cumulative impact analysis is based on the City's cumulative projects list. Cumulative projects would generate both residential, industrial, and commercial development. This project, along with other foreseeable future projects located on or near Farmland, would result in the direct and/or indirect cumulative conversion of Farmland to non-agricultural uses.

The proposed project would result in the conversion of approximately 2.53 acres of Farmland of Statewide importance, if the proposed (optional) extension of Rollie Gates Drive is ultimately constructed. Mitigation Measure AG/mm-1.1 has been included as mitigation. However, because the mitigation would not create restorative Farmland Mapping and Monitoring Program designated Farmland, the mitigation would not be sufficient to reduce potential impacts to a less-than-significant level. Therefore, impacts related to conversion of Farmland would be significant and unavoidable (Class I). In addition, incompatible land uses may have indirect effects on agriculture or result in the conversion of existing agricultural uses. The proposed project would implement mitigation to reduce short- and long-term dust and other air emissions near agricultural lands in order to maintain a suitable growing environment. In addition, this project would not result in water usage that would substantially inhibit agricultural productivity on proximate agricultural land uses.

This project, along with other development projects within the city that would contribute to the potential cumulative loss of Farmland. The proposed project, along with other projects, would be required to adhere to state and local policies for protection of Farmland to avoid other impacts to Farmland. Other related projects would be required to undergo environmental analysis to ensure potential air emissions, water supply, and other environmental impacts do not indirectly impact Farmland within the city without being mitigated to the greatest extent feasible.

Despite implementation of mitigation to avoid and reduce potential direct and indirect impacts to agricultural land to the greatest extent feasible, the project would result in the direct loss of Farmland protected under PRC Section 21060.1 if an extension of Rollie Gates Drive is constructed. Therefore, the project would potentially result in a cumulatively considerable contribution to the loss of Farmland within the city and county, and potential cumulative impacts would be significant and unavoidable.

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4.3 AIR QUALITY AND GREENHOUSE GAS EMISSIONS

This section discusses the project's potential impacts relating to air quality and greenhouse gas (GHG) emissions. The analysis provided in this section is primarily based on the *Air Quality & Greenhouse Gas Impact Assessment for The Landing, Paso Robles, CA* (AMBIENT Air Quality & Noise Consulting [AMBIENT] 2022; Appendix C).

4.3.1 Existing Conditions

4.3.1.1 Air Quality

4.3.1.1.1 CLIMATE AND TOPOGRAPHY

The project site is located within the South Central Coast Air Basin (SCCAB), which includes all of San Luis Obispo, Santa Barbara, and Ventura Counties. The climate of the SCCAB is strongly influenced by its proximity to the Pacific Ocean and the location of the semi-permanent high-pressure cell in the northeastern Pacific. The Mediterranean climate of the Paso Robles region produces moderate average temperatures, although extreme temperatures can be reached in the winter and summer. The warmest months of the year are July and August, and the coldest month of the year is December. The annual average maximum temperature is 76 degrees Fahrenheit (°F), while the annual average minimum temperature is 44°F (U.S. Climate Data 2022). Rainfall is concentrated in the winter months. Local climate conditions are shown in Table 4.3-1.

Table 4.3-1. Paso Robles Climate Conditions

Temperature Condition	Units
Average annual rainfall	12.78 inches
Annual average maximum temperature	76°F
Annual average minimum temperature	44°F
Warmest month	July / August
Coolest month	December
Annual mean temperature	60°F

Source: U.S. Climate Data (2022); Time and Date (2022)

Note: Averages are based on weather reports dating back to 2008.

Air pollutant concentrations are primarily determined by the amount of pollutant emissions in an area and the degree to which these pollutants are dispersed into the atmosphere. The stability of the atmosphere is one of the key factors affecting pollutant dispersion. Atmospheric stability regulates the amount of vertical and horizontal air exchange, or mixing, that can occur within a given air basin. Restricted mixing and low wind speeds are generally associated with a high degree of stability in the atmosphere. These conditions are characteristic of temperature inversions. In the atmosphere, air temperatures normally decrease as altitude increases. However, at varying distances above the earth's surface, a reversal of this gradient can occur. This condition, termed an inversion, is simply a warm layer of air above a layer of cooler air, and it has the effect of limiting the vertical dispersion of pollutants. The height of the inversion determines the size of the mixing volume trapped below. Inversion strength or intensity is measured by the thickness of the layer and the difference in temperature between the base and the top of the inversion. The strength of the inversion determines how easily it can be broken by winds or solar heating.

Several types of inversions are common to this area. Weak surface inversions are caused by radiational cooling of air in contact with the cold surface of the earth at night. In valleys and low-lying areas, this condition is intensified by the addition of cold air flowing downslope from the hills and pooling on the valley floor. Surface inversions are a common occurrence throughout the county during the winter, particularly on cold mornings when the inversion is strongest. As the morning sun warms the earth and the air near the ground, the inversion lifts, gradually dissipating as the day progresses. During the late spring and early summer months, cool air over the ocean can intrude under the relatively warmer air over land, causing a marine inversion. These inversions can restrict dispersion along the coast, but they are typically shallow and will dissipate with surface heating. In the summertime, the presence of the Pacific high-pressure cell can cause the air mass aloft to sink. As the air descends, compressional heating warms it to a temperature higher than the air below. This highly stable atmospheric condition, termed a subsidence inversion, is common to all of coastal California and can act as a nearly impenetrable lid to the vertical mixing of pollutants. The base of the inversion typically ranges from 1,000 to 2,500 feet above sea level; however, levels as low as 250 feet, among the lowest anywhere in the state, have been recorded on the coastal plateau in San Luis Obispo County. The strength of these inversions makes them difficult to disrupt. Consequently, they can persist for one or more days, causing air stagnation and the buildup of pollutants. Highest or worst-case ozone levels are often associated with the presence of this type of inversion (AMBIENT 2022).

4.3.1.1.2 LOCAL AND REGIONAL METEOROLOGY

The climate of the county 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. This effect is diminished inland in proportion to the distance from the ocean or by major intervening terrain features, such as the coastal mountain ranges. As a result, inland areas are characterized by a considerably wider range of temperature conditions. Maximum summer temperatures average about 70°F near the coast, while inland valleys are often in the high 90s. Minimum winter temperatures average from the low 30s along the coast to the low 20s inland (County of San Luis Obispo 2010).

Regional meteorology is largely dominated by a persistent high-pressure area that commonly resides over the eastern Pacific Ocean. Seasonal variations in the strength and position of this pressure cell cause seasonal changes in the weather patterns of the area. The Pacific High remains generally fixed several hundred miles offshore from May through September, enhancing onshore winds and opposing offshore winds (AMBIENT 2022).

During spring and early summer, as the onshore breezes pass over the cool water of the ocean, fog and low clouds often form in the marine air layer along the coast. Surface heating in the interior valleys dissipates the marine layer as it moves inland. In the fall, onshore surface winds decline, and the marine layer grows shallow, allowing an occasional reversal to a weak offshore flow. This, along with the diurnal alternation of land-sea breeze circulation, can sometimes produce a sloshing effect. Under these conditions, pollutants may accumulate over the ocean for a period of 1 or more days and are subsequently carried back onshore with the return of the sea breeze. Strong inversions can form at this time, ultimately trapping pollutants near the surface (County of San Luis Obispo 2010).

This effect is intensified when the Pacific High weakens or moves inland to the east. This may produce a “Santa Ana” condition in which air, often consisting of pollutants, is transported into the county from the east and southeast. This can occur over a period of several days until the high-pressure system returns to its normal location, breaking the pattern. The breakup of a Santa Ana condition may result in relatively stagnant conditions and a buildup of pollutants offshore. The onset of the typical daytime sea breeze can bring these pollutants back onshore, where they combine with local emissions to cause high pollutant concentrations. Not all occurrences of the “post-Santa Ana” condition lead to high ambient pollutant

levels, but it does play an important role in the air pollution meteorology of the county (AMBIENT 2022; County of San Luis Obispo 2010).

4.3.1.1.3 CRITERIA AIR POLLUTANTS

For the protection of public health and welfare, the Clean Air Act requires that the U.S. Environmental Protection Agency (USEPA) establish National Ambient Air Quality Standards (NAAQS) for various pollutants. These pollutants are referred to as "criteria" pollutants because the USEPA publishes criteria documents to justify the choice of standards for each pollutant. These standards define the maximum amount of an air pollutant that can be present in ambient air without harm to the public's health. An ambient air quality standard is generally specified as a concentration averaged over a specific time period, such as 1 hour, 8 hours, 24 hours, or 1 year. The different averaging times and concentrations are meant to protect against different exposure effects. The Clean Air Act allows states to adopt additional or more health-protective standards.

The six criteria pollutants regulated by the Federal Clean Air Act and California Clean Air Act are ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), suspended particles, sulfur dioxide (SO_2), and lead, which are described below.

Ozone

On a regional basis, O_3 is the pollutant of greatest concern in the county. Reactive organic gases (ROG) and nitrogen oxides (NO_x) are the primary precursors to O_3 formation. O_3 is produced by a photochemical reaction, which is triggered by sunlight, between ROG and NO_x and is a primary component of smog. NO_x is formed during the combustion of fossil fuels and ROG is formed during combustion of fossil fuels and through the evaporation of petroleum products (County of San Luis Obispo 2010). O_3 requires sunlight to form; therefore, it mostly occurs in concentrations considered serious between the months of April and October. O_3 is a pungent, colorless, toxic gas with direct health effects on humans, as described in detail below.

Carbon Monoxide

CO is an odorless, poisonous gas produced by incomplete burning of carbon in fuels. CO is a localized pollutant that is found in high concentrations only near its source, which primarily includes automobile traffic. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. Additionally, the highest CO concentrations are generally associated with cold, stagnant weather conditions that occur during the winter (County of San Luis Obispo 2010).

Nitrogen Dioxide

NO_2 is a byproduct of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. Combustion devices emit primarily nitric oxide (NO), which reacts through oxidation in the atmosphere to form NO_2. The combined emissions of NO and NO_2 are referred to as NO_2 and reported as equivalent NO_2 (County of San Luis Obispo 2010). NO_2 is considered an acute irritant.

Suspended Particulates

Particulate matter is a generic term used to describe a complex group of air pollutants (mineral, metal, smoke, soot, and dust particles) that vary in size and composition, depending on the location and time of its source (County of San Luis Obispo 2010). Small particulate matter measuring no more than 10 microns in diameter is referred to as PM_{10}, and fine particulate matter measuring no more than 2.5 microns in diameter is referred to as $PM_{2.5}$. Suspended particulates primarily include dust particles,

nitrates, and sulfates. While PM_{10} and $PM_{2.5}$ have many natural sources, human-derived sources such as vehicle exhaust, road dust, mineral quarries, grading, demolition, agricultural tilling, and burning are major contributors to exceedances in the county. Suspended particulates may also be created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with PM_{10} and $PM_{2.5}$ can be very different. PM_{10} generally comes from windblown dust and dust kicked up from mobile sources. $PM_{2.5}$ is generally associated with combustion processes, as well as formation in the atmosphere as a secondary pollutant through chemical reactions. $PM_{2.5}$ is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter that is inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

Sulfur Dioxide

SO_2 is included in a group of highly reactive gases known as "oxides of sulfur." The largest sources of SO_2 emissions include stationary sources such as coal and oil combustion, steel mills, refineries, and pulp and paper mills (County of San Luis Obispo 2010). Other sources of SO_2 emissions include the burning of fuels with a high sulfur content by locomotives, large ships, and off-road equipment. Health effects associated with SO_2 are described in further detail below.

Lead

Lead is a toxic metal that can be emitted as a result of industrial activities, leaded aviation gasoline, and lead-based paint.

4.3.1.1.4 HUMAN HEALTH AND WELFARE EFFECTS

Common air pollutants and associated adverse health and welfare effects are summarized in Table 4.3-2. Within the SCCAB, the air pollutants of primary concern, with regard to human health, include O_3, particulate matter, and CO. As depicted in Table 4.3-2, exposure to increased pollutant concentrations of O_3, particulate matter, and CO can result in various heart and lung ailments, cardiovascular and nervous system impairment, and death.

Table 4.3-2. Common Pollutants and Adverse Health Effects

Pollutant	Human Health and Welfare Effects
Particulate Matter (PM_{10} and $PM_{2.5}$)	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (haze).
Ozone (O_3)	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants and reduces crop yield. Damages rubber, some textiles, and dyes.
Sulfur Dioxide (SO_2)	Respiratory irritant; aggravates lung and heart problems. In the presence of moisture and oxygen, SO_2 converts to sulfuric acid, which can damage marble, iron, and steel; damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.
Carbon Monoxide (CO)	Reduces the ability of blood to deliver oxygen to vital tissues, effecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO_2)	Respiratory irritant; aggravates lung and heart problems. Precursor to ozone and acid rain. Contributes to global warming and nutrient overloading, which deteriorates water quality. Causes brown discoloration of the atmosphere.
Lead	Anemia, high blood pressure, brain and kidney damage, neurological disorders, cancer, lowered IQ. Affects animals, plants, and aquatic ecosystems.

Valley Fever

Coccidioidomycosis, commonly known as valley fever, is a lung disease common in the southwestern United States and northwestern Mexico and is caused by *Coccidioides immitis*, a fungus that grows in soil and dirt in areas with sparse rainfall and high temperatures (County of San Luis Obispo Public Health Department 2014). These fungal spores become airborne when soil containing the fungus is disturbed. Disturbance may occur as a result of wind, farming, construction, and other ground-disturbing activities. Infection occurs in susceptible people and animals when airborne fungal spores are inhaled. Therefore, construction personnel, agricultural workers, and archaeologists typically have an increased risk of exposure to the *Coccidioides* fungus because those professions are often exposed to disturbed soils that contain the fungal spores. Most people who are exposed to the fungus either do not develop symptoms or experience relatively mild flu-like symptoms. Common symptoms include fever, cough, headache, rash, muscle aches, and joint pain. Symptoms of advanced coccidioidomycosis may include skin lesions, chronic pneumonia, meningitis, or bone or joint infection (County of San Luis Obispo Public Health Department 2014).

Valley fever infection rates are the highest in California from June to November, when soil conditions are typically very dry. A total of 265 cases were reported in San Luis Obispo County in 2019 (California Department of Public Health 2019). County of San Luis Obispo Public Health Department data show that the number of reported cases in San Luis Obispo County is typically highest from October through January, with the most reported cases occurring in October (County of San Luis Obispo Public Health Department 2014).

4.3.1.1.5 ODORS

Typically, odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from the psychological (i.e., irritation, anger, anxiety, etc.) to the physiological, including circulatory and respiratory effects, nausea, vomiting, and headache.

Neither the federal nor the state governments have adopted rules or regulations for the control of odor sources. The San Luis Obispo Air Pollution Control District (SLOAPCD) does not have an individual rule or regulation that specifically addresses odors; however, odors would be applicable to SLOAPCD's Rule 402, Nuisance. Any actions related to odors would be based on citizen complaints to local governments and the SLOAPCD. The SLOAPCD recommends that odor impacts be addressed in a qualitative manner. Such analysis shall determine if the project results in excessive nuisance odors, as defined under the California Code of Regulations (CCR), Health and Safety Code Section 41700, air quality public nuisance.

4.3.1.1.6 TOXIC AIR CONTAMINANTS

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engines that emit exhaust containing solid material known as diesel particulate matter (DPM). TACs are usually present in minute quantities in the ambient air, but due to their high toxicity, they may pose a threat to public health even at very low concentrations. TACs are not considered criteria in that the federal and California Clean Air Acts do not address them specifically through the setting of the NAAQs or California Ambient Air Quality Standards (CAAQS). Instead, the USEPA and California Air Resources Board (CARB) regulate Hazardous Air Pollutants and TACs, respectively, through statutes and

regulations that generally require the use of the maximum or best available control technology to limit emissions.

Within California, TACs are regulated primarily through the Tanner Air Toxics Act (Assembly Bill [AB] 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588). The Tanner Act sets forth a formal procedure for the CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before the CARB designates a substance as a TAC. Existing sources of TACs that are subject to the Air Toxics Hot Spots Information and Assessment Act are required to: (1) prepare a toxic emissions inventory; (2) prepare a risk assessment if emissions are significant; (3) notify the public of significant risk levels; and (4) prepare and implement risk reduction measures.

At the state level, the CARB has authority for the regulation of emissions from motor vehicles, fuels, and consumer products. Most recently, DPM was added to the CARB list of TACs. DPM is the primary TACs of concern for mobile sources. Of all controlled TACs, emissions of DPM are estimated to be responsible for about 70% of the total ambient TAC risk. The CARB has made the reduction of the public's exposure to DPM one of its highest priorities, with an aggressive plan to require cleaner diesel fuel and cleaner diesel engines and vehicles (CARB 2005).

At the local level, air districts have authority over stationary or industrial sources. All projects that require air quality permits from the SLOAPCD are evaluated for TAC emissions. The SLOAPCD limits emissions and public exposure to TACs through a number of programs. The SLOAPCD prioritizes TAC-emitting stationary sources, based on the quantity and toxicity of the TAC emissions and the proximity of the facilities to sensitive receptors. The SLOAPCD requires a comprehensive health risk assessment for facilities that are classified in the significant-risk category, pursuant to AB 2588. No major existing sources of TACs have been identified in the project area.

4.3.1.1.7 ASBESTOS

Asbestos is the common name for a group of naturally occurring fibrous silicate minerals that can separate into thin but strong and durable fibers. Naturally occurring asbestos (NOA) is identified as a toxic air contaminant by the CARB. Serpentine and other ultramafic rocks are fairly common throughout San Luis Obispo County and may contain NOA. If these areas are disturbed during construction, NOA-containing particles can be released into the air and have an adverse impact on local air quality and human health. The project site is not located in an area identified as containing NOA by SLOAPCD. According to the SLOAPCD NOA Map, the project site is not located in an area with known potential for NOA (SLOAPCD 2021).

4.3.1.1.8 AMBIENT AIR QUALITY

Air pollutant concentrations are measured at several monitoring stations in the SCCAB. The closest representative monitoring station with sufficient data to meet USEPA and/or CARB criteria for quality assurance is the Paso Robles-Santa Fe Avenue Monitoring Station. Ambient monitoring data was obtained for the last 3 years of available measurement data (i.e., 2018–2020) and is summarized in Table 4.3-3. As depicted, the federal and state $PM_{2.5}$ standards were exceeded for 11 days in 2020. The state standard for PM_{10} was exceeded on 4 days in 2020. The national standard for 8-hour O_3 concentration was exceeded on 2 days in both 2018 and 2020. Measured 1-hour O_3 and NO_2 concentrations did not exceed the NAAQS or CAAQS in the last 3 years of monitoring.

Table 4.3-3. Summary of Ambient Air Quality Monitoring Data

Pollutant	Monitoring Year		
	2019	2020	2021
Ozone (O_3)[1]			
Maximum concentration (1-hour / 8-hour average; ppm)	0.077 / 0.064	0.092 / 0.073	0.070 / 0.064
Number of days national / state 1-hour standard exceeded	0 / 0	0 / 0	0 / 0
Number of days national / state 8-hour standard exceeded	0 / N/A	2 / N/A	0 / N/A
Nitrogen Dioxide (NO_2)[2]			
Maximum concentration (1-hour average; ppb)	34.0	33.0	44.0
Number of days national / state standard exceeded	0 / 0	0 / 0	0 / 0
Suspended Particulate Matter ($PM_{2.5}$)[2]			
Maximum 24-hour concentration (national / state; µg/m^3)	17.3 / 17.3	242.1 / 242.1	19.1 / 19.1
Number of days national standard exceeded (measured / calculated)[3]	0 / 0	11 / 11.1	0 / 0
Suspended Particulate Matter (PM_{10})[1]			
Maximum concentration (national / state; µg/m^3)	134.4 / 138.0	367.8 / 357.2	74.4 / 74.7
Number of days state standard exceeded (measured / calculated)[3]	9 / N/A	35 / 36	3 / 3.1
Number of days national standard exceeded (measured / calculated)[3]	0 / 0	4 / 4	0 / 0

Source: AMBIENT (2022); information derived from the CARB.

Notes: ppm = parts per million by volume, µg/m3 = micrograms per cubic meter, N/A=not available

[1] Based on ambient concentrations obtained from the Paso Robles-Santa Fe Avenue Monitoring Station.

[2] Based on ambient concentrations obtained from the Atascadero-Lift Station #5 Monitoring Station.

[3] Measured days are those days that an actual measurement was greater than the standard. Calculated days are estimated days that measurement would have exceeded the standard had measurements been collected every day.

4.3.1.1.9 SENSITIVE RECEPTORS

Certain population groups are considered more sensitive to air pollution than others. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardio-respiratory diseases. Sensitive receptor locations include residences, schools, parks and playgrounds, daycare centers, senior care facilities, and hospitals. The nearest sensitive receptor locations to the project site include a single-family residence located directly adjacent to the western project boundary, a single-family residence located approximately 730 feet to the north, a single-family residence located approximately 970 feet to the north, and a single-family residence located 1,000 feet to the south. Other rural single-family residences are scattered throughout the project vicinity beyond 1,000 feet from the project site boundary.

4.3.1.2 Greenhouse Gas Emissions

4.3.1.2.1 CLIMATE CHANGE AND GREENHOUSE GASES

To fully understand global climate change, it is important to recognize the naturally occurring "greenhouse effect" and to define the greenhouse gases (GHGs) that contribute to this phenomenon. Various gases in the earth's atmosphere, classified as atmospheric GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space and a portion of the radiation is absorbed by the earth's surface. The earth emits this radiation back toward

space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation. GHGs, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Primary GHGs attributed to global climate change are described below.

Carbon Dioxide

CO_2 is a colorless, odorless gas that is emitted in a number of ways, both naturally and through human activities. The largest source of CO_2 emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, industrial facilities, and other sources. A number of specialized industrial production processes and product uses such as mineral production, metal production, and the use of petroleum-based products can also lead to CO_2 emissions. The atmospheric lifetime of CO_2 is variable because it is so readily exchanged in the atmosphere (USEPA 2018).

Methane

CH_4 is a colorless, odorless gas that is not flammable under most circumstances. CH_4 is the major component of natural gas, about 87% by volume. It is also formed and released to the atmosphere by biological processes occurring in anaerobic environments. CH_4 is emitted from a variety of both human-related and natural sources. Human-related sources include fossil fuel production, animal husbandry (enteric fermentation in livestock and manure management), rice cultivation, biomass burning, and waste management. These activities release significant quantities of CH_4 to the atmosphere. Natural sources of CH_4 include wetlands, gas hydrates, permafrost, termites, oceans, fresh waterbodies, non-wetland soils, and other sources such as wildfires. The atmospheric lifetime of CH_4 is about 12 years (USEPA 2018).

Nitrous Oxide

N_2O is a clear, colorless gas with a slightly sweet odor. N_2O is produced by both natural and human-related sources. Primary human-related sources of N_2O are agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, acid production, and nitric acid production. N_2O is also produced naturally from a wide variety of biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N_2O is approximately 114 years (USEPA 2018).

Hydrofluorocarbons

HFCs are manmade chemicals, many of which have been developed as alternatives to ozone-depleting substances for industrial, commercial, and consumer products. The only significant emissions of HFCs before 1990 were of the chemical HFC-23, which is generated as a byproduct of the production of HCFC-22 (or Freon 22, used in air conditioning applications). The atmospheric lifetime for HFCs varies from just over 1 year for HFC-152a to 270 years for HFC-23. Most of the commercially used HFCs have atmospheric lifetimes of less than 15 years (e.g., HFC-134a, which is used in automobile air conditioning and refrigeration, has an atmospheric life of 14 years) (USEPA 2018).

Perfluorocarbons

PFCs are colorless, highly dense, chemically inert, and non-toxic gases, of which there are seven: perfluoromethane, perfluoroethane, perfluoropropane, perfluorobutane, perfluorocyclobutane, perfluoropentane, and perfluorohexane. Natural geological emissions have been responsible for the PFCs

that have accumulated in the atmosphere in the past; however, the largest current source is aluminum production, which releases tetrafluoromethane and hexafluoroethane as byproducts. The estimated atmospheric lifetimes for PFCs ranges from 2,600 to 50,000 years (USEPA 2018).

Sulfur Hexafluoride

SF_6, an inorganic compound that is colorless, odorless, non-toxic, and generally non-flammable, is primarily used as an electrical insulator in high voltage equipment. The electric power industry uses roughly 80% of all SF_6 produced worldwide. Leaks of SF_6 occur from aging equipment and during equipment maintenance and servicing. SF_6 has an atmospheric life of 3,200 years (USEPA 2018).

Nitrogen Trifluoride

Nitrogen trifluoride (NF_3) is an inorganic, colorless, odorless, toxic, nonflammable gas used as an etchant in microelectronics. NF_3 is predominantly employed in the cleaning of the plasma-enhanced chemical vapor deposition chambers in the production of liquid crystal displays and silicon-based thin-film solar cells. It has a global warming potential of 16,100 carbon dioxide equivalents (CO_2e). While NF_3 may have a lower global warming potential than other chemical etchants, it is still a potent GHG. In 2009 NF_3 was listed by California as a high global warming potential GHG to be listed and regulated under AB 32 (Health and Safety Code Section 38505).

Black Carbon

Black carbon is the strongest light-absorbing component of particulate matter emitted from burning fuels such as coal, diesel, and biomass. Black carbon contributes to climate change both directly by absorbing sunlight and indirectly by depositing on snow and by interacting with clouds and affecting cloud formation. Black carbon is considered a short-lived species, which can vary spatially and, consequently, it is very difficult to quantify associated global-warming potentials. The main sources of black carbon in California are wildfires, off-road vehicles (locomotives, marine vessels, tractors, excavators, dozers, etc.), on-road vehicles (cars, trucks, and buses), fireplaces, agricultural waste burning, and prescribed burning (planned burns of forest or wildlands) (Climate and Clean Air Coalition [CCAC] 2018; USEPA 2018).

4.3.1.2.2 STATEWIDE GREENHOUSE GAS EMISSIONS

In 2019 GHG emissions within California totaled 418.1 million metric tons of CO_2e ($MMTCO_2e$). Within California, the transportation sector is the largest contributor, accounting for approximately 39.7% of the total statewide GHG emissions. Emissions associated with industrial uses are the second-largest contributor, totaling roughly 21.1%. Electricity generation totaled roughly 14.1%. Other major emission sources included commercial uses, residential uses, agriculture, refrigerants, and waste (CARB 2022).

4.3.1.2.3 CITY OF PASO ROBLES GREENHOUSE GAS EMISSIONS

The City has completed a community-wide inventory of GHG emissions for years 2005 and 2012, which are summarized in Table 4.3-4. As shown, a majority of the City's emissions are associated with mobile sources. Remaining GHG emissions are predominantly associated with energy use and solid waste generation. In comparison to year 2005 community-wide emissions, year 2016 emissions decreased by a total of approximately 12% (City of Paso Robles 2013).

Table 4.3-4. City of Paso Robles GHG Emissions Inventories

Sector	Year 2005 ($MTCO_2e$)	Year 2020 ($MTCO_2e$)	Percent Change from 2005 to 2020
Residential	40,188	46,828	17%
Commercial/Industrial	33,536	30,551	-9%
Transportation	67,801	92,913	37%
Off-Road	13,205	15,878	20%
Solid Waste	13,343	16,653	17%
Wastewater	70	82	17%
Aircraft	1,324	1,543	17%
Total	**169,557**	**203,448**	**20%**

Source: City of Paso Robles (2013)

4.3.1.2.4 EFFECTS OF GLOBAL CLIMATE CHANGE

There are uncertainties as to exactly what the effects of global climate change will be in various local areas of the earth. There are also uncertainties associated with the magnitude and timing of other projected consequences of a warmer planet, including, but not limited to, sea-level rise, spread of certain diseases out of their usual geographic range, effects on agricultural production, water supply, sustainability of ecosystems, increased strength and frequency of storms, extreme heat events, increased air pollution episodes, and the consequence of these effects on the economy.

Within California, climate changes would likely alter the ecological characteristics of many ecosystems throughout the state. Such alterations would likely include increases in surface temperatures and changes in the form, timing, and intensity of precipitation. For instance, historical records are depicting an increasing trend toward earlier snowmelt in the Sierra Nevada. This snowpack is a principal supply of water for the state, providing roughly 50% of the state's annual runoff. If this trend continues, some areas of the state may experience an increased danger of floods during the winter months and possible exhaustion of the snowpack during spring and summer months. Earlier snowmelt would also impact the state's energy resources. Currently, approximately 20% of California's electricity comes from hydropower. Early exhaustion of the Sierra snowpack may force electricity producers to switch to more costly or non-renewable forms of electricity generation during spring and summer months. A changing climate may also impact agricultural crop yields, coastal structures, and biodiversity. As a result, changes in climate will likely have detrimental effects on some of California's largest industries, including agriculture, wine, tourism, skiing, recreational and commercial fishing, and forestry (AMBIENT 2022).

4.3.2 Regulatory Setting

4.3.2.1 Federal

4.3.2.1.1 U.S. ENVIRONMENTAL PROTECTION AGENCY

At the federal level, the USEPA has been charged with implementing national air quality programs. The USEPA's air quality mandates are drawn primarily from the Federal Clean Air Act, which was signed into law in 1970 and amended in 1977 and 1990.

4.3.2.1.2 FEDERAL CLEAN AIR ACT

The Federal Clean Air Act is the federal law passed in 1970, which forms the basis for the national air pollution control effort. The Federal Clean Air Act includes NAAQS for major air pollutants, hazardous air pollutant standards, state attainment plans, motor vehicle emissions standards, stationary source emissions standards and permits, acid rain control measures, stratospheric ozone protection, and enforcement provisions (CARB 2015).

4.3.2.1.3 EXECUTIVE ORDER 13514

Executive Order 13514 is focused on reducing GHGs internally in federal agency missions, programs, and operations. In addition, the executive order directs federal agencies to participate in the Interagency Climate Change Adaptation Task Force, which is engaged in developing a national strategy for adaptation to climate change.

On April 2, 2007, in *Massachusetts v. EPA, 549 U.S. 497 (2007)*, the Supreme Court found that GHGs are air pollutants covered by the Federal Clean Air Act and that the USEPA has the authority to regulate GHG. The Court held that the USEPA Administrator must determine whether or not emissions of GHGs from new motor vehicles cause or contribute to air pollution which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision.

On December 7, 2009, the USEPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the Clean Air Act:

- Endangerment Finding: The Administrator found that the current and projected concentrations of the six key well-mixed GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) in the atmosphere threaten the public health and welfare of current and future generations.
- Cause or Contribute Finding: The Administrator found that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.

Although these findings did not themselves impose any requirements on industry or other entities, this action was a prerequisite to finalizing the USEPA's *Proposed Greenhouse Gas Emission Standards for Light-Duty Vehicles*, which was published on September 15, 2009. On May 7, 2010, the final *Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards* was published in the *Federal Register*.

The USEPA and the National Highway Traffic Safety Administration (NHTSA) are taking coordinated steps to enable the production of a new generation of clean vehicles with reduced GHG emissions and improved fuel efficiency from on-road vehicles and engines. These next steps include developing the first-ever GHG regulations for heavy-duty engines and vehicles, as well as additional light-duty vehicle GHG regulations. These steps were outlined by President Obama in a Presidential Memorandum on May 21, 2010.

The final combined USEPA and NHTSA standards that make up the first phase of this national program apply to passenger cars, light-duty trucks, and medium-duty passenger vehicles, covering model years 2012 through 2016. The standards require these vehicles to meet an estimated combined average emissions level of 250 grams of CO_2 per mile (the equivalent to 35.5 miles per gallon if the automobile industry were to meet this CO_2 level solely through fuel economy improvements). Together, these standards will cut GHG emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012–2016). On August 28, 2012,

the USEPA and NHTSA issued their joint rule to extend this national program of coordinated GHG and fuel economy standards to model years 2017 through 2025 passenger vehicles.

4.3.2.2 State

4.3.2.2.1 CALIFORNIA CLEAN AIR ACT

The California Clean Air Act was established in 1988 and provides a framework for air quality planning and other actions to meet the health-based CAAQS. Air quality standards established under the California Clean Air Act are more stringent than those set through the Federal Clean Air Act. Emission reductions from mobile sources (such as automobiles themselves) are the responsibility of the CARB, while emission reductions from stationary sources and some uses of mobile sources are the responsibility of the air quality management and air pollution control districts (California Department of Transportation [Caltrans] 2021).

4.3.2.2.2 CALIFORNIA AIR RESOURCES BOARD

The CARB is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the California Clean Air Act. Other CARB duties include monitoring air quality (in conjunction with air monitoring networks maintained by air pollution control districts and air quality management districts); establishing CAAQS, which in many cases are more stringent than the NAAQS; and setting emissions standards for new motor vehicles. The emission standards established for motor vehicles differ depending on various factors, including the model year and the type of vehicle, fuel, and engine used. CARB Rules with applicability to the project evaluated in this EIR include, but are not limited to:

- CARB Rule 2485 (13 CCR 2485): Airborne Toxic Control Measure to Limit Diesel-Fuel Commercial Vehicle Idling, which limits nonessential idling to five minutes or less for commercial trucks.
- CARB Rule 2449 (13 CCR 2449): In-Use Off-Road Diesel-Fueled Fleets, which limits nonessential idling to five minutes or less for diesel-powered off-road equipment.

4.3.2.2.3 ASSEMBLY BILLS 1807 AND 2588: TOXIC AIR CONTAMINANTS

Within California, TACs are regulated primarily through AB 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics Hot Spots Information and Assessment Act). The Tanner Air Toxics Act sets forth a formal procedure for the CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before the CARB designates a substance as a TAC. Existing sources of TACs that are subject to the Air Toxics Hot Spots Information and Assessment Act are required to: (1) prepare a toxic emissions inventory; (2) prepare a risk assessment if emissions are significant; (3) notify the public of significant risk levels; and (4) prepare and implement risk reduction measures.

4.3.2.2.4 IN-USE OFF-ROAD DIESEL VEHICLE REGULATION

On July 26, 2007, the CARB adopted a regulation to reduce DPM and NO_x emissions from in-use (existing) off-road heavy-duty diesel vehicles in California. The regulation applies to self-propelled diesel-fueled vehicles that cannot be registered and licensed to drive on-road, as well as two-engine vehicles that drive on-road, with the limited exception of two-engine sweepers. Examples include loaders, crawler tractors, skid steers, backhoes, forklifts, airport ground support equipment, water well drilling rigs, and two-engine cranes. Such vehicles are used in construction, mining, and industrial operations. The regulation does not apply to stationary equipment or portable equipment such as generators. The

off-road vehicle regulation establishes emissions performance requirements, reporting, disclosure, and labeling requirements for off-road vehicles, and limits unnecessary idling.

4.3.2.2.5 CALIFORNIA BUILDING CODE

The California Building Code (CBC) contains standards that regulate the method of use, properties, performance, or types of materials used in the construction, alteration, improvement, repair, or rehabilitation of a building or other improvements to real property. The CBC is adopted every 3 years by the California Building Standards Commission, and the most recent update took effect on January 1, 2023. In the interim, the California Building Standards Commission also adopts annual updates to make necessary mid-term corrections. The CBC standards apply statewide; however, a local jurisdiction may amend a CBC standard if it makes a finding that the amendment is reasonably necessary due to local climatic, geological, or topographical conditions.

4.3.2.2.6 GREEN BUILDING STANDARDS

The California Green Building Standards Code (CALGreen) standards are indistinguishable from any other building standards. Building standards are contained in the CBC and regulate the construction of new buildings and improvements. The only practical distinction between CALGreen and other building standards is that while the focus of traditional building standards has been protecting public health and safety, the focus of CALGreen is to improve environmental performance.

AB 32, which mandates the reduction of GHG emissions in California to 1990 levels by 2020, increased the urgency around the adoption of CALGreen. In its scoping plan for the implementation of AB 32, the CARB identified energy use as the second largest contributor to California's GHG emissions, constituting roughly 25% of all such emissions. In recommending a green building strategy as one element of the scoping plan, the CARB estimated that green building standards would reduce GHG emissions by approximately 26 $MMTCO_2e$ by 2020.

The green building standards are updated every 3 years, with the most recent update having taken effect on January 1, 2023. Referred to as the 2022 Building Energy Efficiency Standards, these most recent updates focus on four key areas: efficient electric heat pumps, electric-ready requirements for new homes (including electric vehicle chargers), expansion of solar photovoltaic and battery storage standards (including specific requirements for warehouses), and strengthening ventilation standards.

4.3.2.2.7 EXECUTIVE ORDER S-3-05

Executive Order S-3-05 (State of California) proclaims that California is vulnerable to the impacts of climate change. The order declares that increased temperatures could reduce the Sierra Nevada snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established total GHG emission targets. Specifically, emissions are to be reduced to the 2000 level by 2010, to the 1990 level by 2020, and to 80% below the 1990 level by 2050.

The Executive Order directed the Secretary of the California Environmental Protection Agency to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The secretary will also submit biannual reports to the governor and state legislature describing (1) progress made toward reaching the emission targets, (2) impacts of global warming on California's resources, and (3) mitigation and adaptation plans to combat these impacts. To comply with the Executive Order, the Secretary of the California Environmental Protection Agency created a Climate Action Team made up of members from various state agencies and commissions. The Climate Action Team released its first report in March 2006 and continues to release periodic reports on progress. The report proposed to achieve the targets by

building on voluntary actions of California businesses, local government, and community actions, as well as through state incentives and regulatory programs.

4.3.2.2.8 ASSEMBLY BILL 32: CALIFORNIA GLOBAL WARMING SOLUTIONS ACT OF 2006

AB 32 (Health and Safety Code Sections 38500, 38501, 28510, 38530, 38550, 38560, 38561–38565, 38570, 38571, 38574, 38580, 38590, and 38592–38599) requires that statewide GHG emissions be reduced to 1990 levels by the year 2020. The gases that are regulated by AB 32 include CO_2, CH_4, N_2O, HFCs, PFCs, NF_3, and SF_6. The reduction to 1990 levels will be accomplished through an enforceable statewide cap on GHG emissions that will be phased in starting in 2012. To effectively implement the cap, AB 32 directs the CARB to develop and implement regulations to reduce statewide GHG emissions from stationary sources. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then the CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

AB 32 requires that the CARB adopt a quantified cap on GHG emissions representing 1990 emissions levels and disclose how it arrives at the cap, institute a schedule to meet the emissions cap, and develop tracking, reporting, and enforcement mechanisms to ensure that the state achieves reductions in GHG emissions necessary to meet the cap. AB 32 also includes guidance to institute emissions reductions in an economically efficient manner and conditions to ensure that businesses and consumers are not unfairly affected by the reductions.

4.3.2.2.9 CLIMATE CHANGE SCOPING PLAN

In October 2008, the CARB published its *Climate Change Proposed Scoping Plan*, which is the state's plan to achieve GHG reductions in California required by AB 32. This initial Scoping Plan contained the main strategies to be implemented in order to achieve the target emission levels identified in AB 32. The Scoping Plan included CARB-recommended GHG reductions for each emissions sector of the state's GHG inventory. The largest proposed GHG reduction recommendations were associated with improving emissions standards for light-duty vehicles, implementing the Low Carbon Fuel Standard program, implementation of energy efficiency measures in buildings and appliances, and the widespread development of combined heat and power systems, and developing a renewable portfolio standard for electricity production.

The Proposed Scoping Plan states that land use planning and urban growth decisions will play important roles in the state's GHG reductions because local governments have primary authority to plan, zone, approve, and permit how land is developed to accommodate population growth and the changing needs of their jurisdictions. The CARB further acknowledges that decisions on how land is used will have large impacts on the GHG emissions that will result from the transportation, housing, industry, forestry, water, agriculture, electricity, and natural gas emissions sectors. With regard to land use planning, the Scoping Plan expects approximately 5.0 $MMTCO_2e$ will be achieved associated with the implementation of Senate Bill 375, which is discussed further below.

The initial Scoping Plan was first approved by the CARB on December 11, 2008, and is updated every five years. The first update of the Proposed Scoping Plan was approved by the CARB on May 22, 2014, which looked past 2020 to set mid-term goals (2030–2035) on the road to reaching the 2050 goals. The most recent update released by the CARB is the *2017 Climate Change Scoping Plan*, which was released in November 2017. The 2017 Scoping Plan incorporates strategies for achieving the 2030 GHG-reduction target established in Senate Bill (SB) 32 and Executive Order B-30-15. Most notably, the 2017 Scoping Plan encourages zero net increases in GHG emissions. However, the 2017 Scoping Plan recognizes that

achieving net zero increases in GHG emissions may not be possible or appropriate for all projects and that the inability of a project to mitigate its GHG emissions to zero would not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA.

The *2022 Climate Change Scoping Plan* update was released by the CARB in December 2022. The *2022 Climate Change Scoping Plan* identifies the state's strategies to reduce GHG emissions by 85% and achieve carbon neutrality by 2045. The Scoping Plan reflects an accelerated target of an 85% reduction in GHG emissions compared to 1990 levels by 2045. This third update relies on key programs in place, including the Cap-and-Trade Regulation and the low carbon fuel standard, while stressing the need to increase their pace and scale.

4.3.2.2.10 SENATE BILL 375: SUSTAINABLE COMMUNITIES STRATEGY ADOPTION

SB 375 requires Metropolitan Planning Organizations to adopt a sustainable communities strategy or alternative planning strategy that will address land-use allocation in that Metropolitan Planning Organization's regional transportation plan. The CARB, in consultation with Metropolitan Planning Organizations, establishes regional reduction targets for GHGs emitted by passenger cars and light trucks for the years 2020 and 2035. These reduction targets will be updated every 8 years but can be updated every 4 years if advancements in emissions technologies affect the reduction strategies to achieve the targets. The CARB is also charged with reviewing each Metropolitan Planning Organization's sustainable communities strategy or alternative planning strategy for consistency with its assigned targets. If Metropolitan Planning Organizations do not meet the GHG reduction targets, funding for transportation projects may be withheld. In 2018 the CARB adopted updated SB 375 targets.

4.3.2.2.11 SENATE BILL 32: GHG EMISSIONS TARGETS

SB 32, signed by Governor Brown on September 8, 2016, effectively extends California's GHG emission-reduction goals from year 2020 to year 2030. This new emission-reduction target of 40% below 1990 levels by 2030 is intended to promote further GHG-reductions in support of the state's ultimate goal of reducing GHG emissions by 80% below 1990 levels by 2050. SB 32 also directs the CARB to update the Climate Change Scoping Plan to address this interim 2030 emission-reduction target.

4.3.2.3 Local

4.3.2.3.1 SAN LUIS OBISPO AIR POLLUTION CONTROL DISTRICT

The SLOAPCD is the agency primarily responsible for ensuring that the NAAQS and CAAQS are not exceeded and that air quality conditions within the region are maintained. Responsibilities of the SLOAPCD include, but are not limited to, preparing plans for the attainment of ambient air quality standards, adopting and enforcing rules and regulations concerning sources of air pollution, issuing permits for stationary sources of air pollution, inspecting stationary sources of air pollution and responding to citizen complaints, monitoring ambient air quality and meteorological conditions, and implementing programs and regulations required by the Federal Clean Air Act and California Clean Air Act.

SLOAPCD 2001 Clean Air Plan San Luis Obispo County

The SLOAPCD *2001 Clean Air Plan San Luis Obispo County* (2001 CAP) is a comprehensive planning document intended to evaluate long-term air pollutant emissions and cumulative effects and provide guidance to the SLOAPCD and other local agencies on how to attain and maintain the state standards for

O_3 and PM_{10}. The 2001 CAP presents a detailed description of the sources and pollutants that impact the jurisdiction's attainment of state standards, future air quality impacts to be expected under current growth trends, and an appropriate control strategy for reducing ozone precursor emissions, thereby improving air quality.

CEQA Air Quality Handbook

The SLOAPCD has developed and updated their *CEQA Air Quality Handbook* (most recently updated with the *November 2017 Clarification Memorandum*) to help local agencies evaluate project-specific impacts and determine if air quality mitigation measures are needed, or if potentially significant impacts could result. This handbook includes established thresholds for both short-term construction emissions and long-term operational emissions.

Use of heavy equipment and earth-moving operations during project construction can generate fugitive dust and engine combustion emissions that may have substantial temporary impacts on local air quality and climate change. Combustion emissions, such as NO_x, ROG, GHGs, and DPM, are most significant when using large, diesel-fueled scrapers, loaders, bulldozers, haul trucks, compressors, generators, and other heavy equipment. The SLOAPCD has established thresholds of significance for each of these contaminants.

Operational impacts are focused primarily on the indirect emissions (i.e., motor vehicles) associated with residential, commercial, and industrial development. Certain types of projects can also include components that generate direct emissions, such as power plants, gasoline stations, dry cleaners, and refineries (referred to as stationary source emissions). General screening criteria are used by the SLOAPCD to determine the type and scope of air quality assessment required for a particular project (Table 1-1 in the *CEQA Air Quality Handbook*). These criteria are based on project size in an urban setting and are designed to identify those projects with the potential to exceed the SLOAPCD's significance thresholds. A more refined analysis of air quality impacts specific to a given project is necessary for projects that exceed the screening criteria below or are within 10% of exceeding the screening criteria.

The SLOAPCD has also estimated the number of vehicular round trips on an unpaved roadway necessary to exceed the 25 pounds per day (lbs/day) threshold of significance for the emission of PM_{10}. According to the SLOAPCD estimates, an unpaved roadway of 1 mile in length carrying six round trips would likely exceed the 25 lbs/day PM_{10} threshold.

4.3.2.3.2 CITY OF EL PASO DE ROBLES GENERAL PLAN 2003

The *City of El Paso de Robles General Plan 2003* includes numerous policies related to air quality. These policies address emissions generated by mobile and non-mobile sources and land use compatibility.

Circulation Element

The following policies included in the Circulation Element are relevant to the proposed project's impacts related to air quality:

Policy CE-1A **Circulation Master Plan.** Revise/update the City's Circulation Master Plan to address the mobility needs of all users of the streets, roads and highways including motorists, movers of commercial goods, seniors, children, pedestrians, disabled persons, users of public transportation, and bicyclists.

Policy CE-1B **Reduce Vehicle Miles Traveled (VMT).** The City shall strive to reduce VMT generated per household per weekday by making efficient use of existing transportation facilities and by providing direct routes for pedestrians and bicyclists through the implementation of sustainable planning principles.

Policy CE-1C **Airport.** Improve/expand transportation to and from the Paso Robles Municipal Airport as set forth in the Airport Master Plan

Policy CE-1D **Transit.** Improve and expand transit services.

Policy CE-1E **Rail.** Promote regional, interstate and intra-state rail service.

Policy CE-1F **Pedestrian and Bicycle Access.** Provide safe and convenient pedestrian and bicycle access to all areas of the City.

Conservation Element

The following policies included in the Conservation Element are relevant to the proposed project's impacts related to air quality:

Policy C-2A **Traffic Congestion Reduction.** Implement circulation systems improvements to reduce congestion and associated air contaminant emissions.

Policy C-2B **VMT Reduction.** Implement programs to reduce the number of VMT, especially by single occupant vehicles, including providing opportunities for mixed-use projects.

Policy C-2C **Emissions Reduction.** Take steps to reduce creation of air contaminant emissions.

4.3.2.3.3 CITY OF PASO ROBLES CLIMATE ACTION PLAN

The *City of Paso Robles Climate Action Plan* is a long-range plan to reduce GHG emissions from City government operations and community activities. The Climate Action Plan will also help achieve multiple community goals such as lowering energy costs, reducing air pollution, supporting local economic development. The Climate Action Plan includes measures to reduce community-wide GHG emissions by 15% below 2005 levels by 2020 (City of Paso Robles 2013).

4.3.2.3.4 COUNTY OF SAN LUIS OBISPO 2019 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

The *2019 Regional Transportation Plan* (RTP) was adopted by the San Luis Obispo Council of Governments (SLOCOG) Board in June 2019. The RTP includes the region's Sustainable Communities Strategy (SCS), which outlines how the region will meet or exceed its GHG reduction targets as required by SB 375 through the promotion of a variety of transportation demand management and system management tools and techniques to maximize the efficiency of the transportation network. Consistency with the requirement of SB 375 ensures consistency with the GHG-reduction targets set by the CARB. The 2019 SCS was found to be consistent with the requirement of SB 375 and is also consistent with the general plans of the region's jurisdictions (SLOCOG 2019).

4.3.3 Thresholds of Significance

4.3.3.1 Air Quality

In accordance with Appendix G of the State CEQA Guidelines, air quality impacts associated with the proposed project would be considered significant if the project would:

a. Conflict with or obstruct implementation of the applicable air quality plan;

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;

c. Expose sensitive receptors to substantial pollutant concentrations; or

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

To assist in the evaluation of air quality impacts, the SLOAPCD has developed recommended significance thresholds, which are contained in the *CEQA Air Quality Handbook* (SLOAPCD 2012) and clarified in the 2017 Clarification Memorandum (SLOAPCD 2017). For the purposes of this analysis, project emissions are considered potentially significant impacts if any of the following SLOAPCD thresholds are exceeded, as described below.

4.3.3.1.1 CONSTRUCTION IMPACT THRESHOLDS

The threshold criteria established by the SLOAPCD to determine the significance and appropriate mitigation level for a project's short-term construction emissions are presented in Table 4.3-5 and discussed below.

Table 4.3-5. SLOAPCD Thresholds of Significance for Construction Impacts

Pollutant	Threshold[1]		
	Daily (lbs/day)	Quarterly Tier 1 (tons)	Quarterly Tier 2 (tons)
Ozone Precursors (ROG + NO_x)	137	2.5	6.3
Diesel Particulate Matter (DPM)	7	0.13	0.32
Fugitive Particulate Matter (PM_{10}), Dust[2]	--	2.5	--

Source: SLOAPCD (2012)

[1] Daily and quarterly emissions thresholds are based on the California Health and Safety Code and the CARB Carl Moyer Guidelines.

[2] Any project with a grading area greater than 4 acres of a worked area can exceed the 2.5 tons PM_{10} quarterly threshold.

Reactive Organic Gases and Nitrogen Oxides Emissions

- **Daily:** For construction projects exceeding the 137 lbs/day threshold, SLOAPCD requires Standard Mitigation Measures.
- **Quarterly – Tier 1:** For construction projects exceeding the 2.5 tons/quarter threshold, require Standard Mitigation Measures and Best Available Control Technology (BACT) for construction equipment. Offsite mitigation may be required if feasible mitigation measures are not implemented, or if no mitigation measures are feasible for the project.

- **Quarterly – Tier 2:** For construction projects exceeding the 6.3 tons/quarter threshold, require Standard Mitigation Measures, BACT, implementation of a Construction Activity Management Plan (CAMP) and offsite mitigation are required.

Diesel Particulate Matter Emissions

- **Daily:** For construction projects exceeding the 7 lbs/day threshold, SLOAPCD requires Standard Mitigation Measures.
- **Quarterly - Tier 1:** For construction projects lasting more than one quarter, exceedance of the 0.13 tons/quarter threshold requires Standard Mitigation Measures, BACT for construction equipment; and,
- **Quarterly - Tier 2:** For construction projects exceeding the 0.32 tons/quarter threshold, require Standard Mitigation Measures, BACT, implementation of a CAMP, and offsite mitigation.

PM_{10} Dust Emissions

- For construction projects exceeding the 2.5 tons/quarter threshold, SLOACPD requires implementation of Fugitive PM_{10} Mitigation Measures and may require the implementation of a CAMP.

4.3.3.1.2 OPERATIONAL IMPACT THRESHOLDS

Criteria Air Pollutants

The threshold criteria established by the SLOAPCD to determine the significance and appropriate mitigation level for long-term operational emissions from a project are presented in Table 4.3-6.

Table 4.3-6. SLOAPCD Thresholds of Significance for Operational Impacts

	Threshold[1]	
Pollutant	**Daily (lbs/day)**	**Annual (tons/year)**
Ozone Precursors (ROG + NO_x)	25	25
Diesel Particulate Matter (DPM)[2]	1.25	--
Fugitive Particulate Matter (PM_{10}), Dust	25	25
CO	550	--

Source: SLOAPCD (2012)

[1] Daily and annual emissions thresholds are based on the California Health and Safety Code Division 26, Part 3, Chapter 10, Section 40918 and the CARB Carl Moyer Guidelines for DPM.

[2] Applies to onsite emissions. DPM is seldom emitted from individual projects in quantities which lead to local or regional air quality attainment violations. Certain industrial and commercial projects may emit substantial quantities of onsite DPM through the use of stationary and mobile onsite diesel-fueled equipment.

Toxic Air Contaminants

If a project has the potential to emit toxic or hazardous air pollutants, or is located in close proximity to sensitive receptors, impacts may be considered significant due to increased cancer risk for the affected population, even at a very low level of emissions. For the evaluation of new proposed land use projects that generate TACs, such as diesel-fueled engines, the SLOAPCD has defined the excess cancer risk significance threshold at 10 in a million.

Localized Carbon Monoxide Concentrations

Localized CO concentrations associated with the proposed project would be considered a less-than-significant impact if: (1) traffic generated by the proposed project would not result in deterioration of signalized intersection level of service (LOS) to LOS E or F; or (2) the project would not contribute additional traffic to a signalized intersection that already operates at LOS of E or F (Caltrans 1996).

Odors

Screening of potential odor impacts is typically recommended for the following two situations:

- Projects that would potentially generate odorous emissions proposed to locate near existing sensitive receptors or other land uses where people may congregate; and
- Residential or other sensitive receptor projects or other projects that may attract people locating near existing odor sources.

If the proposed project would locate receptors and known odor sources within 1 mile of each other, a full analysis of odor impacts is recommended. Known odor sources of primary concern, as identified by the SLOAPCD include landfills, transfer stations, asphalt batch plants, rendering plants, petroleum refineries, and painting/coating operations, as well as, composting, food processing, wastewater treatment, chemical manufacturing, and feedlot/dairy facilities.

4.3.3.2 Greenhouse Gas Emissions

In accordance with Appendix G of the State CEQA Guidelines, GHG emissions impacts associated with the proposed project would be considered significant if the project would:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or

b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The SLOAPCD has adopted recommended GHG significance thresholds that are based on AB 32 GHG emission reduction goals, which take into consideration the emission reduction strategies outlined in the CARB's Scoping Plan. Accordingly, if a project complies with a Qualified Greenhouse Gas Reduction Strategy that is specifically applicable to the project, such as the *City of Paso Robles Climate Action Plan,* then the project could be considered to have a less-than-significant impact.

The City's Climate Action Plan includes a "Consistency Worksheet," which identifies various measures designed to reduce project-related GHG emissions. The Climate Action Plan Consistency Worksheet can be used to demonstrate project-level compliance with the Climate Action Plan. However, it is important to note that the SLOAPCD's GHG significance threshold and the City's Climate Action Plan is based on AB 32 GHG reductions for year 2020 operational conditions and has not yet been updated to reflect SB 32 GHG reductions for target year 2030 conditions. As a result, this analysis provides an analysis of consistency with the City's currently adopted Climate Action Plan; however, consistency with year 2030 GHG reductions, per SB 32, and the State's Scoping Plan have been evaluated using an efficiency threshold, taking into account the state's 2030 GHG-reduction target mandated by SB 32.

The GHG-efficiency threshold was calculated by dividing the GHG emissions inventory goal (allowable emissions), by the estimated service population (SP). The efficiency threshold was based on the CARB's GHG emissions inventory identified in the 2017 Scoping Plan. Emissions sectors that do not apply to the proposed project (e.g., agriculture) were excluded from the calculation. The GHG emissions inventory for

the land use sectors applicable to the proposed project were then divided by the projected SP, defined as the number of residents plus the number of jobs, for future year 2030. The SP was calculated based on the most current population and employment projections derived from the California Department of Finance (DOF) Demographic Research Unit and California Employment Development Department, respectively. The methodology used for quantification of the target efficiency threshold applied to the proposed project is summarized in Table 4.3-7. Accordingly, project-generated GHG emissions that would exceed the efficiency threshold of 2.0 $MTCO_2e$/SP/year in 2030 would be considered to have a potentially significant impact on the environment that could conflict with GHG-reduction planning efforts. To be conservative, amortized construction-generated GHG emissions were included in annual operational GHG emissions estimates, consistent with SLOAPCD-recommended methodologies.

Table 4.3-7. Project-Level GHG Efficiency Threshold Calculation (Operational Year 2030)

Threshold	Total
Land Use Sectors GHG Emissions Target[1]	108,520
Population[2]	37,700
Employment[3]	16,017
Service Population (SP)	53,717
GHG Efficiency Threshold ($MTCO_2e$/SP/year)	2.0

Note: Employment data for interim years are estimated based on proportionality with population trends based on historical data.

[1] Based on Business-as-Usual (year 2005) emissions inventory and the State's target reductions of 40% below Business-as-Usual baseline GHG emissions inventory by 2030. Emissions inventory reflects locally appropriate emissions sectors.

[2] Based on population data derived from the City of Paso Robles Demographic website (https://www.prcity.com/244/Demographics).

[3] Based on employment data derived from the California Employment Development Department Labor Force and Unemployment Rates for Cities and Census Designated Places (https://www.labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html).

4.3.4 Impact Assessment and Methodology

4.3.4.1 Air Quality

Emissions associated with the construction of the proposed project were calculated using the California Emissions Estimator Model (CalEEMod; version 2020.4.0) computer program for project development Phase 1 and Phase 2 conditions. For analytical purposes, construction of Phase 1 is anticipated to occur over an approximately 18-month period beginning in 2023 while the construction of Phase 2 will begin as early as April 2024 and last approximately 5 years. Although construction may commence later than early 2023, assuming an early 2023 start date is conservative because as time passes construction fleet equipment will become less polluting as older pieces of construction equipment are retired from construction fleets and replaced with newer and less polluting equipment. Based on project-specific information provided by the Applicant, approximately 42,000 cubic yards of material would be exported during demolition. Haul truck travel distances were based on the estimated distance from the project site to the Paso Robles Landfill (16 miles round trip). Off-road equipment was based on project-specific information, to the extent available, and model defaults. Project-specific construction information such as worker vehicle trips and equipment load factors were not available at the time this analysis was prepared. Therefore, these parameters were estimated based on default settings contained in the model. Modeling assumptions and output files are included in Appendix C of this EIR.

Long-term operational GHG emissions were calculated using CalEEMod, version 2020.4.0 for project development Phase 1 and buildout conditions. Electricity intensity factors were adjusted to reflect compliance with the State's Renewables Portfolio Standards. Mobile-source emissions were calculated based on vehicle trip-generation rates derived from the traffic analysis prepared for this project (Central

Coast Transportation Consulting [CCTC] 2023). Phase 1 warehouse vehicle trip distances were based on vehicle distribution patterns/percentages provided by CCTC and calculated in-basin travel distances for employee trips of 12.69 miles and truck trips of 36.25 miles. Vehicle travel distribution/distances for development Phase 2 were not available and were based on model defaults for San Luis Obispo County. Emission modeling files are provided in Appendix C.

4.3.4.2 Greenhouse Gas Emissions

Emissions associated with the construction of the proposed project were calculated using CalEEMod, version 2020.4.0 for project development Phase 1 and Phase 2 conditions. Construction of Phase 1 is anticipated to occur over an approximately 18-month period beginning in 2023 while the construction of Phase 2 will begin as early as April 2024 and last approximately 5 years. Although construction may commence later than early 2023, assuming an early 2023 start date is conservative because as time passes, construction fleet equipment will become less polluting as older pieces of construction equipment are retired from construction fleets and replaced with newer and less polluting equipment. Based on project-specific information provided by the Applicant, approximately 42,000 cubic yards of material would be exported during demolition. Haul truck travel distances were based on the estimated distance from the project site to the Paso Robles Landfill (16 miles roundtrip). Off-road equipment was based on project-specific information, to the extent available, and model defaults. Additional construction information such as worker vehicle trips and equipment load factors were not available and were based on default parameters contained in the model. Construction emissions were amortized based on an estimated project life of 25 years and included with operational emissions for determination of impact significance. Modeling assumptions and output files are included in Appendix C of this report.

Long-term operational GHG emissions were calculated using CalEEMod, version 2020.4.0 for project development Phase 1, buildout, and year 2030 operational conditions. Electricity intensity factors were adjusted to reflect compliance with the state's Renewables Portfolio Standards. Mobile-source emissions were calculated based on vehicle trip generation rates derived from the traffic analysis prepared for this project (CCTC 2023). Phase 1 warehouse vehicle trip distances were based on vehicle distribution patterns/percentages provided by CCTC and calculated in-basin travel distances for employee and truck trips. Vehicle travel distribution/distances for development Phase 2 were not available and were based on model defaults for San Luis Obispo County. Emission modeling files are provided in Appendix C.

4.3.5 Project-Specific Impacts and Mitigation Measures

4.3.5.1 Air Quality

WOULD THE PROJECT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE APPLICABLE AIR QUALITY PLAN?

AQ Impact 1: The project would conflict with or obstruct implementation of the SLOAPCD 2001 Clean Air Plan San Luis Obispo County and Particulate Matter Report. Impacts would be significant and unavoidable (Class I).

SLOAPCD 2001 Clean Air Plan San Luis Obispo County

The SLOAPCD's 2001 CAP, adopted by SLOAPCD on March 26, 2002, addresses the attainment and maintenance of the NAAQS and CAAQS and outlines the SLOAPCD's strategies to reduce ozone-precursor pollutants (i.e., ROG and NO_x, etc.) from a wide variety of sources. The 2001 CAP includes a stationary-source control program, which includes control measures for permitted stationary sources, as well as transportation and land use management strategies to reduce motor vehicle emissions and use.

Transportation and land use control measures are implemented at the local or regional level by promoting and facilitating the use of alternative transportation options, increasing pedestrian access and accessibility to community services and local destinations, reducing vehicle miles traveled (VMT), and promoting congestion management efforts. In addition, local jurisdictions also prepare population forecasts, which are used by SLOAPCD to forecast population-related emissions and air quality attainment, including those contained in the 2001 CAP. As a result, consistency with the 2001 CAP has been evaluated based on the project's consistency with the land use management strategies and transportation control measures identified in the 2001 CAP, an analysis of the project's effect on regional VMT, and consistency with regional VMT-reduction efforts, as detailed below.

Transportation and Land Use Control Measures

The 2001 CAP includes multiple transportation and land use control measures intended to reduce emissions through reductions in VMT and the promotion of alternative forms of transportation. The control measures applicable to the proposed project are summarized in Table 4.3-8. As noted, the proposed project would be considered consistent with these applicable measures with implementation of identified mitigation measures. Therefore, potential impacts would be *less than significant with mitigation.*

Table 4.3-8. Project Consistency with SLOAPCD 2001 CAP Transportation and Land Use Control Measures

Control Measures	Project Consistency
Land Use Planning Strategies	
L-3 Balancing Jobs and Housing. The objective of this measure is to narrow the gap between the availability of jobs and the housing supply in cities and unincorporated communities within the county, and to not allow that gap to expand.	**Consistent**. According to the San Luis Obispo County Regional Housing Needs Assessment (RHNA), Paso Robles has about 14% more housing units than jobs, indicative of a "jobs-poor" community. The project is located within the city limits and would not result in the development of residential land uses. The project would result in the creation of approximately 3,561 new jobs, which would help to reduce the current gap between jobs and housing. Improvements to the jobs-to-housing imbalance would be anticipated to help support and promote local and regional improvements related to increased transportation mobility and potential reductions in VMT (SLOCOG 2019). Therefore, the proposed project would be consistent with this measure.
Transportation Control Measures	
T-2B Regional Public Transit Improvements. The objective of this measure is to improve transit service and facilities that will promote increased public transit use instead of a private automobile.	**Consistent with Mitigation Incorporated.** • Existing transit services do not have a route that passes the project location. • The project site design supports the use of bicycle and pedestrian activity. Sidewalks are provided adjacent to and onto the site. The project proposes to maintain bicycle and pedestrian accommodation. • Mitigation Measure AQ/mm-1.1 has been identified to require the preparation and implementation of a Traffic Demand Management Plan (TDMP), which would include additional measures for reducing project-generated VMT through onsite transportation and circulation improvements and programs. • Mitigation Measure AQ/mm-1.2 has been identified to require implementation of additional measures to reduce operational mobile-source emissions, including the installation of bicycle storage onsite in exceedance of current building code requirements.
T-3 Bicycling and Bikeway Enhancements. The objective of this measure is to encourage a modal shift to bicycles through implementation of infrastructure improvements and administrative actions that provide inexpensive commute options and increased safety and convenience for commuters.	

Control Measures	Project Consistency
T-8 Teleworking, Teleconferencing, and Telelearning. The objective of this measure is to reduce the number of trips and miles traveled by employees and students by promoting teleworking, tele-conferencing, and telelearning opportunities.	**Consistent with Mitigation Incorporated.** As noted above, existing operations include numerous measures to reduce employee-related trips. Mitigation Measure AQ/mm-1.1 would require the preparation of a TDMP, which would include additional measures that would reduce operational project-generated VMT by incentivizing employees to utilize rideshare programs, carpools, public transit services, etc. to commute.

Source: AMBIENT (2022)

Projected Population, Employment, and VMT Growth

The proposed project includes creation of a warehouse, industrial flex space, loft offices, commercial retail space, winery, and a hotel. The project would not result in an increase in residents. The project would, however, result in an increase in employment of approximately 3,561 jobs. According to the San Luis Obispo County Regional Housing Needs Assessment (RHNA), the City has approximately 14% more housing units than jobs, indicative of a "jobs-poor" community. The City's jobs-to-housing ratio is estimated to increase from a 2015 jobs-to-housing ratio of 0.87 to a 0.89 jobs-to-housing ratio by 2035. The City is projected to reduce the imbalance between jobs and housing units. The proposed project would result in increased employment and would not result in an increase in housing. As a result, the proposed project would be anticipated to improve the jobs-to-housing imbalance.

A VMT analysis was prepared for this project by CCTC, which included an analysis of project-generated VMT and potential impacts to regional VMT reduction efforts (CCTC 2023). Accordingly, the increase in regional VMT resulting from the project would conflict with regional VMT-reduction efforts and associated reductions in mobile-source emissions accounted for in the 2001 CAP. Estimated regional average VMT modeling results, with and without project implementation, are summarized in Table 4.3-9. Table 4.3-10 presents a summary of project VMT impacts. As depicted, the regional average VMT/SP would remain the same at 22.56 with project implementation. However, project-generated VMT would exceed the significance threshold of 19.18 VMT/SP (15% below the regional average). Therefore, potential impacts associated with consistency with regional VMT reduction plans (and associated mobile-source emission reduction goals) would be significant.

Table 4.3-9. Project Regional VMT Model Results

	San Luis Obispo County VMT/SP	
Category	**Without Project**	**With Project**
Total VMT	8,899,234	8,976,969
Total Population	280,101	280,101
Total Employment	117,276	120,837
Service Population	394,405[1]	397,966[2]
Vehicle Miles Traveled/Service Population	22.56	22.56

Source: CCTC (2022)

[1] Regional value obtained from 2019 RTP, Figure 2-2, San Luis Obispo Region by the Numbers, page 2-6.

[2] Equals regional value plus project anticipated number of employees of 3,561.

Table 4.3-10. Project VMT Impact Summary

Category	VMT/SP Summary
VMT/SP – With Project	22.56
VMT/SP – Regional Average	22.56
VMT/SP Threshold (15% Below Regional Average)	19.18
Percent Reduction in VMT Required to Reduce to Below Threshold	14.98%

Source: CCTC (2022)

Implementation of Mitigation Measure AQ/mm-1.1 would require the preparation of a Traffic Demand Management Plan (TDMP), which would include measures to reduce the project's overall VMT. (Note that the TDMP is required to include other non-VMT-related measures based on the Transportation Impact Study [CCTC 2023] recommendations related to safety impacts.) Based on the analysis conducted, the project would need to achieve reductions in VMT of 14.98% in order to reduce regional average VMT to below the significance threshold (CCTC 2023). In addition, Mitigation Measure AQ/mm-1.2 in this EIR has been identified to require implementation of additional measures to reduce operational mobile-source emissions, including the installation of bicycle storage onsite in exceedance of current building code requirements. With implementation of Mitigation Measures AQ/mm-1.1 and AQ/mm-1.2, potential impacts related to VMT would be reduced, but are not guaranteed to be reduced to less-than-significant levels, and impacts would remain *significant and unavoidable*.

SLOAPCD Particulate Matter Report

In July 2005, SLOAPCD adopted the *Particulate Matter Report*, which identifies various measures and strategies to reduce public exposure to particulate matter emitted from a wide variety of sources, including emissions from permitted stationary sources and fugitive sources, such as construction activities. As discussed in further detail under AQ Impact 2, below, uncontrolled fugitive dust generated during construction may result in localized pollutant concentrations that may result in increased nuisance concerns to nearby land uses. Therefore, construction-generated emissions of particulate matter would be potentially significant. Mitigation Measure AQ/mm-1.3 has been identified to require implementation of fugitive dust reduction measures, including, but not limited to, limiting the area of disturbance, use of dust suppressants, and designation of a fugitive dust emissions monitor. With implementation of Mitigation Measure AQ/mm-1.3, impacts would be *less than significant with mitigation.*

Based on the analysis provided above, the project would conflict with the 2001 CAP due to VMT and the Particulate Matter Report due to dust generation during the project's construction. With implementation of Mitigation Measures AQ/mm-1.1 through AQ/mm-1.3, potential impacts associated with conflicting with the 2001 CAP and Particulate Matter Report would be lessened, but impacts related to conflicting with the 2001 CAP due to VMT would remain *significant and unavoidable*.

AQ Impact 1 (Class I)	
The project would conflict with or obstruct implementation of the SLOAPCD 2001 Clean Air Plan San Luis Obispo County and Particulate Matter Report.	
Mitigation Measures	
AQ/mm-1.1	*The Applicant shall prepare and implement a Traffic Demand Management Plan (TDMP), which shall be reviewed and approved by the City Engineer prior to implementation. The plan shall identify the strategies to be implemented and methods for monitoring the effectiveness of the strategies and include strategies and/or payment of traffic mitigation fees sufficient to*

AQ Impact 1 (Class I)	
	achieve the City of Paso Robles's significance threshold of 15% below the existing County of San Luis Obispo average vehicle miles traveled per service population (VMT/SP) of 19.18. *At a minimum, based on the Transportation Impact Study prepared for this project, the following strategies shall be implemented (Central Coast Transportation Consulting 2023):* *1. Implement a Commute Trip Reduction program through SLO Regional Rideshare and become a Gold Employer in the Back 'N' Forth Club program. This program, operated by the San Luis Obispo Council of Governments (SLOCOG), helps employers develop and implement transportation demand management measures for employees.* *2. Offer financial incentives to employees who carpool, take transit, walk, or bike.* *3. Implement a shuttle system from centralized locations, including transit centers, mobility hubs, and park-and-ride lots.* *4. Provide a fair-share contribution towards the City of Paso Robles's Theater Drive Mobility Hub project.* *5. Implement a vanpool program and subsidize a portion of the vanpool expenses to increase adoption.* *6. Modify shift change schedules and restrict truck trips to avoid peak period congestion on nearby roadways. Restricting truck trips between 10:00 a.m. and 2:00 p.m. on Sundays and 2:00 p.m. and 6:00 p.m. on Fridays would limit exposure during the busiest times on State Route 46 East (SR 46E). Modifying shift changes to occur at or after 7:00 p.m. would also reduce congestion and conflicts on SR 46E.* *7. Construct onsite bicycle and pedestrian facilities connecting to the project entry points or comparable routes. Provide onsite bicycle amenities including bicycle lockers, secure bicycle parking, showers, and bicycle repair stations.* *8. Coordinate with San Luis Obispo Regional Transit Authority to accommodate future transit service to the project site.* *9. Modify shift change schedules and restrict truck trips to avoid peak period congestion on nearby roadways. Shift changes shall occur after 7:00 p.m. and before 10:00 a.m. Truck trips shall be restricted between 10:00 a.m. and 2:00 p.m. on Sundays and 2:00 p.m. and 6:00 p.m. on Fridays.* *10. All outbound and inbound truck traffic from the west shall use the Huer Huero Creek bridge to/from Golden Hill Road. (See Mitigation Measure TR/mm-3.1.)* *Separate TDMPs may be prepared for Phase 1 and Phase 2 (or partial subphases thereof). The Applicant shall monitor the TDMP(s) on an annual basis to determine its effectiveness at reducing project VMT. If the TDMP(s) does not achieve a 14.98% reduction in VMT (19.18 VMT/SP), the Applicant shall work with the City of Paso Robles to update the TDMP(s) to achieve VMT reduction.*
AQ/mm-1.2	*The following San Luis Obispo County Air Pollution Control District (SLOAPCD) recommended measures shall be implemented to reduce the operational emissions generated by the project. City of Paso Robles (City) staff shall evaluate each application submitted for implementing development and determine from the following list of measures which are applicable:* *1. Provide a pedestrian-friendly and interconnected streetscape with good access to/from the development for pedestrians, bicyclists, and transit users to make alternative transportation more convenient, comfortable, and safe.* *2. Incorporate traffic calming modifications to project roads to reduce vehicle speeds and increase pedestrian and bicycle usage and safety.*

AQ Impact 1 (Class I)	
	3. *Meet or exceed 2022 California Green Building Standards Code (CALGreen) nonresidential voluntary measures for the provision of changing/shower facilities for building tenants.* 4. *Provide employee lockers and showers to promote bicycle and pedestrian use. One shower and five lockers for every 25 new employees is recommended.* 5. *Increase bicycle accessibility and safety in the vicinity of the project; for example, provide interconnected bicycle routes/lanes or construction of bikeways.* 6. *Meet or exceed CALGreen standards for providing onsite bicycle parking—both short-term racks and long-term lockers, or a locked room with standard racks and access limited to bicyclists only.* 7. *Provide shade over parking spaces to the extent feasible and allowable per building code requirements to reduce evaporative emissions from parked vehicles and reduce heat-island effect.* 8. *Reduce fugitive dust from roads and parking areas with the use of paving or other materials.* 9. *Install legible, durable, weather-proof signs at truck access gates, loading dock areas, and truck parking areas that identify anti-idling regulations and state that diesel engine idling shall be limited to 3 minutes or less.* 10. *Meet or exceed CALGreen Tier 2 standards for providing electric vehicle charging infrastructure.* 11. *Meet or exceed CALGreen Tier 2 standards for building energy efficiency.* 12. *Meet or exceed CALGreen Tier 2 standards for utilizing recycled content materials.* 13. *Meet or exceed CALGreen building standards at the time of development for water conservation (e.g., use of low flow water fixtures, water efficient water irrigation systems, and drought tolerant landscaping).* 14. *All built-in appliances shall be Energy Star certified or equivalent.* 15. *Utilize onsite renewable energy systems (e.g., solar, wind, geothermal, biomass, and/or bio-gas) to offset at least 10% of the project's energy use.* 16. *Meet or exceed 2022 CALGreen standards for the use of greywater, rainwater, or recycled water where applicable/available.* 17. *Meet or exceed 2022 CALGreen standards for using shading, trees, plants, cool roofs, etc. to reduce "heat island" effect.* 18. *Design roof trusses to handle dead weight loads of standard solar-heated water systems and/or photovoltaic panels.*
AQ/mm-1.3	*The following mitigation measures shall be implemented to reduce construction-generated fugitive dust and shall be shown on grading and building plans:* 1. *Reduce the amount of disturbed area where possible.* 2. *Use water trucks, San Luis Obispo County Air Pollution Control District (SLOAPCD)-approved dust suppressants (see Section 4.3 in the CEQA Air Quality Handbook), or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the SLOAPCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency would be required whenever wind speeds exceed 15 miles per hour. Reclaimed (non-potable) water should be used whenever possible. Please note that since water use is a concern due to drought conditions, the contractor or builder shall consider the use of a SLOAPCD-approved dust suppressant where possible to reduce the amount of water used for dust control. For a list of suppressants, see Section 4.3 of the CEQA Air Quality Handbook.*

AQ Impact 1 (Class I)
3. *All dirt stockpile areas should be sprayed daily or covered with tarps or other dust barriers as needed.* 4. *All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.* 5. *All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard (minimum vertical distance between the top of load and top of trailer) in accordance with California Vehicle Code Section 23114.* 6. *"Track-Out" is defined as sand or soil that adheres to and/or agglomerates on the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto any highway or street as described in California Vehicle Code Section 23113 and California Water Code 13304. To prevent track-out, designate access points and require all employees, subcontractors, and others to use them. Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can be any device or combination of devices that are effective at preventing track out, located at the point of intersection of an unpaved area and a paved road. Rumble strips or steel plate devices need periodic cleaning to be effective. If paved roadways accumulate tracked out soils, the track-out prevention device may need to be modified.* 7. *Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil-disturbing activities.* 8. *Exposed ground areas that are planned to be reworked at dates greater than 1 month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established.* 9. *All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD.* 10. *Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site.* 11. *Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where possible. Roads shall be pre-wetted prior to sweeping when possible.* 12. *The burning of vegetative material shall be prohibited. Effective February 25, 2000, the SLOAPCD prohibited developmental burning of vegetative material within San Luis Obispo County. If you have any questions regarding these requirements, contact the SLOAPCD Engineering and Compliance Division at (805) 781-5912.* 13. *The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20% opacity, and to prevent the transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Engineering and Compliance Division prior to the start of any grading, earthwork, or demolition.*
Residual Impacts
With implementation of the identified mitigation measures, potential impacts associated with conflicts with the 2001 CAP would remain significant and unavoidable.

AQ Impact 1 (Class I)
Secondary Impacts
Implementation of the TDMP included in Mitigation Measure AQ/mm-1.1 would require that all left-turning project truck traffic use the Huer Huero Creek bridge to/from Golden Hill Road. Construction of this bridge would result in additional impacts on Air Quality and Greenhouse Gas Emissions, Biological Resources, Cultural and Tribal Cultural Resources, Geological Resources, Hydrology and Water Quality, and Noise. These impacts are discussed further in TR Impact 3 in Section 4.13, Transportation.

WOULD THE PROJECT RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE PROJECT REGION IS NON-ATTAINMENT?

AQ Impact 2: The project would result in a cumulatively considerable net increase of criteria pollutants that would exceed applicable SLOAPCD thresholds. Impacts would be significant and unavoidable (Class I).

San Luis Obispo County is currently designated as non-attainment for ozone and PM_{10} under the CAAQS. Construction and operation of the project would result in emissions of ozone precursors, including ROG, NO_x, DPM, and PM_{10}, as discussed in detail below.

Short-Term Construction Emissions

While construction-generated emissions would be temporary and last only as long as construction activities occur, they have the potential to represent a significant air quality impact. Construction of the proposed project would result in the temporary generation of emissions associated with demolition of existing structures and infrastructure onsite, site grading and excavation, paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment on unpaved surfaces. Short-term construction emissions would result in increased emissions of ozone-precursor pollutants (i.e., ROG and NO_x) and emissions of particulate matter. Emissions of ozone precursors would result from the operation of on- and off-road motorized vehicles and equipment. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities and can result in increased concentrations of particulate matter that can adversely affect nearby sensitive land uses.

Estimated maximum daily and quarterly emissions associated with construction of the proposed project are presented in Table 4.3-11 and Table 4.3-12, respectively. Construction generated emissions were compared to SLOAPCD's recommended significance thresholds (Daily, Quarterly Tier 1, and Quarterly Tier 2). As depicted in Table 4.3-11, maximum daily emissions associated with construction would occur during Phase 1 and would total approximately 218.9 lbs/day of ROG+NO_x and 7.6 lbs/day of exhaust PM_{10}. As depicted in Table 4.3-12, maximum quarterly construction-generated emissions would total approximately 5.75 tons/quarter of ROG+NO_x, 0.48 tons/quarter of fugitive PM_{10}, and 0.16 tons/quarter of exhaust PM_{10} (AMBIENT 2022).

Table 4.3-11. Daily Construction Emissions without Mitigation

Construction Activity	Emissions (lbs/day)[1]					
	ROG	NO_x	ROG+NO_x	Fugitive PM_{10}	Exhaust PM_{10}	Total PM_{10}
Phase 1						
Demolition	5.3	39.0	44.3	2.9	1.5	4.3
Site Preparation	3.0	26.4	29.4	10.0	1.2	11.2
Grading	9.4	110.0	119.4	10.2	3.9	14.0
Underground Utilities	2.4	23.5	25.8	0.1	1.0	1.1
Building Construction	7.3	51.6	58.9	8.4	2.0	10.4
Architectural Coating[2]	176.8	1.6	178.3	1.1	<0.1	1.1
Paving	5.1	44.3	49.4	0.3	1.9	2.2
Phase 2						
Site Preparation	2.7	27.6	30.3	19.8	1.27	21.1
Grading	3.4	34.6	38.0	9.4	1.4	10.8
Building Construction	2.5	19.2	21.7	2.7	0.7	3.5
Architectural Coating[2]	13.6	1.4	15.1	0.5	0.1	0.5
Paving	1.0	8.6	9.6	0.2	0.4	0.6
Maximum Daily Emissions Phase 1[3]	20.1	198.9	218.9	23.2	7.6	30.6
SLOAPCD Significance Thresholds:	--	--	*137*	--	*7*	--
Exceeds Thresholds?	--	--	**Yes**	--	**Yes**	--

[1] Emissions were quantified using CalEEMod, version 2020.4.0.

[2] Includes the use of low volatile organic compound (VOC) content paint (50 gallons per liter or less)

[3] Maximum daily emissions for Phase 1 assumes some activities, including Phase 1 Demolition, Phase 1 Site Prep, Phase 1 Grading, and Phase 1 Underground utilities could potentially occur simultaneously on any given day.

See Appendix C for emissions modeling assumptions and results.

Table 4.3-12. Quarterly Construction Emissions Without Mitigation

Quarter	Maximum Quarterly Emissions (tons)[1]			
		PM_{10}		
	ROG+NO_x	Fugitive	Exhaust	Total
Year 2023				
Quarter 1	0.51	0.02	0.02	0.05
Quarter 2	4.73	0.41	**0.16**	**0.57**
Quarter 3	3.50	0.28	0.12	0.40
Quarter 4	2.97	0.33	0.10	0.43
Year 2024				
Quarter 1	1.65	0.26	0.05	0.31
Quarter 2[2]	**5.75**	**0.48**	0.09	**0.57**
Quarter 3[2]	1.78	0.09	0.06	0.16
Quarter 4	1.14	0.10	0.03	0.12

Quarter	Maximum Quarterly Emissions (tons)[1]			
		PM_{10}		
	$ROG+NO_x$	Fugitive	Exhaust	Total
Year 2025				
Quarter 1	1.10	0.10	0.02	0.12
Quarter 2	1.09	0.10	0.02	0.12
Quarter 3	1.09	0.10	0.02	0.12
Quarter 4	1.10	0.10	0.02	0.12
Year 2026				
Quarter 1	1.06	0.10	0.02	0.12
Quarter 2	1.05	0.10	0.02	0.12
Quarter 3	1.05	0.10	0.02	0.12
Quarter 4	1.06	0.10	0.02	0.12
Year 2027				
Quarter 1	1.05	0.10	0.02	0.12
Quarter 2	1.04	0.10	0.03	0.13
Quarter 3	1.04	0.10	0.03	0.13
Quarter 4	1.05	0.10	0.02	0.12
Year 2028				
Quarter 1	1.04	0.10	0.02	0.12
Quarter 2	1.04	0.10	0.02	0.12
Quarter 3	1.04	0.10	0.02	0.12
Quarter 4	0.61	0.03	0.01	0.04
Maximum Quarterly Emissions[1]	5.75	0.48	0.16	0.57
SLOAPCD Quarterly Tier 1/Tier 2 Thresholds (tons/quarter)	2.5/6.3	2.5/None	0.13/0.32	None
Exceeds SLOAPCD Tier 1/Tier 2 Thresholds?	**Yes**/No	No/--	**Yes**/No	--

Note: Includes overlap of Phase 1 and Phase 2 project development phases.

[1] To be conservative, total exhaust PM_{10} emissions were compared to SLOAPCD's DPM threshold. Totals may not sum due to rounding. See Appendix C for modeling assumptions and results. Maximum quarterly emissions include onsite and offsite emissions.

Maximum daily and quarterly construction emissions of $ROG+NO_x$ would exceed SLOAPCD's Tier 1 quarterly and daily significance thresholds but would remain under the Tier 2 significance threshold. Emissions would be largely a result of mobile-source emissions associated with construction vehicle and equipment operations anticipated to occur during the grading and installation of underground utilities phase. Estimated emissions of exhaust PM_{10} is projected to exceed the Tier 1 quarterly and daily threshold but remain under the Tier 2 significance thresholds. However, if uncontrolled, fugitive dust generated during construction may result in localized pollutant concentrations that could exceed ambient air quality standards and result in increased nuisance concerns to nearby land uses.

Implementation of Mitigation Measure AQ/mm-1.3 would require implementation of fugitive dust control measures and Mitigation Measure AQ/mm-2.1 has been identified to require the project implement SLOAPCD-recommended standard and BACT measures to reduce construction-generated emissions mobile-source emissions associated with construction vehicles and equipment, and evaporative emissions

from architectural coasting (e.g., low volatile organic compound [VOC] emission paint). Mitigated daily and quarterly emissions are summarized in Table 4.3-13 and Table 4.3-14, respectively.

Table 4.3-13. Construction Emissions with Mitigation

Construction Activity	Emissions (lbs/day)[1]					
	ROG	NO_x	ROG+NO_x	Fugitive PM_{10}	Exhaust PM_{10}	Total PM_{10}
Phase 1						
Demolition	2.9	56.2	59.0	1.4	2.5	3.9
Site Preparation	1.5	27.7	29.2	4.0	1.2	5.2
Grading	4.3	90.7	95.0	5.0	3.0	8.0
Underground Utilities	1.0	19.2	20.2	0.1	0.8	0.9
Building Construction	4.8	50.7	55.5	8.4	2.5	10.8
Architectural Coating[2]	176.8	1.6	178.3	1.1	<0.1	1.1
Paving	2.8	45.2	48.0	0.3	2.0	2.3
Phase 2						
Site Preparation	1.0	19.1	20.1	7.8	1.0	8.8
Grading	1.6	30.0	31.6	3.8	1.3	5.1
Building Construction	1.6	19.0	20.6	2.7	0.9	3.7
Architectural Coating[2]	13.5	1.5	15.0	0.5	0.1	0.6
Paving	0.6	11.3	11.9	0.2	0.6	0.8
Maximum Daily Emissions Phase 1 with Tier 3 Off-Road Equipment[3]:	9.7	193.8	203.4	10.5	7.5	18
Maximum Daily Emissions Phase 1 with Tier 3 Off-Road Equipment and diesel particulate filters[3,4]:	9.7	193.8	203.4	10.5	3.8	18
SLOAPCD Significance Thresholds:	--	--	*137*	--	*7*	--
Exceeds Thresholds?	--	--	**Yes**	--	No	--

[1] Emissions were quantified using CalEEMod, version 2020.4.0.

[2] Includes the use of low VOC content paint (50 gallons per liter or less)

[3] Maximum daily emissions for Phase 1 assumes some activities, including Phase 1 Demolition, Phase 1 Site Prep, Phase 1 Grading, and Phase 1 Underground utilities could potentially occur simultaneously on any given day.

[4] Includes use of diesel particulate filters. Depending on the level of filter installed, average reductions range from 50 to 85%. To be conservative, a minimum reduction of 50% in exhaust particulate matter emissions was applied.

See Appendix C for emissions modeling assumptions and results.

Table 4.3-14. Quarterly Construction Emissions with Mitigation[1]

Quarter	Maximum Quarterly Emissions (tons)[2]			
		PM_{10}		
	ROG+NO_x	Fugitive	Exhaust	Total
Year 2023				
Quarter 1	0.68	0.02	0.03	0.04
Quarter 2	4.57	0.19	**0.17**	0.36
Quarter 3	3.71	0.23	0.16	0.39
Quarter 4	3.26	0.29	0.14	0.43

Quarter	Maximum Quarterly Emissions (tons)[2]			
		PM_{10}		
	$ROG+NO_x$	Fugitive	Exhaust	Total
Year 2024				
Quarter 1	1.63	0.26	0.07	0.34
Quarter 2[3]	**5.57**	**0.33**	0.11	**0.44**
Quarter 3[3]	1.69	0.09	0.07	0.16
Quarter 4	1.10	0.10	0.03	0.13
Year 2025				
Quarter 1	1.10	0.10	0.03	0.13
Quarter 2	1.09	0.10	0.03	0.13
Quarter 3	1.09	0.10	0.03	0.13
Quarter 4	1.10	0.10	0.03	0.13
Year 2026				
Quarter 1	1.09	0.10	0.03	0.13
Quarter 2	1.08	0.10	0.03	0.13
Quarter 3	1.08	0.10	0.03	0.13
Quarter 4	1.09	0.10	0.03	0.13
Year 2027				
Quarter 1	1.09	0.10	0.03	0.13
Quarter 2	1.08	0.10	0.03	0.13
Quarter 3	1.08	0.10	0.03	0.13
Quarter 4	1.09	0.10	0.03	0.13
Year 2028				
Quarter 1	1.08	0.10	0.03	0.13
Quarter 2	1.07	0.10	0.03	0.13
Quarter 3	1.07	0.10	0.03	0.13
Quarter 4	0.64	0.03	0.02	0.05
Maximum Quarterly Emissions (with Tier 3 off-road equipment)[4]	5.57	0.33	0.17	0.44
SLOAPCD Quarterly Tier 1/Tier 2 Thresholds (tons/quarter)	*2.5/6.3*	*2.5/None*	*0.13/0.32*	*None*
Maximum Quarterly Emissions (with Tier 3 off-road equipment and diesel particulate filters)[5]	5.57	0.33	0.09	0.44
Exceeds SLOAPCD Tier 1/Tier 2 Thresholds?	**Yes**/No	No/--	No /No	--

[1] Includes the use of off-road equipment meeting Tier 3 emission standards.

[2] Maximum quarterly emissions include onsite and offsite emissions.

[3] Includes overlap of Phase 1 and Phase 2 project development phases.

[4] To be conservative, total exhaust PM_{10} emissions were compared to SLOAPCD's DPM threshold. Totals may not sum due to rounding. See Appendix C for modeling assumptions and results.

[5] Includes use of diesel particulate filters. Depending on the level of filter installed, average reductions range from 50 to 85%. To be conservative, a minimum reduction of 50% in exhaust particulate matter emissions was applied.

With mitigation, maximum construction-generated daily emissions of ROG+NO_x would be reduced to approximately 203.4 lbs/day and exhaust PM_{10} would be reduced to approximately 3.8 lbs/day (Table 4.3-11; AMBIENT 2022). Maximum quarterly emissions would be reduced to approximately 5.6 tons/quarter of ROG+NO_x, 0.3 tons/quarter of fugitive PM_{10}, and 0.1 tons/quarter of exhaust PM_{10} (Table 4.3-12; AMBIENT 2022). Therefore, even with mitigation, the project would exceed Tier 1 quarterly and daily significance thresholds for ROG+NO_x, and therefore construction-related impacts would be *significant and unavoidable.*

Long-Term Operational Emissions

Long-term operational emissions of criteria air pollutants associated with the proposed project would be predominantly associated with mobile sources (i.e., employee and customer vehicle emissions, haul truck emissions, etc.). To a lesser extent, emissions associated with area sources, such as landscape maintenance activities, as well as use of electricity and natural gas would also contribute to operational emissions.

Unmitigated operational emissions associated with the proposed project are summarized in Table 4.3-15. As depicted, daily operational emission associated with Phase 1 of development would total approximately 209.9 lbs/day of ROG+NO_x, 115.9 lbs/day of CO, 55.2 lbs/day of fugitive PM_{10}, and 1.3 lbs/day of exhaust PM_{10}. Maximum daily emissions of ROG+NO_x and fugitive PM_{10} would exceed SLOAPCD's corresponding daily significance thresholds for the operating year of 2024. At project buildout, daily operational emissions would total approximately 270.6 lbs/day of ROG+NO_x, 320.6 lbs/day of CO, 102.6 lbs/day of fugitive PM_{10}, and 1.8 lbs/day of exhaust PM_{10}. Maximum daily emissions of ROG+NO_x, fugitive PM_{10}, and exhaust PM_{10} would exceed SLOAPCD's corresponding daily significance thresholds.

Table 4.3-15. Operational Emissions Without Mitigation

	Emissions[1]						
					PM_{10}		
Operational Period/Source	**ROG**	**NO_x**	**ROG+NO_x**	**CO**	**Fugitive**	**Exhaust**	**Total**
Daily Emissions (lbs/day)							
Phase 1 (Year 2024)							
Area Source	37.1	<0.1	37.1	0.2	0.0	<0.1	<0.1
Energy Use	0.1	1.3	1.4	1.0	0.0	0.1	0.1
Mobile	9.8	161.7	171.4	114.7	55.2	1.2	56.4
Daily Emissions Phase 1	47.0	162.9	209.9	115.9	55.2	1.3	56.5
SLOAPCD Significance Thresholds	--	--	***25***	***550***	***25***	***1.25***	--
Exceeds SLOAPCD Thresholds?	--	--	**Yes**	No	**Yes**	No	--
Phase 1 and Phase 2 (Year 2028)							
Area Source	54.6	<0.1	54.6	0.2	0.0	<0.1	<0.1
Energy Use	0.5	4.7	5.3	4.0	0.0	0.4	0.4
Mobile	35.9	174.8	210.7	316.3	102.6	1.4	104.0
Daily Emissions Phase 1 & 2 Year 2028	91.1	179.5	270.6	320.6	102.6	1.8	104.4
SLOAPCD Significance Thresholds	--	--	***25***	***550***	***25***	***1.25***	--
Exceeds SLOAPCD Thresholds?	--	--	**Yes**	No	**Yes**	**Yes**	--

Operational Period/Source	Emissions[1]						
					PM_{10}		
	ROG	NO_x	$ROG+NO_x$	CO	Fugitive	Exhaust	Total
Annual Emissions (tons/year)							
Phase 1 (Year 2024)	7.2	28.3	35.5	20.9	9.8	0.2	10.0
Phase 1 and Phase 2 (Year 2028)	15.5	31.8	47.3	50.5	16.8	0.3	22.2
SLOAPCD Significance Thresholds	--	--	***25***	--	***25***	--	--
Exceeds SLOAPCD Thresholds?	--	--	**Yes**	--	No	--	--

Note: Includes minimum reduction in truck emissions based on a comparison of model year 2014 trucks to county-wide fleet average.

[1] Emissions quantified using CalEEMod, version 2020.4.0. Totals may not sum due to rounding. See Appendix C for modeling output files and assumptions.

As depicted in Table 4.3-15, annual emissions for Phase 1 would total approximately 35.5 tons per year of $ROG+NO_x$ and 9.8 tons per year of fugitive PM_{10}. At project buildout, annual emission would total 47.3 tons per year of $ROG+NO_x$ and 16.8 tons per year of fugitive PM_{10}. For both Phase 1 and project buildout conditions, estimated annual operational emissions would exceed SLOAPCD's recommended significance thresholds for $ROG+NO_x$, but would not exceed the significance threshold for fugitive PM_{10}. Emissions would be predominantly associated with the operation of motor vehicles and trucks.

Implementation of Mitigation Measures AQ/mm-1.1 and AQ/mm-1.2 would reduce project operational emissions through implementation of a TDMP to reduce and/or offset project-generated VMT, which would further reduce operational emissions associated with offsite vehicle travel. Mitigation Measure AQ/mm-2.2 has been identified to require emergency back-up power generators to meet USEPA Tier 4 emissions standards in addition to any other required emission control measures associated with the Permit to Operate issued by SLOAPCD.

Mitigation Measure AQ/mm-2.3 would further reduce emissions associated with warehouse operations, including emissions associated with the operation of transport refrigeration units. In addition, Mitigation Measure AQ/mm-2.4 would require compliance with SLOAPCD permitting requirements for the installation of permitted stationary sources of emissions. With implementation of these mitigation measures, operational emissions of ROG and NO_x would be reduced, but not below SLOAPCD significance thresholds. Mitigation Measure AQ/mm-2.4 would require the preparation of an Operational Activity Management Plan (OAMP) for the proposed warehouse operations. The OAMP would identify additional measures and emissions offset to reduce operational emissions, but may not sufficiently reduce emissions below SLOAPCD significance thresholds. Therefore, potential impacts associated with operational emissions would remain significant and unavoidable.

Based on the analysis provided above, project impacts associated with cumulatively considerable net increase of emissions of criteria pollutants for which the region is designated non-attainment would be reduced, but the reduction cannot be assured to reach a level below significance, so the impact would remain *significant and unavoidable*.

AQ Impact 2 (Class I)	
The project would result in a cumulatively considerable net increase of criteria pollutants that would exceed applicable SLOAPCD thresholds.	
Mitigation Measures	
Implement Mitigation Measures AQ/mm-1.1, AQ/mm-1.2, and AQ/mm-1.3.	
AQ/mm-2.1	*The following measures shall be implemented to reduce construction emissions from on and off-road construction equipment (nitrogen oxides, reactive organic gases, and diesel particulate matter) and area sources and shown on grading and building plans. Construction contracts shall be obligated to comply with these measures and permit inspection of the construction site by the City of Paso Robles or its designee and San Luis Obispo County Air Pollution Control District (SLOAPCD) to confirm compliance:* 1. *Maintain all construction equipment in proper tune according to manufacturer's specifications.* 2. *Fuel all off-road and portable diesel-powered equipment with California Air Resources Board (CARB)-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road).* 3. *Heavy-duty (50 horsepower or greater) diesel-fueled construction equipment shall meet, at a minimum, the CARB's Tier 3 certified engines, or cleaner, off-road heavy-duty diesel engines; be fitted with diesel exhaust particulate filters in accordance with manufacturer recommendations; and comply with the State Off-Road Regulation. Heavy-duty equipment with Tier 4 engines shall be used to the extent locally available (within 50 miles). Where Tier 3, or cleaner, equipment is not available, incorporate diesel emission control strategies/retrofits, such that emission reductions achieved equal or exceed that of a Tier 3 engine. Installing California Verified Diesel Emission Control Strategies. Verified diesel emissions control strategies can be found at: https://ww2.arb.ca.gov/diesel/verdev/vt/cvt.htm.* 4. *When applicable, portable equipment, 50 horsepower or greater, used during construction activities shall be registered with the California statewide portable equipment registration program (issued by the CARB) or be permitted by the San Luis Obispo Air Pollution Control District (SLOAPCD). Such equipment may include power screens, conveyors, internal combustion engines, crushers, portable generators, tub grinders, trammel screens, and portable plants (e.g., aggregate plant, asphalt plant, concrete plant). For more information, contact the SLOAPCD Engineering and Compliance Division at (805) 781-5912.* 5. *Use on-road heavy-duty trucks that meet the CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines and comply with the State On-Road Regulation.* 6. *All on- and off-road diesel equipment shall not idle when not in use. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5-minute idling limit.* 7. *Construction equipment staging areas shall be located at the farthest reasonable distance possible from nearby sensitive land uses, or at a minimum distance of 300 feet.* 8. *Stationary noise sources such as generators, pumps, and pavement crushers shall be located at the farthest distance possible from noise-sensitive uses, or at a minimum distance of 300 feet.* 9. *To the extent locally available, electrified or alternatively powered construction equipment shall be used.* 10. *Substitute gasoline-powered in place of diesel-powered equipment, where possible.*

AQ Impact 2 (Class I)	
	11. Use alternative-fueled construction equipment onsite where possible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel. *12. Construction of the proposed project shall use low volatile organic compound content paints not exceeding 50 grams per liter.* *13. To the extent locally available, use prefinished building materials or materials that do not require the application of architectural coatings.* *14. The proposed screening wall to be located along the western boundary of the project site shall be constructed after the completion of onsite demolition, site preparation, and site grading activities for the Phase 1 Warehouse (Lot 32) and prior to the issuance of construction permits for the Phase 1 Warehouse building (Lot 32).*
AQ/mm-2.2	*Prior to installation of stationary emission sources (e.g., emergency back-up power generators), the San Luis Obispo County Air Pollution Control District (SLOAPCD) shall be consulted to identify applicable permitting limitations and requirements. A Permit to Operate (PTO) shall be obtained from the SLOAPCD prior to installation. At a minimum, emergency back-up power generators shall meet U.S. Environmental Protection Agency (USEPA) Tier 4 emission standards. Additional limitations, such as hourly operational limitations and/or alternative fuel sources, may also be required as part of the PTO.*
AQ/mm-2.3	*The following additional mitigation measures shall apply specific to the proposed warehouse:* *1. Loading docks that service chilled, refrigerated, or freezer warehouse space shall be equipped with electrical hookups for trucks with transport refrigeration units or auxiliary power units to minimize truck idling.* *2. Electrical service conduit shall be designed to accommodate future electric charging stations for haul trucks.* *3. Service equipment (e.g., yard hostlers, yard equipment, forklifts, pallet jacks) shall be zero emission or natural gas if zero emission is not available.*
AQ/mm-2.4	*The project shall develop an Operational Activity Management Plan (OAMP) for proposed warehouse operations. The plan shall be developed in coordination with the San Luis Obispo County Air Pollution Control District (SLOAPCD) and shall identify mitigation measures and, if necessary, offsets to be implemented to reduce reactive organic gases and nitrogen oxides (ROG+NO_x) operational emissions in comparison to SLOAPCD's annual significance threshold of 25 tons per year for ROG+NO_x. Such measures may include, but are not limited to, those identified in Mitigation Measures AQ/mm-1.1, AQ/mm-1.2, and AQ/mm-2.2.*
Residual Impacts	
Even with mitigation, construction and operation of the project would exceed Tier 1 quarterly and daily significance thresholds for ROG+NO_x and impacts associated with a considerable net increase of criteria air pollutants that exceed applicable SLOAPCD thresholds would be significant and unavoidable.	

WOULD THE PROJECT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?

AQ Impact 3: Project demolition and construction activities would not have the potential to expose sensitive receptors to substantial concentrations of naturally occurring asbestos. Impacts would be less than significant (Class III).

NOA has been identified as a TAC by the CARB. In accordance with the CARB Airborne Toxic Control Measure (ATCM), prior to any grading activities, a geologic evaluation should be conducted to determine if NOA is present within the area that will be disturbed. If NOA is not present, an exemption request form, along with a copy of the geologic report, must be filed with the SLOAPCD. If NOA is found at the site, the applicant must comply with all requirements outlined in the NOA ATCM.

Based on a review of the SLOAPCD's map depicting potential areas of NOA, the project site is not located in or near an area that has been identified as having a potential for NOA. Therefore, potential impacts associated with exposure of sensitive receptors to NOA during construction activities would be *less than significant.*

AQ Impact 3 (Class III)
Project demolition and construction activities would not have the potential to expose sensitive receptors to substantial concentrations of naturally occurring asbestos.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with exposure of sensitive receptors to naturally occurring asbestos would be less than significant.

AQ Impact 4: Project demolition and construction activities would have the potential to expose sensitive receptors to substantial concentrations of asbestos-containing materials and lead-coated materials. Impacts would be less than significant with mitigation (Class II).

Asbestos-Containing Materials

Demolition activities can have potential negative air quality impacts, including issues surrounding the proper handling, demolition, and disposal of asbestos-containing material (ACM). ACM could be encountered during the demolition of existing buildings, particularly older structures constructed prior to 1970. Asbestos can also be found in various building products, including (but not limited to) utility pipes/pipelines (transit pipes or insulation on pipes). If a project will involve the disturbance or potential disturbance of ACM, various regulatory requirements may apply, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40 Code of Federal Regulations [CFR] 61, Subpart M-Asbestos). These requirements include but are not limited to 1) notification, within at least 10 business days of activities commencing, to the SLOAPCD; 2) an asbestos survey conducted by a Certified Asbestos Consultant; and 3) applicable removal and disposal requirements of identified ACM.

The proposed project would include the demolition of approximately 353,063 square feet of existing onsite structures. The demolition of existing structures may result in disturbance of ACM. Therefore, impacts associated with exposure of sensitive receptors to ACM during construction activities would be potentially significant. Mitigation Measure AQ/mm-4.1 has been identified to require implementation of National Emission Standards for Hazardous Air Emissions requirements for testing, handling, and disposal of NOA as well as SLOAPCD notification and reporting standards. With implementation of Mitigation Measure AQ/mm-4.1, potential impacts associated with NOA would be *less than significant with mitigation.*

Lead-Coated Materials

Demolition of structures coated with lead-based paint can have potential negative air quality impacts and may adversely affect the health of nearby individuals. Improper demolition can result in the release of lead-containing particles from the site. Sandblasting or removal of paint by heating with a heat gun can result in significant emissions of lead. In such instances, proper abatement of lead before demolition of these structures must be performed in order to prevent the release of lead from the site. Depending on the removal method, a SLOAPCD permit may be required. The demolition of existing structures may result in the disturbance of lead-containing materials. Therefore, impacts associated with exposure of sensitive receptors to lead-coated materials during construction activities would be potentially significant. Mitigation Measure AQ/mm-4.1 has been identified to require implementation of appropriate procedures for evaluation, handling, and disposal of materials with potential for lead-coated materials. With implementation of Mitigation Measure AQ/mm-4.1, potential impacts associated with lead-coated materials would be *less than significant with mitigation*.

AQ Impact 4 (Class II)	
Project demolition and construction activities would have the potential to expose sensitive receptors to substantial concentrations of asbestos-containing materials and lead-coated materials.	
Mitigation Measures	
AQ/mm-4.1	*The following mitigation measures shall be implemented to reduce the disturbance of asbestos and lead. Strategies include but are not limited to the following:* *1. Demolition of onsite structures shall comply with the National Emission Standards for Hazardous Air Emissions requirements (Title 40, Code of Federal Regulations, Part 61, Subpart M) for the demolition of existing structures. The San Luis Obispo Air Pollution Control District (SLOAPCD) is delegated authority by the U.S. Environmental Protection Agency to implement the Federal Asbestos National Emission Standards for Hazardous Air Pollutants. Prior to demolition of onsite structures, the SLOAPCD shall be notified, per National Emission Standards for Hazardous Air Pollutants requirements. SLOAPCD notification form and reporting requirements are included in Appendix C of the project environmental impact report. Additional information may be obtained at: http://slocleanair.org/business/asbestos.php.* *2. If during the demolition of existing structures, paint is separated from the construction materials (e.g., chemically or physically), the paint waste will be evaluated independently from the building material by a qualified hazardous materials inspector to determine its proper management. All hazardous materials shall be handled and disposed of in accordance with federal, state, and local regulations. According to the California Department of Toxic Substances Control (DTSC), if the paint is not removed from the building material during demolition (and is not chipping or peeling), the material can be disposed of as construction debris (a non-hazardous waste). The landfill operator will be contacted prior to disposal of building material debris to determine any specific requirements the landfill may have regarding the disposal of lead-based paint materials. The disposal of demolition debris shall comply with any*

AQ Impact 4 (Class II)
such requirements. Contact the SLOAPCD Enforcement Division at (805) 781-5912 for more information. Approval of a lead work plan and permit may be required. Lead work plans, if required, will need to be submitted to SLOAPCD 10 days prior to the start of demolition. 3. *Prior to any grading activities, a geologic evaluation shall be conducted to determine if naturally occurring asbestos (NOA) is present within the area that will be disturbed. If NOA is not present, an exemption request must be filed with the SLOAPCD. If NOA is found at the site, the Applicant must comply with all requirements outlined in the Asbestos Airborne Toxic Control Measure. These requirements may include but are not limited to:* a. *Development of an Asbestos Dust Mitigation Plan which must be approved by the SLOAPCD before operations begin, and* b. *Development and approval of an Asbestos Health and Safety Program (required for some projects).*
Residual Impacts
With implementation of the identified mitigation measures, potential impacts associated with exposure of sensitive receptors to substantial concentrations of asbestos-containing materials and lead-coated materials would be less than significant.

AQ Impact 5: Project demolition and construction activities would have the potential to expose sensitive receptors to substantial localized concentrations of particulate matter. Impacts would be less than significant with mitigation (Class II).

Fugitive dust emissions would be primarily associated with building demolition, site preparation, grading, and vehicle travel on unpaved and paved surfaces. Onsite off-road equipment and trucks would also result in short-term emissions of diesel-exhaust particulate matter, which could contribute to elevated localized concentration at nearby receptors. Uncontrolled emissions of fugitive dust may also contribute to potential increases in nuisance impacts to nearby receptors. For these reasons, localized uncontrolled concentrations of construction-generated particulate matter would be considered to have a potentially significant impact. Mitigation Measure AQ/mm-1.3 has been identified to require implementation of fugitive dust reduction measures, including, but not limited to, limiting the area of disturbance, use of dust suppressants, and designation of a fugitive dust emissions monitor. With implementation of Mitigation Measure AQ/mm-1.3, potential impacts would be *less than significant with mitigation.*

AQ Impact 5 (Class II)
Project demolition and construction activities would have the potential to expose sensitive receptors to substantial localized concentrations of particulate matter.
Mitigation Measures
Implement Mitigation Measure AQ/mm-1.3.
Residual Impacts
Potential impacts associated with exposure of sensitive receptors to substantial localized concentrations of particulate matter would be less than significant.

AQ Impact 6: Project demolition and construction activities would have the potential to expose sensitive receptors to health hazards associated with valley fever. Impacts would be less than significant with mitigation (Class II).

The project would result in fugitive dust emissions associated with building demolition, site preparation, grading, and vehicle travel on unpaved and paved surfaces that could expose proximate sensitive receptors to potential health hazards associated with valley fever, particularly during periods of high wind speeds and/or high temperatures. The Applicant and all construction contractors would be subject to California Title 8 health and safety regulations pertaining to protection from valley fever. These regulations include, but are not limited to, injury and illness prevention, control of harmful exposures, protocol for respiratory protection, and reporting work-connected fatalities and serious injuries. However, sensitive receptors residing within proximity to the project site could be exposed to potential health hazards associated with valley fever during project construction, resulting in a potentially significant impact.

Mitigation Measure AQ/mm-1.3 would serve to reduce fugitive dust emissions during construction activities, which would reduce potential exposure of sensitive receptors to health hazards associated with valley fever. In addition, Mitigation Measure AQ/mm-6.1 has been identified to require additional dust suppression measures during periods of high wind and/or high temperatures and notification to the City prior to start of construction activities to allow for the distribution of educational information and enhanced disease surveillance in the area during and acter construction activities involving grading. With implementation of these measures, potential impacts associated with valley fever would be *less than significant with mitigation*.

AQ Impact 6 (Class II)	
Project demolition and construction activities would have the potential to expose sensitive receptors to health hazards associated with valley fever.	
Mitigation Measures	
Implement Mitigation Measure AQ/mm-1.3.	
AQ/mm-6.1	*The Applicant and contractor(s) shall implement the following measures during construction activities to reduce potential impacts associated with valley fever:* *1. If peak daily wind speeds exceed 15 miles per hour (mph) or peak daily temperatures exceed 95 degrees Fahrenheit (ºF) for 3 consecutive days, additional dust suppression measures shall be implemented prior to and immediately following ground-disturbing activities. These measures shall include, at a minimum, use of additional water or the application of additional soil stabilizer on areas of disturbance and stockpiles. The additional dust suppression measures shall continue to be implemented until peak daily wind speeds are 10 mph or less and outdoor air temperatures are below a peak daily temperature of 90ºF for at least 2 consecutive days.* *2. Heavy construction equipment traveling on unpaved roads within the project site shall be preceded by a water truck to dampen roadways and reduce dust from transportation along such roads.* *3. The Applicant or contractor(s) shall notify the City of Paso Robles no more than 60 nor less than 30 days before initiation of site-disturbing construction activities to allow the City of Paso Robles the opportunity to provide education outreach to community members and medical providers, as well as enhanced disease surveillance in the area both during and after construction activities involving grading.*

AQ Impact 6 (Class II)
4. *Prior to any project grading activity, the project construction contractor(s) shall prepare and implement a worker training program that describes potential health hazards associated with valley fever, common symptoms, proper safety procedures to minimize health hazards, and notification procedures if suspected work-related symptoms are identified during construction, including the fact that certain ethnic groups and immune-compromised persons are at greater risk of becoming ill with valley fever. The objective of the training shall be to ensure the workers are aware of the danger associated with valley fever. The worker training program shall be included in the standard in-person training for project workers and shall identify safety measures to be implemented by construction contractors during construction. Prior to initiating any grading, the Applicant shall provide the City of Paso Robles with copies of all educational training material for review and approval. No later than 30 days after any new employee or employees begin work, the Applicant shall submit evidence to the City of Paso Robles that each employee has acknowledged receipt of the training (e.g., sign-in sheets with a statement verifying receipt and understanding of the training).* 5. *The Applicant shall work with a medical professional, in consultation with the City of Paso Robles and the County of San Luis Obispo Public Health Department, to develop an educational handout for onsite workers and surrounding residents within 3 miles of the project site that includes the following information on valley fever:* a. *Potential sources/causes;* b. *Common symptoms;* c. *Options or remedies available should someone be experiencing these symptoms; and* d. *The location of available testing for infection.* *Prior to grading permit issuance, this handout shall have been created by the Applicant and reviewed by the City of Paso Robles. No less than 30 days prior to any surface disturbance (e.g., grading, filling, trenching) work commencing, this handout shall be mailed to all existing residences within three miles of the project site.* *The Applicant or developer(s) shall submit proof that the County of San Luis Obispo Public Health Department has been consulted prior to commencement of construction activities, a worker training program has been conducted, and the educational handout has been mailed to existing residences within 3 miles of the project area to the City of Paso Robles.*
Residual Impacts
With implementation of the identified mitigation measures, potential impacts associated with exposure of sensitive receptors to health hazards associated with valley fever would be less than significant.

AQ Impact 7: The long-term operation of the project would not expose sensitive receptors to substantial localized concentrations of carbon monoxide. Impacts would be less than significant (Class II).

Localized concentrations of CO are of primary concern in areas located near congested roadway intersections. Of particular concern are signalized intersections that are projected to operate at unacceptable LOS E or F (Caltrans 1996). With implementation of the project, the following signalized intersections would operate at LOS E or F (CCTC 2023):

- Golden Hill Road/Union Road currently operates at LOS E during the Friday PM peak hour and with Phase 1 would operate at LOS E during the weekday AM peak hour and LOS F during the weekday and Friday PM peak hours, and with project buildout would operate at LOS E during the Sunday PM peak hour and LOS F during the weekday AM and PM and Friday PM peak hours.

Under cumulative conditions, the intersection would continue to operate at LOS E during the weekday and Friday PM peak hours with Phase 1 and LOS F with full project buildout during the weekday and Friday PM peak hours.

- Airport Road/Dry Creek Road would become signalized and operate at LOS E with project buildout during the Friday PM peak hour. Under cumulative conditions, this intersection would worsen to LOS F during the Friday PM peak hour.
- SR 46E/Golden Hill Road would operate at LOS E with project buildout during the weekday and Friday PM peak hours and would continue to operate at LOS E with Phase 1 during the weekday AM and PM peak hours under cumulative conditions. With full project buildout the intersection would operate at LOS E during the weekday AM peak hour and LOS F during the weekday and Friday PM peak hour under cumulative conditions.
- Airport Road/SR 46E Parallel Route would operate at LOS F with project buildout during the weekday AM and PM and Friday PM peak hours under cumulative conditions.
- SR 46E Parallel Route/Wisteria Lane would operate at LOS F with project buildout during the weekday and Friday PM peak hour under cumulative conditions.
- SR 46E Parallel Route/Tractor Street would operate at LOS E with Phase 1 during the weekday AM peak hour under cumulative conditions and LOS F with project buildout during the weekday AM and weekday and Friday PM peak hours under cumulative conditions.
- SR 46E Parallel Route/Union Road would continue to operate at LOS F under cumulative conditions during the weekday PM peak hour with Phase 1 and would worsen to LOS F during the weekday AM and Friday PM peak hours with full project buildout.

Mitigation Measure AQ/mm-1.1 has been identified to require that a TDMP for the project be prepared and implemented to help reduce intersection congestion generated by the project by incentivizing carpool, transit, and other alternative methods of transportation, and by requiring shift changes outside of peak traffic hours. Mitigation Measures TR/mm-3.1 and TR/mm-4.1 require construction of circulation system improvements that would alleviate congestion at intersections through implementation of an SR 46E parallel route, including an overcrossing at SR 46E/Union Road and roundabout improvements at the Golden Hill Road/Union Road intersection. With implementation of the mitigation identified by the Transportation Impact Study prepared for the project (CCTC 2023), all city intersections would operate at LOS D or better. As a result, implementation of the proposed project would not be anticipated to result in or contribute to localized CO concentrations that would exceed applicable ambient air quality standards. Therefore, potential impacts associated with long-term exposure of sensitive receptors to localized CO emissions would be *less than significant with mitigation.*

AQ Impact 7 (Class II)
The long-term operation of the project would not expose sensitive receptors to substantial localized concentrations of carbon monoxide.
Mitigation Measures
Implement Mitigation Measure AQ/mm-1.1, TR/mm-3.1, and TR/mm-4.1.
Residual Impacts
Potential impacts associated with exposure of sensitive receptors to substantial localized concentrations carbon monoxide matter would be less than significant.

AQ Impact 8: The long-term operation of the project would have the potential to expose sensitive receptors to harmful localized concentrations of diesel particulate matter. Impacts would be significant and unavoidable (Class I).

TACs associated with long-term operation of the proposed project would consist primarily of DPM associated with the operation of diesel trucks at the proposed warehouse. Primary sources of truck-related DPM emissions include the operation of truck refrigeration units (TRUs). Although TRUs have relatively small diesel-powered engines, their emissions can pose a significant health risk to nearby individuals. Other sources of onsite DPM include truck travel to and from the warehouse.

In 2005 the CARB released an *Air Quality and Land Use Handbook* that recommended not siting sensitive land uses within 1,000 feet of distribution centers/warehouses. This recommendation was based on year 2000 truck emission rates and included the onsite operation of TRUs. By year 2020, taking into account projected reductions in truck emission rates, this recommended distance was reduced to approximately 225 feet (AMBIENT 2022). Since the release of this document, the CARB has adopted two ATCMs to reduce DPM emissions associated with truck operations at distribution centers/warehouses. The first measure prohibits the idling of a vehicle for more than 5 minutes at any one location. The second measure requires that TRUs operating in California become cleaner over time. The elimination of unnecessary idling and implementation of TRU emission standards significantly reduces localized impacts caused by DPM, as well as other TACs contained in diesel vehicle exhaust. It is also important to note that implementation of Mitigation Measure AQ/mm-2.3 includes measures that would significantly reduce DPM emissions associated with loading dock operations, including restriction on idling and electrification of the loading dock to power TRUs (AMBIENT 2022).

A screening-level health risk assessment (HRA) was conducted for the proposed loading dock operations to evaluate potential health risk impacts associated with DPM at the nearest residential land use, which is believed to be a structure used by agricultural farm workers located approximately 240 feet west of the loading dock and approximately 120 feet from onsite truck travel areas. The HRA was conducted using the AERMOD View, version 10.2.1, computer program from Lakes Environmental. This computer program is a graphic user interface developed by Lakes Environmental based on USEPA AERSCREEN Model 21112. The AERSCREEN model utilizes worst-case meteorological assumptions to calculate predicted concentrations. As a result, this analysis would be considered conservative.

The cancer risk value at the nearest residential dwelling was predicted to be approximately 230 in a million (AMBIENT 2022). With implementation of Mitigation Measure AQ/mm-2.3 and the use of electric plug-ins for TRUs, the cancer risk value would be 35.47 in a million. The SLOAPCD has set a significance threshold of 10 in a million (SLOAPCD 2012). Based on the screening-level analysis, predicted health risks at the nearest residential dwelling would exceed the SLOAPCD significance threshold. As a result, this impact at the nearest residential structure would be significant.

It is important to reiterate that this analysis is conservative, based on worst-case meteorological conditions and assuming that the receptor would be located down wind of the source. Prevailing winds in the project area are from the northwest to the southeast. As a result, actual health risks at this nearest residential structure would likely be less than predicted. No additional mitigation measures have been identified that would reduce this impact to a less than significant level. Therefore, this impact would be *significant and unavoidable*.

AQ Impact 8 (Class I)
The long-term operation of the project would have the potential to expose sensitive receptors to harmful localized concentrations of diesel particulate matter.
Mitigation Measures
Implement Mitigation Measure AQ/mm-2.3.
Residual Impacts
With implementation of the identified mitigation measures, impacts associated with exposure of sensitive receptors to harmful localized concentrations of diesel particulate matter would remain significant and unavoidable.

WOULD THE PROJECT RESULT IN OTHER EMISSIONS (SUCH AS THOSE LEADING TO ODORS) ADVERSELY AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?

AQ Impact 9: The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant (Class III).

The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and regulatory agencies. Projects with the potential to frequently expose members of the public to objectionable odors would be deemed to have a significant impact.

The proposed project would not result in the installation of any equipment or processes that would be considered major odor-emission sources. In addition, no known odor sources are within 1 mile of the project site. However, construction of the proposed project would involve the use of a variety of gasoline or diesel-powered equipment that would emit exhaust fumes. Exhaust fumes, particularly diesel-exhaust, may be considered objectionable by some people. In addition, pavement coatings and architectural coatings used during project construction would also emit temporary odors. However, construction-generated emissions would occur intermittently throughout the workday and would dissipate rapidly with increasing distance from the source. As a result, short-term construction activities would not expose a substantial number of people to frequent odorous emissions. For these reasons, potential exposure of sensitive receptors to odorous emissions would be *less than significant*.

AQ Impact 9 (Class III)
The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.
Mitigation Measures
Mitigation is not required.

AQ Impact 9 (Class III)
Residual Impacts
Potential impacts associated with other emissions (such as those leading to odors) would be less than significant.

4.3.5.2 Greenhouse Gas Emissions

WOULD THE PROJECT GENERATE GREENHOUSE GAS EMISSIONS THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT?

GHG Impact 1: The project would generate greenhouse gas emissions, directly and indirectly, that would have a significant impact on the environment. Impacts would be significant and unavoidable (Class I).

Estimated GHG emissions attributable to future development would be primarily associated with increases of CO_2 from mobile sources. To a lesser extent, other GHG pollutants, such as CH_4 and N_2O, would also be generated. Short- and long-term GHG emissions associated with the development of the proposed project are discussed in greater detail below.

Short-Term Construction GHG Emissions

Estimated increases in GHG emissions associated with the construction of the proposed project are summarized in Table 4.3-16. Based on the modeling conducted, construction-related GHG emissions would total approximately 7,389.3 $MTCO_2e$. Amortized GHG emissions, when averaged over the assumed 25-year minimum life of the project, would total approximately 295.6 $MTCO_2e$ per year. There would also be a small amount of GHG emissions from waste generated during construction; however, this amount is speculative. Actual emissions may vary depending on the final construction schedules, equipment required, and activities conducted. Amortized construction generated GHG emissions are included in the operational GHG emissions impact discussion provided below.

Table 4.3-16. Construction-Generated GHG Emissions Without Mitigation

Construction Year	GHG Emissions ($MTCO_2e$/Year)
2022	2,648.1
2023	1,705.1
2024	804.6
2025	792.0
2026	782.6
2027	656.9
Construction Total	7,389.3
Amortized Construction Emissions	295.6

[1] Amortized emissions are quantified based on a minimum 25-year project life. See Appendix C for modeling assumptions and results.

Long-Term Operational GHG Emissions

Estimated long-term increases in GHG emissions associated with the proposed project for Phase 1 (buildout year 2024), with Phase 2 (buildout year 2028), and future year 2030 are summarized in Table 4.3-17, with implementation of preliminary mitigation measures including 50% recycling rates and use of low-flow water fixtures and water-efficient landscaping. As depicted, operational GHG emissions for the proposed project, with the inclusion of amortized construction GHGs, would total approximately 19,359.1 $MTCO_2e$ per year during the initial year of full Phase 1 operation (year 2024), 25,439.2 $MTCO_2e$ per year during the initial year of Phase 2 operation (year 2028), and 24,460.5 $MTCO_2e$ per year for operational year 2030. A majority of the operational GHG emissions would be associated with motor vehicles. To a lesser extent, GHG emissions would also be associated with solid waste generation, energy use, and onsite stationary sources.

Table 4.3-17. Operational GHG Emissions

	GHG Emissions ($MTCO_2e$/Year)		
Operational Year/Source	**Phase 1 (Year 2024)**	**Phase 1 & II (Year 2028)**	**Future Operational (Year 2030)**
Area	0.1	0.1	0.1
Energy Use[1]	740.6	1,909.3	1,795.0
Motor Vehicles[2]	17,564.9	22,174.6	21,325.3
Waste[3]	314.4	485.0	485.0
Water[4]	443.4	574.4	559.5
Total Operational Emissions	19,063.5	25,143.6	24,164.9
Amortized Construction Emissions	295.6	295.6	295.6
Total with Amortized Construction Emissions	19,359.1	25,439.2	24,460.5
Service Population (SP)[5]	1,200	3,561	3,561
$MTCO_2e$/SP	16.1	7.1	6.9
GHG Efficiency Significance Threshold:			*2.0*
Exceeds Threshold?			**Yes**

[1] Includes natural gas use. Assumes use of Pacific Gas and Electric Company (PG&E) for energy supplier.

[2] Based on traffic report trip generation and length. Truck type was based on South Coast Air Quality Management District data on fulfillment centers.

[3] Includes a conservative assumption of a 50% recycling rate.

[4] Includes use of low-flow water fixtures and water-efficient landscaping.

[5] Based on an estimated 1,200 employees for phase 1 and the service population for year 2028 and 2030.

See Appendix C for modeling assumptions and results.

Based on the modeling conducted and assuming a total service population of 1,200 employees for Phase 1 and 3,561 employees for Phases 1 and 2, the calculated GHG efficiency for the proposed project, with the implementation of waste diversion and water efficiency mitigation measures, would be 16.1 $MTCO_2e$/SP/year in 2024, 7.1 $MTCO_2e$/SP/year in 2028, and 6.9 $MTCO_2e$/SP/year in 2030. The GHG efficiency for the proposed project would exceed the GHG Efficiency significance threshold for each year. As a result, this impact would be potentially significant.

Implementation of Mitigation Measures AQ/mm-1.1, AQ/mm-1.2, and AQ/mm-2.1 through AQ/mm-2.4 would require implementation of numerous measures that would reduce long-term operational GHG emissions, including implementation of a TDMP to reduce project-generated VMT, as well as onsite measures to reduce operational emissions. However, based on the quantity of exceedance of project-

generated GHGs above the GHG significance threshold of 2.0 $MTCO_2e$/SP/year, implementation of these measures would not reduce project emissions enough to fall below the applicable service population threshold.

Mitigation Measure GHG/mm-1.1 has been identified to require the preparation of a GHG Reduction Plan, which would include additional measures to reduce project-generated GHG emissions to below the efficiency threshold for year 2030, in accordance with the GHG-reduction targets identified by SB 32. These additional measures could include, but would not be limited to, purchase of GHG reduction credits and/or obtaining and retiring carbon offsets to offset the remaining exceedance of project-generated GHG emissions over the applicable threshold. GHG reduction credits would be required to achieve GHG emission reductions that are real, permanent, quantifiable, verifiable, and enforceable in accordance with the criteria set forth in the CARB's most recent *Process for the Review and Approval of Compliance Offset Protocols in Support of the Cap-and-Trade Regulation*. GHG reduction credits would not include reductions that would otherwise be required by law. In accordance with the applicable registry requirements, the Applicant (or its designee) would retain an independent, qualified third-party to confirm the GHG emissions reduction or sequestration achieved by the Direct GHG Reduction Activities against the applicable registry protocol or methodology. Similarly, if the Applicant chooses to obtain carbon offsets, they would be required to be purchased from CARB-approved registries and would comply with CARB-approved protocols to ensure that offset credits accurately and reliably represent actual emissions reductions.

However, given the uncertainty of the availability of GHG reduction credits and/or offset credits and the ability to lower GHG emissions to below the efficiency threshold for year 2030 in accordance with the GHG reduction targets identified by SB 32, potential impacts associated with the generation of GHG emissions would remain *significant and unavoidable*.

GHG Impact 1 (Class I)	
The project would generate greenhouse gas emissions, directly and indirectly, that would have a significant impact on the environment.	
Mitigation Measures	
Implement Mitigation Measures AQ/mm-1.1, AQ/mm-1.2, and AQ/mm-2.1 through AQ/mm-2.4.	
GHG/mm-1.1	*A Greenhouse Gas (GHG) Reduction Plan shall be prepared for the proposed project. The GHG Reduction Plan shall include a menu of possible onsite GHG reduction measures sufficient to reduce operational emissions to below the GHG efficiency significance threshold identified in The Land Paso Robles Final Environmental Impact Report of 2.0 metric tons of carbon dioxide equivalents ($MTCO_2e$) per service population per year (SP/year). In the event that the City of Paso Robles (City) adopts an updated Climate Action Plan or the San Luis Obispo Air Pollution Control District (SLOAPCD) releases updated recommended GHG significance thresholds that addresses future-year 2030 GHG emissions reductions, the GHG-Reduction Plan shall be evaluated in comparison to the GHG thresholds and reduction measures identified in the Climate Action Plan or those identified by the SLOAPCD and adjusted if an efficiency threshold of 2.0 $MTCO_2e$/SP/year is no longer necessary in order for the project to be in compliance with the Climate Action Plan. The GHG Reduction plan shall be approved by the City prior to issuance of building construction permits. The list of GHG-reduction measures to be included in the GHG Reduction Plan shall include, but not be limited to, those identified in Mitigation Measures AQ/mm-1.1, AQ/mm-1.2, and AQ/mm-2.1 through AQ/mm-2.4, as well as the following:* 1. *Up to the extent allowed by the building code at the time of development, incorporate natural lighting in buildings to minimize daytime lighting demand.*

GHG Impact 1 (Class I)
2. *Design outdoor lighting shall be designed to minimize electrical demand, such as the use of solar-powered lighting and lighting controlled by motion sensors.* 3. *Meet or exceed building code requirements for solar installation.* 4. *Elect to receive electricity from Central Coast Community Energy (3CE).* 5. *To the extent possible, install electrically powered appliances and building mechanical equipment in place of natural-gas fueled equipment.* 6. *Provide organic waste pick up and the appropriate onsite enclosures consistent with the provisions of the City of Paso Robles Development Standards for Solid Waste Services.* *A GHG emissions calculation per SP shall be submitted by the Applicant with each building permit application. If the emissions exceed the efficiency threshold identified in the GHG Reduction Plan, under California Environmental Quality Act Guidelines Section 15126.4(c)(3) and (c)(4), respectively, a project's GHG emissions can be reduced by offsite measures, including offsets that are not otherwise required and measures that sequester GHGs. In the event that feasible onsite GHG-reduction measures are insufficient to reduce operational GHG emissions to below the City of Paso Robles's threshold of significance, offsite mitigation measures may be included. Offsite mitigation measures may include "Direct Reduction Activities" or the purchase of "Carbon Offset Credits" and discussed further, as follows:* 1. ***Direct Reduction Activities.*** *Directly undertake or fund activities that will reduce or sequester GHG emissions. GHG reduction credits shall achieve GHG emission reductions that are real, permanent, quantifiable, verifiable, enforceable, in accordance with the criteria set forth in the most recent California Air Resources Board (CARB) Process for the Review and Approval of Compliance Offset Protocols in Support of the Cap-and-Trade Regulation (2013). GHG reduction credits shall be undertaken for the specific purpose of reduction project-generated GHG emissions and shall not include reductions that would otherwise be required by law. All Direct Reduction Activities and associated reduction credits shall be confirmed by an independent, qualified third party.* *The "Direct Reduction Activity" shall be registered with a CARB-approved registry and in compliance with CARB-approved protocols. In accordance with the applicable Registry requirements, the Applicant (or its designee) will retain an independent, qualified third-party to confirm the GHG emissions reduction or sequestration achieved by the Direct GHG Reduction Activities against the applicable Registry protocol or methodology. The Applicant (or its designee) will then apply for issuance of carbon credits in accordance with the applicable registry rules.* 2. ***Carbon Offsets.*** *Obtain and retire "Carbon Offsets." Carbon offsets shall achieve GHG reductions that are real, permanent, quantifiable, verifiable, and enforceable. Carbon offsets shall be purchased from CARB-approved registries and shall comply with CARB-approved protocols to ensure that offset credits accurately and reliably represent actual emissions reductions. If the purchase of carbon offsets is selected, offsets shall be purchased according to the following preference: (1) within the City of Paso Robles; (2) within the SLOAPCD jurisdictional area; (3) within the State of California; (4) elsewhere in the United States; and then (5) through a United Nations approved offset program. In the event that a project or program providing offsets to the Applicant loses its accreditation, the Applicant shall comply with the rules and procedures of retiring offsets specific to the registry involved and shall purchase an equivalent number of credits to recoup the loss.*
Residual Impacts
Due to the uncertainty of the availability of GHG reduction credits and/or offset credits and the ability to lower GHG emissions to below the efficiency threshold for year 2030 in accordance with the GHG reduction targets identified by SB 32, potential impacts associated with the generation of GHG emissions would remain significant and unavoidable.

WOULD THE PROJECT CONFLICT WITH AN APPLICABLE PLAN, POLICY, OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING EMISSIONS OF GREENHOUSE GASES?

GHG Impact 2: The project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions. Impacts would be significant and unavoidable (Class I).

Operational GHG emissions attributable to the proposed project would be primarily associated with mobile sources. Applicable GHG reduction plans related to reducing operational GHG emissions is the *City of Paso Robles Climate Action Plan* and the *County of San Luis Obispo's Regional Transportation Plan/Sustainable Communities Strategy*. The project's consistency with these plans is discussed in detail below.

City of Paso Robles Climate Action Plan

The City's Climate Action Plan is a long-range plan to reduce GHG emissions from City government operations and community activities within the city. The City's Climate Action Plan includes numerous measures to reduce GHG emissions associated with energy use, motor vehicle use, water use, waste generation, and construction. It is important to note, however, that the City's Climate Action Plan is based on year 2020 GHG-reduction targets and has not yet been updated to reflect year 2030 GHG-reduction targets, per SB32 and therefore is not considered a Qualified Greenhouse Gas Reduction Strategy and cannot be used as a GHG significance threshold. A summary of the proposed project's consistency with the measures identified in the City's Climate Action Plan are summarized in Table 4.3-18.

Table 4.3-18. Project Consistency with the City's Climate Action Plan

Climate Action Plan Measures	Project Consistency
Energy Measures	
Does the Project include an operational commitment to reduce energy demand and increase onsite energy supply?	**Consistent with Mitigation**. Mitigation measures have been identified to reduce onsite energy use/demand and to increase onsite energy supply by requiring installation of renewable energy systems. Mitigation Measure AQ/mm-1.2 has been identified to require an operational commitment to use energy efficient appliances and Mitigation Measure GHG/mm-1.1 includes a provision to install electric appliances and building equipment in place of natural gas appliances/equipment to the extent possible.
Does the Project exclusively include "All-electric buildings"?	**Consistent with Mitigation.** Mitigation Measure GHG/mm-1.1 includes a provision to install electric appliances and building equipment in place of natural gas appliances/equipment to the extent possible. In addition, Mitigation Measure AQ/mm-1.2 includes provisions to promote the installation of infrastructure to facilitate the future installation of alternative energy sources, such as the installation of photovoltaic systems.
If the Project/Plan includes a new mixed-fuel building or buildings (plumbed for the use of natural gas as fuel for space heating, water heating, cooking or clothes drying appliances) does that building/those buildings meet or exceed the City's Energy Reach code?	
Transportation and Land Use Measures	
Does the Project comply with requirements in the City's Municipal Code with no exceptions, including bicycle parking, bikeway design, and EV charging stations?	**Consistent with Mitigation.** Mitigation Measure AQ/mm-1.2 includes provisions to require compliance and/or exceedance of applicable building codes related to bicycle parking, bikeway design, and electric vehicle (EV) charging stations.

Climate Action Plan Measures	Project Consistency
Is the estimated Project-generated Vehicle Miles Traveled (VMT) within the City's adopted thresholds, as confirmed by the City's Transportation Division?	**Consistent with Mitigation.** Mitigation Measure AQ/mm-1.1 has been identified to require the preparation and implementation of a TDMP, which would include measures for reducing project-generated VMT through onsite transportation and circulation improvements and programs. The TDMP would include strategies and/or payment of traffic fees sufficient to achieve the City's adopted thresholds. The TDMP would be subject to the review and approval by the City's Transportation Division prior to implementation.
If "No," does the Project/Plan include VMT mitigation strategies and/or a Transportation Demand Management Plan (TDMP) approved by the City's Transportation Division?	
Does the Project demonstrate consistency with the City's Bicycle Network Plan?	**Consistent with Mitigation.** The City Bicycle Network Plan does not identify any proposed bicycle improvement projects within or adjacent to the project site. Mitigation Measure AQ/mm-1.2 includes provisions to require compliance and/or exceedance of applicable building codes related to bicycle parking and bikeway design.
Off-Road Measure	
Will the Project work to reduce GHG emissions by reducing off-road equipment and vehicle usage and idling?	**Consistent with Mitigation.** Mitigation Measures AQ/mm-1.2 and AQ/mm-2.3 have been identified to require the project to restrict idling and vehicle usage.
Water Measure	
Does the Project comply with water efficiency and conservation requirements?	**Consistent with Mitigation**. Mitigation Measure AQ/mm-1.2 has been identified to require the use of low-flow water fixtures, water efficient irrigation systems, and drought-tolerant landscaping.
Waste Measure	
Does the Project include an operational commitment to reduce the amount of trash and other waste and recycle as many materials as possible?	**Consistent.** The project would provide organic waste pick-up and shall provide the appropriate onsite enclosures consistent with the provisions of the City of Paso Robles Development Standards for Solid Waste Services.
Tree Planting Measure	
Does the Project include an operational commitment to maintain a healthy urban forest and incorporate native drought tolerant trees?	**Consistent with Mitigation.** The project would be subject to the tree removal and replacement regulations set forth in the City's municipal code. Mitigation Measure AQ/mm-1.2 includes provisions to require installation of trees and drought tolerant landscaping.

As shown in Table 4.3-18, with implementation of proposed mitigation measures, the project would be consistent with the GHG-reduction measures identified in the City's currently adopted Climate Action Plan (City of Paso Robles 2013) and impacts associated with consistency would be *less than significant with mitigation.*

County of San Luis Obispo 2019 Regional Transportation Plan/Sustainable Communities Strategy

The 2019 RTP includes the region's SCS, which outlines how the region will meet or exceed its GHG reduction targets as required by SB 375 through the promotion of a variety of transportation demand management and system management tools and techniques to maximize the efficiency of the transportation network. Consistency with the requirement of SB 375 ensures consistency with the GHG-reduction targets set by the CARB. The 2019 SCS was found to be consistent with the requirement of SB 375 and is also consistent with the general plans of the region's jurisdictions (SLOCOG 2019).

According to the San Luis Obispo County RHNA, the City has about 15% more housing units than jobs, indicative of a "jobs-poor" community. The north county's housing-to-jobs ratio is estimated to increase

from a year 2015 ratio of 0.87 jobs/housing to a ratio of 0.89 jobs/housing by year 2035, thereby decreasing the imbalance between jobs and housing units.

The proposed project would result in increased employment opportunities and would not result in an increase in housing. As a result, the proposed project would be anticipated to improve the city's jobs-housing imbalance. However, the project is projected to result in an overall increase in regional VMT. A VMT analysis was prepared for this project by CCTC, which included an analysis of project generated VMT and potential impacts on regional VMT reduction efforts (CCTC 2023). Accordingly, exceedance of the City's VMT threshold of 15% below the regional average VMT/SP would conflict with regional VMT-reduction efforts and associated reductions in mobile-source emissions accounted for in the 2001 CAP.

Estimated regional average VMT modeling results, with and without project implementation, are summarized in Table 4.3-8. Table 4.3-9 presents a summary of project VMT impacts. As depicted, the regional average VMT/SP would remain at 22.56 with project implementation. However, project-generated VMT would exceed the significance threshold of 19.18 VMT/SP (15% below the regional average). As a result, the proposed project would not be consistent with VMT projections and reduction efforts upon which the RTP/SCS is based. In addition, as noted in GHG Impact 1, project-generated GHG emissions would exceed the year 2030 service population threshold, which reflects GHG reductions established per SB 32. For these reasons, the proposed project could conflict with statewide and regional GHG-reduction efforts. As a result, this impact would be potentially significant.

Implementation of Mitigation Measure AQ/mm-1.1 would require the preparation of a TDMP, which would include measures sufficient to reduce the project's overall VMT to below the City's threshold of significance. In addition, implementation of Mitigation Measures AQ/mm-1.2 and GHG/mm-1.1 would further reduce project-generated GHG emissions to ensure consistency with future year 2030 GHG-reduction targets. However, given the uncertainty of the availability of GHG-reduction credits and/or offset credits, potential impacts associated with the generation of GHG emissions would remain *significant and unavoidable*.

GHG Impact 2 (Class I)
The project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions.
Mitigation Measures
Implement Mitigation Measures GHG/mm-1.1, AQ/mm-1.1, AQ/mm-1.2, AQ/mm-2.4, and AQ/mm-2.5.
Residual Impacts
Potential impacts associated with conflicts with an applicable policy or regulation adopted for the purpose of reducing GHG emissions would be significant and unavoidable.

4.3.6 Cumulative Impacts

4.3.6.1 Air Quality

As discussed in *Chapter 3, Environmental Setting*, the cumulative impact analysis is based on the City's cumulative projects list. Cumulative projects would generate residential, industrial, and commercial development within the city. If a project does not exceed applicable SLOAPCD emissions thresholds and is consistent with the 2001 CAP, it would not have a cumulatively considerable impact on air quality within the air basin. Alternatively, if a project is projected to exceed any applicable SLOACPD emissions

thresholds or is found to be inconsistent with the 2001 CAP, the project would have the potential to result in a cumulatively considerable environmental impact associated with air quality. The proposed project would be inconsistent with the elements of the 2001 CAP because implementation of the proposed project would be inconsistent with regional VMT reduction efforts because implementation of the project would increase regional VMT in excess of applicable per capita thresholds. Mitigation Measures AQ/mm-1.1 and AQ/mm-1.2 has been included to reduce VMT generated by the project; however, no mitigation measures have been identified that would reduce these impacts to below applicable thresholds. Therefore, reasonably foreseeable future projects within the city have the potential to further exceed established VMT reduction requirements. Reasonably foreseeable future projects would be subject to separate environmental review to determine consistency with applicable air quality plans and would be required to implement measures, as necessary, to ensure consistency with established plans, policies, and goals included in those plans. However, other reasonably future projects would likely increase regional VMT. Therefore, cumulative impacts would be significant and unavoidable.

Mitigation Measures AQ/mm-2.1 through AQ/mm-2.4 have been included to reduce operational emissions where feasible; however, operation of the proposed project would result in the exceedance of daily and quarterly emissions thresholds established by the SLOAPCD. This exceedance is primarily attributed to the increase in mobile source (i.e., vehicle use) emissions generated by the project. Other reasonably foreseeable future projects have the potential to contribute pollutant emissions and further exceed established thresholds. Reasonably foreseeable future projects would be subject to separate environmental review to determine potential long-term sources of pollutant emissions and would be required to reduce pollutant emissions as necessary and feasible. Since other reasonably foreseeable future projects are anticipated to generate substantially less VMT, implementation of long-term emission reduction strategies would likely mitigate impacts to below established SLOAPCD emissions thresholds. However, due to project-specific significant impacts, the project would have a cumulatively considerable effect on air quality and cumulative impacts would be potentially significant.

As discussed under AQ Impact 8, the project would have the potential to expose sensitive receptors to substantial pollutant concentrations associated with long-term operational localized diesel particulate matter emissions, resulting in a long-term significant and unavoidable impact. AQ Impact 8 would be cumulatively considerable impacts when considered in combination with current and future development projects proximate to the project area described in Section 3.3.2, *Cumulative Development Scenario* of this EIR. Therefore, cumulative impacts associated with air quality would be significant and unavoidable. Refer to AQ Impact 8 for a discussion of the human health impacts related to the project's significant and unavoidable air quality impacts.

4.3.6.2 Greenhouse Gas Emissions

If a project does not exceed an applicable GHG efficiency threshold developed based on current SB 32 emissions targets and is consistent with state and local policies adopted for the purpose of reducing the emissions of greenhouse gases, it would not have a cumulatively considerable impact associated with GHG emissions. Alternatively, if a project would exceed applicable GHG efficiency threshold or conflicts with an applicable GHG reduction plan or policy, it would have the potential to result in a cumulatively considerable impact associated with GHG emissions. As discussed in GHG Impact 1 above, the project would have the potential to generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Mitigation measures have been identified to reduce project-generated operational GHG emissions through implementation of onsite improvements and programs, and development and implementation of a GHG Reduction Plan, which may include direct reduction activities and/or purchase of carbon offsets.

Even with implementation of identified mitigation, project GHG emissions would not be guaranteed due to the uncertainty of the availability of GHG reduction credits and/or offset credits and potential impacts

associated with the generation of GHG emission would exceed the GHG efficiency threshold developed in accordance with SB 32 reduction targets. Other individual future projects would be subject to separate environmental review to determine individual impacts related to consistency with the 2019 RTP/SCS and implement reduction measures as necessary and feasible. Other reasonably foreseeable future projects are not anticipated to generate VMT of the scale of the proposed project in terms of total miles traveled; however, reasonably foreseeable future projects within the city still have the potential to contribute VMT and further exceed established thresholds. Since other reasonably foreseeable future projects are anticipated to generate substantially less VMT in terms of total miles traveled, implementation of long-term VMT reduction strategies would likely mitigate impacts to below established VMT thresholds. However, due to project-specific significant impacts, the project's contribution to cumulative impacts would be significant and unavoidable.

4.4 BIOLOGICAL RESOURCES

This section examines the potential effects to biological resources associated with the proposed project and evaluates potential impacts to biological resources that are reasonably foreseeable to result from development of the site directly or indirectly. This analysis considers natural communities, jurisdictional waters, critical habitats, and special-status species that are known to occur or have the potential to occur on the project site.

The information in this section is primarily based on the *Biological Resource Assessment for the Landing Paso Robles* (Althouse and Meade 2022a; Appendix D), *Delineation of Potentially Jurisdictional Wetlands and Waters for the Landing Paso Robles* (Althouse and Meade 2022b; Appendix D), *Protocol-Level Dry-Season Sampling for Federally-Listed Large Branchiopods at the Paso Robles Boys School Project* (Helm Biological Consulting 2021; Appendix D), and *U.S. Army Corps of Engineers 404 Permit Application Federal Endangered Species Act Section 7 Biological Assessment for the Threatened Vernal Pool Fairy Shrimp* (David Wolff Environmental 2021; Appendix D).

4.4.1 Existing Conditions

4.4.1.1 Project Site Setting

The project site is located in the northeastern portion of the city of Paso Robles, north of SR 46E and northwest of the intersection of Airport Road and Dry Creek Road. The project site has a long history of development and land disturbance resulting in a dominance of non-native annual weedy grasses and forbs. The main campus of the former Paso Robles Boys School is approximately 65 acres, and is fully developed with numerous building structures, paved streets and concrete sidewalks, a dirt track, and outdoor recreational facilities (Figures 4.4-1 and 4.4-2) (Althouse and Meade 2022a). A maintenance facility serving the campus occupies approximately 2.8 acres adjacent to the main campus and six currently vacant homes are located along the western portion of the project site that were previously inhabited by school employees. A small section of Huer Huero Creek flows adjacent to the southwest end of the project site and in an area of proposed offsite project disturbance.



Figure 4.4-1. View of the southeast portion of the project site, facing west (April 2, 2021).



Figure 4.4-2. View of fenced Paso Robles Boy School campus facilities on the northeast portion of the project site, facing east (April 2, 2021).

Table 4.4-1 lists the four habitat types identified and mapped within the project site (Figure 4.4-3). Most of the project site, approximately 85.0 acres, is mapped as annual grassland habitat. The remaining area consists of approximately 72.0 acres of urban habitat, 5.8 acres of oak savanna, 0.7 acre of riverine habitat, and 0.1 acre of freshwater emergent wetland habitat.

Table 4.4-1. Habitat Types

Habitat Type	Approximate Area (Acres)
Freshwater emergent wetland	0.1
Riverine	0.7
Annual grassland	85.0
Oak Savanna	5.8
Urban	72.0
Total	**163.6 (includes offsite improvement areas, collectively referred to as project area)**

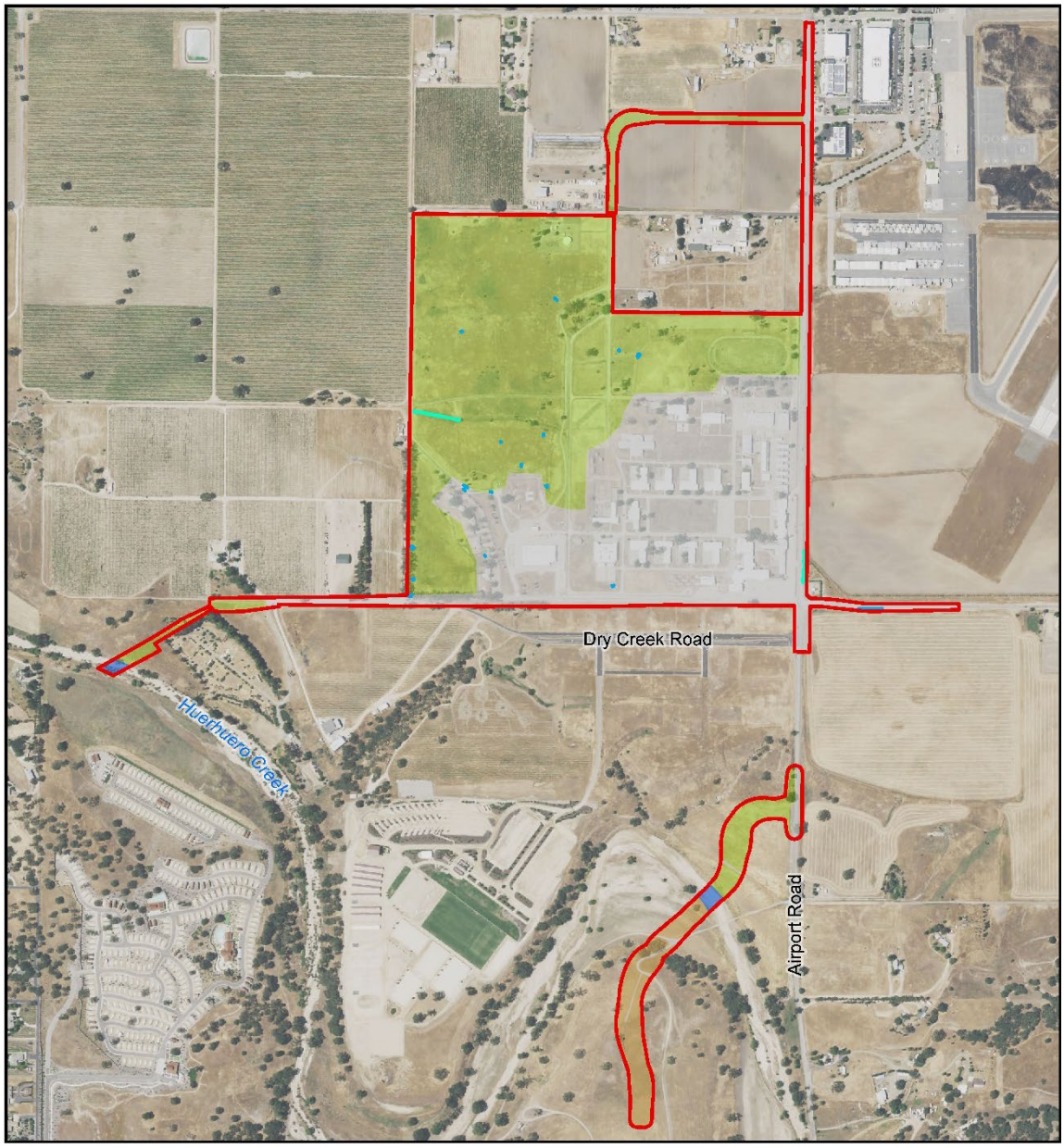


Figure 4.4-3. Project site and adjacent offsite improvement areas habitat communities.

4.4.1.1.1 ANNUAL GRASSLAND

Annual grasses and forbs comprised mainly of ruderal species is the dominant vegetation type in the north and west portions of the project site and adjacent to Airport Road in the area of the modified Class I Multiuse Trail low water crossing (Figure 4.4-4), occupying approximately 85.0 acres. Due to the non-native annual grassland presence, this habitat type most closely conforms to wild oats and annual brome grasslands (*Avena* spp. – *Bromus* spp. Semi-natural herbaceous stands). Common species include ripgut brome (*Bromus diandrus*), soft chess brome (*B. hordeaceus*), red brome (*B. madritensis*), oats (*Avena barbata, A. fatua*), filaree (*Erodium brachycarpum, E. cicutarium),* and rattail sixweeks grass (*Festuca myuros).* Other weedy forb species common throughout the project site include yellow starthistle (*Centaurea solstitialis*), tocalote *(C. melitensis*), short-podded mustard (*Hirschfeldia incana*), Italian thistle (*Carduus pycnocephalus* ssp. *Pycnocephalus*), and tumbleweed (*Amaranthus albus*). Scattered coyote brush (*Baccharis pilularis*), valley oak (*Quercus lobata*), coast live oak (*Q. agrifolia*), blue oak (*Q. douglasii*), and canyon oak *(Q. chrysolepis*) are present, at low densities, within annual grassland on the project site. A row of blue gum trees (*Eucalyptus globulus*) is present on the south and western property lines (Althouse and Meade 2022a).



Figure 4.4-4. View of annual grassland habitat onsite, facing northwest (April 1, 2021).

4.4.1.1.2 URBAN

Urban areas within the project site include the main Paso Robles Boys School campus, maintenance facilities, a small well pad, and a row of residential homes along the southwestern side of the project site (Figure 4.4-5), occupying approximately 72.0 acres. Habitat within these areas has been modified with ornamental landscape plants. Common species include valley oak, cork oak (*Quercus suber*), and blue gum. Areas of bare soil are present around the maintenance facility and well pad. Several paved roads bisect the main campus, and paved roads are present around the perimeter of the project site with one dirt road bisecting east to west across the project site. Segments of Airport and Dry Creek Roads are part of the project proposed for improvements and are included in the urban habitat type (Althouse and Meade 2022a).



Figure 4.4-5. View of existing school facilities onsite, facing west (April 2, 2021).

4.4.1.1.3 OAK SAVANNA

Oak savanna comprises approximately 5.8 acres of the offsite improvement area. This habitat occurs along the east- and north-facing slopes at the site of the proposed modified Class I Multiuse Trail low water crossing (Figure 4-4.6). Oak savanna is generally defined as a plant community where oak trees are a component, but at such low density that other herbaceous vegetation becomes dominant. Open-canopy areas within the oak savanna habitat are dominant with California annual grassland species (see *Section 4.4.1.1.1, Annual Grassland*), with an abundance of clustered tarweed (*Deinandra fasciculata*) and Salinas tarplant (*Deinandra pentactisi*) and occasional jimsonweed (*Datura wrightii*) (Althouse and Meade 2022a).



Figure 4.4-6. View of oak savanna habitat (June 17, 2022).

4.4.1.1.4 RIVERINE

Riverine habitat within the project area includes a small, 0.3-acre portion of Huer Huero Creek southwest of the project site in an area proposed for stormwater improvements and in a 0.4-acre area in the channel of the Huer Huero Creek in the area proposed for the modified Class I Multiuse Trail low water crossing. Riverine habitat is predominantly unvegetated within the low flow channel (Figure 4.4-7). Mule fat shrubs (*Baccharis salicifolia* ssp. *Salicifolia*) are scattered within the active floodplain, and one valley oak tree is present on the north bank of the creek. Herbaceous species including brome grasses and short-podded mustard are present within the active floodplain.

The entire riverine habitat area is considered waters of the United States and State under Clean Water Act (CWA) Sections 404 and 401.



Figure 4.4-7. View of Huer Huero Creek riverine habitat, facing east (August 5, 2021).

4.4.1.1.5 FRESHWATER EMERGENT WETLAND

Approximately 0.1 acre of wetland habitat that meets U.S. Army Corps of Engineers (USACE) definitions is present on the project site, consisting of two manmade stormwater features that meet the USACE three-factor wetland criteria for hydrology, hydric soils, and hydrophytic vegetation (Figure 4.4-8). Wetland features were determined to have a federal jurisdiction in light of recent regulatory changes to federal wetland definitions, where a significant nexus may include wetlands within non-wetland waters where culverts are used to pass flow and/or visible connectivity is observable on aerial photography (Althouse and Meade 2022b).

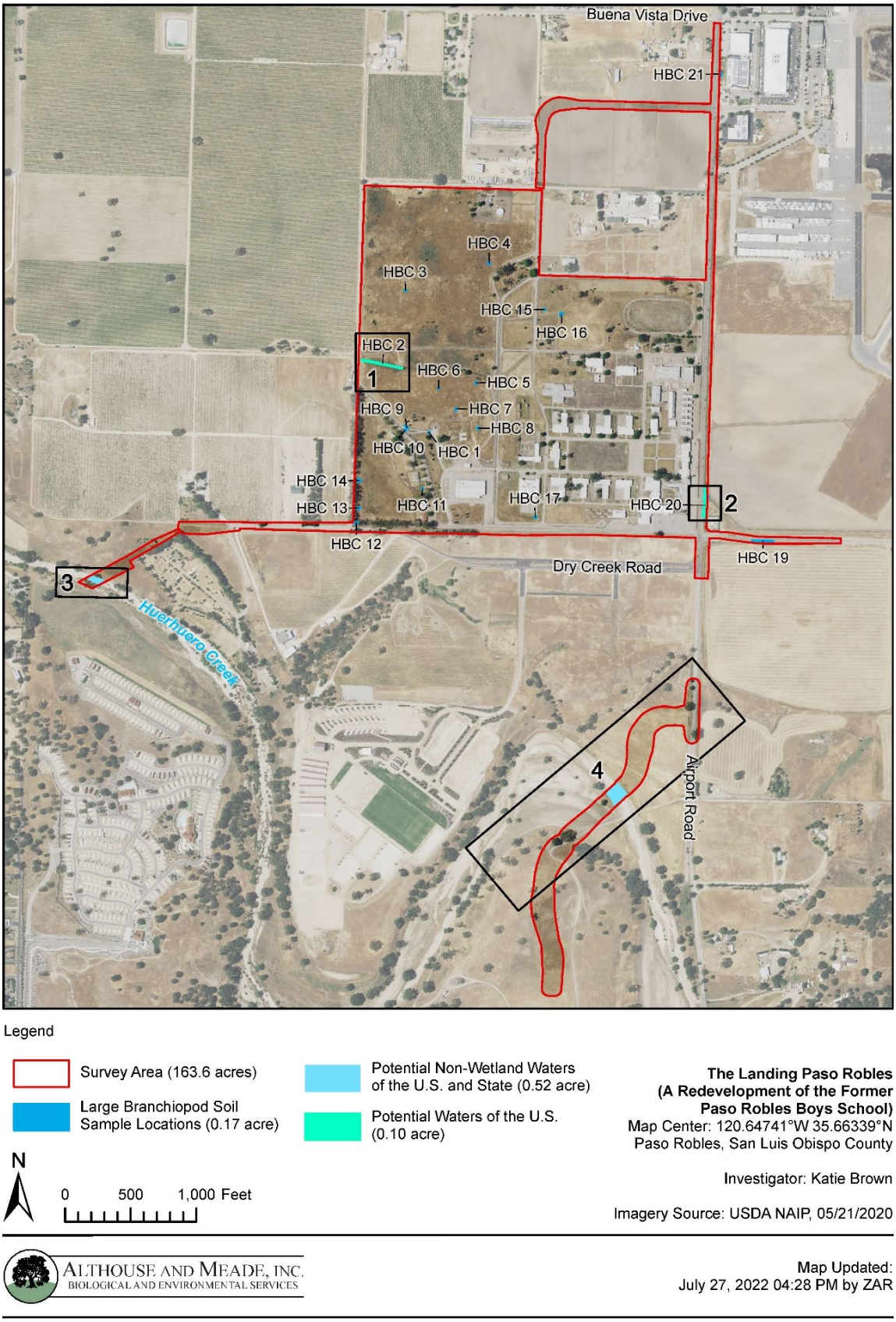


Figure 4.4-8. Jurisdictional aquatic features overview.

Approximately 0.05-acre of freshwater emergent wetland is present along Airport Road (identified as HBC 20; Figure 4.4-9). This wetland is formed within a manmade stormwater drainage ditch along the eastern edge of Airport Road, where a City-owned and maintained well flushes routinely. Common plant species within this wetland feature include tall flat sedge (*Cyprus eragrostis*), Olney's three-square bulrush (*Schoenoplectus americanus*), English plantain (*Plantago lanceolata*), Parish's spikerush (*Eleocharis parishii*), fringed willowherb (*Epilobium ciliatum* subsp. *ciliatum*), cattail (*Typha* sp.), and stinkwort (*Dittrichia graveolens*). As determined by the presence of hydrophytic vegetation, the stormwater drainage feature is a low topographic area where water ponds for long periods; however, no scouring or distinct bed and bank features are visible. This wetland is classified as palustrine (inland, non-tidal, freshwater), emergent, with persistent emergent vegetation (erect, rooted, herbaceous aquatic plants; Althouse and Meade 2022b).



Figure 4.4-9. View of the freshwater emergent wetland along Airport Road, facing south (June 24, 2021).

A second wetland feature occurs as a low-quality wetland of approximately 0.05 acre within a manmade stormwater drainage ditch in annual grassland habitat, discharging off the west end of the project site (identified as HBC 2) (Figure 4.4-10). A double culvert was installed at the western edge of the project site to transport stormwater under a paved road into a small drainage ditch on an adjacent property that terminates in a neighboring vineyard. Water ponds at the culvert inlet creating a small, 0.05 acre, three-factor wetland within the drainage. This wetland feature extends east by approximately 315 feet from the culvert where a row of coyote brush naturally crosses the drainage feature to create an eastern boundary and the culvert creates the western boundary. This wetland is classified as palustrine, emergent, with non-persistent vegetation (Althouse and Meade 2022b).

After a site inspection on September 22, 2021, with the Central Coast Regional Water Quality Control Board (CCRWQCB), it was determined that the onsite wetland features are a result of manmade stormwater drainages that would lose function should the water input cease. Based on the non-historic and non-permanent attributes of these features, the CCRWQCB determined that these onsite wetlands do not meet the definition for state wetlands and therefore are not jurisdictional by the State of California (Althouse and Meade 2022b).



Figure 4.4-10. View of the western wetland feature in the stormwater drainage ditch, facing west (April 2, 2021).

4.4.1.2 Special-Status Species

The Federal Endangered Species Act (FESA) provides legislation to protect federally listed plant and animal species. The California Endangered Species Act (CESA) ensures legal protection for plants listed as rare or endangered and wildlife species formally listed as endangered or threatened, and also maintains a list of California Species of Special Concern (SSC). SSC status is assigned to species that have limited distribution, declining populations, diminishing habitat, or unusual scientific, recreational, or educational value. Under state law, the California Department of Fish and Wildlife (CDFW) has the authority to review projects for their potential to impact special-status species and their habitats. The CDFW also maintains a Watch List for species that were previously SSC but no longer merit SSC status, or which do not meet SSC criteria but for which there is concern and a need for additional information to clarify status. Lastly, the CDFW also identifies a Fully Protected classification to identify and provide additional protection to those animals that were rare or faced possible extinction. Fully Protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for scientific research, for relocation of the bird species for the protection of livestock, or if they are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan.

The California Native Plant Society (CNPS) maintains a list of plant species ranging from presumed extinct to limited distribution, based on the following:

California Rare Plant Ranks (CRPR):

- 1A: Plants presumed extirpated in California and either rare or extinct elsewhere
- 1B: Plants rare, threatened, or endangered in California and elsewhere
- 2A: Plants presumed extirpated in California, but common elsewhere
- 2B: Plants rare, threatened, or endangered in California, but more common elsewhere
- 3: Plants about which more information is needed
- 4: Plants of limited distribution – a watch list

California Rare Plant Threat Sub-Ranks:

- 0.1: Seriously threatened in California
- 0.2: Moderately threatened in California
- 0.3: Not very threatened in California

For the purposes of this EIR, special-status species are those plants and animals listed, proposed for listing, or candidates for listing as threatened or endangered by the U.S. Fish and Wildlife Service (USFWS) under the FESA; those listed or proposed for listing as rare, threatened, or endangered by the CDFW under the CESA; animals designated as "SSC," "Fully Protected," or "Watch List" by the CDFW; and plants with a CRPR of 1, 2, 3, or 4. In addition, native oak trees are also afforded some protections through the City's Oak Tree Preservation Ordinance, so they are also considered a sensitive species.

4.4.1.2.1 LITERATURE AND DATA REVIEW

A data search of the California Natural Diversity Database (CNDDB) and the CNPS Online Inventory of Rare and Endangered Plants of California was conducted on July 27, 2021. Supplemental occurrence data included online herbarium records maintained by the Consortium of California Herbaria, and publicly available consultant reports from the region (Althouse and Meade 2022a). The search area included the Paso Robles, California USGS 7.5-minute quadrangle and the eight surrounding quadrangles (Adelaida, Bradley, Creston, Estrella, Ranchito Canyon, San Miguel, Templeton, and York Mountain).

4.4.1.2.2 SPECIAL-STATUS SPECIES EVALUATION

Special-status species lists produced by database and literature searches were cross-referenced and analyzed according to the described habitat types in the project site in order to identify all potential special-status species that could occur in or near the project site. After review of the literature, and completing site visits, the following criteria were used to determine the potential for special-status species to occur within the project site:

- **Present:** The species was observed in the project area during field surveys.
- **High Potential:** Highly suitable habitat and CNDDB or CNPS occurrence records indicate the species is likely to occur in the project area or the immediate vicinity. Individuals may not have been observed during field surveys; however, the species likely occurs in or immediately adjacent to the project area and (for wildlife) could move into the project area in the future.
- **Moderate Potential:** Moderately suitable habitat is present in the project area and CNDDB occurrences or surveys have recorded the species in the vicinity of the project area. Individuals were not observed during field surveys, but the species could be present, at least seasonally or as a transient.
- **Low Potential:** Marginally suitable habitat is present in the project area, and there are no occurrence records or other historical (i.e., 50 years or older) records in the vicinity of the project area. Individuals were not observed during surveys and are not expected to be present.
- **No Potential:** Suitable habitat for the species is not present in the project area, and/or the species is not known to occur in the region.

4.4.1.2.3 SPECIAL-STATUS PLANT SPECIES

Literature and data review on special-status plant occurrences conducted within the vicinity of the project site determined 44 special-status plant species are known to occur in the region. Botanical surveys were conducted on April 22, 2021, by SWCA and on April 22, June 9, and June 24, 2021, and June 17, 2022,

by Althouse and Meade Based on an analysis of known ecological requirements for the special-status plant species reported from the region, and the habitat conditions that were observed in the project site, it was determined that five special-status plant species have some potential to occur in the project area. One special-status plant species has a moderate potential to occur— Shining navarretia (*Navarretia nigelliformis* ssp. *radians*)—and four species have a low potential to occur—Douglas' fiddleneck (*Amsinckia douglasiana*), San Luis Obispo owl's clover (*Castilleja densiflora* ssp. *obispoensis*), Lemmon's jewelflower (*Caulanthus lemmonii*), and Spreading navarretia (*Navarretia fossalis*)—described below (Althouse and Meade 2022a).

Shining Navarretia

Shining navarretia is a CRPR 1B.2 subspecies endemic to California, primarily occurring in central California. It is known to occur in vernal pools, grassland, and cismontane woodland habitats, often on clay and alkaline sites between elevations of 65 and 1,000 meters. It is an annual herb that typically blooms between March and July. The closest known record is less than 1 mile south of the project site. The annual grassland is moderately suitable in the project site; however, clay substrate is not present onsite (the site is characteristically sandy loam). This species was not detected in the project site during the 2021 or 2022 surveys (Althouse and Meade 2022a).

Douglas' Fiddleneck

Douglas' fiddleneck is a CRPR 4.2 species endemic to California. It is known to occur on dry, unstable shaly sedimentary slopes in grassland and woodland habitats below elevations of 1,850 meters. It is an annual herb that typically blooms between March and May. The closest known record is approximately 1.7 miles southeast of the project site. The disturbed annual grassland in the project site may provide low suitability for this species; however, the site lacks shaly sedimentary slopes. This species was not detected in the project site during the 2021 or 2022 surveys (Althouse and Meade 2022a).

San Luis Obispo Owl's Clover

San Luis Obispo owl's clover is a CRPR 1B.2 subspecies endemic to San Luis Obispo County. It is known to occur in coastal grasslands on sandy or clay soils. It is an annual hemi-parasitic herb that typically blooms between March and May. Three subspecies of *Castilleja densiflora* occur in San Luis Obispo County; only the white form, San Luis Obispo owl's clover, is considered rare. It is not generally known from inland areas, where purple forms are more common (*Castilleja densiflora* ssp. *densiflora* and *C. densiflora* ssp. *gracilis*); however, there are reports from the Paso Robles and Camp Roberts regions. CNDDB occurrence 42 is from a specimen collection just south of the project site near the north end of Airport Road. This subspecies was also detected in 2011 along the east bank of Huer Huero Creek, adjacent to the Paso Robles Horse Park. There is only marginally suitable habitat present in grassland in the project site. Based on known records and marginal habitat, there is low potential for this subspecies to occur within the project site. San Luis Obispo owl's clover was not detected in the project site during the 2021 or 2022 surveys (Althouse and Meade 2022a).

Lemmon's Jewelflower

Lemmon's jewelflower is a CRPR 1B.2 subspecies endemic to California. It is known to occur on dry, exposed slopes in grassland and pinyon and juniper woodland habitats. It is an annual herb that typically blooms between February and May. The closest known record is approximately 1 mile south of the project site, although the exact location is not known. It is a 1960 record and describes the plants as occurring on a steep grassy hillside with oak trees. Appropriate grassland habitat is present within the project site and there is low potential for Lemmon's jewelflower to occur. Lemmon's jewelflower was not detected in the project site during the 2021 or 2022 surveys (Althouse and Meade 2022a).

Spreading Navarretia

Spreading navarretia is listed as threatened under FESA and is a CRPR 1B.1 species that occurs from southern California south to Baja California. It is known to occur in chenopod scrub, shallow freshwater marshes and swamps, playas, and vernal pool habitats between elevations of 30 and 655 meters. It is an annual herb that typically blooms between April and June. The closest known record is approximately 11 miles southeast of the project site. Ditches located in the project site have a low suitability for this species to occur; however, it was not detected in the project site during the 2021 or 2022 surveys (Althouse and Meade 2022a).

4.4.1.2.4 SPECIAL-STATUS WILDLIFE SPECIES

Research on special-status animal occurrences conducted within the designated search area determined 32 special-status animal species are known to occur in the region. Based on an analysis of known ecological requirements for the special-status wildlife species reported or known from the region, and the habitat conditions that were observed in the project site, it was determined that 12 special-status animal species have some potential to occur within the project site. Three species have a high potential to occur—golden eagle (*Aquila chrysaetos*), vernal pool fairy shrimp (*Branchinecta lynchi*), and western spadefoot (*Spea hammondii*); four species have a moderate potential to occur—Cooper's hawk (*Accipiter cooperii*), pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), and American badger (*Taxidea taxus*); and five species have a low potential to occur in the project site—burrowing owl (*Athene cunicularia*), ferruginous hawk (*Buteo regalis*), Salinas pocket mouse (*Perognathus inornatus psammophilus*), coast horned lizard (*Phrynosoma blainvillii*), and San Joaquin kit fox (*Vulpes macrotis mutica*)—which are described below (Althouse and Meade 2022a).

Golden Eagle

Golden eagle is designated a Fully Protected species by the CDFW and is federally protected by the Bald and Golden Eagle Protection Act of 1940. The species range extends throughout much of North America and in California is found in broadleaved upland and montane coniferous forests, cismontane, pinon and juniper woodlands, coastal prairie, great basin scrub and great basin, and valley and foothill grassland habitat types. Most golden eagles in California are residents year-round, but in the winter months, this population is expanded with migratory individuals from other nearby western states. The eagle breeding season in California is generally from late January through August (Althouse and Meade 2022a).

The golden eagle prefers open habitat and in California, it extensively utilizes grazed grasslands and open shrublands for preying on its main food source of hares or rabbits and marmots or ground squirrels. Studies have shown that both the golden eagle's reproduction rate and success declines with a decrease in prey abundance, and golden eagles will refrain from egg laying when prey numbers are low. In California, golden eagles nest almost exclusively in trees (82% trees in central California) but in montane regions they also prefer cliffs and will avoid nesting in densely forested habitat. The golden eagle is highly sensitive to anthropogenic (i.e., human) presences and will avoid nesting near urban areas. Golden eagles will even abandon nests when human activity and development increases in their territory (Althouse and Meade 2022a).

A pair of golden eagles were documented nesting in blue oak trees along the banks of Huer Huero Creek in 2006, less than 1 mile from the project site. Nesting behavior, including an adult eagle at a nest, was observed at this occurrence in 2018 by Althouse and Meade biologists while monitoring work at the adjacent Cava Robles RV Resort; however, no chicks were observed during the 2018 monitoring effort and this nest did not appear successful. Golden eagles and two large stick nests were detected during 2020 and 2021 biological surveys for the Huer Huero Bridge and Roundabout Project. While a pair of eagles were observed each year, no nesting behavior was observed. The nest that was occupied in 2018 collapsed

between February and April 2020. Due to the known presence of golden eagles in the area, there is high potential for the species to forage onsite. No golden eagle nests were present in the project area during the 2021 and 2022 surveys, and none are known to have been present in the past (Althouse and Meade 2022a).

Vernal Pool Fairy Shrimp

Vernal pool fairy shrimp is a small freshwater crustacean that is federally listed as threatened and occurs in the Central Valley of California from Shasta County to Tulare County and the central and southern Coast Ranges from northern Solano County to Ventura County. This shrimp is found in grasslands in cool, clear-water sandstone-depression, grassed swale, earth slump, and basalt-flow depression pools with a higher occurrence in Redding, Corning, and Red Bluff soils. Preferred pool depth by the shrimp ranges from 2 to 122 centimeters. Individuals hatch from cysts during cold-weather winter storms and require water temperatures of 50°F or lower to hatch. The time to maturity and reproduction is temperature dependent, varying between 18 days and 147 days, with a mean of 39.7 days. Immature and adult shrimp are known to die off when water temperatures rise to approximately 75°F. The species is typically associated with smaller and shallower vernal pools (typically about 6 inches deep) that have relatively short periods of inundation and relatively low to moderate total dissolved solids and alkalinity (Althouse and Meade 2022a).

The closest recorded occurrence of the vernal pool fairy shrimp to the project site was reported in 2001 in vernal pool depressions surrounded by vineyards and dirt roads and/or along fence lines. These occurrence records are located approximately 1.3 miles southeast and 1.5 miles east–southeast, respectively. Due to the known nearby occurrences, and slight depressional features located throughout the western half of the property and along Dry Creek Road, the site was surveyed in April 2021 at 19 different basins for vernal pool fairy shrimp following USFWS methods for dry-season soil collection and processing (see Figure 4.4-7; Helm Biological Consulting 2021). Protocol-level wet season surveys were not completed in 2021 due to the lack of adequate rainfall. Protocol-level wet season surveys were completed from November 2022 through April 2023. No federally threatened vernal pool fairy shrimp were identified onsite or in the offsite improvement areas.

Western Spadefoot Toad

Western spadefoot toad is a California SSC and has a Global Rank of G3 (Vulnerable) and a State Rank of S3 (Vulnerable). The species is endemic to California and northern Baja California, Mexico. Western spadefoot toad is primarily an inland species, occurring in grassland habitats with friable soils and seasonal rain pools. Spadefoot toad remains underground for most of the year, emerging to breed in seasonal wetland pools during the rainy season and if enough rain occurs, this species can be found above ground from October through April. Typical breeding season is from December to March. Development of the larvae from egg to metamorphosis can be very quick (3–11 weeks), depending on water temperature and food resources. Recruitment will most often fail if breeding ponds are inhabited by predators such as bullfrogs (*Lithobates catesbeiana*) and crayfishes. The closest reported occurrences of the western spadefoot toad are located approximately 0.3 to 0.5 mile northwest/west in shallow roadside puddles. Due to potentially suitable breeding habitat, the project site's proximity to Huer Huero Creek, and recent occurrences in the immediate vicinity, this species has a high potential to occur onsite. The western spadefoot toad was not observed on the project area during the 2021 and 2022 surveys; however, onsite depressions were dry during the time of surveys (Althouse and Meade 2022a). Western spadefoot toad was not observed onsite during the 2023 wet season survey, but tadpoles were identified in the pools along Dry Creek Road.

Cooper's Hawk

Cooper's hawk is a CDFW Watch List species (for nesting occurrences only) that occurs regularly in California during the winter months and during spring and fall migration. Cooper's hawk frequents oak and riparian woodland habitats, and increasingly urban areas, where they prey primarily on small birds. The closest reported occurrence of nesting Cooper's hawk is located approximately 3.5 miles southwest of the project site in 2011. A nearby occurrence was documented by an Althouse and Meade biologist in 2021, where a pair was observed approximately 1.6 miles southwest of the project site with a potential nest start in a blue oak tree. Suitable, though limited, nesting habitat is present onsite in the low-density oak trees. Numerous occurrences of foraging Cooper's hawks have been reported in the vicinity and this species has moderate potential to nest and hunt in the project site. Cooper's hawk was not observed in the project area during the 2021 and 2022 surveys but could be present seasonally as a winter migrant or as a spring nesting species (Althouse and Meade 2022a).

Pallid Bat

Pallid bat is a California SSC that occurs throughout the state and occupies a wide variety of habitats. This large, long-eared bat is most common in open, dry areas ideal for foraging with rocky outcrops for roosting and is regularly found in oak and pine woodlands where it roosts in caves, mines, rock crevices, hollow trees and building. Bridges are also frequently used by pallid bat, often as night roosts between foraging periods. The closest reported occurrence of the pallid bat is approximately 6 miles northwest from the project where it was identified in 2001 under River Road Bridge crossing the Salinas River in the San Miguel area. Due to the presence of abandoned buildings and structures suitable for roosting, the pallid bat has a moderate potential to occur onsite; however, specialized bat surveys were not conducted to verify presence/absence and are not required to be conducted because potential presence is assumed and pre-construction surveys will be required. Pallid bat or sign of this species was not observed in the project area during the 2021 and 2022 daytime surveys (Althouse and Meade 2022a).

Townsend's Big-Eared Bat

Townsend's big-eared bat is a California SSC that is found in most habitats throughout California but prefers mesic habitats; it is not found in subalpine or alpine habitats. This species is found within its range during all seasons but in low numbers in California, where it is uncommon. The preferred roosting habitat for Townsend's big-eared bat is cave dwellings, but on the Pacific Coast, it has an affinity for abandoned buildings, tunnels, and bridges. Roosting sites must be spacious with a minimum length of 30 meters and located at least 2 meters above the ground. In northern Utah, it was found that entrances to roosts are more likely to be occupied by Townsend's big-eared bat if they have a single entrance with a low height of less than 1.5 meters. Townsend's big-eared bat distribution is correlated with the availability of preferred roosting habitat and is sensitive to human disturbance. Mating occurs from October to February and maternity colonies can start to form as early as March, with young being born August and October. Townsend's big-eared bat feed primarily on small moths but also eat a variety of soft-bodied insects. The closest reported occurrence of the Townsend's big-eared bat is located approximately 9 miles northwest of the project site in building within the Camp Roberts area. Onsite roosting habitat in abandoned buildings and structures provide moderate suitability to support the Townsend's big-eared bat; however, specialized bat surveys were not conducted as part of this assessment and are not required to be conducted because potential presence is assumed and preconstruction surveys will be required. Townsend's big-eared bat or sign of this species was not observed during the 2021 and 2022 daytime surveys (Althouse and Meade 2022a).

American Badger

American badger is a California SSC with a widespread range across the state. It is a permanent but uncommon resident in all parts of California, except for forested regions of the far northwestern corner, and is more abundant in dry, open areas of most shrub and forest habitats. The American badger requires friable soil in order to dig burrows for cover and breeding. The main food source for this species is fossorial rodents, mainly ground squirrels and pocket gophers. The breeding season for badgers is in summer and early fall, and females give birth to litters usually in March and April. The closest reported occurrence of the American badger is located approximately 7 miles northwest from the project site in the Camp Roberts area. They are highly mobile and could be present anywhere in the region where suitable prey base is found. American badgers have a moderate potential to occur on the project site. Badgers or their sign (dens, scat, tracks) were not detected in the project area during the 2021 and 2022 surveys (Althouse and Meade 2022a).

Burrowing Owl

Burrowing owl is a California SSC that occupies abandoned mammal holes in the ground, most notably those of the California ground squirrel (*Otospermophilus beecheyi*). In California, this small, rare owl is a year-round resident in the Carrizo Plain, Central Valley, Imperial Valley, and San Francisco Bay region. In the winter months, burrowing owl individuals from other western populations will augment the year-round Californian populations. The breeding season is generally from March through August. Suitable habitat types for the burrowing owl are dry, open annual or perennial grasslands and deserts with an abundance of burrows. More specifically, the owl is found in coastal prairie, coastal scrub, great basin, Mojave and Sonoran Desert scrub, and great basin and valley and foothill grassland habitats. The burrowing owl commonly nests in abandoned holes in the ground but is also known to inhabit badger and fox dens and manmade holes, such as pipes and culverts. Rarely, it has been known to dig its own burrow in softer soil types. Burrows with high horizontal visibility and low vegetation coverage are preferred, but burrows with dense vegetation with high perch sites will be used. Although *Orthoptera* are the main food source for the owl, it will also consume other insects, as well as amphibians, carrion, small mammals, reptiles and birds. The closest reported occurrence of the burrowing owl is approximately 8.3 miles northwest from the project area in non-native annual grassland. Potential nesting and wintering annual grassland habitat has low suitability for burrowing owl in the project site. However, there are no confirmed breeding records within the vicinity of the site. Burrowing owl was not observed in the project area during the 2021 and 2022 surveys (Althouse and Meade 2022a).

Ferruginous Hawk

Ferruginous hawk is a California Watch List species tracked by the CDFW due to declining populations throughout its range. It has a Global Rank of G4 (Apparently Secure) and a State Rank of S3S4, meaning it is uncertain whether this species can be considered Vulnerable (S3) or Apparently Secure (S4). Only a very small number of ferruginous hawk nests have been found in the northeast part of California and the species is considered a winter visitor or migrant to the state. In California, the ferruginous hawk is found in great basin and valley and foothill grassland, great basin scrub, and pinon and juniper woodlands. The bird prefers large, open grasslands for coursing low in search of prey and scattered trees, power poles, and shrubs for perching. The ferruginous hawk tends to avoid habitat near human development. Its main prey sources are California ground squirrel, California kangaroo rat (*Dipodomys californicus*), cottontail (*Sylvilagus* spp.), northern pocket gopher (*Thomomys talpoides*), and white-tailed jackrabbit (*Lepus townsendii*). Ferruginous hawk occurs within San Luis Obispo County from November through April and are known to winter in fields in the vicinity of the Paso Robles Airport. The annual grassland and surrounding trees in the project area provide low suitability for winter foraging, though no ferruginous hawk was detected in the project area during the 2021 and 2022 surveys (Althouse and Meade 2022a).

Salinas Pocket Mouse

Salinas pocket mouse is a rare pocket mouse listed as a California SSC (CDFW 2021). It has a Global Rank of G4T2 (rounded status T2 – Imperiled) and a State Rank of S1 (Critically Imperiled). Salinas pocket mouse is one of three subspecies located from the Sacramento Valley, south to the San Joaquin and contiguous valleys (including Salinas Valley). Like other species of pocket mice, the Salinas pocket mouse is nocturnal and spends the day in a burrow with a plugged entrance. During periods of low temperatures, this mouse will enter a period of torpor, emerging occasionally from its burrow if its cache needs to be replenished. Salinas pocket mouse forages on the seeds of grasses and forbs as well as seasonal vegetation. Although disturbed in quality, marginally suitable annual grassland may be present. The nearest record is from 1918, 3.8 miles northwest; however, more recent records from 1995 are located in woodland and chaparral, approximately 8.2 miles west–northwest (Althouse and Meade 2022a).

Coast Horned Lizard

Coast horned lizard is a California SSC that is distributed from northern Baja California through northern California, occurring in open areas of valley foothill hardwood, conifer, riparian, pine-cypress, juniper, and annual grassland habitats. The horned lizard needs friable sandy soil with rocks and logs essential for burrows and reproduction. Appropriate habitat for the horned lizard must include an abundance of the native harvester ant (*Pogonomyrmex* and *Messor*); the non-native Argentine ant (*Linepithema humile*) is detrimental to horned lizard food resources as it is out competing the native harvester ant, and the lizard will not eat the Argentine ant. Very little data exists on the habitat requirement for reproduction of coast horned lizard; however, it has been reported that in southern California the egg-laying season is from late May through June. The closest reported occurrence of the coast horned lizard is located approximately 7 miles northwest from the project site where the habitat is level sandy soil dominated by sandbar willow. Although disturbed in quality, marginally suitable annual grassland is present and substrate may be appropriate, particularly in the sandy wash of Huer Huero Creek; however, no harvester ants were noted during biological surveys and coast horned lizard was not found in the project area during the 2021 and 2022 surveys (Althouse and Meade 2022a).

San Joaquin Kit Fox

San Joaquin kit fox is federally listed as endangered and state listed as threatened. The San Joaquin kit fox is one of two subspecies of the kit fox (*Vulpes macrotis*), which is the smallest canid species in North America. It is endemic to the San Joaquin Valley and a few adjacent valleys in the central region of California. San Joaquin kit fox is primarily nocturnal and typically occurs in annual grassland or mixed shrub/grassland habitats throughout low, rolling hills and in valleys. They need loose sandy soils in order to dig their burrows and a prey population of black-tailed jackrabbit (*Lepus californicus*), rodents, desert cottontail, insects, some birds, reptiles, and vegetation. The most suitable habitat for San Joaquin kit fox has low precipitation, sparse vegetation coverage with high densities of kangaroo rats (*Dipodomys* spp.). For the San Joaquin kit fox to succeed in an area, it needs large expanses of non-fragmented suitable habitat. This type of habitat is decreasing rapidly by conversion into agricultural land or being degraded by urban development. Female San Joaquin kit fox began preparing natal dens in September and October and then breeding occurs from December through February. Pups are born from January to March and family groups typically split up the following October. The project site is within contiguous kit fox habitat with the potential to block or degrade an existing corridor linking populations or isolate a subpopulation. The closest known reported occurrence for kit fox is approximately 2.5 miles south of the project site, south of SR 46E. This species is likely extirpated from the city and unincorporated areas of Paso Robles; therefore, San Joaquin kit fox has a low potential to occur (Althouse and Meade 2022a).

A kit fox habitat evaluation form that identifies the quality and value of the habitat to the recovery of the kit fox was prepared for the project site by Althouse and Meade and produced a score of 68, consistent with 3:1 mitigation ratio for the area's habitat loss (Althouse and Meade 2022a).

4.4.1.3 Oak Trees

Within the project area, 110 trees were assessed—one species of sycamore and five different oak tree species were catalogued; valley oaks were the most abundant with a total of 78 individuals. Both valley and blue oaks are common deciduous species in the Paso Robles area and often hybridize, and Althouse and Meade noted some hybridized trees within the project area. The hybridized trees displayed characteristics that were most similar to valley oaks and were identified as valley oak trees in the Biological Resources Assessment (Althouse and Meade 2022a). Although not locally abundant onsite, 17 blue and coast live oaks were represented in disproportionate quantities compared to the valley oak. Three canyon and two cork oaks were also observed on the former Paso Robles Boys School campus. Canyon oaks are a California native, although Paso Robles is outside of its typical range indicating the trees may have been planted horticulturally. The two cork oaks and 12 London plane trees (*Platanus* × *acerifolia*) are not native to California and were likely planted for ornamental reasons (Althouse and Meade 2022a). One Freemont cottonwood (*Populus fremontii*) is also present. Of the 110 trees, 34 of the trees were observed to be in poor health with pests and fungi responsible for decay, 49 of the trees were observed to be in moderate health, and 27 trees were observed to be in good health. No trees were determined to be in excellent health (Althouse and Meade, Inc. 2022a).

4.4.1.4 Wildlife Corridors

Wildlife corridors and habitat connectivity are important for the movement of wildlife between different populations and habitats. Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Wildlife movement corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas; and facilitate the exchange of genetic traits between populations. Wildlife movement corridors are considered sensitive by resource and conservation agencies (Althouse and Meade 2022a).

The southwestern linear "branch" of the Study Area consists of Huer Huero Creek, which connects to the Salinas River approximately 3 river miles northwest of the project site. The project site and immediate vicinity is relatively flat to gently sloping, ranging between 775 feet above mean sea level (msl) in the southwest corner to 800 feet above msl along the entire eastern portion. As evidenced by desert cottontail, coyote, black-tailed jackrabbit, and California ground squirrel activity, it is reasonable to assume that terrestrial wildlife occurs locally in and around the project site and for use of Huer Huero Creek. Huer Huero Creek is the most significant regional corridor associated with the project site and provides a major thoroughfare for unobstructed terrestrial wildlife movement. The project area is also within contiguous kit fox habitat with the potential to block or degrade an existing corridor linking populations or isolate a subpopulation (Althouse and Meade 2022a).

4.4.2 Regulatory Setting

4.4.2.1 Federal

4.4.2.1.1 FEDERAL ENDANGERED SPECIES ACT

The FESA of 1973 provides the legal framework for the listing and protection of species (and their habitats) identified as being endangered or threatened with extinction. "Critical Habitat" is a term within the FESA designed to guide actions by federal agencies and is defined as "an area occupied by a species listed as threatened or endangered within which are found physical or geographical features essential to the conservation of the species, or an area not currently occupied by the species which is itself essential to the conservation of the species." Actions that jeopardize endangered or threatened species and/or critical habitat are considered "take" under the FESA. "Take" under federal definition means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.

Projects that would result in take of any federally listed threatened or endangered species, or critical habitats, are required to obtain permits from the USFWS through either Section 7 (interagency consultation with a federal nexus) or Section 10 (Habitat Conservation Plan [HCP]) of the FESA, depending on the involvement by the federal government in permitting and/or funding of the project. Through Section 10, it is required to prepare an HCP to be approved by the USFWS, which results in the issuance of an Incidental Take Permit (ITP). Through Section 7, which can only occur when a separate federal nexus in a project exists (prompting interagency consultation), a consultation by the various federal agencies involved can take place to determine appropriate actions to mitigate negative effects on endangered and threatened species and their habitat.

4.4.2.1.2 MIGRATORY BIRD TREATY AND BALD AND GOLDEN EAGLE PROTECTION ACTS

All migratory, non-game bird species that are native to the United States or its territories are protected under the federal Migratory Bird Treaty Act (MBTA) of 1918 (50 CFR Section 10.13), as amended under the Migratory Bird Treaty Reform Act of 2004. The MBTA makes it illegal to purposefully take (pursue, hunt, shoot, wound, kill, trap, capture, or collect) any migratory bird, or the parts, nests, or eggs of such a bird, except under the terms of a valid federal permit. Migratory non-game native bird species are protected by international treaty under the federal MBTA. The Bald and Golden Eagle Protection Act (BGEPA) is the primary law protecting eagles, including individuals and their nests and eggs. The USFWS implements the MBTA (16 United States Code [USC] Sections 703–711) and BGEPA (16 USC Section 668). Under the BGEPA Eagle Permit Rule (50 CFR 22.26), the USFWS may issue permits to authorize limited, non-purposeful take of bald eagles and golden eagles.

4.4.2.1.3 SECTION 10 OF THE RIVER AND HARBORS ACT

Section 10 of the Rivers and Harbors Act of 1899 requires authorization from the Secretary of the Army, acting through the USACE, for the construction of any structure in or over any navigable water of the United States. Regulated activities include dredging or disposal of dredged materials, excavation, filling, re-channelization and construction of any structure or any other modification of a navigable water of the United States.

4.4.2.1.4 CLEAN WATER ACT

The CWA establishes the basic structure for regulating discharges of pollutants into waters of the United States and regulating quality standards for surface waters. The purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all waters of the United States. Permitting is required for filling waters of the United States (including wetlands). Permits may be issued on an individual basis or may be covered under approved nationwide permits.

Section 404 of the CWA authorizes the USACE to regulate activities that discharge dredged or fill material to wetlands and other waters of the United States. The term "waters of the United States" encompasses resources described by the U.S. Environmental Protection Agency (USEPA) and the USACE regulations, 33 CFR Section 120.2(1) and 33 CFR Section 328.3(a). The geographic limits of relevant federal jurisdiction for non-tidal waters of the United States are defined at 33 CFR Section 328.4(c).

The USEPA defines wetlands as areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar. Wetlands are considered "special aquatic sites" under the USACE definition. Special aquatic sites are afforded protection under the CWA (Sections 401 and 404).

The USACE asserts jurisdiction over wetlands that exhibit hydrology, hydric soil, and hydrophytic vegetation (three parameters) by the standard set forth in the Arid West Regional Supplement. These areas must also exhibit a significant nexus to a Traditional Navigable Water. For non-wetland water features, USACE jurisdiction is limited to the Ordinary High Water Mark.

Navigable Waters Protection Rule (Rescinded August 30, 2021)

On June 9, 2021, the USEPA and the U.S. Department of the Army announced their intent to revise the definition of "waters of the United States" put in place under the Navigable Waters Protection Rule on April 21, 2020. Water regulations set forth in 2015 (2015 Rule) were repealed in 2020 as part of the Navigable Waters Protection Rule, which defined categories of jurisdictional non-wetland waters based on stream classifications and specifically excluded ephemeral streams as jurisdictional tributaries (USACE 2020). When determining jurisdictional status of wetlands, the scope of *adjacency* was reduced to wetlands with only certain surface water connections to other jurisdictional waters under the Navigable Waters Protection Rule. This excluded wetlands formed by artificial berms, for instance, which were considered adjacent under the pre-2015 regulatory regime and the 2015 Rule regardless of the presence or absence of a hydrologic surface connection.

Current Implementation of Waters of the United States (September 2021)

The USEPA and USACE are "in receipt of the U.S. District Court for the District of Arizona's August 30, 2021, order vacating and remanding the Navigable Waters Protection Rule in the case of *Pascua Yaqui Tribe v. U.S. Environmental Protection Agency*." The USEPA and USACE are interpreting waters of the United States consistent with the pre-2015 regulatory regime until further notice. The following definitions are provided for the term waters of the United States (Althouse and Meade 2022a):

1. All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
2. All interstate waters including interstate wetlands;

3. All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including any such waters:
    a. Which are or could be used by interstate or foreign travelers for recreational or other purposes; or
    b. From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or
    c. Which are used or could be used for industrial purposes by industries in interstate commerce;
4. All impoundments of waters otherwise defined as waters of the United States under this definition;
5. Tributaries of waters identified in paragraphs (s)(1) through (4) of this section;
6. The territorial sea;
7. Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (s)(1) through (6) of this section; waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA (other than cooling ponds as defined in 40 CFR 423.11(m) which also meet the criteria of this definition) are not waters of the United States.

Waters of the United States do not include prior converted cropland. Notwithstanding the determination of an area's status as prior converted cropland by any other federal agency, for the purposes of the CWA, the final authority regarding CWA jurisdiction remains with the USEPA (Althouse and Meade 2022a).

4.4.2.2 State

4.4.2.2.1 CALIFORNIA ENDANGERED SPECIES ACT

The CESA of 1984 (California Fish and Game Code Section 2050 et. seq.) prohibits take of state-listed threatened and endangered species without a CDFW ITP. Take under CESA is restricted to direct harm of a listed species and does not prohibit indirect harm by way of habitat modification and is defined as to "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" (California Fish and Game Code Section 86).

Protection of Fully Protected species is described in California Fish and Game Code Sections 3511, 4700, 5050 and 5515. These statutes prohibit take or possession of Fully Protected species. Incidental take of Fully Protected species may be authorized under an approved Natural Community Conservation Plan.

4.4.2.2.2 CALIFORNIA FISH AND GAME CODE

Sections 3503, 3503.5, and 3511

California Fish and Game Code Sections 3503, 3503.5 and 3511 describe unlawful take, possession, or destruction of birds, nests and eggs. Fully Protected birds may not be taken or possessed except under specific permit. Section 3503.5 protects all birds-of-prey and their eggs and nests against take, possession, or destruction of nests or eggs.

Section 1600 et seq.

Section 1600 et seq. of the California Fish and Game Code prohibits, without prior notification to CDFW, the substantial diversion or obstruction of the natural flow of, or substantial change to or use of any material from the bed, channel, or bank of, any river, stream, or lake; or deposit or disposal of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake. In order for these activities to occur lawfully, the CDFW must receive written notification regarding the activity in the manner prescribed by the department and may require a lake or streambed alteration agreement. Lakes, ponds, perennial and intermittent streams, and associated riparian vegetation, when present, are subject to this regulation.

4.4.2.2.3 NATIVE PLANT PROTECTION ACT

The CDFW also has the authority to administer the Native Plant Protection Act of 1977, which requires the CDFW to establish criteria for determining if a species, subspecies, or variety of native plant is endangered or rare. Under Section 1913(c) of the Native Plant Protection Act, the owner of land where a rare or endangered native plant is growing is required to notify the department at least 10 days in advance of changing the land use to allow for salvage of the plant(s).

4.4.2.2.4 NATURAL COMMUNITY CONSERVATION PLANNING ACT

The Natural Communities Conservation Planning Act (NCCPA) of 1991 was established by the California Legislature, is directed by the CDFW, and is implemented by the state, as well as public and private partnerships as a means to protect habitat in California. The NCCPA takes a regional approach to preserving habitat. A Natural Community Conservation Plan identifies and provides for the regional protection of plants, animals and their habitats, while allowing compatible and appropriate economic activity. Once a Natural Communities Conservation Plan has been approved, the CDFW may provide take authorization for all covered species, including Fully Protected species.

4.4.2.2.5 PORTER-COLOGNE WATER QUALITY CONTROL ACT

The State Water Resources Control Board (SWRCB) and each of the nine local RWQCBs have jurisdiction over "waters of the State," which are defined as any surface water or groundwater, including saline waters, within the boundaries of the state pursuant to the Porter-Cologne Water Quality Control Act. The SWRCB has issued general Waste Discharge Requirements (WDRs) regarding discharges to "isolated" waters of the state (Water Quality Order No. 2004-0004-DWQ, *Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the U.S. Army Corps of Engineers to be Outside of Federal Jurisdiction (General WDRs)*). The local RWQCB implements this general order for isolated waters not subject to federal jurisdiction and is also responsible for the issuance of water quality certifications pursuant to Section 401 of the CWA for waters subject to federal jurisdiction.

4.4.2.3 Local

4.4.2.3.1 CITY OF EL PASO DE ROBLES GENERAL PLAN 2003

The *City of El Paso de Robles General Plan 2003* addresses biological resources and compatibility with development through implementation of adopted policies and programs in the city's updated Conservation Element.

Conservation Element

The following Conservation Element policies define the local regulatory setting for biological resources in the Specific Plan Area:

Policy C-3A **Oak Trees.** Preserve existing oak trees and oak woodlands. Promote planting of new oak trees:

Action Item 1 Implement the Oak Tree Preservation Ordinance

Action Item 2 Plant oaks in parks and on other City-owned properties. Care shall be taken to plant new and replacement oak trees in locations and setting that will be appropriate to their species (e.g., avoiding mitigation that would not be suitable).

Action Item 3 Encourage and/or require new development to include the planting of new oaks where feasible and appropriate.

Policy C-3B **Sensitive Habitat.** Incorporate habitats into project design, as feasible, including: oak woodlands, native grasslands, wetlands, and riparian areas

Action Item 1 As part of the environmental review of new development projects:

- Biological studies/surveys will be prepared when appropriate to assess habitat value.
- Alternatives to habitat removal will be explored; and
- Input will be sought from other public agencies with expertise in biological resources.

Action Item 2 As part of the environmental review of new development projects, the City will require that mitigation for potential impacts to the San Joaquin Kit Fox and its habitat be provided in consultation with the CA Department of Fish and Game and the U.S. Fish and Wildlife Service.

Action Item 3 Encourage use of native plants.

4.4.2.3.2 CITY OF EL PASO DE ROBLES MUNICIPAL CODE

The City of Paso Robles Oak Tree Preservation Ordinance (Municipal Code Chapter 10.01) provides policies, regulations, and specifications necessary to govern preservation of oak trees within the city and to control their pruning and/or removal. The provisions apply to private property owners, tree maintenance services and arborists, and new development, redevelopment, and any discretionary considerations by the City that result in development of intensities that could impact existing oak trees. Preservation of existing oak trees and opportunities to promote the establishment of new oak trees is considered for development projects or development related entitlements.

Pursuant to the Oak Tree Preservation Ordinance, oak tree protection measures are for trees measured at 6 inches or greater in diameter at 4.5 feet above ground level (diameter at breast height [dbh]). Any oak tree slated for removal requires a permit, which is processed by the City's Community Development Department, and permits for pruning oak trees are in the purview of the City's Public Works Department. Oak trees marked for removal require mitigation, where the total dbh of replacement tree (or caliper) shall be equivalent to 25% of the total dbh of trees removed.

Trees not marked for removal or completely avoided are assessed according to their critical root zone (CRZ). The City defines the CRZ as the area circumscribed around the tree's trunk using a radius of 1 foot per 1-inch dbh. Although not specified in the ordinance, mitigation of CRZ impacts is often assessed according to the percent of CRZ impact (i.e., less than 50% or greater than 50%).

4.4.3 Thresholds of Significance

The determinations of significance of project impacts are based on applicable policies, regulations, goals, and guidelines defined by CEQA and the City. Specifically, the project would be considered to have a significant effect on biological resources if the effects exceed the significance criteria described below:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Each of these thresholds is discussed under *Section 4.4.5, Project-Specific Impacts and Mitigation Measures*, below.

4.4.4 Impact Assessment and Methodology

The impact assessment focuses on identifying potential impacts associated with implementation of the project and is based on the site's existing conditions, the regulatory setting, and the project description. The emphasis is on determining the potential effects of the project on federal, state, and locally regulated species and habitats on the project site. Adverse impacts could occur if the project could result in temporary or permanent modification of sensitive communities, or habitats occupied by special-status species, or directly affect special-status species.

The impact assessment below is based on the results of the technical studies prepared for the project, onsite observations made during associated surveys and site visits, and review of existing data.

4.4.5 Project-Specific Impacts and Mitigation Measures

WOULD THE PROJECT HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR THROUGH HABITAT MODIFICATIONS, ON ANY SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL-STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS, OR BY THE CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE OR U.S. FISH AND WILDLIFE SERVICE.

BIO Impact 1: Construction and grading activities would not result in an adverse substantial impact on a candidate, sensitive, or special-status plant species. Impacts would be less than significant (Class III).

Most project impacts would occur within the areas mapped as annual grassland and urban habitats. The urban habitat does not provide potential for any of the five special-status plant species with potential to occur onsite or within the offsite improvement areas. While the annual grassland habitat onsite provides marginally suitable habitat for these five species, the site habitat lacks other characteristics necessary for the species, such as shaly sedimentary slopes, clay substrate, and swampy areas. As discussed above, no special-status plants were observed onsite or in the offsite improvement areas during appropriately timed seasonal surveys; no federally or state listed plants, including special-status plants, are expected to occur onsite (Althouse and Meade 2022a). Potential impacts to candidate, sensitive, or special-status species would be *less than significant*.

BIO Impact 1 (Class III)
Construction and grading activities would not result in an adverse substantial impact on a candidate, sensitive, or special-status plant species.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to candidate, sensitive, or special-status plant species would be less than significant.

BIO Impact 2: Construction and grading activities would not result in direct impacts to vernal pool fairy shrimp individuals, a federally threatened species, and would not remove vernal pool fairy shrimp habitat. Impacts would be less than significant (Class III).

One USFWS protocol-level dry season survey and two USFWS protocol-level wet season surveys for vernal pool fairy shrimp were completed for the project (Figure 4.4-11). Protocol-level dry season sampling was conducted at the project site in 2021 and resulted in the detection of cysts belonging to the genus *Branchinecta* at two out of 19 sampled locations (HBC-2 and HBC-21) (Helm 2021). One broken cyst was found at HBC-2 (a seasonal swale) and a low number of cysts at HBC-21 (a roadside stormwater ditch). Protocol-level wet season surveys were then conducted during the 2021/2022 rain season and resulted in the detection of versatile fairy shrimp (*Branchinecta lindahli*), a non-listed species, at two of 19 sampled locations (HBC-18 and HBC-19, roadside stormwater retention pools). An unknown species of the genus *Branchinecta* was also found at nearby feature AM-2, a small seasonal pool, which dried before animals were mature enough to identify (Althouse and Meade 2022). No federally listed large branchiopod species were detected during the wet season sampling that occurred for the 2021/2022 wet

season; however, the potential for listed species to occur in the project footprint could not be ruled out since the surveys occurred during a period of severe drought and at least one pool dried before the fairy shrimp matured. Protocol-level wet season surveys were conducted during the 2022/2023 rain season which resulted in the detection of versatile fairy shrimp at four of 36 sampled locations (AM-2, AM-22 [roadside stormwater ditch], HBC-18, and HBC-19). Precipitation for the 2022/2023 rain season was far above average and provided suitable conditions to evaluate aquatic features for vernal pool fairy shrimp. Based on the results of the two wet season surveys, it is expected that cysts identified during the 2021 dry season belonged to versatile fairy shrimp that were washed down from upstream occurrences connected through the system of stormwater ditches along Airport Road and Dry Creek Road. No vernal pool fairy shrimp or other federally listed vernal pool branchiopods have been detected on the project site or offsite improvement areas and none are expected to occur.

The project is located within an area mapped by the USFWS as critical habitat for the vernal pool fairy shrimp (Critical Habitat Unit 29). These mapped areas are those that the USFWS considers to contain physical and biological features that are essential to the conservation of the species and that may require special management considerations and protections (David Wolff Environmental 2021). Existing manmade features, which include most of the potential habitat locations of the project site, do not contain primary constituent elements that could be considered critical habitat. Potential impacts to vernal pool fairy shrimp would be *less than significant*.

BIO Impact 2 (Class III)
Construction and grading activities would not result in direct impacts to vernal pool fairy shrimp individuals, a federally threatened species, and would not remove vernal pool fairy shrimp habitat.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to vernal pool fairy shrimp would be less than significant.

BIO Impact 3: Construction and grading activities would result in direct and indirect impacts and habitat modifications to several sensitive and special-status wildlife species that have the potential to occur onsite and in offsite improvement areas. Impacts would be less than significant with mitigation (Class II).

The project would result in several impacts to sensitive and special-status wildlife species. Mitigation Measure BIO/mm-3.1 would require the Applicant to retain a qualified biologist to monitor portions of grading and ground-disturbing activities and to provide worker awareness training to construction workers related to natural resources and species that may be present onsite.

Coast Horned Lizard

The 2021 and 2022 biological surveys did not detect coast horned lizard onsite or in the offsite improvement areas. However, this species has the potential to occur in the sandy loamy substrate in the onsite annual grassland habitat or within the sandy wash of Huer Huero Creek. Project construction activities such as grading and other excavation work would potentially result in direct impacts, habitat loss, and/or mortality. Mitigation Measure BIO/mm-3.2 would require focused preconstruction surveys and relocation of present individuals. With implementation of this measure, impacts to coast horned lizard would be less than significant.

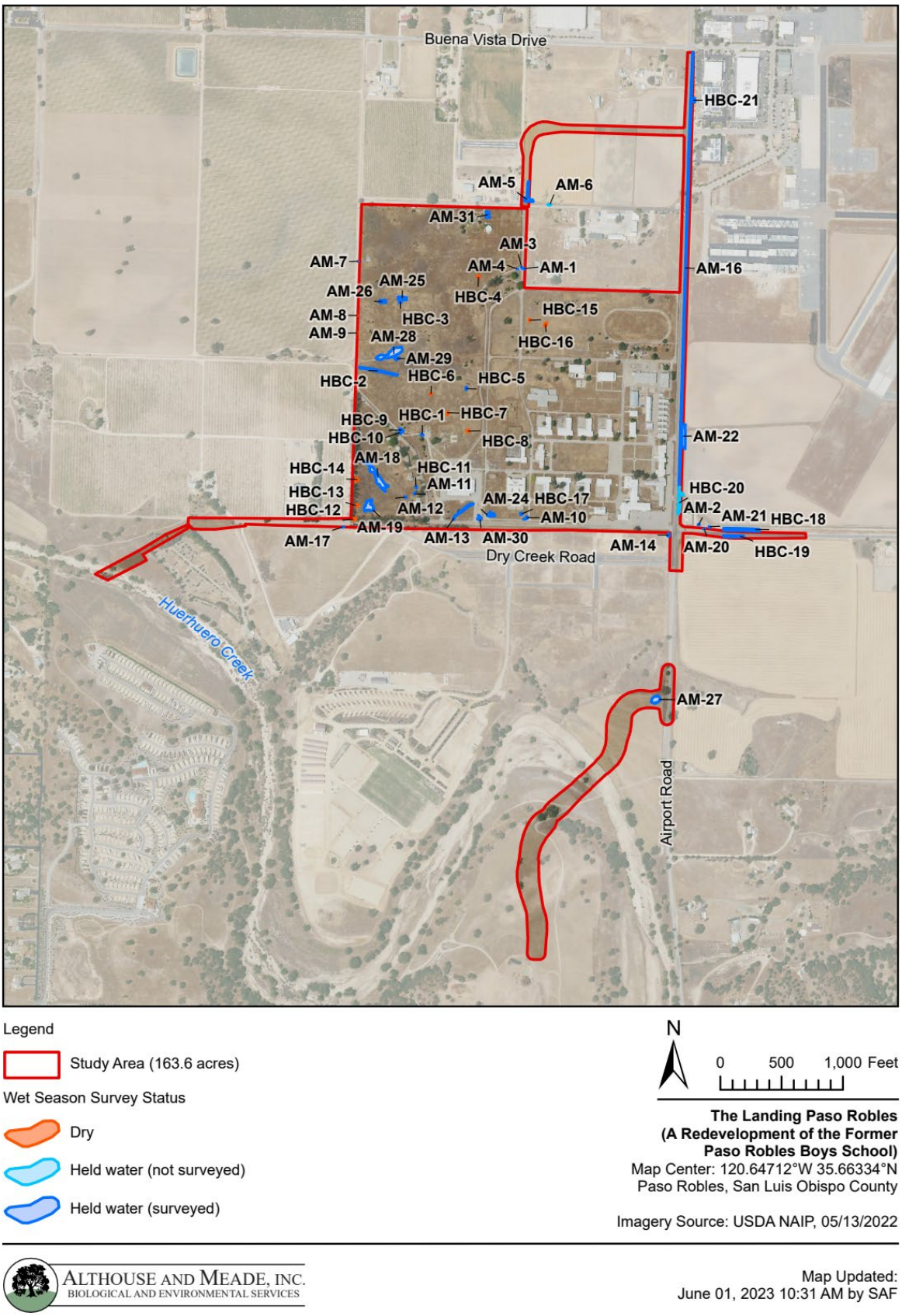


Figure 4.4-11. Fairy shrimp sample locations.

Western Spadefoot Toad

Spadefoot toads breed in ephemeral pools in interior areas of San Luis Obispo County, including Huer Huero Creek and surrounding annual grasslands. As discussed above, they are known to breed in the immediate vicinity of the project site and could breed anywhere temporary pools form during winter rain periods, including shallow roadside puddles. During the non-breeding season, spadefoot toads spend most of the year in upland grassland habitats where they use mammal burrows or directly bury themselves to wait out the dry season. The proposed project would permanently impact 85 acres of annual grassland habitat that is suited to harbor spadefoot toads during the non-breeding season and therefore, the potential for the project to directly impact spadefoot toads is high. Mitigation Measure BIO/mm-3.3 would require preconstruction activities and relocation of individuals that cannot be avoided. With implementation of this measure, impacts to western spadefoot toad would be less than significant.

Golden Eagles

A pair of golden eagles was reported nesting along Huer Huero Creek within 1 mile of the project site in 2006, with eagles present but unconfirmed nesting success in 2018, 2020, and 2021 (Althouse and Meade 2022a). There appears to have been several nest sites used or constructed since 2006 and a full survey of the area has not been possible due to private property constraints. Current guidance by the USFWS (May 2021) recommends a 1 mile no-disturbance buffer surrounding golden eagle nesting sites that are "in-use" in California. If a nest is in use, meaning it has eggs, dependent young, or adult eagles on the nest in the past 10 days, and it is within 1 mile of the project, the Applicant is required to consult with the USFWS under the Bald and Golden Eagle Protection Act to determine if a take permit is needed. The eagle nesting season extends from January through August. Construction activities conducted outside the nesting season would not affect nesting golden eagles. However, given the project's expected construction duration, Mitigation Measure BIO/mm-3.4 would require surveys to identify whether nesting golden eagles are present within 1 mile of the project site or offsite project disturbance areas. If nesting eagles are present, the Applicant would be required to obtain a take permit from the USFWS and comply with all permit requirements and recommendations. With implementation of this measure, impacts to golden eagle would be less than significant.

Wintering and Nesting Birds

Ferruginous hawk and burrowing owl are special-status raptors that are known to winter in interior grassland habitats in San Luis Obispo County and were determined to have low potential to winter or migrate through the project site. Most of California is outside the breeding and nesting range for ferruginous hawk and this species has no potential to nest in the project site, though it may be observed foraging in the area during winter months. Potential nesting and wintering annual grassland habitat suitable for burrowing owl is present within the project site; however, the site is not expected to support breeding burrowing owl pairs, as there is a lack of known records of burrowing owl breeding within 5 miles of the project site. The nearest confirmed breeding record within the project vicinity is 8.3 miles northwest of the project site (Althouse and Meade 2022a). No burrowing owl or sign of burrowing owl, such as potential dens, was observed during the 2021 site surveys.

The project would result in a net loss of potential wintering habitat in the region for these species. Due to the large amount of suitable wintering habitat in the area, this impact is negligible, and no further surveys or mitigations are recommended.

Impacts to or take of nesting birds protected under the MBTA or California Fish and Game Code could occur if nests are destroyed by ground or vegetation disturbance activities, including tree removals, or if adults abandon nests due to disruption from construction noise levels or human activity. Migratory non-game native bird species are protected by international treaty under the MBTA. Sections 3503, 3503.5,

and 3513 of the California Fish and Game Code prohibit take of all native birds and their active nests, including raptors and other migratory non-game birds (as listed under the federal MBTA).

To reduce potential adverse effects of the proposed project on nesting birds (including golden eagle and burrowing owl), Mitigation Measure BIO/mm-3.5 would require preconstruction surveys and work zone buffering from active nests. With implementation of this measure, impacts to golden eagle, burrowing owl, and other bird species protected under the MBTA or California Fish and Game Code would be less than significant.

Roosting Bats

Demolition of abandoned structures located on the project site could adversely affect common and special-status roosting bats, if present. Preliminary visual inspections identified potential roosting habitat in abandoned buildings and large trees in the project site but did not detect sign of bat roosts. The proposed project would remove mature trees and many structures that could harbor roosting bats. Mitigation Measure BIO/mm-3.6 would require focused surveys to identify any roosting bats prior to demolition or vegetation removal. With implementation of this measure, impacts would be less than significant.

Special-Status Mammals

Three special-status mammal species—Salinas pocket mouse, American badger, and San Joaquin kit fox—were determined to have potential to occur within the project site and offsite improvement areas. Project activities include grading and excavation work that could result in direct injury or mortality to these animals, or indirect take by disturbance of natal dens and subsequent abandonment by adults. The project site and offsite improvement areas are located within the San Luis Obispo County San Joaquin kit fox 3:1 mitigation ratio area, which was confirmed by results included in the Althouse and Meade San Joaquin Kit Fox Habitat Evaluation Form and is subject to concurrence by the CDFW. Therefore, standard kit fox mitigation measures would apply to this project. Implementation of Mitigation Measures BIO/mm-3.7 through BIO/mm-3.13 combined with above-mentioned Mitigation Measure BIO/mm-3.1 would reduce potential project-related impacts to terrestrial special-status mammals to less than significant.

Therefore, potential impacts to sensitive and special-status wildlife species would be *less than significant with mitigation*.

BIO Impact 3 (Class II)	
Construction and grading activities would result in direct and indirect impacts and habitat modifications to several sensitive and special-status wildlife species that have the potential to occur onsite and in offsite improvement areas.	
Mitigation Measures	
BIO/mm-3.1	*Prior to issuance of grading, demolition, or tract improvement permits, or prior to any vegetation removal or ground disturbance activities in or within 100 feet of Huer Huero Creek or oak woodland habitat, the Applicant shall retain a City of Paso Robles (City)-approved biologist to monitor grading/ground-disturbing activities located within and directly adjacent to Huer Huero Creek and oak woodlands to ensure the avoidance of significant indirect impacts, such as sedimentation and invasive plant material introduction. The requirement for biological monitoring and the implementation of best management practices (BMPs) to avoid significant indirect impacts shall be noted on all grading, demolition, tract improvement, and other permits that authorize construction activities in or within 100 feet of Huer Huero Creek or oak woodlands. The biological monitor will verify that mitigation measures and construction BMPs*

BIO Impact 3 (Class II)	
	are properly implemented. The biological monitor shall actively communicate observations and information with the construction supervisor as necessary for maintenance of mitigation and BMPs. The construction supervisor shall keep the biological monitor apprised of the project schedule. The biological monitor shall prepare a post-construction report that documents completion of ground-disturbing activities adjacent to natural resources that are to be retained onsite, and progress of mitigation measures implemented. Reports shall be furnished to the construction supervisor and the City of Paso Robles Community Development Department. *Within 30 days of initiating ground-disturbing construction activities, the biological monitor retained by the Applicant shall provide a Worker Education Training Program to all personnel associated with vegetation removal and ground-disturbing construction activities, with instructions on BMPs, to avoid or reduce impacts to biological resources. At a minimum, the training shall include information on the protection of riparian and oak woodland habitats, Huer Huero Creek, special-status wildlife with potential to occur, and all mitigation measures specified by the City of Paso Robles, as well as any related biological report(s) prepared for the project. The Applicant shall notify the City of Paso Robles Community Development Department 1 week prior to this meeting. A fact sheet shall also be developed prior to the training program, and distributed at the training program to all contractors, employers, and other personnel involved with the construction of the project.*
BIO/mm-3.2	*Immediately prior to vegetation removal, ground disturbing activities, and/or grading, a focused preconstruction survey for coast horned lizards shall be conducted by a City of Paso Robles (City)-approved qualified biologist with a valid scientific collecting permit from the California Department of Fish and Wildlife (CDFW) in proposed work areas that would affect potentially suitable habitat; these areas include sandy loamy substrate in annual grassland habitat or within the sandy wash of Huer Huero Creek, as determined by the City-approved project biologist. The scope of the survey shall be determined by the qualified biologist and shall be sufficient to determine presence or absence of the species in the project areas proposed for ground disturbance. If the focused survey results are negative, a letter report shall be submitted to the City Community Development Department, and no further action shall be required. If coast horned lizards are found to be present in the proposed work areas the following steps shall be taken:* *1. Coast horned lizards shall be captured by hand by the City-approved qualified biologist with a valid CDFW scientific collecting permit and relocated to an appropriate offsite location an appropriate distance away from the project area to prevent the species from repopulating the site during construction activity, as determined by the City-approved project biologist.* *2. Construction monitoring by the City-approved qualified biologist shall be required for all new ground-breaking activities located within coast horned lizard habitat. Construction monitors shall capture and relocate lizards as specified above.* *3. A letter report shall be submitted to the City Department of Community Development within 30 days of coast horned lizard relocation.* *4. A final letter report shall be submitted to the City Department of Community Development within 30 days of completion of construction activities in coast horned lizard habitat and shall document the project's compliance with this measure.*
BIO/mm-3.3	*Prior to commencement of ground-disturbing construction activities during the breeding season of western spadefoot toad (February–May), a seasonally appropriate survey (per California Department of Fish and Wildlife [CDFW] guidelines) shall be conducted within 3 weeks of saturating winter rainfall to determine the presence or absence of spadefoot toads in the project area. If spadefoot toads are detected in the project area, a mitigation plan shall be developed to ensure direct impacts are minimized. The mitigation plan shall address the potential for impacts to aquatic breeding habitat and upland non-breeding habitat and include recommendations to minimize direct mortality of individuals by implementation of avoidance and/or relocation measures.*

BIO Impact 3 (Class II)	
	For ground disturbing construction activities outside of the breeding season, a City of Paso Robles (City)-approved qualified biologist with a valid scientific collecting permit from CDFW shall capture by hand and relocate any uncovered spadefoot toads an appropriate distance away from the project area to prevent the species from repopulating the site during construction activity, as determined by the City-approved project biologist.
BIO/mm-3.4	*Prior to commencement of any vegetation removal or construction activities, the project biologist shall survey trees within 1 mile of the project site, including offsite improvement areas, for eagle nests, including the known nesting site in the Huer Huero Creek where golden eagles and two large stick nests were detected during 2020 and 2021 biological surveys for the Huer Huero Bridge and Roundabout Project. If the project biologist identifies a nest that is in use, meaning it has eggs, dependent young, or adult eagles, then the Applicant shall consult with the U.S. Fish and Wildlife Service (USFWS) regarding the necessity for a take permit under the Bald and Golden Eagle Protection Act. Should a take permit be required, the Applicant shall obtain the permit and implement all requirements and recommendations of the USFWS prior to any vegetation removal or construction activities and shall provide written evidence to the City of Paso Robles Community Development Department that such actions have been completed.*
BIO/mm-3.5	*Within 1 week of vegetation removal or any construction activities other than demolition activities located entirely within a building, that commence between February 1 and August 15, nesting bird surveys shall be conducted in the area proposed for disturbance and a 500-foot buffer. If surveys do not locate nesting birds, construction activities may be conducted with no further action needed. If work lapses for more than 2 weeks, new surveys shall be conducted. If nesting birds are located, no construction activities shall occur within 100 feet of nests (or other setback distance determined by a qualified biologist). Occupied nests of special-status bird species within project work areas shall be mapped using the Global Positioning System (GPS) or survey equipment. Work shall not be allowed within a 300-foot buffer (for special-status non-raptors) or 500-foot buffer (for raptors) while the nest is in use. The buffer zone shall be delineated on the ground with highly visible fencing or rope barriers where it overlaps work areas. The project biologist conducting the nesting survey shall have the authority to reduce or increase the recommended buffer depending upon site conditions and the species. Occupied nests of special-status bird species shall be monitored at least every 2 weeks through the nesting season to document nest success and check for project compliance with buffer zones. Once nests are deemed inactive and/or chicks have fledged and are no longer dependent on the nest, work may commence in these areas. A preconstruction survey report shall be submitted to the City of Paso Robles Community Development Department immediately upon completion of the survey. The report shall detail appropriate fencing or flagging of the buffer zone and make recommendations on additional monitoring requirements, where applicable. A map of the project site and nest locations shall be included with the report.*
BIO/mm-3.6	*Within 30 days of commencement of interior or exterior building demolition or tree removal activities, a focused survey shall be conducted by a qualified biologist to determine if roosting bats are present in and near construction, vegetation removal, and demolition areas. The survey shall include complete visual inspection of buildings and structures to be demolished and evaluation of large trees for potential roosts. An acoustic survey combined with a visual bat emergence survey shall be conducted. If a bat roost is located in the planned disturbance area and cannot be avoided, a Bat Habitat Mitigation and Monitoring Plan (BHMMP) shall be prepared, specific to the observed conditions. The BHMMP shall contain specific details regarding exclusion efforts for the existing roosting habitat to be removed, details on the type and placement of alternative roosting habitat, and protection measures for roost habitat to remain if feasible. If a maternity colony is identified during the breeding season (generally April–October) and it cannot be avoided, the Applicant's qualified biologist shall consult with the California Department of Fish and Wildlife (CDFW) for guidance and shall implement all requirements and recommendations provided by the CDFW.*

BIO Impact 3 (Class II)	
BIO/mm-3.7	*Prior to commencement of vegetation removal or grading, a City of Paso Robles (City)-approved qualified biologist with a valid scientific collecting permit from California Department of Fish and Wildlife (CDFW) for Salinas pocket mouse shall be retained by the Applicant. The qualified biologist shall be present during all ground-disturbing construction activities associated with developing the project, including, but not limited to, grading, excavations, and tilling. The biologist shall conduct a morning clearance survey of the project area each day that ground-disturbing activities are proposed. Salinas pocket mouse captured during surveys or during construction monitoring shall be relocated to the nearest suitable habitat outside of the project area. A letter report shall be submitted to the City Department of Community Development within 30 days of Salinas pocket mouse relocation.*
BIO/mm-3.8	*American badger preconstruction surveys shall be conducted within 30 days of any ground-disturbing construction activity on the project site to identify if badgers are present. The results of the survey shall be sent to the City of Paso Robles Community Development Department. If the preconstruction survey finds potential badger dens, they shall be inspected to determine whether they are occupied. The survey shall cover the entire impact area and examine both old and new dens. If potential badger dens are too long to completely inspect from the entrance, a fiber optic scope shall be used to examine the den to the end. Inactive dens may be excavated by hand with a shovel to prevent reuse of dens during construction. If badgers are found in dens on the property between February and July, nursing young may be present. To avoid disturbance and the possibility of direct take of adults and nursing young, and to prevent badgers from becoming trapped in burrows during construction activity, no grading shall occur within 100 feet of active badger dens between February and July. Between July 1 and February 1 all potential badger dens shall be inspected to determine if badgers are present. During the winter, badgers do not truly hibernate but are inactive and asleep in their dens for several days at a time. Because they can be torpid during the winter, they are vulnerable to disturbances that may collapse their dens before they rouse and emerge. Therefore, surveys shall be conducted for badger dens throughout the year. Exclusion of badgers from dens may only be done during the non-breeding season by a qualified biologist experienced in den exclusions. Dens shall be fully excavated and backfilled after eviction is complete.*
BIO/mm-3.9	*The proposed project occurs within a 3:1 San Joaquin kit fox mitigation zone. Prior to issuance of grading and/or construction permits that authorize ground disturbance, the Applicant shall submit evidence to the City of Paso Robles (City) Community Development Department and California Department of Fish and Wildlife (CDFW) that satisfactorily demonstrates one or a combination of the following three San Joaquin kit fox mitigation measures has been implemented to offset the project's calculated compensatory impacts at 3:1 ratio:* 1. ***Habitat Set Aside:*** *Provide for the protection in perpetuity, through acquisition of fee or a conservation easement, the number of acres of required mitigation of suitable habitat in the kit fox corridor area, as determined by the CDFW (e.g., within the San Luis Obispo County kit fox habitat area), either onsite or offsite, and provide for a non-wasting endowment to provide for management and monitoring of the property in perpetuity. Lands conserved shall be subject to the review and approval of the CDFW and the County of San Luis Obispo (County).* *Mitigation alternative 1 requires that all aspects if this program must be in place before City permit issuance or initiation of any ground-disturbing activities.* 2. ***In-Lieu Fee:*** *Deposit funds into an approved in-lieu fee program, which would provide for the protection in perpetuity of suitable habitat in the kit fox corridor area within San Luis Obispo County and provide for a non-wasting endowment for management and monitoring of the property in perpetuity.* *Mitigation alternative 2 can be completed by providing funds to The Nature Conservancy (TNC) pursuant to the Voluntary Fee-Based Compensatory Mitigation Program (Program). The Program was established in agreement between the CFDW and TNC to preserve San Joaquin kit fox habitat, and to provide a voluntary*

BIO Impact 3 (Class II)	
	mitigation alternative to project proponents who must mitigate the impacts of projects in accordance with the California Environmental Quality Act (CEQA). This fee is calculated based on the current cost-per-unit of $2,500 per acre of mitigation, which is scheduled to be adjusted to address the increasing cost of property in San Luis Obispo County; the actual cost may increase depending on the timing of payment. This fee shall be paid after the CDFW provides written notification about mitigation options but prior to City permit issuance and initiation of any ground-disturbing activities. 3. ***Conservation Bank Credit:*** *Purchase the number of credits required by the CDFW in a CDFW-approved conservation bank, which would provide for the protection in perpetuity of suitable habitat within the kit fox corridor area and provide for a non-wasting endowment for management and monitoring of the property in perpetuity.* *Mitigation alternative 3 can be completed by purchasing credits from the Palo Prieto Conservation Bank. The Palo Prieto Conservation Bank was established to preserve San Joaquin kit fox habitat, and to provide a voluntary mitigation alternative to project proponents who must mitigate the impacts of projects in accordance with CEQA. This fee is calculated based on the current cost-per-credit of $2,500 per acre of mitigation. The fee is established by the conservation bank owner and may change at any time. The actual cost may increase depending on the timing of payment. Purchase of credits must be completed prior to County permit issuance and initiation of any ground disturbing activities.*
BIO/mm-3.10	*Prior to issuance of grading and/or construction permits that authorize ground disturbance, the project biologist (BIO-mm/3.1) shall perform the following monitoring activities:* 1. *Prior to issuance of grading and/or construction permits that authorize ground disturbance and within 30 days prior to initiation of site disturbance and/or construction, the project biologist shall conduct a pre-activity (i.e. preconstruction) survey for known or potential kit fox dens and submit a letter to the City of Paso Robles (City) Community Development Department reporting the date the survey was conducted, the survey protocol, survey results, and what measures were necessary (and completed), as applicable, to address any kit fox activity within the project limits.* 2. *The project biologist shall conduct weekly site visits during site-disturbance activities (e.g., grading, disking, excavation, stock piling of dirt or gravel, etc.) that proceed longer than 14 days, for the purpose of monitoring compliance. Site disturbance activities lasting up to 14 days do not require weekly monitoring by the biologist unless observations of kit fox or their dens are made onsite, or the qualified biologist recommends monitoring for some other reason. When weekly monitoring is required, the biologist shall submit weekly monitoring reports to the City Community Development Department.* 3. *Prior to or during project construction activities, if any observations are made of San Joaquin Kit fox, or any known or potential San Joaquin kit fox dens are discovered within the project limits, the project biologist shall re-assess the probability of incidental take (e.g., harm or death) to kit fox. At the time a den is discovered, the project biologist shall contact the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) for guidance on possible additional kit fox protection measures to implement and whether or not a federal and/or state incidental take permit is needed. If a potential den is encountered during construction, work shall stop until such time the USFWS determines it is appropriate to resume work. If incidental take of kit fox during project activities is possible, before project activities commence, the Applicant must consult with the USFWS. The results of this consultation may require the Applicant to obtain a federal and/or state permit for incidental take during project activities. The Applicant should be aware that the presence of kit foxes or known or potential kit fox dens at the project site could result in further delays of project activities.*

BIO Impact 3 (Class II)	
	4. In addition, the project biologist shall implement the following measures: *a. Within 30 days prior to initiation of site disturbance and/or construction, fenced exclusion zones shall be established around all known and potential kit fox dens. Exclusion zone fencing shall consist of either large, flagged stakes connected by rope or cord, or survey laths or wooden stakes prominently flagged with survey ribbon. Each exclusion zone shall be roughly circular in configuration with a radius of the following distance measured outward from the den or burrow entrances:* *i. Potential kit fox den: 50 feet* *ii. Known or active kit fox den: 100 feet* *iii. Kit fox pupping den: 150 feet* *b. All foot and vehicle traffic, as well as all construction activities, including storage of supplies and equipment, shall remain outside of exclusion zones. Exclusion zones shall be maintained until all project-related disturbances have been terminated, and then shall be removed. If kit foxes or known or potential kit fox dens are found onsite, daily monitoring by the project biologist shall be required during ground disturbing activities.*
BIO/mm-3.11	*The following measures shall be implemented during all construction activities other than interior building demolition:* *1. Grading and construction activities after dusk shall be prohibited unless coordinated through the City of Paso Robles.* *2. To prevent entrapment of the San Joaquin kit fox, all excavations, steep-walled holes and trenches in excess of two feet in depth shall be covered at the close of each working day by plywood or similar materials or provided with one or more escape ramps constructed of earth fill or wooden planks. Trenches shall also be inspected for entrapped kit fox each morning prior to onset of field activities and immediately prior to covering with plywood at the end of each working day. Before such holes or trenches are filled, they shall be thoroughly inspected for entrapped kit fox. Any kit fox so discovered shall be allowed to escape before field activities resume or removed from the trench or hole by the project biologist and allowed to escape unimpeded.* *In addition, any pipes, culverts, or similar structures with a diameter of 4 inches or greater, stored overnight at the project site shall be thoroughly inspected for trapped San Joaquin kit foxes before the subject pipe is subsequently buried, capped, or otherwise used or moved in any way. If during the construction phase a kit fox is discovered inside a pipe, that section of pipe will not be moved. If necessary, the pipe may be moved only once to remove it from the path of activity, until the kit fox has escaped.* *3. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of only in closed containers. These containers shall be regularly removed from the site. Food items may attract San Joaquin kit fox onto the project site, consequently exposing such animals to increased risk of injury or mortality. No deliberate feeding of wildlife shall be allowed.* *4. Prior to, during, and after the site-disturbance and/or construction phase, use of pesticides or herbicides shall be in compliance with all federal, state, and local regulations. This is necessary to minimize the probability of primary or secondary poisoning of endangered species utilizing adjacent habitats, and the depletion of prey upon which San Joaquin kit fox depends.*

BIO Impact 3 (Class II)	
BIO/mm-3.12	*During all construction activities, any contractor or employee that inadvertently kills or injures a San Joaquin kit fox or who finds any such animal either dead, injured, or entrapped shall be required to report the incident immediately to the City of Paso Robles Community Development Department. In the event that any observations are made of injured or dead kit fox, the Applicant shall immediately notify the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) by telephone. In addition, formal notification shall be provided in writing within 3 working days of the finding of any such animal(s). Notification shall include the date, time, location, and circumstances of the incident. Any threatened or endangered species found dead or injured shall be turned over immediately to the CDFW for care, analysis, or disposition.*
BIO/mm-3.13	*Prior to issuance of a building permit or other permit that authorizes the installation of fencing, all proposed fencing shall be installed to provide for kit fox passage and 8- by 12-inch openings near the ground shall be provided every 100 yards. Upon fence installation, the Applicant shall notify the City of Paso Robles (City) Community Development Department to verify proper installation. Any fencing constructed after issuance of a final permit shall follow the above guidelines and shall be inspected during quarterly monitoring by the City.*
Residual Impacts	
Potential direct and indirect impacts and habitat modifications related to sensitive and special-status wildlife species would be less than significant with mitigation.	

WOULD THE PROJECT HAVE A SUBSTANTIAL ADVERSE EFFECT ON ANY RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITY IDENTIFIED IN LOCAL OR REGIONAL PLANS, POLICIES, REGULATIONS OR BY THE CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE OR U.S. FISH AND WILDLIFE SERVICE?

BIO Impact 4: The project would impact approximately 0.3 acre of non-wetland waters of the United States and 0.5 acre of non-wetland waters of the state that are protected under the Clean Water Act. Impacts would be less than significant with mitigation (Class II).

Stormwater improvements and construction of the offsite modified Class I Multiuse Trail low water crossing for vehicular use would impact 0.7 acre of riverine habitat, which includes 0.3 acre of non-wetland USACE jurisdictional waters and 0.5 acre of non-wetland CCRWQCB jurisdictional waters associated with Huer Huero Creek. Impacts would include water quality impacts from earth-moving activities and vegetation removal. Mitigation Measure BIO/mm-4.1 requires the Applicant to obtain all necessary permits related to impacts to the non-wetland jurisdictional riverine habitat, and BIO/mm-4.2 requires the removed non-wetland jurisdictional riverine habitat be offset through habitat creation and enhancement, which would be implemented through a Habitat Mitigation and Monitoring Plan (HMMP). Therefore, potential impacts to non-wetland waters of the United States and non-wetland waters of the state would be *less than significant with mitigation*.

BIO Impact 4 (Class II)	
The project would impact approximately 0.3 acre of non-wetland waters of the United States and 0.5 acre of non-wetland waters of the state that are protected under the Clean Water Act.	
Mitigation Measures	
BIO/mm-4.1	*Prior to construction activities for the stormwater outfall in Huer Huero Creek or construction of the modified Class I Multiuse Trail low water crossing for temporary vehicular use, the Applicant shall comply with all state and federal permitting requirements, including those of the U.S. Army Corps of Engineers and Central Coast Regional Water Quality Control Board, including requirements for riverine habitat creation and/or enhancement specified in BIO/mm-4.2. The Applicant shall provide the City of Paso Robles Community Development Department copies of the federal and state permits and with written evidence of compliance with the jurisdictional agencies' requirements.*
BIO/mm-4.2	*To minimize impacts to riverine habitat and non-wetland jurisdictional waters, prior to commencement of construction activities for the stormwater outfall in Huer Huero Creek or construction of the modified Class I Multiuse Trail low water crossing for temporary vehicular use, the project biologist (BIO/mm-3.1) shall prepare and implement a Riverine Habitat Mitigation and Monitoring Plan (HMMP). Impacted areas shall be restored at a 1:1 ratio (habitat restored to habitat impacted) according to the plan immediately following disturbance. Appropriate restoration and enhancement activities shall include planting native species, correcting bank stabilization issues, and providing habitat enhancements by reducing non-native invasive species. Success criteria shall include, at a minimum, at least 80% survival of container plants and 80% relative cover by vegetation type.*
Residual Impacts	
Potential impacts related to non-wetland waters of the United States and waters of the state that are protected under the Clean Water Act would be less than significant with mitigation.	

WOULD THE PROJECT HAVE A SUBSTANTIAL ADVERSE EFFECT ON STATE OR FEDERALLY PROTECTED WETLANDS (INCLUDING, BUT NOT LIMITED TO, MARSH, VERNAL POOL, COASTAL, ETC.) THROUGH DIRECT REMOVAL, FILLING, HYDROLOGICAL INTERRUPTION, OR OTHER MEANS?

BIO Impact 5: The project would impact, through removal, approximately 0.1 acre of freshwater emergent wetland. Impacts would be less than significant with mitigation (Class II).

The project would permanently impact 0.05 acre of freshwater emergent wetland (HBC 20) from proposed road improvements along Airport Road and 0.05 acre of freshwater emergent wetland (HBC 2) in a manmade drainage ditch in annual grassland habitat discharging off the west end of the project site.

Althouse and Meade prepared a *Delineation of Potentially Jurisdictional Wetlands and Waters for The Landing Paso Robles* (Althouse and Meade 2022b) that identified wetlands under federal jurisdiction. Jurisdictional areas were determined based on physical characteristics identified in the field and in consultation with representatives from the USACE and CCRWQCB. CWA Section 404 jurisdiction consists of 0.1 acre of freshwater emergent wetland (HBC 2 and HBC 20) (see Figure 4.4-8). The jurisdictional determination provided on September 8, 2021, concluded that the USACE would take jurisdiction of the aforementioned features. In addition, a site visit with the CCRWQCB on September 22,

2021, concluded that onsite aquatic features were not historic nor relatively permanent and therefore the CCRWQCB would not take jurisdiction over these features (Althouse and Meade 2022b).

Mitigation Measure BIO/mm-5.1 requires the Applicant to obtain all necessary federal permits related to impacts to the wetland habitat, and BIO/mm-5.2 requires the removed wetland habitat be offset through habitat creation and enhancement, which would be implemented through a HMMP. Therefore, potential impacts to freshwater emergent wetland would be *less than significant with mitigation*.

BIO Impact 5 (Class II)	
The project would impact, through removal, approximately 0.1 acre of freshwater emergent wetland.	
Mitigation Measures	
BIO/mm-5.1	*Prior to construction activities that would impact the emergent wetlands identified as HBC 20 and HBC 2 in Delineation of Potentially Jurisdictional Wetlands and Waters for The Landing Paso Robles prepared by Althouse and Meade for the project, the Applicant shall comply with all federal permitting requirements, including those of the U.S. Army Corps of Engineers, including requirements for wetland creation and/or habitat enhancement specified in BIO/mm-5.2. The Applicant shall provide the City of Paso Robles Community Development Department copies of the state and federal permits and written evidence of compliance with the jurisdictional agencies' requirements.*
BIO/mm-5.2	*Prior to grading or site disturbance of the two identified freshwater emergent wetlands, the Applicant shall prepare and implement a Wetland Habitat Mitigation and Monitoring Plan (HMMP) for review and approval by the City of Paso Robles Community Development Department. Because wetlands in the project area are manmade and low quality, mitigation for temporary and permanent impacts shall be at a 1:1 ratio (wetlands impacted to wetlands restored), unless a greater ratio is required by the U.S. Army Corps of Engineers and shall consist of onsite enhancement of existing wetlands or creation of replacement wetlands. Appropriate restoration and enhancement activities include planting native species, correcting bank stabilization issues, and providing habitat enhancements by reducing non-native invasive species.*
Residual Impacts	
With implementation of the identified mitigation measures, potential residual impacts associated with removal of wetlands would be less than significant.	

WOULD THE PROJECT INTERFERE SUBSTANTIALLY WITH THE MOVEMENT OF ANY NATIVE RESIDENT OR MIGRATORY FISH OR WILDLIFE SPECIES OR WITH ESTABLISHED NATIVE RESIDENT OR MIGRATORY WILDLIFE CORRIDORS, OR IMPEDE THE USE OF NATIVE WILDLIFE NURSERY SITES?

BIO Impact 6: The project site may interfere with movement of populations or subpopulations of San Joaquin kit fox. Impacts would be less than significant with mitigation (Class II).

Huer Huero Creek is a regionally significant wildlife corridor; however, the project does not propose impacts that would impede or block wildlife from utilizing Huer Huero Creek for movement. The project site and offsite improvement areas are within contiguous kit fox habitat and would have the potential to block or degrade an existing corridor linking populations or isolate a subpopulation. Implementation of Mitigation Measures BIO/mm-3.9 through BIO/mm-3.13 would reduce impacts to San Joaquin kit fox to

less than significant. Specifically, Mitigation Measure BIO/mm-3.13 would allow for San Joaquin kit fox passage through the project site via openings in project site fencing. Therefore, potential impacts to movement of San Joaquin kit fox would be *less than significant with mitigation*.

BIO Impact 6 (Class II)
The project site may interfere with movement of populations or subpopulations of San Joaquin kit fox.
Mitigation Measures
Implement Mitigation Measures BIO/mm-3.9 through BIO/mm-3.13.
Residual Impacts
Potential impacts associated with movement of populations or subpopulations of San Joaquin kit fox would be less than significant.

WOULD THE PROJECT CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES, SUCH AS A TREE PRESERVATION POLICY OR ORDINANCE?

BIO Impact 7: The project would remove up to 54 native oak trees that are protected under the City's Oak Tree Preservation Ordinance. Impacts would be less than significant with mitigation (Class II).

The project site and offsite improvement areas currently include 97 oak trees subject to the City's Oak Tree Preservation Ordinance, including valley (78 trees), blue (eight tress), coast live (six trees), canyon (three trees), and cork (three trees) oak species, ranging in size from 3 to 69 inches dbh. Project design would involve the removal of up to 41 oak trees onsite, and the offsite improvement would involve the removal of up to 13 additional oak trees, which will require an Oak Tree Removal Permit from the City. An Oak Tree Removal Permit is sought by the Applicant as part of the project's entitlement. Native oak trees are afforded some level of protection through the City's Oak Tree Preservation Ordinance. Mitigation for removal of oak trees and CRZ impacts shall be implemented through a combination of best management practices (BMPs) to protect the retained oaks, as well as individual tree protection measures. Mitigation for individual trees that are proposed for removal and/or CRZ impacts shall also be implemented through tree protection measures described in Mitigation Measure BIO/mm-7.1. A separate Tree Mitigation Protection Plan is required by the City prior to the issuance of a grading permit for the project that details individual oak tree mitigation and protection measures at a construction level of detail. Therefore, potential impacts to native oak trees would be *less than significant with mitigation* and mandatory compliance with the City's Oak Tree Preservation Ordinance.

BIO Impact 7 (Class II)
The project would remove up to 54 native oak trees that are protected under the City's Oak Tree Preservation Ordinance.
Mitigation Measures
BIO/mm-7.1 *An Oak Tree Mitigation and Protection Plan shall be prepared and approved by the City of Paso Robles (City) Community Development Department prior to the issuance of a grading permit, at a construction level of detail.* *1. Tree canopies and trunks within 50 feet of proposed disturbance zones have been mapped and numbered by a qualified biologist and a licensed land surveyor. Data for each tree includes date, species, number of stems, diameter at breast height (dbh) of each stem, critical root zone (CRZ) diameter, canopy diameter, tree height, health, habitat notes, and nests observed. This information shall be indicated on the grading plan prior to the issuance of a grading permit.* *2. Impacts to the oak canopy or CRZ should be avoided where practicable. Impacts include pruning, any ground disturbance within the dripline or CRZ of the tree (whichever distance is greater), and trunk damage.* *3. Replacement oaks for impacted trees would be at a 1:1 ratio for impacts less than 50 percent and 2:1 ratio for impacts to more than 50% of the CRZ. Replacement trees shall be indicated on a landscaping plan subject to City approval.* *4. Replacement oaks for removed trees must be equivalent to 25% of the diameter of the removed tree(s). For example, if a 16-inch dbh tree is removed, 4 inches total caliper of replacement trees is required. A 1-inch caliper tree is generally in a 15-gallon container, and approximately 8 to 10 feet tall—four of these would be required. Smaller caliper trees may be planted at a ratio of 5:1 for each tree removed. Replacement trees shall be indicated on a landscaping plan subject to City approval.* *5. Replacement trees should be seasonally maintained (browse protection, weed reduction, and irrigation, as needed) and monitored annually for at least 7 years after initial planting by an arborist retained by the Applicant.* *6. Upon issuance of the Oak Tree Removal permit, it is the responsibility of the owner or project manager to provide a copy of the Oak Tree Mitigation and Protection Plan to any and all contractors and subcontractors that work within the CRZ of any native tree and confirm they are trained in maintaining fencing, protecting root zones, and conforming to all tree protection goals. It is highly recommended that each contractor sign and acknowledge the Oak Tree Mitigation and Protection Plan. Any future changes (within the CRZ) will need an arborist review and implementation of potential mitigation measures before proceeding.* *7. Any future changes (within the CRZ) in the project will need an arborist review and implementation of potential mitigation measures before any said changes can proceed.* *8. The proposed fencing around existing oak trees to be protected shall be shown on the grading plan. It must be a minimum of 4-foot-high chain link, snow, or safety fence staked (with t-posts 8 feet on center) at the edge of the CRZ or line of encroachment for each tree or group of trees. The fence shall be up before any construction or earth moving begins. The owner shall be responsible for maintaining an erect fence throughout the construction period. The arborist(s), upon notification, will inspect the fence placement once it is erected. After this time, fencing shall not be moved without arborist inspection/approval. If the orange plastic fencing is used, a minimum of four zip ties shall be used on each stake to secure the fence. All efforts shall be made to maximize the distance from each saved tree. Weatherproof signs shall be permanently posted on the fences every 50 feet, with the following*

BIO Impact 7 (Class II)

information: "Tree Protection Zone: No personnel, equipment, materials, or vehicles allowed."

9. *Soils within the CRZ that have been compacted by heavy equipment and/or construction activities must be returned to their original state before all grading work is completed. Methods include water jetting, adding organic matter, and boring small holes with an auger (18 inches deep, 2–3 feet apart with a 2–4-inch auger) and the application of moderate amounts of nitrogen fertilizer. The arborist(s) shall advise.*
10. *All areas within the CRZ of the trees that can be fenced shall receive a 4- to 6-inch layer of chip mulch to retain moisture, preserve soil structure, and reduce the effects of soil compaction.*
11. *All trenching within the CRZ of native trees shall be hand dug. All major roots shall be avoided whenever possible. All exposed roots larger than 1 inch in diameter shall be clean cut with sharp pruning tools and not left ragged. A mandatory meeting between the arborists and grading contractor(s) must take place prior to work start.*
12. *Grading shall not encroach within the CRZ unless authorized. Grading shall not disrupt the normal drainage pattern around the trees. Fills shall not create a ponding condition and excavations shall not leave the tree on a rapidly draining mound. Any exposed roots shall be covered the same day they were exposed if possible. If they cannot, they must be covered with burlap or another suitable material and wetted down two times per day until reburied.*
13. *Vehicles and all heavy equipment shall not be driven under the trees, as this will contribute to soil compaction. Also, there is to be no parking of equipment or personal vehicles in these areas. All areas behind fencing are off limits unless pre-approved by the arborist.*
14. *The existing ground surface within the CRZ of all oak trees shall not be cut, filled, compacted, or pared unless shown on the grading plans and approved by the arborist.*
15. *No liquid or solid construction waste shall be dumped on the ground within the CRZ of any native tree. The CRZ areas are not for storage of materials.*
16. *An arborist shall be present for soil disturbance work within the CRZ of oak trees. Monitoring does not necessarily have to be continuous but observational at times during these activities. All monitoring will be documented on the field report form which will be forwarded to the project manager and the City Community Development Department.*
17. *Roots impacted during construction (e.g., trenching or grading operations) shall be treated by the arborist on a case-by-case basis using best practices such as clean cuts accompanied by application of appropriate fungicides and insecticides by a licensed pest control applicator.*
18. *An onsite preconstruction meeting with the arborist(s), the owner(s), Planning Staff, and the earth-moving team shall be required for this project. Prior to final occupancy, a letter from the arborist(s) shall be required verifying the health/condition of all impacted trees and providing any recommendations for any additional mitigation. The letter shall verify that the arborist(s) were onsite for all grading and/or trenching activity that encroached into the CRZ of the selected native trees, and that all work done in these areas was completed to the standards set forth above.*
19. *Class 1 pruning has emphasis on aesthetics, removal of dead, dying, decaying weak branches and selective thinning to lesson wind resistance. Class 2 pruning is recommended where aesthetic conditions are secondary to structural integrity and tree health concerns. It shall consist of removal of dead, dying, decaying, interfering, obstructing and weak branches as well as selective thinning to lesson wind resistance. Class 3 pruning includes removal of dead, diseased, decayed, and weak branches where safety considerations and hazardous conditions are the highest priority. Class 4 pruning, including crown reduction pruning, shall consist of reduction of tops, sides or individual limbs. A certified arborist shall direct all pruning. No*

BIO Impact 7 (Class II)
pruning shall take more than 25% of the live crown of any native tree. Any trees that may need pruning for road/home clearance shall be pruned prior to any grading activities to avoid any branch tearing. 20. *All landscape within the CRZ shall consist of drought-tolerant or native varieties. Lawns shall be avoided. All irrigation trenching shall be routed around CRZs; otherwise, aboveground drip irrigation shall be used. It is the owner's responsibility to notify the landscape contractor regarding this mitigation. For this site, it is strongly recommended that drought-tolerant native landscape is used with the approval of the arborist. This includes all City sidewalk/greenbelt areas.* 21. *All utilities, sewer, and storm drains shall be placed down the roads and driveways and when possible, outside of the CRZ. The arborist shall supervise trenching within the CRZ. All trenches in these areas shall be exposed by air spade or hand dug with utilities routed under/over roots larger than 3 inches in diameter.* 22. *As the project moves toward completion, the arborist(s) may suggest either fertilization and/or mycorrhizal inoculation applications that will benefit tree health. Application of mycorrhizal inoculum offers several benefits to the host plant, including faster growth, improved nutrition, greater drought resistance, and protection from pathogens.*
Residual Impacts
Potential impacts related to the removal of native oak trees that are protected under the City's Oak Tree Preservation Ordinance would be less significant.

WOULD THE PROJECT CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN?

BIO Impact 8: There are no adopted habitat conservation plans, natural community conservation plans, or other adopted or approved local, regional, or state habitat conservation plans applicable to the project site. Impacts would be less than significant (Class III).

There are no adopted habitat conservation plans, natural community conservation plans, or other adopted or approved local, regional, or state habitat conservation plans applicable to the project site; therefore, impacts would be *less than significant*.

BIO Impact 8 (Class III)
There are no adopted habitat conservation plans, natural community conservation plans, or other adopted or approved local, regional, or state habitat conservation plans applicable to the project site.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to adopted habitat conservation plans, natural community conservation plans, or other adopted or approved local, regional, or state habitat conservation plans would be less than significant.

4.4.6 Cumulative Impacts

Past, present, and foreseeable future projects within the city and surrounding unincorporated county would cumulatively contribute to the direct conversion of rural open space, wildlife habitat, and oak trees to urban uses, and indirect impacts resulting from increased impervious surfaces, noise, night lighting, and traffic.

Cumulative impacts to biological resources are addressed on a project-by-project basis through site-specific investigations and surveys as well as the development of the assessment of potential impacts and prescription of appropriate mitigation. As with the project, other cumulative development within the city that would result in potential impacts to biological resources would be subject to applicable General Plan goals and policies and would be required to incorporate project-specific mitigation measures to implement these policies. Cumulative development outside of the city limits that would result in potential impacts to biological resources would be subject to applicable County goals and policies and would be required to incorporate project-specific mitigation measures to implement these policies.

Implementation of the mitigation measures described in *Section 4.4.5, Project-Specific Impacts and Mitigation Measures*, would reduce all project-level impacts to biological resources to a less-than-significant level.

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4.5 CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

The following section describes potential impacts to cultural resources and tribal cultural resources. Cultural resources are defined by CEQA Section 15064.5 and include resources listed in, or eligible to be listed in, the California Register of Historical Resources (CRHR) or local register of historic resources, prehistoric and historic archaeological resources, and historic-period resources (objects, buildings, structures, area, place, or objects). Tribal cultural resources are defined in PRC Section 21074(a) as sites, features, places, cultural landscapes that are geographically defined in terms of the size and scope of the landscape, sacred places, or objects with cultural value to a California Native American tribe that are either included or determined eligible for inclusion in the CRHR or included in a local register of historical resources, or other resources determined by the lead agency, in its discretion and supported by substantial evidence, to be significant tribal cultural resources.

4.5.1 Existing Conditions

4.5.1.1 Prehistoric Archaeological Resources

4.5.1.1.1 REGIONAL SETTING

The project site is located in the territory of the Salinan Tribe (AECOM 2010; Padre Associates, Inc. [Padre] 2018). The Salinan Tribe occupied the geographical area extending from present-day San Luis Obispo in the south to King City in the north, and west to the coast. The Salinan Tribe were seasonally migratory and would inhabit coastal beaches for marine resources and the interior Santa Lucia Range for acorn and mammal resources. The project site falls within the territory of the Migueleño group of the Salinan Tribe, as they inhabited the upper course of the Salinas River (Padre 2018).

4.5.1.1.2 PROJECT SITE

The project site is located in the northeastern portion of the city of Paso Robles in the Paso Robles, California USGS 7.5-minute quadrangle, approximately 0.3 mile northeast of Huer Huero Creek. There is existing development associated with the former Paso Robles Boys School on the eastern portion of the 140.75-acre project site. Also evaluated in this EIR are 17.31 acres of offsite property that would be disturbed to install project-related infrastructure improvements. Collectively, the project site and the project-related offsite disturbance areas are called the "project impact area." A records search conducted at the Central Coast Information Center (CCIC), formerly at the University of California, Santa Barbara, found that four previous archaeological reports have been completed within the project impact area:

- A Cultural Resources Evaluation was conducted by Robert L. Hoover from the University Sponsored Programs at California Polytechnic State University, San Luis Obispo for several areas within the project site in 1985 (Hoover 1985). These areas included locations for the dormitories and the maintenance building. The Cultural Resources Evaluation consisted of a records search of the CCIC and a pedestrian survey of the dormitory and maintenance building areas, which did not reveal any archaeological resources or evidence of archaeological resources (Hoover 1985).
- An Archaeological Survey Report was conducted for the dozer storage areas at the CAL FIRE site in the northeastern portion of the project parcel by Ben Parker in 1995 (Parker 1995). This portion of the project parcel is outside the project impact area. The Archaeological Survey Report consisted of a records search at the CCIC and a pedestrian survey, which did not reveal any archaeological resources or evidence of archaeological resources (Parker 1995).

- A Cultural Resources Inventory and Assessment was conducted for the entire project site by AECOM in 2010 (AECOM 2010). The Cultural Resources Inventory and Assessment consisted of a records search at the CCIC; review of the National Register of Historic Places (NRHP), CRHR, California Points of Historical Interest, California Historical Landmarks, Directory of Properties in the Historical Resources Inventory, Historic Property Data File, and California Department of Transportation (Caltrans) State and Local Bridge Inventory; and a pedestrian survey of the project site. The records search revealed two previous studies within the project site (see surveys noted above), one previous study adjacent to the project site, and six previous studies outside of the project site. However, previous studies did not identify any known cultural resources within the project area.

  The survey included a pedestrian survey for the entire project site. Ground visibility due to vegetation, buildings, and other hardscape was limited to less than 1% of the survey area and primarily limited to erosion areas, dirt roadways, dirt paths, and rodent burrows. The limited pedestrian survey did not reveal any archaeological resources or evidence of archaeological resources, such as darkened soil (AECOM 2010).

- A Phase I Archaeological Study was conducted adjacent to the project site, along Airport Road and Dry Creek Road, by Padre in 2018 (Padre 2018). The Phase I Archaeological Study included a records search and a field survey of the project area. The records search was conducted at the CCIC at the University of California, Santa Barbara, and identified that the site had been previously surveyed; however, the results of the previous surveys were negative. The field survey identified one potential resource site, a historic trash scatter, on the east side of the airport, outside of the project site; however, it was determined not to be historically significant (Padre 2018). No resources were identified along Airport Road or Dry Creek Road adjacent to the project site.

- Cultural Resource Management Services (CMRS) prepared a Cultural Resources Inventory to evaluate the potential impacts of the Huer Huero Bridge and Roundabout Project on archaeological and historical resources, and included the location of the modified Class I Multiuse Trail low water crossing proposed as part of this project (CRMS 2020). This survey included records searches at the CCIC and NAHC, and the sending of information letters soliciting input to California Native American tribes on the City's (CMRS 2020). The inventory relocated two previously identified prehistoric archaeological sites with low-density lithic scatters (CA-SLO-2826 and CA-SLO-2827) and an isolate artifact (Resource 40-038329). During the field surveys, visibility ranged from 10% to 90% and no previously unknown sites or resources were identified. The proposed modified Class I Multiuse Trail low water crossing and connecting access roadways are located over 1,500 feet from the nearest site and over 2,500 feet from the other site and isolate artifact.

An updated CCIC and California Native American Heritage Council (NAHC) records search for the project impact area and a 0.25-mile radius conducted by SWCA revealed there are no identified cultural resources on the project site or within a 0.25-mile radius.

4.5.1.2 Historic Resources

4.5.1.2.1 PROJECT SITE

Prior to use as the Paso Robles Boys School, the project site was the Estrella Airfield. During World War II, the U.S. Government scouted and surveyed a large tract of land in the Estrella area northeast of Paso Robles as a potential location for a military airfield. Once the site was formally approved, contracts for electrical power and construction were quickly awarded, and the prospective Naval Auxiliary Air Station was under way. The new airfield then had two 4,700-foot runways laid out in a "V," with fuel facilities,

but no hangars or maintenance buildings (Figure 4.5-1). The airfield also consisted of a housing, administration, and storage facility, located to the south of the runways. The facility consisted of 43 buildings and underground utilities, which would later be the temporary buildings used by the Paso Robles Boys School (SWCA 2021).

In 1944, the airfield was deactivated and the California Youth Authority (CYA) purchased and took over the property. The CYA had recognized the need to establish an additional residential facility to house and provide treatment for boys between the ages of 14 and 17. Their decision to acquire the Estrella property from the War Assets Administration was based on the fact that barracks buildings suitable for temporary housing were already present, along with water wells, electricity, telephone connections, and a sewage disposal system (SWCA 2021).

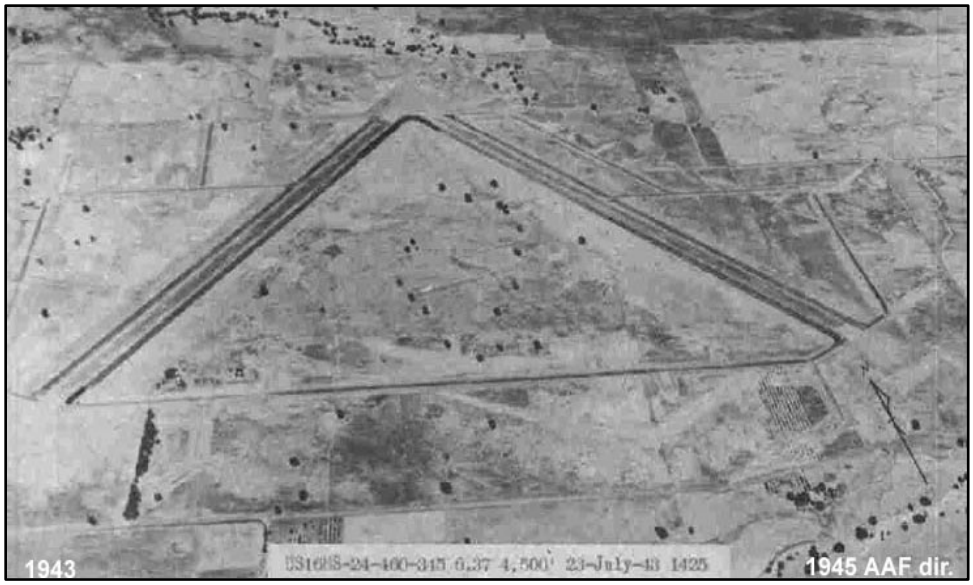


Figure 4.5-1. Estrella Air Field, photographed in 1943.

The eastern portion of the 140.75-acre project site consists of 42 separate buildings associated with the former Paso Robles Boys School (Figure 4.5-2). The 42 buildings include 12 buildings for housing, a school auditorium, two gymnasiums (one with a pool), a visitor center, a library, a fire drill station with truck garage, a large boiler room, a central kitchen, a medical and dental building, workshops, an administration building, maintenance facilities, and recreational facilities. The project site also includes six residential homes formerly occupied by staff members, two sally ports into the secured facility, previous fuel stations, and a car wash.

The site layout resembles, in part, a military base and, in part, a school campus with classrooms and athletic fields. The administrative and residential buildings are symmetrically arranged around an extended rectangle of lawns flanked by narrow roads and crossed at intervals by sidewalks. The academic area, north of the administration building fronting on Airport Road, is a “finger-plan”-style row of connected classrooms (SWCA 2021).

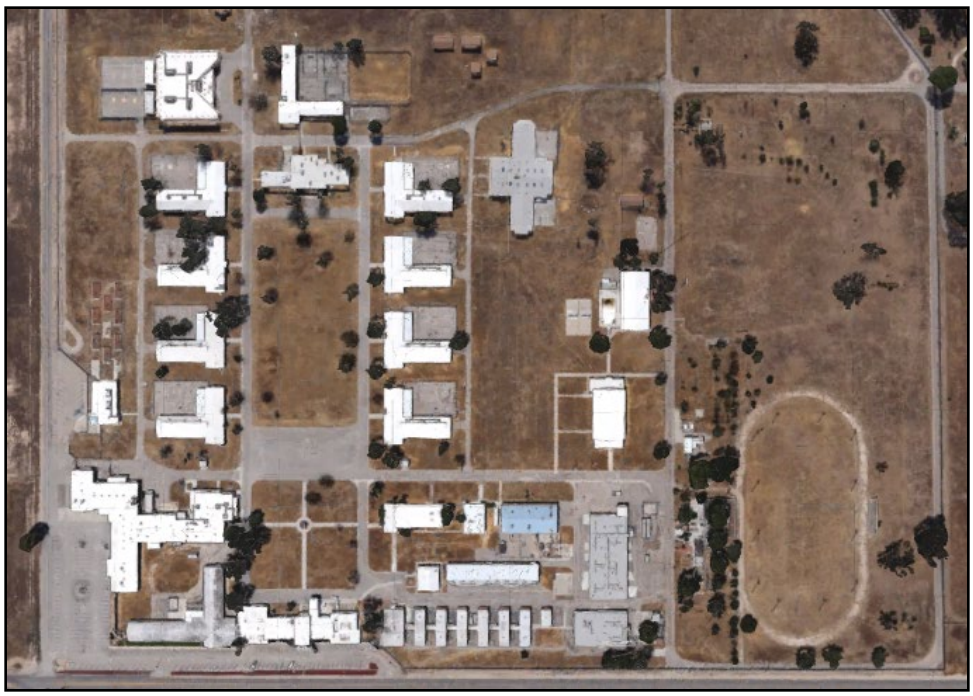


Figure 4.5-2. Aerial of campus, 1985 (Google Earth historical imagery).

Of the 42 buildings onsite, the following buildings are over 50 years in age:

- Administration
- Admissions and Nacimiento Cottage
- Kitchen/Laundry Services Complex
- Boiler Plant
- Avenal Cottage
- Los Osos West Cottage
- Cayucos Cottage
- Los Osos East Cottage
- Nipomo Cottage
- Morro Cottage
- Cholame Cottage
- San Simeon Cottage
- Cambria Cottage
- Auditorium/Chapel
- Academic School
- Gymnasium and Pool
- Old Gymnasium
- Two Staff Residences

In 2006 the CDCR contracted with Kitchell to assess the former campus facilities for historic resources. The site survey was carried out by a team of licensed engineers and architects who examined and photographed the exteriors and interiors of the campus buildings to evaluate their current condition. The subsequent Facility Assessment Report was prepared by Kitchell in 2007 (SWCA 2021).

More recently, in 2014, the historic-period (within 50 years of age) architectural resources were inventoried and evaluated by Ascent Environmental, also under contract with the CDCR. Ascent Environmental studied the state-owned facility pursuant to PRC Sections 5024 and 5024.5 and produced a Compliance Report for the El Paso de Robles Youth Correctional Facility in 2016 regarding compliance with PRC Section 5024. Ascent Environmental focused on the following five historic context themes: (1) early juvenile incarceration, (2) the establishment of the CYA, (3) innovations of the CYA, (4) changes to the juvenile court system, and (5) prison planning and design. A set of California

Department of Parks and Recreation (DPR) Series 523 Primary Record Forms, prepared in October 2014, comprises the core of that report, which documented all of the various buildings and structures built prior to 1957 and still present on the campus. The Ascent Environmental report concluded that the resources did not meet eligibility criteria for listing (either individually or as a potential historic district) on the NRHP or as a California Historic Landmark (SWCA 2021).

The CMRS survey (2020) noted a light scattering of historic debris within the Huer Huero Bridge and Roundabout Project study area, which was also noted by Singer (1996) and during the fieldwork for the nearby Wisteria Project:

> Sparse historical archaeological debris (e.g., glass, ceramic, and various ferrous metals) was observed in very limited quantities within the project area. These materials are likely associated with the aforementioned historic-era structures visible on the 1948 Paso Robles 7.5-minute USGS quadrangle and are still present on the 1978 version.... The buildings are no longer present. The highly diffuse nature and low quantities of historic materials are likely the result of the demolition and removal of the structures. Due to the disturbed nature and lack of concentrated deposits/scatters, these materials are not considered a historical archaeological site and do not warrant formal recordation; they are given no further consideration in the report due to their lack of potential to qualify as historical or unique archaeological resources under CEQA. (Laurie and Pulcheon 2013)

4.5.1.3 Tribal Cultural Resources

The City provided Native American tribes consultation opportunities consistent with SB 18 and AB 52 to identify potential concerns or issues associated with Native American cultural resources located within the project site and offsite improvement areas. The City mailed notice letters inviting requests for consultation to representatives of the Barbareño/Ventureño Band of Mission Indians, Chumash Council of Bakersfield, Coastal Band of the Chumash Nation, Northern Chumash Tribal Council, Salinas Tribe of Monterey and San Luis Obispo Counties, San Luis Obispo County Chumash Council, Santa Ynez Band of Chumash Indians, Xolon-Salinan Tribe, and yak titʸu titʸu yak tiłhini Northern Chumash Tribe on June 3, 2021. No consultation requests have been received as of the date of this DEIR. Additionally, notice letters were sent to the above tribes inviting requests for consultation on the Huer Huero Bridge and Roundabout Project, which includes the modified Class I Multiuse Trail low water crossing portion of this project. Four responses were received, and mitigation was added to the Mitigated Negative Declaration (MND) requiring monitoring of ground disturbance within 100 feet of CA-SLO-2826 and CA-SLO-2827.

4.5.2 Regulatory Setting

The following federal, state, and local laws and regulations are related to preservation of cultural, historical, and tribal cultural resources.

4.5.2.1 Federal

4.5.2.1.1 NATIONAL HISTORIC PRESERVATION ACT

The National Historic Preservation Act (NHPA) is intended to identify and preserve historic and archaeological sites within the country. The NHPA created the State Historic Preservation Officer (SHPO), the NRHP, and the Section 106 review process. Section 106 of the NHPA requires federal agencies to undergo a review process for all federally funded and permitted projects that may impact historical or archaeological resources that are listed in or eligible for listing in the NRHP. Section 106

requires federal agencies to consider the effect a project may have on a historic property and allows interested parties the opportunity to comment on a project's potential effects. The typical process includes the following four steps:

1. Initiation of the Section 106 Review process;
2. identification of Historic Properties that may be affected;
3. assessment of adverse effects; and
4. resolution of adverse effects.

The NRHP is an authoritative guide to be used by federal, state, and local governments; private groups; and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment (36 Code of Federal Regulations [CFR] Part 60, Section 60.4). The NRHP program is administered by the National Park Service (NPS). The NRHP acts as the nation's official list of districts, sites, buildings, structures, and objects that are recognized as Historic Properties. The purpose of the NRHP is to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment.

The criterion for listing in the NRHP follows guidelines established by the NPS for determining significance of properties (36 CFR 60.4). The following criteria is applied to evaluate the quality of significance in American history, architecture, archaeology, engineering, and culture present in districts, sites, buildings, structures, and objects:

a. That are associated with events that have made a significant contribution to the broad patterns of our history;
b. That are associated with the lives of persons who are significant in our past;
c. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
d. That have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting any or all of the eligibility criteria identified above, properties must also possess historic integrity in order to be eligible for listing in the NRHP. Historic integrity is defined as the ability of a property to convey its significance and is defined as the "authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic period" (36 CFR 60.3). According to *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* (U.S. Department of the Interior [DOI] 1995), to retain the integrity, the property must demonstrate several of these aspects; however, determining the most important of these aspects requires information specific to when, where, and why the property is significant. To determine this, the seven aspects of integrity, as defined by the NPS, include the following:

- **Location:** The place where the historic property was constructed or the place where the historic event took place.
- **Design:** The combination of elements that create the form, plan, space, structure, and style of a property.
- **Setting:** The physical environment of a historic property.
- **Materials:** The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

- **Workmanship:** The physical evidence of the crafts or a particular culture or people during any given period in history or prehistory.
- **Feeling:** A property's expression of the aesthetic or historic sense of a particular period of time.
- **Association:** The direct link between an important historic event or person and a historic property.

4.5.2.2 State

4.5.2.2.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT

Section 15064.5(a)(3) of the State CEQA Guidelines states that a resource shall be considered historically significant by the lead agency if the resource meets the criteria for listing in the CRHR (PRC Section 5024.1, 14; California Code of Regulations [CCR] Section 4852), including the following:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Is associated with the lives of persons important in our past;
- 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
- Has yielded, or may be likely to yield, information important in prehistory or history.

According to PRC Section 21084.1, cultural resources meeting one or more of the identified criteria are defined as historical resources under CEQA. Resources included in a local register of historical resources (pursuant to PRC Section 5020.1(k)) or identified as significant in a historical resources survey (meeting the criteria in PRC Section 5024.1(g)) also are considered historical resources for the purposes of CEQA.

The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, is not included in a local register of historical resources, or is not identified in a historical resources survey does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

4.5.2.2.2 ASSEMBLY BILL 52

AB 52, which took effect on July 1, 2015, amends PRC Section 5097.94 by adding eight new sections that relate to Native Americans and expands CEQA by establishing a formal consultation process for California tribes that must be completed before a CEQA document can be certified. Any project that may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. Consultation is beneficial because tribes may have knowledge about the land and cultural resources that should be included in the environmental analysis for projects. The NAHC identifies Native American tribes to be included in the process. PRC Section 21080.3.1 identifies timing and other protocols for the consultation process.

Section 21074 of AB 52 also defines tribal cultural resources as a new category of resources under CEQA. According to PRC Section 21074(a)(1), tribal cultural resources are either defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe or are listed in or eligible for the CRHR or a local historic register or have been determined by the lead agency to be a tribal cultural resource. PRC Section 21084.2 establishes that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource may have a significant effect on the environment. PRC Section 21084.3(a) states that the lead

agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible.

4.5.2.2.3 TRADITIONAL TRIBAL CULTURAL PLACES ACT (SENATE BILL 18)

California Government Code Section 65352.3 (adopted pursuant to the requirements of SB 18) requires local governments to coordinate and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations would be considered eligible to consult on a project if they were to have traditional lands in a local government's jurisdiction, and are identified, upon request, by the NAHC. As noted in the California Office of Planning and Research (OPR) Tribal Consultation Guidelines (OPR 2005), "The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

4.5.2.2.4 CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The CRHR is used by state and local agencies, private groups, and citizens to identify the state's historic resources and indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change (PRC Section 5024.1; CCR Chapter 11.5). The following criteria for eligibility for listing in the CRHR are based on the following NRHP Criteria:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California, or national history.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master of possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

The CRHR consists of resources that are listed automatically and those that have been nominated through an application and public hearing process. The CRHR includes the following:

- California properties formally determined eligible for listing in the NRHP, identified with a California Historical Resources Status Code (Status Code) 2 in the California Historic Resources Inventory (HRI), or listed in the NRHP (Status Code 1 in the HRI).
- State Historical Landmarks No. 770 and all consecutively numbered state historical landmarks following No. 770. For state historical landmarks preceding No. 770, the California Office of Historic Preservation (OHP) shall review their eligibility for the CRHR in accordance with procedures to be adopted by the State Historical Resources Commission.
- Points of historical interest that have been reviewed by the OHP and recommended for listing by the State Historical Resources Commission for inclusion in the CRHR in accordance with criteria adopted by the State Historical Resources Commission (PRC Section 5024.1[d]).

In addition, the CRHR uses the seven aspects of integrity as defined by the NPS for evaluating the potential significance of properties. The seven aspects are described above in *Section 4.5.2.1.1, National Historic Preservation Act*. The CRHR requires that properties "must meet one of the criteria of significance . . . and retain enough historical character or appearance to be recognizable as historical resources and to convey the reasons for their significance" (OHP n.d.).

4.5.2.2.5 HUMAN REMAINS

The disposition of human remains is governed by Section 7050.5 of the California Health and Safety Code and PRC Sections 5097.94 and 5097.98 and falls within the jurisdiction of the NAHC. According to California Health and Safety Code Section 7050.5(b), if human remains are discovered, the County Coroner must be notified within 48 hours and there should be no further disturbance to the site where the remains were found. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. California Health and Safety Code Section 7051(a) prohibits all persons from removing or otherwise disturbing human remains that are inadvertently discovered before their significance may be determined. The California Native American Graves Protection and Repatriation Act (NAGPRA) of 2001 is outlined in California Health and Safety Code 8010–8011. The purpose of the regulation is to respect Native American remains in a manner that is consistent with the federal regulation (NAGPRA). The NAHC, pursuant to PRC Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.

4.5.2.2.6 CALIFORNIA ADMINISTRATIVE CODE, TITLE 14 SECTION 4308

The purpose of California Administrative Code (CAC) Title 14, Section 4308 is to preserve the state's cultural resources. This regulation prohibits any persons from removing, injuring, defacing, or otherwise destroying any valuable archaeological or historical resource.

4.5.2.3 Local

4.5.2.3.1 CITY OF PASO ROBLES HISTORIC PRESERVATION ORDINANCE

According to Section 21.50.080B of the City of Paso Robles Historic Preservation Ordinance, a building, structure, object, or site may be designated as a Historic Landmark if it possesses sufficient character-defining features; possesses integrity of location, design, setting, materials, workmanship, feeling, or association; and meets at least one of the following criteria:

- It reflects special elements of the city's historical, archaeological, cultural, social, economic, aesthetic, engineering, or architectural development;
- It is identified with persons or events significant in local, state or national history;
- It embodies distinctive characteristics of a style, type, period, or method of construction, or it is a valuable example of the use of indigenous materials or craftsmanship; or whether the building or structure represents an established and familiar visual feature of a neighborhood or community of the city; or
- It has yielded, or has the potential to yield, information important to the history or prehistory of Paso Robles, California, or the nation.

4.5.2.3.2 CITY OF EL PASO DE ROBLES GENERAL PLAN 2003

Conservation Element

The Conservation Element addresses historic and architectural resources within the city. New development is evaluated for consistency with the following adopted goals and policies relating to archaeological and historical resources:

Goal C-6 **Cultural Resources.** Strive to preserve/protect important historic and archeological resources.

Policy C-6A **Historic Resources**. Encourage the preservation and restoration of historic buildings in the downtown and the Vine Street neighborhood.

Action Item 1 Continue to implement the Council adopted Downtown Design Guidelines.

Action Item 2 Establish a Vine Street Historic and Architectural Preservation Overlay District for the historic neighborhood located between Chestnut Street, Oak Street, 8th Street and 21st Street, inclusive of both sides of these boundary streets. Prepare and implement design guidelines for future development and renovations within this District. The intent of these guidelines would be to maintain the historic character of the neighborhood.

Policy C-6B **Archaeological Resources**. Strive to preserve/protect "unique archaeological resources" as defined by the California Environmental Quality Act (CEQA).

Action Item 1 Require the preparation of archaeological studies and/or preliminary evaluation reports for new developments that are subject to CEQA and the site could potentially contain a "unique archaeological resource." Incorporate mitigation measures identified by such studies into the development.

4.5.2.3.3 CITY OF EL PASO DE ROBLES MUNICIPAL CODE

In addition to the City's requirements to preserve and protect cultural resources, Title 17 (Buildings and Construction), Title 21 (Zoning), and Article V of the City's Code of Ordinances contain specific requirements for the review, designation, preservation, and protection of historic and archaeological resources in the city, including criteria for determining buildings of historic or architectural significance (Section 17.16.040), the Paso Robles Historic Resources Inventory (Section 21.50.070), and criteria for CEQA review of undesignated resources (Section 21.50.150). According to the Municipal Code, a building, a structure, an object, or a site is considered a historic resource if it is listed in or determined eligible for listing in the NRHP or CRHR; it is listed in the Paso Robles Historic Resources Inventory; or it meets at least one of the criteria for designating a historic landmark. The Paso Robles Historic Resources Inventory identifies buildings, structures, and objects that are designated historic resources, appear eligible for historic designation, or are considered historic resources for purposes of CEQA. Prior to the issuance of a permit pursuant to Municipal Code Chapter 17.16 for the demolition or relocation of any structure that is not a historic landmark, an environmental assessment must be completed pursuant to the provisions of CEQA.

4.5.3 Thresholds of Significance

If a project would cause a substantial adverse change in the characteristics of a resource that convey its significance or justify its eligibility for inclusion in the CRHR or a local register, either through demolition, destruction, relocation, alteration, or other means, then the project is judged to have a significant effect on the environment (State CEQA Guidelines Section 15064.5(b)). The following thresholds are based on Appendix G of the State CEQA Guidelines.

4.5.3.1 Cultural Resources

Impacts on cultural resources would be significant if the project would:

a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5;

b. Cause a substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines Section 15064.5; or

c. Disturb any human remains, including those interred outside of formal cemeteries.

4.5.3.2 Tribal Cultural Resources

Impacts on tribal cultural resources would be significant if the project would:

a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

    i. Listed in or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k), or

    ii. A resource determined by the lead agency, in its discretion and support by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying criteria set forth in subdivision (c) of the PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

4.5.4 Impact Assessment and Methodology

State CEQA Guidelines 15064.5(b) states that a project that results in substantial adverse change to an archaeological or historical resource may have a significant effect on the environment. According to State CEQA Guidelines 15064.5(b)(1), substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surrounding.

For purposes of this EIR, potential impacts to cultural and tribal cultural resources were evaluated by determining if any potentially significant historical or archaeological resources are present within the project area, and, if so, determining the project's potential effect on those resources. As identified in State CEQA Guidelines Section 15064.5(b)(1), project-specific impacts would occur if implementation of the project were to result in the removal, demolition, or alteration of any potentially significant historical or archaeological resources without implementing appropriate mitigation.

This section is based on the following four previous cultural resource studies and one historical resources evaluation:

- *Cultural Resources Evaluation El Paso De Robles School* (Hoover 1985);
- *CDF Project Review Report for Archaeological and Historical Resources* (California Department of Forestry 1995);
- *Cultural Resources Inventory and Assessment, California Department of Corrections and Rehabilitation Paso Robles Facility, San Luis Obispo County, California* (AECOM 2010);
- *Phase 1 Archaeological Study Phase Robles Phase 1 Airport Area Infrastructure Improvement and Dry Creek Road Realignment Projects* (Padre 2018);
- *Cultural Resources Inventory for the New Airport Road Extension, Huer Huero Bridge, and Multi-Use Path* (CRMS 2020); and
- *Historical Resources Evaluation Report for the California Youth Authority Paso Robles Boys School San Luis Obispo County, California* (HRER) (SWCA 2021; Appendix E).

Pursuant to CCR Section 15120(d), information regarding archaeological sites and sacred lands is considered confidential and not available for public review. Therefore, the five cultural reports listed above and specific details regarding tribal outreach are summarized in this section but not included in Appendix E.

4.5.5 Project-Specific Impacts and Mitigation Measures

4.5.5.1 Cultural Resources

WOULD THE PROJECT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN CEQA GUIDELINES §15064.5?

CUL Impact 1: The project would not have the potential to result in a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5. Impacts would be less than significant (Class III).

As described above, the former Paso Robles Boys School is comprised of 42 buildings, 19 of which are over 50 years in age. Site preparations include demolition of all structures at the former Paso Robles Boys School (with the exception of the existing maintenance facility, which is not one of the historic-age buildings).

In 2021 SWCA was retained by the City to peer review the 2016 Ascent Environmental report and prepare updated DPR Series 523 forms to provide supplemental information for the architectural evaluation of the historic-period resources associated with the former Paso Robles Boys School.

The existing buildings associated with the Paso Robles Boys School were evaluated by SWCA for listing in the CRHR under the following criteria:

- **Criterion 1:** A resource would be considered significant under Criterion 1 if the resource is associated with events that have made a significant contribution to the broad patterns of our history.

The former youth facility lacks significance under Criterion 1 because it no longer exemplifies the institutional intent that created it in the late 1940s and early 1950s (SWCA 2021). When first established, the CYA "was celebrated as a major, progressive step forward in juvenile justice." The population at the Paso Robles Boys School was relatively small, and the residents were teenagers. The changing mission of the CYA—adapting in response to upheavals in society, economic realities, and political will—resulted in physical changes to the buildings, as well (SWCA 2021).

- **Criterion 2:** A resource would be considered significant under Criterion 2 if the resource is associated with the lives of persons important to local, California, or national history.

  At the outset, the Paso Robles Boys School was in many ways the product of the particular emphasis on rehabilitation, rather than punishment, shared by the early directors of the CYA and early superintendents of the Paso Robles facility. The historic-period resources, however, are not considered notable for their association with any of these individuals, nor with any civic leaders or other residents of Paso Robles (SWCA 2021).

- **Criterion 3:** A resource would be significant under Criterion 3 if the resource embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic value.

  The architects of the Paso Robles Boys School were Los Angeles-based firm Earl Heitschmidt & Charles O. Matcham. The designer's initials on the Paso Robles Boys School architectural plans are "W. S. T.," which likely belonged to Whiting S. Thompson, who replaced Matcham as Heitschmidt's partner at the firm (SWCA 2021). Heitschmidt and his firm contributed many designs to the Los Angeles area and, although he played a role in the architectural community, he is better known for his contributions to the architectural profession, not his architectural style. This conclusion is based on the very few mentions of him or his work in the online archives of the Pacific Coast Architecture Database, Survey L.A., Architectural Record and Progressive Architecture, and the Avery Index of Architectural Periodicals. Additionally, Heitschmidt and his firm did not develop a signature architectural style that influenced later work or produce buildings that were critically acclaimed, and their work on the Paso Robles Boys School was not considered a significant commission for the firm. Therefore, the Paso Robles Boys School is not considered a significant example of Heitschmidt's work (SWCA 2021).

  The original structures of the Paso Robles Boys School are mid-century in style, which was a common architectural style adopted for schools constructed post-war. This style is generally characterized by low building profiles with flat or shed rooflines, ribbon windows tucked under broad eaves, or expanses of plate glass to showcase interiors (when used on storefronts) or outside views (when used in residences). Red brick was a popular building material, often used in conjunction with stucco or masonry featuring regional stone. Planters were popular in California for their appealing blurring of indoor and outdoor spaces (Figure 4.5-3). The most common arrangement of these post-war schools was the "finger-plan" style, where classrooms were connected by covered corridors with simple flat roofs supported on steel poles (SWCA 2021). Many of these mid-century design characteristics can be seen throughout the Paso Robles Boys School. Although there are many aesthetically pleasing details, such as the angled brick window ledges, concave tooling of the mortar, and effective use of cement slump block (slumpstone), there is not in any of the buildings a high level of artistry of architectural design. The wrought iron scrollwork grilles installed on many of the brick buildings appear to have been added at a later date; no detailed drawings of these were seen in the architectural plans reviewed during the site visit conducted by SWCA in June 2021 (SWCA 2021).

- **Criterion 4.** A resource would be significant under Criterion 4 if the resource has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

  This criterion is generally applied to archaeological resources. In some instances, buildings can reveal important new information, based (for example) on novel or rare construction techniques or materials, but the Paso Robles Boys School was constructed using methods that were commonplace and are already well understood (SWCA 2021).



Figure 4.5-3. Enclosed wood-and-metal-mesh corridor between reinforced red brick classroom buildings. Based on the HRER, the Paso Robles Boys School would not be eligible for listing under the CRHR. Due to the lack of institutional intent, the former Paso Robles Boys School did not make a significant contribution to the broad patterns of our history and does not qualify for listing under Criterion 1. The Paso Robles Boys School is not associated with notable or important individuals, civic leaders, or residents of Paso Robles and therefore is not eligible for listing under Criterion 2. The Paso Robles Boys School does not represent a significant example of Heitschmidt's work and does not embody the distinctive characteristics of a type, period, or method of construction or represent the work of a master. Therefore, the buildings would not be eligible for listing under Criterion 3. The structures of the Paso Robles Boys School do not yield information relevant to the history of the area that was not already known and therefore are not eligible for listing under Criterion 4.

The Paso Robles Boys School is not considered a significant local historic resource because it is not listed in or determined eligible for listing in the NRHP or the CRHR, is not listed in the Paso Robles Historic Resources Inventory, and does not meet at least one of the criteria for designating a historic landmark (Municipal Code 17.16.040). Based on this determination, proposed demolition of the existing buildings would not result in the physical change to a significant historical resource.

The Phase 1 Archaeological Study conducted in 2018 by Padre that looked at Airport and Dry Creek Roads identified one potential historic resource site, a historic trash scatter, on the east side of the airport, outside of the project impact area; however, it was determined not to be historically significant (Padre 2018).

Therefore, implementation of the project would not cause a substantial adverse change in the significance of a historical resource and impacts would be *less than significant*.

CUL Impact 1 (Class III)
The project would not have the potential to result in a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with an adverse change in the significance of a historical resource would be less than significant.

WOULD THE PROJECT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE AS DEFINED IN CEQA GUIDELINES §15064.5?

CUL Impact 2: There are no known archaeological resources within the project impact area based on previous surveys and records searches, but project construction and grading activities may result in adverse impacts to undiscovered subsurface archaeological resources. Impacts would be less than significant with mitigation (Class II).

The project site is located 0.28 mile north of Huer Huero Creek and would result in 140.75 acres of onsite disturbance, including 353,200 cubic yards of cut, and 17.31 acres of offsite disturbance, including 28,756 cubic yards of cut. The maximum depth of proposed cut is 33.5 feet.

As described in *Section 4.5.1.1.2, Project Site*, and *Section 4.5.4, Impact Assessment and Methodology*, there have been four previously documented archaeological surveys within the project impact area, including a pedestrian survey by AECOM in 2010 of the entire project site. All four previous surveys produced negative results for known resources. The 2020 survey by CRMS of the Huer Huero Bridge and Roundabout Project relocated two previously identified prehistoric archaeological sites with low-density lithic scatters (CA-SLO-2826 and CA-SLO-2827) and an isolate artifact (Resource 40-038329). The proposed modified Class I Multiuse Trail low water crossing and access roadways are located over 1,500 feet from the nearest site and over 2,500 feet from the other site and isolate artifact. Construction of the modified Class I Multiuse Trail low water crossing and access roadways would not impact these known resources.

The project impact area does not contain any known archaeological resource sites that may be affected by ground-disturbing activities associated with implementation of the project. In addition, the eastern portion of the project site has undergone previous ground-disturbing activities for development of the Estrella Airfield and Paso Robles Boys School, which further reduces the potential for intact significant archaeological resources to be located within the eastern portion of the project site.

However, there is potential for unidentified subsurface archaeological resources to be present onsite, which ground-disturbing activities associated with implementation of the project would have the potential to impact. Mitigation Measure CUL/mm-2.1 requires worker awareness training to educate project

personnel on inadvertent resource discovery and, consistent with the environmental analysis for the Huer Huero Bridge and Roundabout Project, would require any ground disturbance (including equipment staging) within 100 feet of CA-SLO-2826 and CA-SLO-2827 to be monitored by a City-approved archeologist. In the event of an inadvertent resource discovery, CUL/mm-2.2 and CUL/mm-2.3 would apply and would require work to cease in the area of the discovery until a City-approved archaeologist can determine the appropriate method of disposition of the resource.

Therefore, impacts would be *less than significant with mitigation*.

CUL Impact 2 (Class II)	
There are no known archaeological resources within the project impact area based on previous surveys and records searches, but project construction and grading activities may result in adverse impacts to undiscovered subsurface archaeological resources.	
Mitigation Measures	
CUL/mm-2.1	*Prior to any subsurface ground disturbing activities, a City of Paso Robles (City)-approved archaeologist shall be retained by the Applicant to conduct a Workers Environmental Awareness Program training for all project personnel involved in ground-disturbing activities, such as grading, excavation, trenching, and other earthwork. The training shall describe applicable laws and regulations regarding archaeological and tribal cultural resources, types of resources that may be found in the project impact area, and the required procedures in the event of an inadvertent discovery.* *All ground-disturbing activities, including equipment staging, within 100 feet of the recorded site boundaries of CA-SLO-2826 and CA-SLO-2827 shall be monitored by the City-approved archaeologist. The monitoring shall be guided by a Cultural Resource Monitoring Plan written by the archaeologist and approved by the City. The Cultural Resource Monitoring Plan shall include, but not be limited to, the following:* *1. A list of personnel involved in the monitoring activities;* *2. Description of Native American involvement, including a requirement that a tribal representative from the yak titʸu titʸu yak tiłhini Northern Chumash Tribe be present for all monitoring;* *3. Description of how the monitoring shall occur;* *4. Description of frequency of monitoring (e.g., full time, part time, spot checking);* *5. Description of what resources are expected to be encountered;* *6. Description of circumstances that would result in the halting of work at the project site;* *7. Description of procedures for halting work on the site and notification procedures;* *8. Description of monitoring reporting procedures; and* *9. Provide specific, detailed protocols for what to do in the event of the discovery of human remains.*
CUL/mm-2.2	*During construction, in the event of any inadvertent discovery of archaeological or tribal cultural resources, all work within 100 feet of the discovery shall immediately cease. The Applicant and/or contractor shall immediately contact a City of Paso Robles (City)-approved archaeologist and notify the City Community Development Department. The City-approved archaeologist shall evaluate the significance of the discovery pursuant to California Environmental Quality Act Guidelines Section 15064.5 and Public Resources Code Section 21083.2. Should the discovery be determined to not be significant, the City-approved archaeologist, in consultation with the City, shall determine what, if any, measures are appropriate. Work may resume in the area upon approval of the City-approved archaeologist.*

CUL Impact 2 (Class II)	
	Should the City-approved archaeologist determine the discovery to be significant, CUL/mm-2.3 shall apply.
CUL/mm-2.3	*Pursuant to CUL/mm-2.2, should the City of Paso Robles (City)-approved archaeologist determine an inadvertent discovery is significant, the Applicant, in discussion with the City and the City-approved archeologist, shall determine if avoidance of the discovery is feasible through site design measures or alternative construction techniques. If avoidance is not feasible, a Data Recovery Plan shall be prepared by the City-approved archaeologist and submitted to the City for review. The Data Recovery Plan shall include, at a minimum:* *1. Mapping of the resource boundary;* *2. Quantification of the volume of impact to the resource;* *3. Excavation of a sample of the resource to characterize the nature of the site and retrieve a representative sample of artifacts within the impacted area;* *4. Monitoring of excavations by a tribal representative;* *5. Technical analysis of the recovered samples, including radiocarbon dating, typological and technical analysis of tools and debris, identification and analysis of preserved faunal and floral remains, and other studied appropriate to research questions outlined in the research design;* *6. Cataloguing and curation of all artifacts and records detailing the results of the investigations at a City-approved curation facility or to a Native American Tribe; and* *7. Submission of a final technical report detailing the results of the investigations.*
Residual Impacts	
Potential impacts related to the inadvertent discovery of archaeological resources would be less than significant.	

WOULD THE PROJECT DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF FORMAL CEMETERIES?

CUL Impact 3: Grading and construction activities have low potential to impact previously undiscovered human remains that are outside a formal cemetery, and existing California Health and Safety Code regulations identify protocol in the event human remains are discovered. Compliance with existing regulations would result in less-than-significant impacts (Class III).

As noted above, the project site does not contain any known archaeological resources or burial sites that may be affected by ground-disturbing activities associated with implementation of the project.

The project would be required to comply with California Health and Safety Code Section 7050.5, which identifies the proper protocol in the event human remains are discovered. The California Health and Safety Code requires that no further disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner is required to notify the NAHC within 24 hours. Compliance with the California Health and Safety Code would ensure the project would not result in significant adverse effects to human remains. Therefore, impacts would be *less than significant.*

CUL Impact 3 (Class III)
Grading and construction activities have low potential to impact previously undiscovered human remains that are outside a formal cemetery, and existing California Health and Safety Code regulations identify protocol in the event human remains are discovered.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to inadvertent discovery of human remains would be less than significant.

4.5.5.2 Tribal Cultural Resources

WOULD THE PROJECT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A TRIBAL CULTURAL RESOURCE, DEFINED IN PUBLIC RESOURCES CODE (PRC) SECTION 21074 AS EITHER A SITE, FEATURE, PLACE, CULTURAL LANDSCAPE THAT IS GEOGRAPHICALLY DEFINED IN TERMS OF THE SIZE AND SCOPE OF THE LANDSCAPE, SACRED PLACE, OR OBJECT WITH CULTURAL VALUE TO A CALIFORNIA NATIVE AMERICAN TRIBE, AND THAT IS:

I. LISTED OR ELIGIBLE FOR LISTING IN THE CRHR, OR IN A LOCAL REGISTER OF HISTORICAL RESOURCES AS DEFINED IN PRC SECTION 5020.1(K), OR

II. A RESOURCE DETERMINED BY THE LEAD AGENCY, IN ITS DISCRETION AND SUPPORT BY SUBSTANTIAL EVIDENCE, TO BE SIGNIFICANT PURSUANT TO CRITERIA SET FORTH IN SUBDIVISION (C) OF PRC SECTION 5024.1? IN APPLYING CRITERIA SET FORTH IN SUBDIVISION (C) OF THE PRC SECTION 5024.1, THE LEAD AGENCY SHALL CONSIDER THE SIGNIFICANCE OF THE RESOURCE TO A CALIFORNIA NATIVE AMERICAN TRIBE.

TCR Impact 1: The project would not impact the significance of a tribal cultural resource that is listed in or is eligible for listing in the CRHR or local register of historic resources. Impacts would be less than significant (Class III).

As described above, there are no listed resources or resources eligible for listing in the CRHR or local register of historic resources. Impacts would be *less than significant*.

TCR Impact 1 (Class III)
The project would not impact the significance of a tribal cultural resource that is listed in or is eligible for listing in the CRHR or local register of historic resources.

TCR Impact 1 (Class III)
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to a tribal cultural resource that is listed in or is eligible for listing in the CRHR or local register of historic resources would be less than significant.

TCR Impact 2: The project would not impact any known tribal cultural resources determined by the City to be a significant resource to a California Native American tribe. Impacts would be less than significant (Class III).

Pursuant to AB 52 and SB 18, the City provided the following tribes an opportunity to comment and engage in tribal consultation regarding the proposed project: Barbareño/Ventureño Band of Mission Indians, Chumash Council of Bakersfield, Coastal Band of the Chumash Nation, Northern Chumash Tribal Council, Salinas Tribe of Monterey and San Luis Obispo Counties, San Luis Obispo County Chumash Council, Santa Ynez Band of Chumash Indians, Xolon-Salinan Tribe, and yak tit^{y}u tit^{y}u yak tiłhini Northern Chumash Tribe.

Three tribes requested copies of the records searches and cultural reports for the project site. No tribes requested consultation with the City, and no tribes provided information regarding tribal cultural resources within the vicinity of the project. The City is not aware of any tribal cultural resources on the project site that have been determined to be a significant resource to a California Native American tribe.

Therefore, implementation of the project would not result in a substantial adverse change in the significance of a tribal cultural resource and impacts would be *less than significant*.

TCR Impact 2 (Class III)
The project would not impact any known tribal cultural resources determined by the City to be a significant resource to a California Native American tribe.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to known tribal cultural resources determined by the City to be a significant resource to a California Native American tribe would be less than significant. Additionally, CUL/mm-2.3 would involve tribal oversight on inadvertent discovery of significant archaeological resources.

4.5.6 Cumulative Impacts

Past, present, and reasonably foreseeable projects in and around the city (see Table 3-1 in *Chapter 3, Environmental Setting*) have the potential to contribute to loss of historical resources and therefore would not contribute to a cumulative loss of historic resources within the city. There are no known

archaeological resources that would be impacted by the project, and existing regulations that protect archaeological resources would be adhered to in the event of unanticipated discovery, along with CUL/mm-2.1 through CUL/mm-2.3. In the event of unanticipated resource discovery, the project may contribute incrementally to the cumulative loss of significant archaeological resources within the city and region.

Other cumulative projects would be required to evaluate impacts to historic, archaeological, and tribal cultural resources; require mitigation for any identified significant impacts; and be required to adhere to applicable federal, state, and local laws and regulations.

Therefore, the proposed project would not result in the loss of any significant identified historical or tribal cultural resources and has the potential to result in the loss of cultural resources in the event of inadvertent discovery; the projects contribution to cumulative impacts related to cultural and tribal cultural resources would be *less than significant with mitigation.*

4.6 GEOLOGY AND SOILS

This section discusses the project's potential impacts relating to geologic hazards and resources. Geologic resources include physical (i.e., soil, rock, mineral) and topographical (i.e., steep slopes, faults) features that may create obstacles to development. This section incorporates the setting and impact analysis from the *Preliminary Geotechnical and Geologic Hazards Report for Paso Robles Industrial Park* (Yeh and Associates 2021) and a wide range of other geotechnical analyses prepared for the project site over the years. Paleontological resources are also identified as geological resources pursuant to CEQA. Paleontological resources are fossilized remains of organisms that generally occur subsurface.

4.6.1 Existing Conditions

The *Preliminary Geotechnical and Geologic Hazards Report* prepared for the proposed project (Yeh and Associates 2021) includes the results of the geotechnical investigation for the project, as well as previously conducted geotechnical studies conducted within the project area by The Mark Group (1998), Harza (1999, 2000), Reynolds (2003), Fugro Consultants, Inc. (2011), CB&I (2013), and Avocet Environmental (2017, 2018). These studies have been used to develop an overview of existing geologic conditions at the site. The *City of El Paso de Robles General Plan 2003 Safety Element* was used to provide information related to offsite improvement areas.

4.6.1.1 Regional Geology

The city of Paso Robles is in the Coast Ranges Geomorphic Province of California. The Coast Ranges consist of primarily northwest-trending mountain ranges with rounded summits and extensive folding and faulting. Within San Luis Obispo County, the Coast Ranges are divided into two major blocks: the Salinian block and the Coastal block. The Salinian block is bound by the Sur-Nacimiento fault zone and the Coastal block on the west and the San Andreas Fault on the east. The project area is located within the Salinian block, which represents a magmatic arc and consists of metamorphic rocks and granitic plutons from the Late Cretaceous (69–110 million years ago [Ma]) (Barbeau et al. 2005). After the Late Cretaceous, deposition shifted to the continental shelves, and a thick series of Cenozoic marine sedimentary rocks were deposited in the Coast Ranges through the late Miocene (5.3–23 Ma). During the Pliocene (2.6–5.3 Ma), the sea had withdrawn from most of the Coast Ranges, and erosion of the uplands onto valley floors was prominent by the Pleistocene (2.6 Ma), which continues to today (Norris and Webb 1990).

4.6.1.2 Project Site Geologic Conditions

4.6.1.2.1 TOPOGRAPHY

The project site is slightly sloping, ranging from 808 feet above msl along the eastern property line to 775 feet above msl along the western property line. The eastern developed portion of the site is fairly level, while the southwest corner of the site slopes into a lower terrace behind the existing residences, and the northwest corner of the site gently rises.

4.6.1.2.2 FORMATIONAL UNITS

Based on a review of published geologic maps (Dibblee and Minch 2004), the Preliminary Geotechnical and Geologic Hazards Report (Yeh and Associates 2021), and the *DEIR of the Paso Robles Property Master Reuse Plan* (AECOM 2010), the project area is immediately underlain by unmapped recent artificial fill and Pleistocene-age (0.01–2.6 Ma) older alluvial sediments (Qoa) at the surface, and Pleistocene- to latest Pliocene-age (3.6–2.6 Ma) Paso Robles Formation (QTp) in the subsurface. Based

on the results of the Preliminary Geotechnical and Geologic Hazards Report, the maximum depth of artificial fill ranges from 1.5 to 5 feet below ground surface but may be absent in portions of the project area (Yeh and Associates 2021). Pleistocene-age older alluvial sediments consist of terraces of dissected alluvial gravel and sand (Dibblee and Minch 2004) and have a maximum depth of 5 to 22 feet below ground surface (Yeh and Associates 2021). The Pleistocene- and latest Pliocene-age Paso Robles Formation, which immediately underlies the older alluvial sediments, consists of light, medium gray, and weakly indurated pebble, gravel, sand, and clay, which includes redeposited materials composed of white siliceous shale from the late and middle Miocene-age Monterey Formation, as well as limestone as a minor constituent (Woodring and Bramlette 1950). The area of the modified Class I Multiuse Trail low water crossing and access roadways is made up of Quaternary-aged surficial sediments consisting of alluvial gravel and sand of the valley area and stream channels.

4.6.1.2.3 SOILS

Soils at the project site and surrounding offsite improvement areas are predominantly clayey sand, sandy clay, and well-graded sand, with sandy clay being the most dominant soil type (Yeh and Associates 2021) (Figure 4-6.1). The USDA NRCS identifies the soil types within the project site as follows (NRCS 2021):

- Arbuckle-San Ysidro complex 2 to 9 percent slopes: This moderately well-drained soil has a low runoff class with a depth to water table of more than 80 inches. The soil profile consists of fine sandy loam, sandy clay loam, and stratified sandy loam to very gravelly sandy clay loam.
- Hanford and Greenfield gravelly sandy loams, 0 to 2 percent slopes: This well-drained soil has a very low runoff class and a depth to water table of more than 80 inches. The soil profile consists of gravelly sandy loam.
- Hanford and Greenfield gravelly sandy loams, 2 to 9 percent slopes: This well-drained soil has a very low runoff class and a depth to water table of more than 80 inches. The soil profile consists of gravelly sandy loam.
- San Ysidro loam, 0 to 2 percent slopes, Major Land Resource Area (MLRA) 14: This moderately well-drained soil has a very low runoff class and a depth to water table of more than 80 inches. The soil profile consists of loam and clay loam.

Based on these soil types, soils on the project site and surrounding offsite improvement areas are considered suitable for construction, with the exception of the San Ysidro soils, which have a high shrink/swell potential and low strength (CDCR 2010). The soils at the site are considered very low to moderately expansive, with older alluvial sediments encountered at the site generally considered moderately expansive (Yeh and Associates 2021). Soils within the project area also have a low to moderate susceptibility to erosion when disturbed by grading or excavations, which would be required to implement the proposed project.

Soils at the modified Class I Multiuse Trail low water crossing and access roadways include:

- Arbuckle-San Ysidro complex 2 to 9 percent slopes (see above).
- Arbuckle-Positas complex 30 to 50 percent slopes: This complex consists of very deep, well drained, rapid surface runoff, high erodibility, and high shrink-swell potential. The soil has a depth to water table of more than 80 inches and a profile of fine sandy loam, sandy clay loam, and stratified sandy loam to very gravelly sandy clay loam.
- Elder loam, flooded, 0 to 5 percent slopes: This very deep, nearly level to gently sloping, well-drained soil has moderate permeability, slow surface runoff potential, and slight erodibility. The soil has a depth to water table of more than 80 inches and the profile consists of loam and sandy loam.

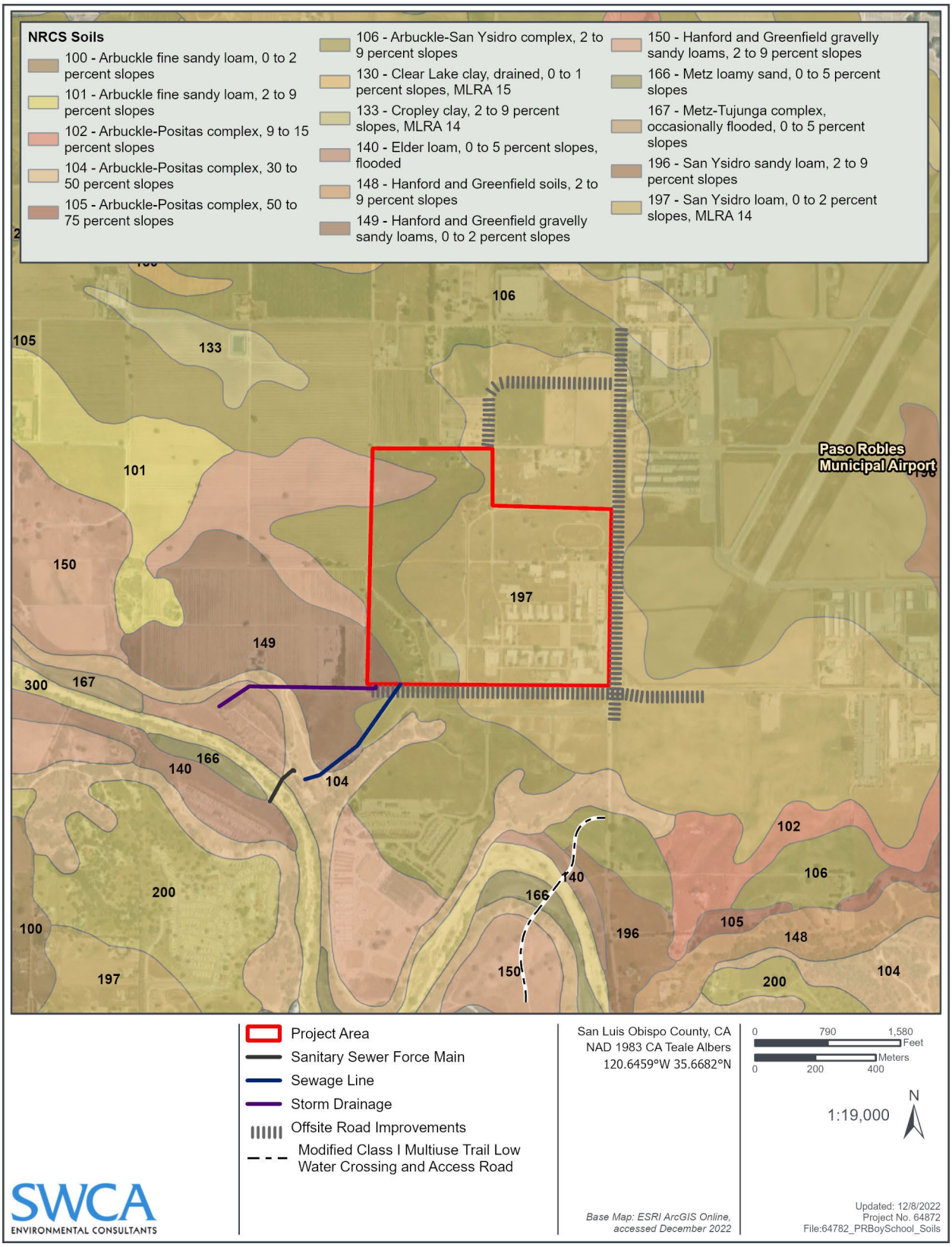


Figure 4.6-1. Project site soils.

- Hanford and Greenfield gravelly sandy loams, 2 to 9 percent slopes (see above).
- Metz loamy sand, 0 to 5 percent slopes: This somewhat excessively drained soil has low runoff potential and moderate permeability and a depth to water table of more than 80 inches. The soil profile consists of loamy sand and stratified sand to very fine sandy loam.
- San Ysidro loam, 0 to 2 percent slopes (see above).
- Corducci and Typic Xerofluvents, 0 to 5 percent slopes: This somewhat poorly drained soil has negligible runoff potential and moderately slow permeability and a depth to water table of more than 80 inches. The soil profile consists of fine to coarse sand.

4.6.1.3 Seismic and Geologic Hazards

The city of Paso Robles and surrounding areas are susceptible to seismic hazards from movement along several regional faults. Active faults within the region include the San Andreas, Nacimiento, and Rinconada Faults, as well as other offshore faults. Most seismic activity within the city has been associated with the San Andreas Fault, which is located approximately 22 miles northeast of the city. The project site is located approximately 4 miles northeast from the Rinconada Fault zone, which trends through the center of the Salinian block, and approximately 22 miles west of the San Andreas Fault (DOC 2015). Regional faults, liquefaction potential, and landslide potential are depicted in the *City of El Paso de Robles General Plan 2003 Safety Element* (City of Paso Robles 2014). Other geologic hazards associated with seismicity in the city of Paso Robles area include fault rupture, ground shaking, liquefaction and seismically induced settlement, expansive soils, and erosive soils.

4.6.1.3.1 FAULT RUPTURE

Seismically induced ground rupture occurs as the result of differential movement across a fault. An earthquake occurs when seismic stress builds to the point where rocks rupture. As the rocks rupture, one side of a fault block moves relative to the other side. The resulting shock wave is the earthquake. If the rupture plane reaches the ground surface, ground rupture occurs. The California Geological Survey (CGS) defines "active" faults as those that have exhibited displacement within the last 11,000 years (i.e., Holocene age), "potentially active" faults as those that have exhibited displacement within the last 1.6 million years but have not been active during the Holocene age, and "inactive" faults as those that have not experienced displacement within the last 2.58 million years (i.e., prior to the Pleistocene) (2008). According to the DOC, the project site is not located within an Alquist-Priolo Earthquake Fault Zone and no active faults have been mapped across the project site. The nearest Alquist-Priolo Fault Zone is the San Andreas Fault, located approximately 18.6 miles northeast of the project site (CDCR 2010). The Rinconda Fault, which is classified by the CGS as a potentially active northwest-trending fault (Jennings and Bryant 2010), is located approximately 4 miles away and is the closest known fault. Other major faults in the region include the San Andreas, San Juan, Los Osos, Hosgri, San Luis Range, Great Valley 13, Casmalia (Orcutt), and Lions Head Faults (CDCR 2010). Most of the faults within San Luis Obispo County have not been active in recent geologic time (Horizon Water and Environment 2020).

4.6.1.3.2 GROUND SHAKING

Section 1613 of the 2019 CBC requires that structures be designed and constructed to resist the effects of seismic ground motions. The design of such structures is dependent on the following criteria:

- Soil site class, which are based on soil classifications A–F (hard rock, rock, very dense soil/soft rock, stiff soil, soft soil, and special soil);

- Building occupancy use, which is categorized by four types: Type IV (agricultural buildings), Type III (essential buildings), Type II (structures that represent a substantial hazard in the event of a collapse), and Type I (all other buildings); and
- Mapped spectral accelerations for short periods and for a 1-second period.

The project area is situated with a seismically active region, which has historically resulted in strong and damaging ground motion from earthquakes. The Preliminary Geotechnical and Geologic Hazards Report presents a summary of magnitude 2.0 and greater seismic events recorded from 1931 to 2020 by the Advanced National Seismic Systems (2020) and Clark et al. (1994) (Yeh and Associates 2021). Based on these data presented in the Preliminary Geotechnical and Geologic Hazards Report, the closest fault to the project site is the Rinconada Fault, which has had small to moderate earthquakes (i.e., less than 3.9 magnitude), with some large earthquakes (i.e., 7.5 maximum magnitude) (CDCR 2010), and other faults in the vicinity have produced strong and damaging earthquakes. The San Andreas Fault to the east of the project area has generated several earthquakes of 5.0 to 6.5 magnitude or greater approximately every 20 years (on average), with the maximum ranging from 6.5 to 8.0 magnitude (CDCR 2010).

Due to the proximity of the project area to several active and potentially active fault zones, including the San Andreas Fault, Rinconada Fault, and others, seismically induced ground shaking/ground motions may be expected at the project site during a seismic event.

4.6.1.3.3 LIQUEFACTION AND SEISMICALLY INDUCED SETTLEMENT

Liquefaction is a seismic phenomenon in which loose-to-medium dense, young, saturated, granular, and non-plastic fine-grained soil or sensitive clay lose their structure/strength when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist:

1. Shallow groundwater (within the top 50 feet of the ground surface);
2. Low-density non-plastic soils; and
3. High-intensity ground motion.

Loose granular soil can also settle (compact) during liquefaction and as pore pressures dissipate following an earthquake. Settlement can occur when foundations and surface improvements span soils with variable consolidation characteristics, such as the soils with variable moisture and density. Settlement can stress and damage foundations and surface improvements, resulting in cracks and displacement

Based on the Preliminary Geotechnical and Geologic Hazards Report prepared for the project, the project site is underlain by unsaturated, loose to very dense clayey sand, medium to very dense well-graded sand with gravel, and medium stiff to hard lean clay with varying amounts of sand and gravel, all of which have a low potential for liquefaction, seismic settlement, or lateral spreading (Yeh and Associates 2021).

4.6.1.3.4 LANDSLIDES AND SLOPE INSTABILITY

The Safety Element identifies the project site as being in an area of low to moderate landslide potential (City of Paso Robles 2014). The project site was assessed during the geotechnical analysis, which included a review of geologic maps and aerial photographs, as well as a field reconnaissance survey, for the potential for landslides or slope instability. No evidence of landslides or slope instability was observed in the project area (Yeh and Associates 2021).

4.6.1.4 Paleontological Setting

The Society of Vertebrate Paleontology (SVP) has established standard guidelines that outline professional protocols and practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation (SVP 1995, 2010). Most practicing professional vertebrate paleontologists adhere closely to the SVP's assessment, mitigation, and monitoring requirements as specifically provided in its standard guidelines. Most state regulatory agencies with paleontological laws, ordinances, regulations, and standards accept and use the professional standards set forth by the SVP.

In general, paleontological studies assess fossils as significant if one or more of the following criteria apply:

1. The fossils provide information on the evolutionary relationships and developmental trends among organisms, living or extinct;
2. The fossils provide data useful in determining the age(s) of the rock unit or sedimentary stratum, including data important in determining the depositional history of the region and the timing of geologic events therein;
3. The fossils provide data regarding the development of biological communities or interaction between paleobotanical and paleozoological biotas;
4. The fossils demonstrate unusual or spectacular circumstances in the history of life; or
5. The fossils are in short supply and/or are in danger of being depleted or destroyed by the elements, vandalism, or commercial exploitation, and are not found in other geographic locations.

Paleontological potential or sensitivity is defined as the potential for a geologic unit to produce scientifically significant fossils. This is determined by rock type, history of the geologic unit in producing significant fossils, and fossil localities recorded from that unit. Paleontological sensitivity is derived from the known fossil data collected from the entire geologic unit, not just from a specific survey or study. A geologic unit known to contain significant fossils is considered sensitive to adverse impacts if there is a high probability that earth-moving or ground-disturbing activities in that rock unit would either disturb or destroy fossil remains, directly or indirectly.

Based on scientific literature and fossil locality databases, significant paleontological resources have been recovered from Pleistocene-age older alluvial sediments (Qoa) and other unnamed Pleistocene-age deposits throughout San Luis Obispo County, including fossil horse, bison, camel, ground sloth, mammoth, and other terrestrial vertebrates (Jefferson 1991a, 1991b; Jefferson et al. 1992; Paleobiology Database 2021; University of California Museum of Paleontology [UCMP] 2021). Additionally, scientific literature and fossil locality databases have indicated Pleistocene- and latest Pliocene-age Paso Robles Formation (QTp) from San Luis Obispo County has also yielded significant paleontological resources, including undifferentiated mammal, seal, bivalve, gastropod, ostracod, and brachiopod (Addicott and Galehouse 1973; Kellogg 1921; Paleobiology Database 2021; UCMP 2021; Woodring and Bramlette 1950).

Paleontological resources may be present within artificial fill; however, any such fossil resource discovered from artificial fill has lost its geologic or stratigraphic context (i.e., provenance). Therefore, unmapped artificial fill that is present in portions of the project area has a low paleontological sensitivity based on SVP (2010) guidelines. Pleistocene-age older alluvial sediments, which is present either at the surface or at very shallow depths below the artificial fill, and Pleistocene- and latest Pliocene-age Paso Robles Formation, which immediately underlies the older alluvial sediments at shallow to moderate depths, both have yielded significant paleontological resources throughout the area. Therefore, these native geologic units have a high paleontological sensitivity based on SVP (2010) guidelines.

4.6.2 Regulatory Setting

4.6.2.1 Federal

There are no applicable federal regulations relevant to the proposed project.

4.6.2.2 State

4.6.2.2.1 ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING ACT

The Alquist-Priolo Earthquake Fault Zoning Act was signed into law following the 1971 San Fernando earthquake. The act provides a mechanism for reducing losses from surface fault rupture on a statewide basis. The intent of the act is to ensure public safety by prohibiting the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. This act groups faults into categories of active, potentially active, and inactive. Historic- and Holocene-age faults are considered active, Late Quaternary- and Quaternary-age faults are considered potentially active, and pre-Quaternary-age faults are considered inactive.

4.6.2.2.2 SEISMIC HAZARDS MAPPING ACT

The Seismic Hazards Mapping Act of 1990 (PRC Chapter 7.8, Sections 2690–2699.6) directs the CGS to delineate Seismic Hazard Zones. The purpose of the act is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards. Cities, counties, and state agencies are directed to use seismic hazard zone maps developed by the CGS in their land use planning and permitting processes. The act requires that site-specific geotechnical investigations be performed prior to permitting most urban development projects within seismic hazard zones.

4.6.2.2.3 CALIFORNIA BUILDING CODE

The CBC, Title 24, Part 2 provides building codes and standards for the design and construction of structures in California. The 2019 CBC is based on the 2018 International Building Code with the addition of more extensive structural seismic provisions. Chapter 16 of the CBC contains definitions of seismic sources and the procedure used to calculate seismic forces on structures. The CBC requires addressing soil-related hazards, such as treating hazardous soil conditions involving removal, proper fill selection, and compaction, prior to construction. In cases where soil remediation is not feasible, the CBC requires structural reinforcement of foundations to resist the forces of expansive soils.

4.6.2.2.4 PUBLIC RESOURCES CODE SECTION 5097.5

Requirements for paleontological resource management are included in PRC Division 5, Chapter 1.7, Section 5097.5, which states:

> No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

These statutes prohibit the removal, without permission, of any paleontological site or feature from land under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, local agencies are required to comply with PRC 5097.5 for their own

activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others. PRC Section 5097.5 also establishes the removal of paleontological resources as a misdemeanor and requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (state, county, city, and district) land.

4.6.2.3 Local

4.6.2.3.1 CITY OF EL PASO DE ROBLES GENERAL PLAN 2003

Safety Element

The *City of El Paso de Robles General Plan 2003 Safety Element* is intended to guide land use planning by providing goals and policies to minimize the adverse effects of geologic hazards and ensure adequate design of structures (City of Paso Robles 2014). Goals and policies that are applicable to the project include:

Policy S-1D **Structural Safety.** The City will rely on its planning and building permit review process to ensure that existing and proposed structures are adequately designed, and to reduce susceptibility to damage from fire, flooding, and geologic hazards.

Action Item 4 The City will discourage the locating of critical facilities within identified hazard areas.

Action Item 6 The City will prohibit construction within seismic and geologic hazards areas, including: areas directly astride known active or potentially active faults or fault zones; areas in high landslide risk areas without site-specific slope stability investigations; and areas of potential liquefaction without site-specific analysis of liquefaction potential.

Action Item 7 In reviewing development proposals for future water impoundments, the City will require an evaluation of potential inundation areas and design of the dam to withstand earthquakes.

Section 20.12 of the Paso Robles Municipal Code describes requirements for soils and geology reports and grading permit requirements. Title 20 Grading and Title 22 Subdivisions of the Municipal Code describe requirements related to the control of drainage and stormwater and the design of streets and other public improvements.

4.6.3 Thresholds of Significance

The following thresholds are based on Appendix G of the State CEQA Guidelines. Impacts would be significant if the project would:

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault;
    ii. Strong seismic ground shaking;
    iii. Seismic-related ground failure, including liquefaction; or
    iv. Landslides.

b. Result in substantial soil erosion or the loss of topsoil;

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse;

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property;

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water; and/or

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

As discussed in the IS/NOP, the City determined the proposed project would not install septic tanks or alternative waste water disposal systems. Therefore, threshold (e) is not discussed further in the EIR. See *Appendix A, Initial Study and Notice of Preparation*, for more information. Wastewater treatment and associated impacts are discussed in *Section 4.14, Utilities/Service Systems and Energy.*

4.6.4 Impact Assessment and Methodology

For the purposes of this analysis, relevant documents were reviewed, particularly the Preliminary Geotechnical and Geologic Hazards Report (Yeh and Associates 2021). This report describes the geologic conditions of the site based on literature review, field reconnaissance, subsurface exploration including soil boring, soil laboratory testing, geologic surface mapping, and fault investigations to classify subsurface soil and formational units and to supplement regional geologic mapping. These reports and investigations were prepared in the absence of final development plans, and consequently provide only general recommendations regarding geologic site suitability for planning-level analysis.

The SVP (2010) guidelines were used for the assessment of potential for paleontological resources to occur within the Project site. Additionally, relevant geologic maps, scientific literature, and fossil locality database information were reviewed for paleontological resources.

4.6.5 Project-Specific Impacts and Mitigation Measures

WOULD THE PROJECT DIRECTLY OR INDIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR DEATH INVOLVING:

I. RUPTURE OF A KNOWN EARTHQUAKE FAULT, AS DELINEATED ON THE MOST RECENT ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING MAP ISSUED BY THE STATE GEOLOGIST FOR THE AREA OR BASED ON OTHER SUBSTANTIAL EVIDENCE OF A KNOWN FAULT? REFER TO DIVISION OF MINES AND GEOLOGY SPECIAL PUBLICATION 42.

II. STRONG SEISMIC GROUND SHAKING?

III. SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION?

IV. LANDSLIDES?

GEO Impact 1: The project would not cause substantial adverse effects due to seismic-related conditions. Impacts would be less than significant (Class III).

The project site and surrounding offsite improvements areas are not located within an Alquist-Priolo Earthquake Zone, and no active faults that could result in rupture of the ground surface have been identified within the project area. Impacts related to fault rupture would be *less than significant*.

The city of Paso Robles and surrounding areas are susceptible to seismic hazards from movement along several regional faults, including the San Andreas Fault, Rinconada Fault, and others. The nearest fault is the Rinconada Fault, which is located approximately 4 miles to the southwest of the project site. The design of the project must conform to the mandatory standards of the CBC Title 24, which contains specific requirements on building design to reduce damage from seismically induced ground shaking/ground motions during a seismic event. Therefore, with the adherence to the requirements of CBC Title 24 on the project's design, impacts caused by potential hazards to people or structures from strong seismically induced ground shaking/ground motions would be *less than significant*.

Based on the Preliminary Geotechnical and Geologic Hazards Report conducted for the project, the site is underlain by unsaturated, loose to very dense clayey sand, medium dense to very dense well-graded sand with gravel, and medium stiff to hard lean clay with varying amounts of sand and gravel, all of which have a low potential for liquefaction, seismic settlement, or lateral spreading (Yeh and Associates 2021). Therefore, impacts from seismically induced liquefaction, seismic settlement, and lateral spreading would be *less than significant*.

The project site and offsite improvements areas are in an area of low to moderate landslide potential based on the Safety Element and the results of the Preliminary Geotechnical and Geologic Hazards Report. Moreover, the local topography is relatively flat to low relief, and no evidence of landslides or slope instability on the project site was noted during the geotechnical investigation (Yeh and Associates 2021). Therefore, impacts from seismically induced landslides or slope instability would be *less than significant*.

GEO Impact 1 (Class III)
The project would not cause substantial adverse effects due to seismic-related conditions.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to seismic conditions would be less than significant.

WOULD THE PROJECT RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL?

GEO Impact 2: Project grading and vegetation clearance would result in approximately 158.06 acres of ground disturbance, which would have the potential to result in substantial soil erosion or the loss of topsoil, and the modified Class I Multiuse Trail low water crossing has the potential to result in scouring around the crossing's piles. Impacts would be less than significant with mitigation (Class II).

The project area contains soils composed of a mixture of clayey sands and sandy clays and is predominantly located on flat topography, supported by natural oak tree and other vegetation cover. These soils have a low to moderate susceptibility to erosion when disturbed by grading or excavations. All of the areas where construction would occur would be covered by built structures, such as concrete, asphalt, buildings, etc., or ornamental landscaping, upon completion of the project, with the exception of areas onsite where existing oak trees would be preserved. Preconstruction and construction-related ground-disturbing activities would temporarily disturb soil and could expose soils in disturbed areas to wind and rain events that have the potential to cause localized erosion via runoff. As described in *Section 4.7, Hydrology and Water Quality*, temporary impacts related to increased erosion and sedimentation would be mitigated by implementation of Mitigation Measure HYD/mm-1.1, which requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) with BMPs to reduce the amount of erosive or other runoff during construction activities.

The modified Class I Multiuse Trail low water crossing for vehicular use would be a low water crossing style bridge, approximately 1 foot above the low flow channel of the Huer Huero Creek, supported by five driven steel pipe piles. Although Huer Huero Creek is typically a subterranean creek that flows to the Salinas River, during periods of heavy rains surface flows can occur. During periods of surface flow, accumulated sediment and debris from upstream can accumulate and build up in the creek channel or catch on the piles or railing of the bridge and change the way the water flows. This could potentially result in scour of sediment from around the bridge piles and increase soil erosion and sedimentation downstream, including in the Salinas River. Mitigation Measure HYD/mm-2.1 would require protection/armoring of the low water crossing piles.

Therefore, with implementation of stormwater controls, impacts to soil erosion would be *less than significant with mitigation*.

GEO Impact 2 (Class II)	
Project grading and vegetation clearance would result in approximately 158.06 acres of ground disturbance, which would have the potential to result in substantial soil erosion or the loss of topsoil, and the modified Class I Multiuse Trail low water crossing has the potential to result in scouring around the crossing's piles.	
Mitigation Measures	
Implement Mitigation Measure HYD/mm-1.1.	
GEO/mm-2.1	*The final modified Class I Multiuse Trail low water crossing design for vehicular use shall include armoring or protection of the driven piles to prevent scouring during periods of surface flow. Armoring or protection shall include riprap, tetraprons, grout filled bags, concrete blocks, grouted rock slope protection, or functional equivalent as determined by civil engineer responsible for the design of the low water crossing and the City of Paso Robles Engineer. These specifications shall be noted on all applicable construction documents and shall be inspected by the City of Paso Robles Engineer to confirm appropriate installation during the construction process.*

GEO Impact 2 (Class II)
Residual Impacts
Potential impacts related to soil erosion or loss of topsoil would be less than significant.

WOULD THE PROJECT BE LOCATED ON A GEOLOGIC UNIT OR SOIL THAT IS UNSTABLE, OR THAT WOULD BECOME UNSTABLE AS A RESULT OF THE PROJECT, AND POTENTIALLY RESULT IN ON- OR OFFSITE LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION OR COLLAPSE?

GEO Impact 3: The project site is not located in an area susceptible to land failure events and the project would not increase the potential to induce land failure. Impacts would be less than significant (Class III).

The project site and offsite improvements in an area of low to moderate landslide potential based on the Safety Element and the results of the Preliminary Geotechnical and Geologic Hazards Report (City of Paso Robles 2014; Yeh and Associates 2021). Moreover, the local topography is relatively flat to low relief, and no evidence of landslides or slope instability was noted on the project site during the geotechnical investigation (Yeh and Associates 2021). The project does not include components that would increase landslide risk, such as the creation of steep slopes. Therefore, impacts from seismically induced landslides or slope instability would be *less than significant*.

Based on the Preliminary Geotechnical and Geologic Hazards Report prepared for the project, the site is underlain by unsaturated, loose to very dense clayey sand, medium to very dense well-graded sand with gravel, and medium stiff to hard lean clay with varying amounts of sand and gravel, all of which have a low potential for liquefaction, seismic settlement, or lateral spreading (Yeh and Associates 2021). Therefore, impacts from liquefaction, seismic settlement, and lateral spreading are *less than significant*.

Based on satellite imagery, it is estimated that land in the project area subsided by 0.8 to 2.1 inches in 1997, most likely from groundwater extraction (Yeh and Associates 2021). Though no specific subsidence information is known for the project site, it is estimated wells on the site were pumping approximately 221.94 AFY in 1997, which has since declined to approximately 4.78 AFY in 2020 (Todd Groundwater 2021). Ground subsidence at the project site would be exacerbated by the project if the project's water demand is extracted from the existing onsite wells, or if new wells are installed and used. However, the project proposes to abandon the existing wells and would connect to municipal water to meet the project's water needs. Therefore, impacts from subsidence are expected to be *less than significant*.

GEO Impact 3 (Class III)
The project site is not located in an area susceptible to land failure events and the project would not increase the potential to induce land failure.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with land failure events would be less than significant.

WOULD THE PROJECT BE LOCATED ON EXPANSIVE SOIL, AS DEFINED IN TABLE 18-1-B OF THE UNIFORM BUILDING CODE (1994), CREATING SUBSTANTIAL DIRECT OR INDIRECT RISKS TO LIFE OR PROPERTY?

GEO Impact 4: The project would be located on moderately expansive soils and would be required to adhere to the requirements of the California Building Code regarding foundation design, which are based on the Uniform Building Code. Impacts would be less than significant (Class III).

Based on the geotechnical investigations, near-surface soils composed of clayey sand and sandy clay are considered very low to moderately expansive, with older alluvial sediments encountered at the site generally considered moderately expansive (Yeh and Associates 2021). Expansive soils may fluctuate in volume due to changes in moisture level, which could affect the stability of the building foundations and other built structures on the project site. The design of the project must conform to mandatory CBC standards, which include specific requirements on building design to reduce substantial direct or indirect risks to life or property caused by expansive soils, and are based on the Uniform Building Code.

The Preliminary Geotechnical and Geologic Hazards Report provides planning-level analysis for the project site at a sufficient level of detail to identify potential impacts; a design-level report is necessary to identify specific recommendations for construction when construction plans are submitted to the City for review. It is anticipated that specific recommendations to address expansive conditions would include replacing subsurface soils below slabs and flatwork with 12 inches of non-expansive material, such as sand or gravel; deepening foundation footings to reduce moisture fluctuations; and drainage considerations to direct surface water away from structures. Section 20.12.010 of the Paso Robles Municipal Code (Title 20 – Grading), requires that each application for grading permits be accompanied by a geologic investigation, and that the recommendations included in the investigation be incorporated into project plans.

Therefore, with adherence to the mandatory requirements of CBC standards on the project's design, and mandatory adherence to the recommendations of a design-level geotechnical report (in compliance with the Paso Robles Municipal Code), which cannot be produced until construction-level design plans are available, potential impacts associated with the project being located on expansive soils, creating substantial direct or indirect risks to life or property, would be *less than significant*.

GEO Impact 4 (Class III)
The project would be located on moderately expansive soils and would be required to adhere to the requirements of the California Building Code regarding foundation design, which are based on the Uniform Building Code.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with the project being located on expansive soil would be less than significant.

WOULD THE PROJECT DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE?

GEO Impact 5: Grading and subsurface construction activity would disturb native geological formations that are known to have high paleontological sensitivity and could therefore destroy paleontological resources. Impacts would be less than significant with mitigation (Class II).

The project area is immediately underlain by unmapped recent artificial fill and Pleistocene-age older alluvial sediments (Qoa) at the surface, and Pleistocene- to latest Pliocene-age Paso Robles Formation (QTp) in the subsurface. Based on the results of the geotechnical analysis, the maximum depth of artificial fill ranges from 1.5 to 5 feet below ground surface but may be absent in portions of the project area (Yeh and Associates 2021). Pleistocene-age older alluvial sediments have a maximum depth of 5 to 22 feet below ground surface and are immediately underlain by Pleistocene- and latest Pliocene-age Paso Robles Formation (Yeh and Associates 2021). Artificial fill that is present in portions of the project area has a low paleontological sensitivity based on SVP (2010) guidelines, and older alluvial sediments and Paso Robles Formation have a high paleontological sensitivity based on SVP (2010) guidelines.

Grading for Phase 1 would require approximately 297,235 cubic yards (cy) of cut, and grading for Phase 2 would require 53,900 cy of cut, with cut depths up to 33.5 feet. Ground-disturbing activities, including offsite trenching and grading, may impact geologic units of low to high paleontological sensitivity, increasing with depth, such as artificial fill, and/or geologic units of high paleontological sensitivity at the surface and at depth, such as older alluvial sediments and Paso Robles Formation. Should fossils be encountered, they would be at risk of damage or destruction from earthwork activities. Mitigation Measure GEO/mm-5.1 would require the Applicant to retain a qualified paleontologist to administer worker awareness training to educate project's construction personnel on inadvertent resource discovery. Mitigation Measure GEO/mm-5.2 requires a monitoring plan to be implemented for all earthwork in older alluvium or Paso Robles Formation and work greater than 5 feet in depth. Therefore, with implementation mitigation measures, impacts to paleontological resources or sites would be *less than significant with mitigation*.

GEO Impact 5 (Class II)	
Grading and subsurface construction activity would disturb native geological formations that are known to have high paleontological sensitivity and could therefore destroy paleontological resources.	
Mitigation Measures	
GEO/mm-5.1	*A City of Paso Robles (City)-approved paleontologist shall be retained by the Applicant that meets the qualifications of a Qualified Professional Paleontologist as defined by the Society of Vertebrate Paleontology to develop and conduct a Workers Environmental Awareness Program training for project personnel involved in ground-disturbing activities, such as grading, excavation, trenching, and other earthwork. The training shall describe applicable laws and regulations regarding paleontological resources, types of resources that may be found in the project area, and the required procedures in the event of an inadvertent discovery.*
GEO/mm-5.2	*The City of Paso Robles (City)-approved paleontologist shall develop and submit a Paleontological Resources Management Plan (PRMP) to the City for review and approval. The approved PRMP shall be implemented during all construction activities. The PRMP shall include provisions for documenting the site according to the standards developed by the National Research Council (1987) and shall include, at a minimum:*

GEO Impact 5 (Class II)
1. *All ground disturbances greater than or equal to 5 feet below ground surface, or that impact older alluvium or Paso Robles Formation regardless of depth, shall be monitored by the City-approved paleontologist;* 2. *A map, based on final grading plans, showing the areas where monitoring shall occur;* 3. *Processes and procedures for paleontological monitoring, fossil salvaging, reporting, and curation;* 4. *In the event paleontological resources are identified during construction, all work within 50 feet of the discovery shall immediately cease so that the City-approved paleontologist can evaluate the significance of the discovery;* 5. *Preservation of significant fossils found during construction by prompt removal and/or stabilization whenever feasible; and* 6. *Cataloguing and curation of all artifacts and records detailing the results of the investigations at a recognized, nonprofit paleontological specimen repository with permanent curator, such as a museum or university, or at the discretion of the paleontologist, at a City-approved facility.* *At the conclusion of paleontological monitoring, the City-approved paleontologist shall prepare a final Paleontological Resources Monitoring Report that documents the implementation of the PRMP, as well as any paleontological resources discoveries, and submit the final report to the City.*
Residual Impacts
Potential impacts associated with disturbance of native geological formations that are known to have high paleontological sensitivity would be less than significant.

4.6.6 Cumulative Impacts

Cumulative impacts related to geology and soils would result if project-related impacts, when combined with other projects identified in Table 3-1, Cumulative Development Scenario Project List, in *Chapter 3, Environmental Setting*, would cumulatively increase the potential for geologic hazards, such as ground shaking, or increased soil impacts, such as erosion. Any structure built in the seismically active region of the Central Coast is naturally at risk to damage during major seismic events, though requirements in the CBC are intended to protect life, ensure safety, and prevent building collapse. Cumulative development may uncover previously undisturbed paleontological resources, depending on the sensitivity of the geologic unit, and could potentially result in damage or loss of such resources. However, project-specific impacts would be addressed on a project-by-project basis. All discretionary development within the city, including development projects listed in Table 3-1 would be required to undergo analysis of each site's geological and soil conditions prior to construction. This analysis would include an investigation of structural stability based on soils present; soil hazards, including landslide and liquefaction; and the potential for reasonably foreseeable seismic activity and would meet the most current building safety requirements. The project would have a less-than-significant impact associated with seismic activity, soil instability, subsidence, collapse, and/or expansive soil, and therefore, the cumulative contribution would be less than significant.

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4.7 HAZARDS, HAZARDOUS MATERIALS, AND WILDFIRE

This section discusses the project's potential impacts relating to hazards, hazardous materials, and wildfire. This analysis consists of a description of existing conditions of the project site and surrounding area, a summary of the regulatory framework, and an evaluation of potential impacts associated with hazards, hazardous materials, and wildfire. The analysis in this section is partially based on the information provided in the *Phase I Environmental Site Assessment Former Estrella Youth Correctional Facility 4545 Airport Road, Paso Robles California* (Phase I ESA) (Avocet Environmental, Inc. [Avocet] 2017a), *Phase II Investigation Former Estrella Youth Correctional Facility 4545 Airport Road, Paso Robles California* (Phase II Investigation) (Avocet 2017b), and *Additional Phase II Investigation Former Estrella Youth Correctional Facility 4545 Airport Road, Paso Robles California* (Additional Phase II Investigation) prepared for the project site (Avocet 2018) prepared for the project site (Appendix G). Additionally, Haro Environmental reviewed and summarized the findings of these investigations and identified and filled any data gaps that may not have previously been addressed or that could have occurred since the conclusion of the previous investigations (Haro Environmental 2021; see Appendix G).

4.7.1 Existing Conditions

4.7.1.1 Hazards and Hazardous Materials

This section describes existing conditions at the project site and offsite improvement areas related to hazards and hazardous materials.

4.7.1.1.1 PROJECT SITE HISTORY

The project site is located in the northeastern portion of the city of Paso Robles, adjacent to the Paso Robles Municipal Airport. Surrounding land uses include vineyards and wineries to the south, the Paso Robles Municipal Airport to the east, and agricultural uses to the north and west (City of Paso Robles 2018). The site currently supports 42 separate buildings dating back to the 1950s associated with the former Paso Robles Boys School which include buildings previously used for housing, school facilities, a visitor center, a library, a fire drill station with a truck garage, a large boiler plant, a kitchen, medical and dental offices, workshops, an administration building, maintenance facilities, and recreational facilities. The site also includes six residential homes for staff, two sally ports, previous fuel stations, a car wash, and fencing.

The former Paso Robles Boys School was closed in 2008 and the infrastructure was left intact in anticipation of reopening the facility; however, in 2013, the State determined that the site would officially be closed (Avocet 2017a). Support facilities of the former Paso Robles Boys School include the previously mentioned boiler plant, a maintenance facility (for vehicle and equipment maintenance), and water supply infrastructure including three groundwater supply wells, two water supply reservoirs, and a disinfection system.

American Society for Testing and Materials (ASTM) defines a recognized environmental condition (REC) as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to the release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. The three site assessments prepared for the project identified three RECs at the project site, one controlled recognized environmental condition (CREC), four historical recognized environmental conditions (HRECs), and ten other environmental features (OEFs), which are environmental conditions that do not meet the ASTM definition of a REC, CREC, or HREC. See Figure 4.7-1 for a map of all environmental conditions and features on the site.

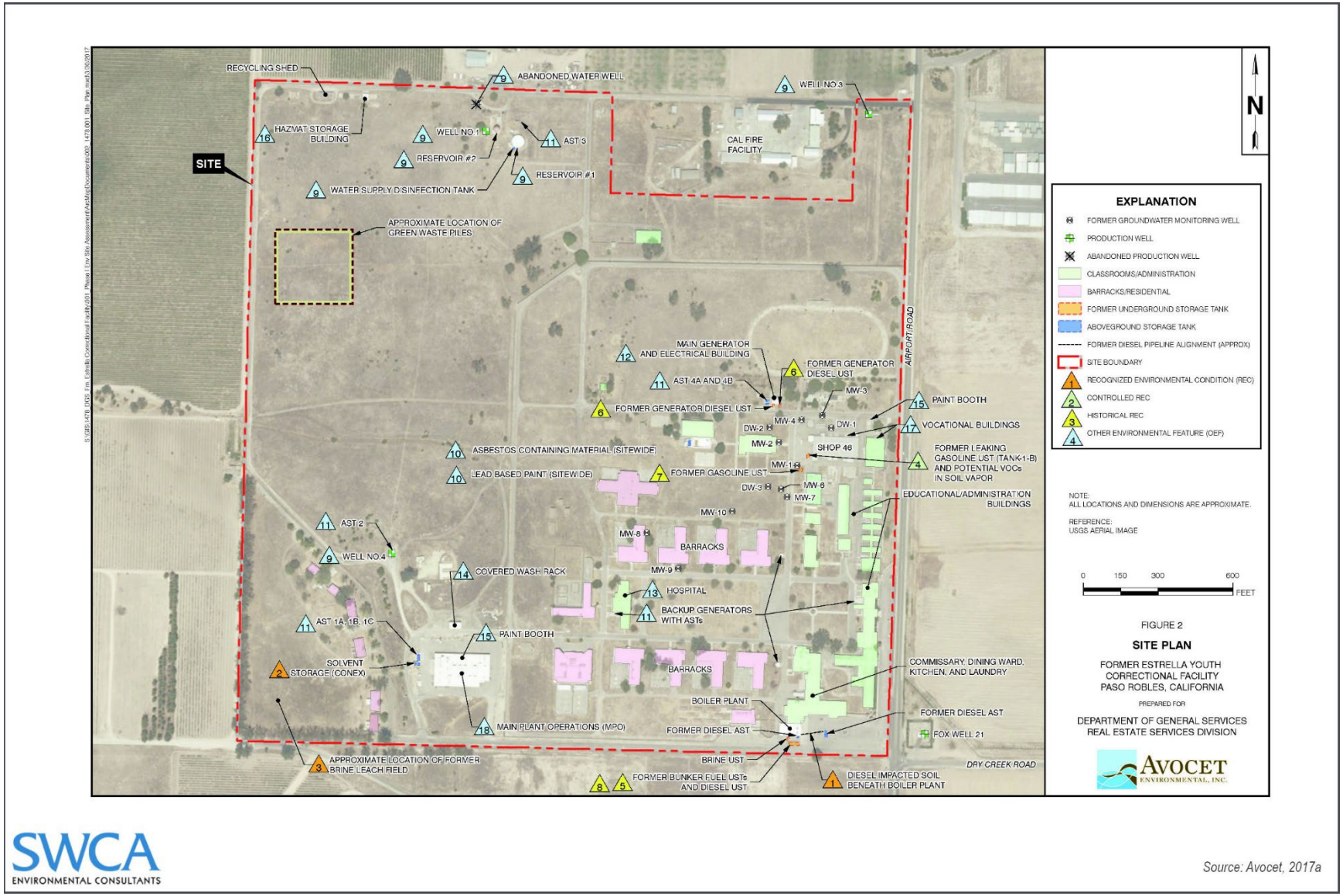


Figure 4.7-1. Project site Recognized Environmental Conditions and features.

4.7.1.1.2 RECORDED HAZARDOUS MATERIALS SITES (CORTESE LIST SITES)

The SWRCB Geotracker database was queried and identified two closed Leaking Underground Storage Tank (LUST) clean-up sites within the project site (SWRCB 2021). One of these LUST clean-up sites is located within the central eastern portion of the project site and has been closed since 1987. The other LUST clean-up site onsite is also located within the central eastern portion of the project site and has been closed since October 2013. See below for more information on USTs located on the site.

The California Department of Toxic Substance Control (DTSC) Envirostor database was also queried, and no other recorded hazardous materials cleanup sites were identified within the project site, within 1,000 feet of the project site, or within 1,000 feet of the offsite road improvements areas. The nearest hazardous materials cleanup site recorded by the DTSC is a Military Evaluation site located within the Paso Robles Municipal Airport approximately 1,500 feet northeast of the project site (DTSC 2021). In their NOP comment letter, the DTSC indicated that the former Estrella Airfield, which included the project site, generated hazardous waste, including solvents, battery acids, and fuel releases from underground storage tanks and that undiscovered contaminates resulting from military or other aeronautical operations may remain subsurface.

In addition, based on a review of the California Department of Conservation Geologic Energy Management Division (CalGEM) Well Finder map database, there are no reported oil or gas wells recorded within the project site or offsite improvement areas (CalGEM 2021).

4.7.1.1.3 CONTAMINATED SOIL

Underground Storage Tanks

Per the Avocet, the project site has historically contained eight USTs, seven of which were used for fuel storage and one that was used to store brine from the boiler.

Between 1986 and 1997, the seven fuel storage USTs were removed from the project site, and it was discovered that two of the USTs had leaked (identified above as closed Cortese list sites). The first leaking underground storage tank (LUST) was removed in 1986 and consisted of a 10,000-gallon bunker oil fuel tank located directly south of the boiler plant. In order to clean-up the site, visibly impacted soil was over-excavated. Soils samples taken after the clean-up did not indicate significant soil impacts and the case was closed in August 1987 and the County of San Luis Obispo Environmental Health Services (SLOEHS) and Central Coast Regional Water Quality Control Board (CCRWQCB) issued “no further action” letters.

In February 1997, a 1,000-gallon gasoline UST was removed from the vicinity of Shop 46 (vocational buildings) in the eastern portion of the site (CREC 4). The UST had leaked gasoline and impacted the underlying soil and shallow groundwater. In order to clean-up the site, remedial soil excavation occurred in the source area and 12 groundwater monitoring wells were installed between 2000 to 2003. The wells were monitored from 2000 to 2011 and yielded decreasing contaminant concentrations. In October 2013, the Central Coast Regional Water Quality Control Board (CCRWQCB) ordered the case closed with the understanding that residual contamination still exists in shallow groundwater (see discussion below).

The boiler plant featured two industrial water softeners. When they were operational, waste brine solution was discharged to a leach field in the southwest corner of the site (REC 3). Its lateral extent, depth, and construction materials are not well documented. The composition of the waste brine solution is also not known. Soil matrix samples were analyzed for metals. Metals in most soil samples were detected at concentrations representative of background levels.

Aboveground Storage Tanks

There are 12 aboveground storage tanks (ASTs) onsite that were used for fuel storage, seven of which were for diesel fuel storage and five for gasoline storage.

In December 1992, diesel fuel was observed on the ground surface above a pipeline connected to an AST located near the boiler plant; it was estimated that 250 gallons of diesel fuel had been released. Soil sampling indicated that diesel-impacted soil was present to the east of and likely beneath the boiler plant (REC 1); total petroleum hydrocarbons as diesel (TPH-d) were detected in soil to depths of at least 6.5 feet below ground surface, with concentrations over 1,000 milligrams per kilogram (mg/kg) at some locations. Soil remediation was not possible without compromising the structural integrity of the boiler plant building. The SLOEHD allowed a paving project to occur within the vicinity of the boiler plant without requiring remedial action; however, it was stated that additional investigation would be required if the site were to be redeveloped, citing inadequate delineation of the diesel-impacted soil during the initial investigation (Avocet 2017a).

In 2006, a diesel UST and associated subsurface piping were removed from the area just south of the boiler plant. Upon removal, diesel fuel was observed in the pipe trench inside the boiler plant. To investigate this condition, soil matrix and groundwater samples were collected from soil auger borings in the parking lot to the east of the boiler plant building and from hand-auger borings beneath the boiler plant building and analyzed for TPH and VOCs. Additionally, one sub-slab soil vapor sample was collected from beneath the floor of the boiler plant and analyzed for VOCs. Eighteen of the 59 soil samples collected as part of the boiler plant investigation contained detectable concentrations of TPH-cc (carbon chain ranges of C6-C44) ranging from 13 to 2,800 mg/kg. Ultimately, the 2017b Avocet report concluded that the diesel-impacted soil beneath and to the east of the boiler plant did not represent a significant risk or hazard to current project site occupants; however, if the building is demolished, the impacted soil should be excavated and disposed of.

Other Sources

Electrical Transformers (OEF 12)

The main electrical switches for the PRBS facility and at least one transformer are located in a building in the central portion of the project site. Avocet was unable to access the building and inspect the switch gear and transformer(s), but noted that many transformers are oil-cooled, and in older transformers, the oil may contain polychlorinated biphenyls (PCBs). PCBs may also be present in other electrical equipment onsite. Soil matrix samples did not contain detectable concentrations of PCBs, and Avocet (2017b) indicated that no further action was necessary at the time. However, in the future if the emergency generator is permanently decommissioned, Avocet (2017b) recommended that the transformers should be tested for PCBs and disposed of accordingly.

Vehicle Wash Rack (OEF 14)

The project site contains a covered vehicle wash rack, located north of the maintenance building. However, it reportedly was not used often, as its pressure washer tended to remove paint from vehicles (Avocet 2017a). The wash rack features a drain connected to the sanitary sewer, and minor staining on the wash rack pad was observed. Although there is no indication that wash rack operations have resulted in impacts to the subsurface, Avocet recommended that soil beneath and around the wash rack should be inspected in conjunction with its removal (2017a).

Paint Booths (OEF 15)

The project site contains two paint booths, one located inside the maintenance building and the other located behind the Shop 46 vocational buildings. The maintenance paint booth reportedly was never used and the paint booth behind Shop 46 was reportedly used for a short period of time only (Avocet 2017a). There was no visual or olfactory (i.e., smell) indication that a significant release had occurred within the Shop 46 paint booth. Although there was no indication that Shop 46 paint booth operations resulted in impacts to the subsurface, Avocet collected eight soil samples in the immediate vicinity of the Shop 46 paint booth and analyzed the samples for VOCs. Only one soil sample contained VOCs at a concentration exceeding the reporting limit, which was acetone. Because neither the EPA nor DTSC have established screening levels for acetone, Avocet expressed that this detection of acetone is not likely a concern with regards to future use or redevelopment of the property (2017a).

Maintenance Building (OEF 18)

The maintenance building was used to conduct light vehicle maintenance, such as oil changes. It was also used to store facility maintenance materials and equipment, including oil, coolant, and brake fluids. Waste oil and coolant are currently stored in 55-gallon drums in the corner of the maintenance area and inside a storage room. Although secondary containment is not provided for all of the drums, no indications of leaks or spills were observed. Avocet noted staining elsewhere on the concrete floor as being consistent with decades of automotive fluids use throughout the building and being indicative of de minimis releases only.

4.7.1.1.4 CONTAMINATED GROUNDWATER

The project site contains three active groundwater supply wells and one abandoned production well (OEF 9). Avocet expressed that the fourth well may not have been abandoned in accordance with State of California regulations and recommended that it be reevaluated for regulatory compliance. Furthermore, if the abandoned well was fitted with an oil-lubricated deep well turbine pump like the three active wells, Avocet recommended that the water surface should be inspected for the presence of oil, which can accumulate due to maintenance of the pump shaft (2017b).

As discussed above, a 1,000-gallon gasoline UST was removed from the vicinity of Shop 46 (vocational buildings) in the eastern portion of the site (CREC 4), and it was discovered that the UST had leaked gasoline and impacted the underlying shallow groundwater. Groundwater monitoring wells were installed, and the wells were monitored from 2000 to 2011 and yielded decreasing contaminant concentrations. Residual contamination still exists in shallow groundwater.

The diesel UST and associated subsurface piping that were removed from the area just south of the boiler plant in 2006 did not result in diesel-impacted soil beneath and to the east of the boiler plant that was considered a significant risk or hazard to current project site occupants. Avocet noted that the groundwater impacts related to this spill would not be considered a significant constraint to project site reuse; however, it is possible that the oversight agency may request a groundwater investigation to characterize the nature and extent of the impacts (2017a).

Avocet determined the boiler plant leach field in the southwest corner of the site likely impacted shallow groundwater. Given the unknown composition of the brine discharge, Avocet took groundwater samples to identify any dissolved metals and minerals that may have resulted from the discharge. Groundwater samples identified the presence of calcium, magnesium, sodium, and chloride at quantities above background levels, which indicated that shallow groundwater quality had been compromised. The concentrations of chloride and TDS measured in the samples were measurably higher than the water

quality goals recommended in the Paso Robles Groundwater Basin Salt/Nutrient Management Plan. California regulatory agencies have discretion to decide whether to pursue enforcement action on releases to the environment that do not pose a direct threat to human health but compromise the value of a resource such as groundwater. In their Phase II Investigation, Avocet recommended that SLOEDH and/or CCRWQCB be contacted to determine their interest in additional characterization of the brine leach field impacts (2017a).

4.7.1.1.5 STORED HAZARDOUS MATERIALS

In addition to the fuel ASTs, other hazardous substances are stored above ground in three polyethylene totes and a Conex storage container (metal reusable shipping box, similar to a seatrain). Two of the totes are located adjacent to an empty swimming pool and formerly contained hydrochloric acid and sodium hypochlorite. Both of these totes are currently empty, as is the swimming pool. The third tote is located adjacent to the main water supply reservoir and contains sodium hypochlorite, which is used for disinfection of the water supply (Avocet 2017a).

Solvents (Lacquer Diluent 66) are currently being stored in four 55-gallon drums, without secondary containment, inside a Conex unit to the west of the maintenance building (REC 2). Two 55-gallon drums containing waste antifreeze were also observed. No visible or olfactory indications of leakage were observed. Soil matrix and soil vapor samples were collected from a boring advanced immediately adjacent to the solvent storage shed located to the west of the maintenance building and analyzed for VOCs. Of the eight soil samples collected in the immediate vicinity of the solvent storage container and analyzed for VOCs, only one contained VOCs at a concentration exceeding the reporting limit. Using default attenuation factors to estimate the concentrations of VOCs that could potentially accumulate in indoor air, all of the estimated concentrations were all below the corresponding, calculated DTSC Screening Levels and/or EPA Regional Screening Levels. As such, Avocet concluded that a release to the subsurface environment in the vicinity of the solvent storage container, if any, was de minimis in nature (2017a).

A hazardous materials storage building is located in the northwest corner of the project site, adjacent to the water reservoir enclosure (OEF 16). Avocet personnel were unable to inspect the inside of the building; however, state staff reported that it currently contains empty totes for disinfection chemicals and spent fluorescent light bulbs to be recycled, and has historically been used for such purposes. However, past inventory records were not available for Avocet to review. Avocet did not find indications that liquid hazardous materials are presently stored in the building but may have been in the past. Soil samples were taken from eight borings within the footprints of the hazardous materials storage building and recycling shed. Soil matrix samples were collected and analyzed for TPH, VOCs, and PCBs. Soil vapor samples were also collected and analyzed for VOCs. The concentrations of all analytes tested were non-detectable. Avocet concluded that the subsurface beneath the hazardous materials storage building and recycling shed were not impacted by past use and did not recommend further action (2017a).

Medical facilities at the PRBS included an X-ray machine. The X-ray heads in such machines are required to be registered and regulated. The California Department of Public Health must be notified within 30 days of the transfer or disposal of the machine, and the equipment must be removed by a suitably trained or experienced individual. Avocet also noted that X-ray machines manufactured before 1980 may contain PCBs in their power supply transformers (2017a). Since the age of the machine is not known, PCBs are assumed to be present and Avocet's report recommended that the machine should be tested for PCB content prior to disposal (2017a).

4.7.1.1.6 ASBESTOS-CONTAINING MATERIALS

Asbestos was used as insulation in walls and ceilings and as a component in adhesives in buildings constructed prior to 1979. Certain cement products, such as mortar and roofing components, and metal siding (galvanized asbestos [galbestos]) also commonly contained asbestos. Asbestos can pose a health risk when very small fibrous particles become airborne. Three of the major health effects associated with asbestos exposure are lung cancer, mesothelioma, and asbestosis.

The PRBS campus and original buildings are over 60 years old, and the facility is in generally poor condition. In 2003, a series of tests were conducted on building materials throughout the PRBS campus to determine presence or absence of asbestos containing materials (ACM). ACM were detected positive or assumed positive in 14 of the structures onsite (OEF 10; California Department of General Services 2003). ACM may also be present in the subsurface in asbestos-concrete pipe or in insulation assumed to be wrapped around steam distribution piping that were inaccessible at the time of testing. Avocet did not have access to the 2003 asbestos tests, and therefore asbestos is assumed to be present and Avocet recommended in their investigation that the buildings be surveyed for ACMs including Galbestos siding (2017a).

4.7.1.1.7 LEAD-BASED PAINT

Lead is a highly toxic metal that was used for many years in products found in and around structures, including paint. Lead-based paint (LBP) was commonly used in construction prior to the enactment of federal regulations limiting its use in the late 1970s. Exposure to lead can cause a range of health effects, from behavioral problems and learning disabilities, to seizures and death. The primary source of LBP is deteriorating paint that is dry scraped, dry sanded, or heated. Dust also forms when painted surfaces bump or rub together. LBP that is in good condition is usually not a hazard if it is not disturbed. None of the site investigations specifically tested for the presence of LBP; however, given the age of the buildings, it is assumed that LBP is present in building construction in or prior to 1978.

4.7.1.1.8 AERIALLY DEPOSITED LEAD

Elevated lead concentrations exist in soils along older roadways as a result of aerially deposited lead (ADL) from the historical use of leaded gasoline. Refiners in the United States started adding lead compounds to gasoline in the 1920's to boost octane levels and improve engine performance by reducing engine "knock" and allowing higher engine compression. Tailpipe emissions from automobiles using leaded gasoline contained lead and resulted in aerially deposited lead being deposited in and along roadways throughout California. The phaseout of lead in gasoline began in 1974 when, under the authority of the Clean Air Act Amendments of 1970, the U.S. Environmental Protection Agency (EPA) introduced rules requiring the use of unleaded gasoline in new cars equipped with catalytic converters. The introduction of catalytic converters for control of hydrocarbon, nitrous oxide, and carbon monoxide emissions required that motorists use unleaded gasoline because lead destroys the emissions control capacity of catalytic converters. By the early 1980s gasoline lead levels had declined approximately 80% as a result of both the regulations and fleet turnover. Beginning in 1992, lead was banned as a fuel additive in California.

ADL-contaminated soil still exists along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. The highest lead concentrations are usually found within 10 feet of the edge of the pavement and within the top 6 inches of soil. In some cases, lead is as deep as 2 to 3 feet below the surface and can extend 20 feet or more from the edge of pavement (California Department of Toxic Substances Control [DTSC] 2016). None of the site investigations

evaluated the surrounding roadways for the presence of ADL; however, given the vicinity's past intensive military use, it is assumed that ADL is present along roadways.

4.7.1.1.9 RADON

Radon is a naturally occurring gas produced by the breakdown of uranium in soil, rock, and water. Accumulations of this gas inside structures can become a health hazard because radon is known to cause lung cancer. The threat of radon is very low in well-ventilated structures. Basements in radon areas can lead to health issues but are rare in the region (City of Paso Robles 2014). Based on the analysis provided in the Phase I ESA prepared for the project, naturally occurring radon levels in the site vicinity are expected to be low and within regulatory agency criteria (Avocet 2017a).

4.7.1.1.10 HAZARDOUS MATERIAL TRANSPORT AND DISPOSAL

The 2016 *City of Paso Robles Local Hazard Mitigation Plan* (LHMP) states that the areas of main concern for hazardous materials upset include US 101 and SR 46, and the Union Pacific Railroad. The proximity of these transportation routes to densely populated areas of the city presents a remote possibility of a catastrophic disaster. Truck accidents could result in spills of such materials. However, none of these routes are adjacent to the project site (AECOM 2016). SR 46E is located 1.3 miles south of the project site and US 101 is located 2.5 miles west of the project site. The Union Pacific Railroad is located approximately 3 miles west of the project site.

The nearest hazardous waste disposal facility is Kettleman Hills, located 3.5 miles southwest of Kettleman City, approximately 50 miles northeast of the project site. Transportation of hazardous materials from the project site to Kettleman Hills would occur via SR 46E and State Route 41 (SR 41).

4.7.1.1.11 AIRPORT SAFETY HAZARDS

Projects within close proximity to an airport have the potential to expose people to excessive noise hazard from aircraft activity. The eastern boundary of the project site is located on the opposite side of Airport Road adjacent to the Paso Robles Municipal Airport, approximately 1,700 feet away from the edge of the runway. According to the Airport Land Use Plan (ALUP) for the Paso Robles Municipal Airport, the project site is located in Safety Zone 5 which is located within the 55 decibel (dB) community noise equivalent level (CNEL) airport noise contour (City of Paso Robles 2006; 2007).

Wildlife on and near airports can present safety issues to the public and property damage to airplanes. In 2019, the FAA reported that there were 17,228 wildlife strikes at 753 different airports in the U.S. Bird strikes are the most common type of wildlife strike, accounting for 97% of all aircraft strikes in the U.S. (FAA 2021). The majority of bird strikes occur during landing of an aircraft and result in estimated damage of $500 million per year (FAA 2021). Airports implement wildlife management programs to manage wildlife habitat and reduce bird presence at airports.

The FAA recommends a minimum separation of 5 miles from an airport's air operations area (areas related to takeoff, landing, or surface maneuvering) to a known hazardous wildlife attractant. Common hazardous wildlife attractants include waste disposal facilities, water management facilities such as water treatments facilities and retention basins and ponds, wetlands, and agricultural operations. FAA recommendations related to stormwater facilities include designing for a maximum retention period of 48-hours, and for the facility to remain completely dry between rain events (FAA 2005).

There are currently no known hazardous wildlife attractants within the project site. The nearest potential hazardous wildlife attractants to the project site include agricultural pond/basins associated with nearby vineyards, the nearest located approximately 1,675 feet northwest.

4.7.1.1.12 CITY OF PASO ROBLES FIRE AND EMERGENCY SERVICES

The City of Paso Robles Fire and Emergency Services (Emergency Services) provides fire protection services to the city. Emergency Services has entered into an automatic aid program with other fire protection agencies within San Luis Obispo County that provides for additional response capabilities. This cooperative system gives each agency a depth and weight of response to be successful in mitigating both large scale and simultaneous emergency events within the County.

The owner or operator of any business or entity that handles a hazardous material above threshold quantities is required, by State and Federal laws, to submit a Business Plan to the local Certified Unified Program Agency (CUPA). SLOEHD is the CUPA, and Emergency Services administers the program within the city.

4.7.1.2 Wildfire

This section describes existing conditions at the project site related to wildfire.

4.7.1.2.1 REGIONAL SETTING

A fire environment is defined as the surrounding conditions, influences, and modifying forces that determine fire behavior. The four components that affect fire behavior are fuels, weather, topography, and human behavior. Understanding the relationship between these factors and their influences on fire behavior must be considered to plan the most effective strategies for reducing the threat of unwanted fire. Of these factors, fuels (i.e., vegetation, buildings, etc.) are the component that is typically the focus of wildfire risk reduction because it is the factor that is most easily affected. For example, vegetation can be removed or manipulated in ways that will dramatically reduce fire risk. Structures can be "hardened" by being built with non-combustible or fire-resistant materials as defined in the California Wildland-Urban Interface Code (WUI) Chapter 7A. Hardened structures with adequate defensible space and proper property hygiene, enforced by the Hazardous Fuels Reduction Program, have the best chance of survival in a wildland fire (City of Paso Robles 2019).

Fuels

Vegetation (or fuel) plays a major role in fire behavior and shaping fire hazard potential. Vegetation distribution throughout the County varies by location and topography, with dramatic differences observed between the eastern, agricultural and ranching portions of the County, and the more mountainous central and southern regions. The most abundant vegetative cover within San Luis Obispo County is herbaceous (46.9%), or annual grassland, distributed primarily in the inland valley and plain areas east of the La Panza, Garcia, and Santa Lucia Ranges. While this fuel type can burn quickly under strong, dry wind patterns, it does not produce the high heat intensity and high flame lengths associated with scrub, chaparral, and forest fuel types. Other significant vegetative cover types include: light brush (16.5%), pine/grass (12.1%), and hardwood/conifer litter (8.3%). These vegetation types are primarily associated with the steeper, upland areas in the La Panza, Garcia, and Santa Lucia Ranges throughout the central portion of the County. Fire behavior in brush fuel types produces higher flame lengths than that in grassland, although spread rates are typically slower. Fire behavior in forests is variable, depending on surface fuel conditions and the presence of ladder fuels.

The moist climate in the Central Coast Region supports the Sudden Oak Death (SOD) pathogen. Sudden Oak Death is currently found at the Monterey/San Luis Obispo County border, though the potential for spread into San Luis Obispo County is high. SOD has the potential to kill a significant number of coast live oak, California black oaks, Shreve oaks, canyon live oaks and tanoaks in the County. This poses a

potentially significant increase in the fire hazard within infected areas due to the increase in the amount of dead fuel available. The loss of tree canopy will increase ground fuels by regenerating shrub species, which in turn increases the fire hazard. Aerial monitoring, stream side monitoring and ground checking dying oak trees are conducted annually by agencies and universities to monitor the spread of the disease and ongoing research is being conducted to determine potential abatement methods (City of Paso Robles 2019).

Weather

Paso Robles is characterized by a Mediterranean climate with most annual rainfall occurring during the winter and early spring. However, the primary climate is defined by long, hot, dry summers and brief, cool sometimes rainy winters. The city receives an annual rainfall of about 14.71 inches per year. Paso Robles often receives less than 10 inches of rain per year and typically, no rain falls from May through September. Summers in Paso Robles tend to be very hot, with daily temperatures frequently exceeding 100 degrees from late June mid-September. It is not uncommon to experience a heat wave exceeding 110 degrees for several days. Summers in Paso Robles experience an unusually large daytime-nighttime temperature swing. There may be profound temperature differences between the daytime and nighttime temperatures, as much as 50 degrees (City of Paso Robles 2019).

Topography

Topography is essentially the "lay of the land" and is commonly characterized by measurements of slope, elevation, and aspect. The topography of Paso Robles is variable and greatly affected by the Santa Lucia Coastal Range. The topography of the Paso Robles area consists of gentle rolling hills on the eastern half of the city, and foothill peaks which rise in elevation to the west. Much of these areas to the west are blanketed in the California chaparral environment. Paso Robles sits on the eastern foothills of the Santa Lucia Coastal Mountain Range, which lies directly to the West of the city, and runs in North-South direction. The city is located at the southern end of the Salinas River Valley, which is centered between the Temblor Range to the east and the Santa Lucia Range to the West (City of Paso Robles 2019).

Human Behavior

The *City of Paso Robles Community Wildfire Protection Plan* (2019) included an analysis of State Responsibility Area (SRA) ignition data for San Luis Obispo County over a 5-year period (2013 through 2017). The 5-year ignition history identified trends in ignition type, with most ignition causes classified as Miscellaneous or Undetermined (42%). Vehicle, Equipment Use, and Powerlines also emerged as significant ignition sources in the County (40%). Spatial analysis of ignition locations revealed a direct correlation between ignitions and roads/transportation corridors. A high density of ignitions was also observable within and adjacent to urban areas, with notable concentrations observed near the communities of Cambria, Lake Nacimiento, Paso Robles, Templeton, Atascadero, Los Osos, San Luis Obispo, Arroyo Grande, and in the Nipomo area. This concentration of ignitions in urban areas and along transportation corridors emphasizes the importance of public education and fire prevention activities (City of Paso Robles 2019).

Fire History

Fire history information can provide an understanding of fire frequency, fire type, most vulnerable communities/areas, and significant ignition sources. Many large, damaging wildfires have occurred in the County, notably the Chimney Fire (2016), the Weferling Fire (1960), the Las Pilitas Fire (1985), the Chispa Fire (1989), the Highway 41 Fire (1994), the Highway 58 Fire (1996), and the Logan Fire (1997). The fires burned approximately 400,000 acres, destroyed numerous structures, and cost millions of dollars

to suppress. The fire with the most recent significant impact on the County was the Chimney Fire west of the City of Paso Robles. The Chimney Fire destroyed 49 residences and 21 other structures. While these large fires can create significant damages due to their size, even smaller WUI fires in densely developed areas can be very damaging. Based on historical fire perimeter data, repeated burning is observed within the County primarily in the Santa Lucia Range (City of Paso Robles 2019).

CAL FIRE's California Statewide Fire Map shows the history of fires across the state dating back through 2013. Based on a review of these maps, no fires since 2013 have burned across the project site. The closest recorded wildfires include the Vista Fire in June 2018 that burned 60 acres approximately 1.1 miles west of the project site north of Buena Vista Drive and the Linne Fire that burned in September 2017 that burned 79 acres approximately 3 miles south of the project site north of Linne Road. Fires are routine during summer in the Salinas River, especially near the Niblick Bridge.

4.7.1.2.2 SITE SETTING

Fire Hazard Severity

CAL FIRE maps Fire Hazard Severity Zones (FHSZs) based on factors such as fuel, slope, and fire weather to identify the degree of fire hazards throughout California (e.g., moderate, high, very high). While FHSZs do not predict when or where a wildfire will occur, they do identify areas where wildfire hazards could be more severe and are therefore of greater concern. According to the CAL FIRE San Luis Obispo County Fire Hazard Severity Zone Maps for Responsible Areas, the project site is classified as Local Responsibility Area (LRA) and is surrounded by other LRA areas (California Department of Forestry and Fire Protection [CAL FIRE] 2021a). CAL FIRE has not made any recommendations on Very High FHSZs within the City of Paso Robles LRA. Surrounding areas classified under SRAs are designated as High FHSZ. According to the *City of El Paso de Robles General Plan 2003 Safety Element* (Safety Element), the project site is located within non-wildland/non-urban, moderate, and high fire hazard severity zones within the LRA (Figure 4.7-2) (City of Paso Robles 2014).

Fuels and Topography

The project site and offsite improvement areas support vacant structures associated with the former Boy's School, 110 mature oak trees, and an assortment of other native and nonnative trees and shrubs. The undeveloped portion of the project site is primarily annual grassland. Areas surrounding the project site include annual grassland, vineyard, row crop, and grain production. The offsite improvement areas include annual grasslands, riverine habitat, and oak tree savanna. Combustible building materials and vegetation serve as fuel for wildfire.

Topography of the project site is slightly sloping, with an average slope of 2 percent, ranging from 808 feet above msl along the eastern property line to 775 feet above msl along the western property line. The eastern developed portion of the site is fairly level, while the southwest corner of the site slopes into a lower terrace behind the existing residences, and the northwest corner of the site gently rises.

4.7.2 Regulatory Setting

The management of hazardous materials and hazardous wastes is regulated at federal, state, and local levels, including through programs administered by the USEPA; agencies within the California EPA, such as the DTSC; federal and state occupational safety agencies; and SLOEHD. Regulations pertaining to flood hazards are further discussed in *Section 4.8, Hydrology and Water Quality*. Regulations pertaining to wildfire include provisions set forth by the California Fire Code and California Building Code, as well as the City's Safety Element, Fire Department, and LHMP.

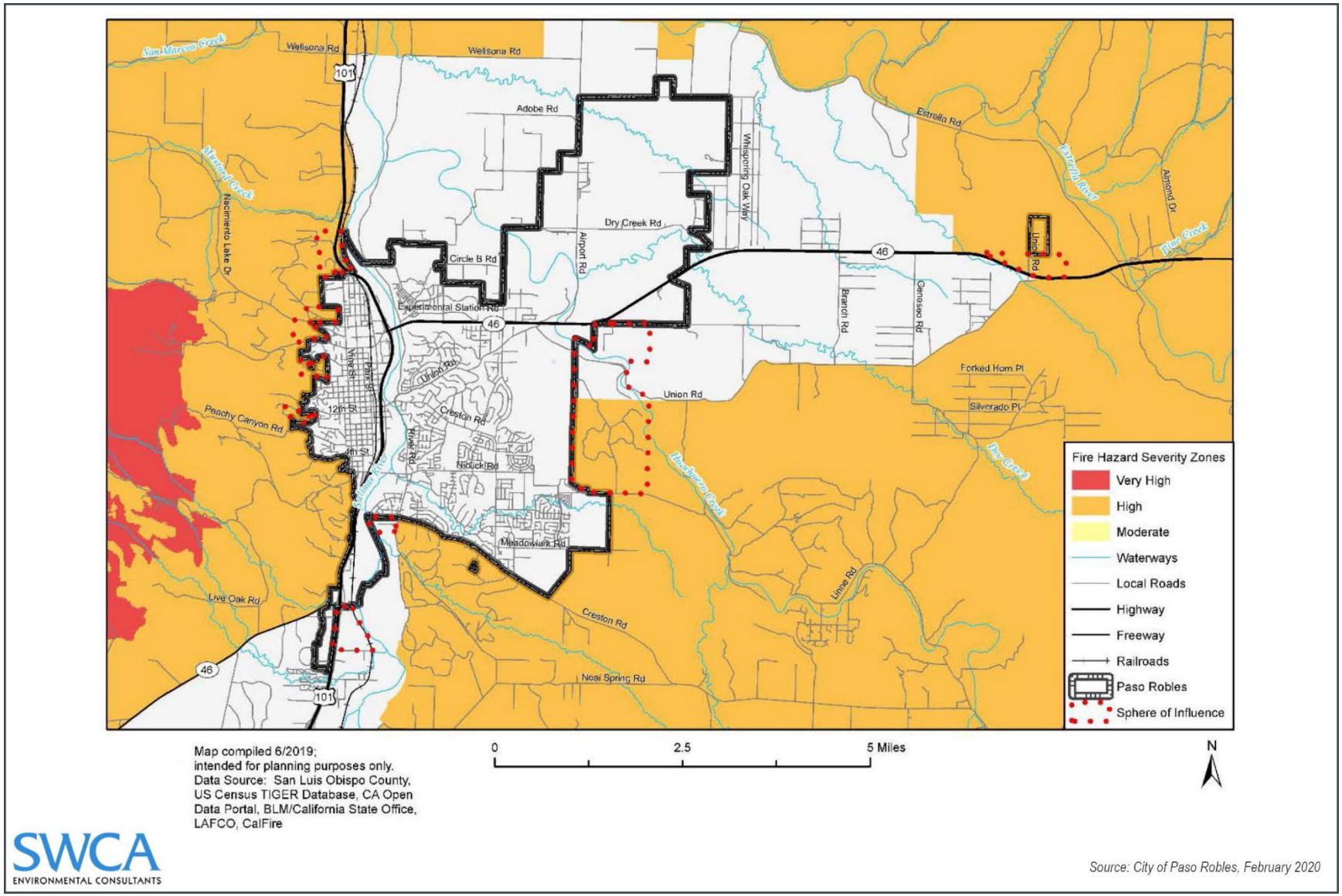


Figure 4.7-2. Fire hazard severity zones.

4.7.2.1 Definition of Hazardous Materials

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such an agency. A hazardous material is defined in Title 22 of the California Code of Regulations as follows:

> A substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed. (California Code of Regulations, Title 22, Section 66261.10)

Chemical and physical properties cause a substance to be considered hazardous. Such properties include toxicity, ignitability, corrosiveness, and reactivity. California Code of Regulations, Title 22, Sections 66261.20 through 66261.24 defines the aforementioned properties. The release of hazardous materials into the environment can contaminate soils, surface water, and groundwater supplies.

4.7.2.2 Federal

4.7.2.2.1 RESOURCE CONSERVATION AND RECOVERY ACT

The Federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act (RCRA) of 1976 established a program administered by the U.S. EPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. Among other things, the use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act.

4.7.2.2.2 COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND LIABILITY ACT

The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) was enacted in 1980 and amended by the Superfund Amendments and Reauthorization Act in 1986 (SARA). This law provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Among other things, CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled revision of the National Contingency Plan, which provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priorities List.

4.7.2.2.3 SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT

The Superfund Amendments and Reauthorization Act (SARA) of 1986 reauthorized CERCLA to continue cleanup activities around the country. Several site-specific amendments, definitions, clarifications, and technical requirements were added to the Legislation, including additional enforcement authorities. Additionally, Title III of SARA authorizes the Emergency Planning and Community Right-to-Know Act (EPCRA).

4.7.2.2.4 HAZARDOUS MATERIAL TRANSPORTATION ACT

The Hazardous Material Transportation Act (HMTA) of 1975 empowered the Secretary of Transportation to designate a hazardous material as any "particular quantity or form" of a material that "may pose an unreasonable risk to health and safety or property" (U.S. Occupational Safety and Health Administration [OSHA]). Hazardous materials regulations are identified in the following Code of Federal Regulations (CFR) sections:

- 49 CFR Parts 101, 106, 107 – Procedures and/or Policies
- 49 CFR Part 172 – Material Designations
- 49 CFR Parts 173, 178, 179, 180 – Packaging Requirements
- 49 CFR Parts 171, 173, 174, 175, 176, 177 – Operational Rules

4.7.2.2.5 HAZARDOUS MATERIAL TRANSPORTATION UNIFORM SAFETY ACT

In 1990 Congress enacted the Hazardous Material Transportation Uniform Safety Act to clarify conflicting state, local, and federal regulations. The Act requires the Secretary of Transportation to promulgate regulations for the safe transport of hazardous material in intrastate, interstate, and foreign commerce. The Secretary also retains the authority to designate hazardous materials as hazardous when they pose unreasonable risks to health, safety, or property. The statue includes provisions to encourage uniformity among different state and local highway routing regulations, to develop criteria for issuance of federal permits to motor carriers of hazardous materials, and to regulate the transport of radioactive materials.

4.7.2.2.6 FEDERAL AVIATION REGULATIONS PART 77

Federal Regulations Title 14 Part 77 establishes standards and notification requirements for objects affecting navigable airspace. This notification serves as the basis for:

- Evaluating the effect of the construction or alteration on operating procedures;
- Determining the potential hazardous effect of the proposed construction on air navigation;
- Identifying mitigating measures to enhance safe air navigation;
- Charting of new objects.

Title 14 Part 77 §77.9 of the Regulation requires any person or organization who intends to sponsor any of the following construction or alterations must notify the Administrator of the FAA:

- Any construction or alteration exceeding 200 ft above ground level
- Any construction or alteration
    - within 20,000 ft of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with at least one runway more than 3,200 ft.
    - within 10,000 ft of a public use or military airport which exceeds a 50:1 surface from any point on the runway of each airport with its longest runway no more than 3,200 ft.
    - within 5,000 ft of a public use heliport which exceeds a 25:1 surface
- Any highway, railroad or other traverse way whose prescribed adjusted height would exceed that above noted standards

- When requested by the FAA
- Any construction or alteration located on a public use airport or heliport regardless of height or location

4.7.2.2.7 FEDERAL OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION - PROCESS SAFETY MANAGEMENT STANDARD (29 CFR 1910.119)

This standard includes requirements for preventing or minimizing the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals. Requirements of this standard include providing employees with information pertaining to hazardous chemicals, training employees on the operation of equipment with hazardous materials, and employer requirements to perform a process hazard analysis.

4.7.2.2.8 TOXIC SUBSTANCES CONTROL ACT

The Toxic Substances Control Act (TSCA) of 1976 provides the EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. Various sections of the TSCA provide the authority to:

- Require pre-manufacture notification for “new chemical substances” prior to manufacture (Section 5);
- Require testing of chemicals by manufacturers, importers, and processors where risks or exposure of concern are found (Section 4);
- Issue Significant New Rules (SNURs) when it identifies a “significant new use” that could result in exposures to, or releases of, a substance of concern (Section 5);
- Maintain the TSCA Inventory, which contains more than 83,000 chemicals. As new chemicals are commercially manufactured or imported, they are placed on a list (Section 8);
- Require those importing or exporting chemicals to comply with certification reporting and/or other requirements (Section 12b and Section 13);
- Require reporting and record-keeping by persons who manufacture, import, process, and/or distribute chemical substances in commerce (Section 8);
- Require that any person who manufactures (including imports), processes, or distributes in commerce a chemical substance or mixture and who obtains information which reasonably supports the conclusion that such substance or mixture presents a substantial risk of injury to health or the environment to immediately inform EPA, except where EPA has been adequately informed of such information. EPA screens all TSCA b§8(e) submissions as well as voluntary "For Your Information" (FYI) submissions. The latter are not required by law but are submitted by industry and public interest groups for a variety of reasons Section 8e).

4.7.2.2.9 ASBESTOS HAZARD EMERGENCY RESPONSE ACT

The Asbestos Hazard Emergency Response Act (AHERA) of 1986 is the federal legislation that governs the control and abatement of asbestos hazards present in school buildings. The purpose of AHERA is to also require the U.S. EPA to evaluate the extent of danger to human health posed by asbestos in public and commercial buildings and the means to respond to any identified danger.

4.7.2.2.10 ASBESTOS NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (40 CFR 61 SUBPART M)

The air toxics provisions of the Clean Air Act (CAA) require the USEPA to develop and enforce regulations to protect the public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with Section 112 of the CAA, USEPA established National Emission Standards for Hazardous Air Pollutants (NESHAP). The USEPA regulation for asbestos is intended to minimize the release of asbestos fibers during activities involving the handling of asbestos.

Air toxics regulations under the CAA specify work practices for asbestos to be followed during demolitions and renovations of all facilities, including, but not limited to, structures, installations, and buildings (excluding residential buildings that have four or fewer dwelling units). The regulations require a thorough inspection where the demolition or renovation operation will occur. Performing the work in accordance with the Asbestos NESHAP helps to ensure that areas in use during the renovation are not contaminated and that the area under renovation, when it is complete, is also free of contamination (USEPA 2021).

Projects requiring the removal or relocation of utility pipelines or removal or renovation of buildings may be subject to the requirements stipulated in the NESHAP. These requirements include but are not limited to:

- Notification requirements to the local state/regional air quality control authority;
- Asbestos survey conducted by a Certified Asbestos Inspector; and
- Applicable removal and disposal requirements of asbestos containing materials.

4.7.2.2.11 CLEAN AIR ACT

Regulations under the Clean Air Act are designed to prevent accidental releases of hazardous materials. The regulations require facilities that store minimum quantities (called threshold quantities) or greater of listed regulated substances to develop a Risk Management Plan including hazard assessments and response programs to prevent accidental releases of listed chemicals.

4.7.2.2.12 LEAD-BASED PAINT ELIMINATION FINAL RULE

Regulations for lead-based paint (LBP) are contained in the Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations (CFR) 33, governed by the U.S. Department of Housing and Urban Development, which requires sellers and lessors to disclose known LBP and LBP hazards to prospective purchasers and lessees. Additionally, all LBP abatement activities must be in compliance with California and federal OSHA and with the State of California Department of Health Services requirements. Only LBP trained and certified abatement personnel are allowed to perform abatement activities. All lead LBP removed from structures must be hauled and disposed of by a transportation company licensed to transport this type of material at a landfill or receiving facility licensed to accept the waste.

4.7.2.2.13 14 CFR SECTION 139.337 - WILDLIFE HAZARD MANAGEMENT

The certification and operation of land airports that serve any scheduled or unscheduled passenger operation of an air carrier that is conducted with an aircraft having a seating capacity of more than nine passengers is governed by 14 CFR 139. Part 139.337 speaks specifically to the airport operator's responsibilities when dealing with the reduction of wildlife strike hazards on and around airports. Part 139.337(a) states "In accordance with its Airport Certification Manual and the requirements of this section, each certificate holder must take immediate action to alleviate wildlife hazards whenever they are

detected." To facilitate this mandate, the Federal Aviation Administration (FAA) issues Advisory Circulars (AC) to Part 139 airports that provide guidance to the airports on how to address wildlife hazards at and near airports. AC 150/5200-33C provides guidance on certain land uses that have the potential to attract hazardous wildlife on or near public-use airports. It also discusses airport development projects (including airport construction, expansion, and renovation) affecting aircraft movement near hazardous wildlife attractants.

4.7.2.3 State

4.7.2.3.1 CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL

DTSC, a department of the California Environmental Protection Agency (CalEPA), is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of RCRA and the California Health and Safety Code.

DTSC also administers the California Hazardous Waste Control Law to regulate hazardous wastes. While the Hazardous Waste Control Law is generally more stringent than RCRA, until the USEPA approves the California program, both state and federal laws apply in California. The Hazardous Waste Control Law lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

Government Code Section 65962.5 requires the DTSC, the State Department of Health Services, the SWRCB, and CalRecycle to compile and annually update lists of hazardous waste sites and land designated as hazardous waste sites throughout the state (Cortese List). The Secretary for Environmental Protection consolidates the information submitted by these agencies and distributes it to each city and county where sites on the lists are located. Before the lead agency accepts an application for any development project as complete, the applicant must consult these lists to determine if the site at issue is included.

4.7.2.3.2 CALIFORNIA CODE OF REGULATIONS (CCR) TITLE 22

If any soil is excavated from a site containing hazardous materials, it would be considered a hazardous waste if it exceeded specific criteria in Title 22 of the California Code of Regulations. Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

4.7.2.3.3 CALIFORNIA ACCIDENTAL RELEASE PREVENTION PROGRAM

The California Accidental Release Prevention (CalARP) program was implemented on January 1, 1997 to prevent accidental releases of substances that can cause serious harm to the public and the environment, minimize the damage if releases do occur, and satisfy community right-to-know laws. The program requires businesses that handle more than a specific threshold quantity of a regulated substance listed in the regulations to develop a Risk Management Plan (RMP) detailing the potential accident factors present and the mitigation measures that can be implemented to reduce this accident potential. RMPs must include, but are not limited to, safety information, a hazard review, operating procedures, training

requirements, maintenance requirements, compliance audits, and incident investigation procedures. The CalARP program requirements are implemented and enforced at the local government level by Unified Program Agencies (UPAs), such as the SLOEHD. The UPAs determine the level of detail needed in the RMPs, review the RMPs, conduct facility inspections, and provide public access to most of the relevant information (California Governor's Office of Emergency Services 2019).

4.7.2.3.4 STATE OF CALIFORNIA FOOD AND AGRICULTURAL CODE

The State of California Food and Agricultural Code regulates the use of pesticides. Section 12972 requires that the use of pesticides not result in substantial drift to non-target areas. Section 12977 empowers the Agricultural Commissioner to enforce this provision. In addition, Section 12982 states that the local health officer shall investigate any health hazard from pesticide use and take necessary action, in cooperation with the Agricultural Commissioner, to abate the hazard. California Code of Regulations, Title 3, Section 6614 restricts pesticide application when there is a reasonable possibility of: substantial drift to non-target areas; contamination of the bodies or clothing of persons not involved in the application process; damage to non-target crops, animals or other public or private property; or contamination of public or private property, including the creation of a health hazard that prevents normal usage of that property.

4.7.2.3.5 SITE-SPECIFIC HEALTH AND SAFETY (CAL/OSHA TITLE 8 AND OSHA 29 CFR 1910)

Under the requirements of the California Division of Occupational Safety and Health Administration (Cal/OSHA) Title 8 and OSHA 29 CFR 1910, employers must develop site-specific Health and Safety Plans. Workers potentially exposed to hazardous materials in their workplace must be trained so that they are aware of the hazards and provided necessary protection from the hazardous materials.

4.7.2.3.6 HAZARDOUS MATERIAL RELEASE RESPONSE PLANS AND INVENTORY LAW (CALIFORNIA HEALTH AND SAFETY CODE CHAPTER 6.95)

This law requires businesses to develop a Release Response Plan for hazardous materials emergencies if they handle more than 500 pounds, 55 gallons, or 200 cubic feet of hazardous materials. In addition, the business must prepare a Hazardous Materials Inventory of all hazardous materials stored or handled at the facility over the above thresholds. Also, all hazardous materials must be stored in a safe manner. Both the Release Response Plan and the Hazardous Materials Inventory must be supplied to the CUPA for the program. For the project site, the CUPA consists of the SLOEHD and a Participating Agency, the City of San Luis Obispo Fire Department.

4.7.2.3.7 CALIFORNIA HEALTH AND SAFETY CODE, DIVISION 20, CHAPTER 6.8, SECTION 25319.5 - PRELIMINARY ENDANGERMENT ASSESSMENT

The California Health and Safety Code (HSC) requires that a preliminary endangerment assessment provide sufficient information to determine whether or not current or past waste management practices have resulted in the release or a threatened release of hazardous substances that pose a threat to public health or the environment. The preliminary endangerment assessment should also provide sufficient information to conclude whether or not significant response actions are necessary at the site as well as include an analysis of the scope and identity of the affected community.

4.7.2.3.8 SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT (PROPOSITION 65)

In California, pursuant to the Safe Drinking Water and Toxic Enforcement Act of 1986: (1) no person in the course of doing business shall knowingly discharge or release a chemical known to the state to cause cancer or reproductive toxicity into water or onto land where such chemical passes or probably will pass into any source of drinking water, and (2) no person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the state to cause cancer or reproductive toxicity without first giving clear and reasonable warning to such individual. The "no significant risk" level for carcinogens that is enforced by this Act is one in one hundred thousand (1×10^{-5}).

4.7.2.3.9 PORTER-COLOGNE WATER QUALITY CONTROL ACT (CALIFORNIA WATER CODE DIVISION 7)

The Porter-Cologne Act establishes a regulatory program to protect water quality and to protect beneficial uses of state waters. The Porter-Cologne Act also establishes the state board and regional boards as the principal state agencies responsible for control of water quality. Each of the nine Regional Water Quality Control Boards in California is required to develop guidance to assist in ensuring that the intent of the Porter-Cologne Act is met. Cleanup criteria are based on the type of contaminant (e.g., gasoline, diesel, or oil) released and the depth to groundwater.

4.7.2.3.10 HEALTH AND SAFETY CODE, DIVISION 20, CHAPTER 6.5, AND CCR TITLE 22 – HAZARDOUS WASTE MANAGEMENT

Waste that is toxic, corrosive, flammable, or reactive when tested in accordance with the CCR Title 22, Article 11, Section 66693 must be handled, stored, transported, and disposed of in accordance with these regulations, which are more stringent than federal regulations.

4.7.2.3.11 CALIFORNIA GOVERNMENT CODE SECTION 51178

This section of the California Government Code (CGC) specifies that the director of CAL FIRE, in cooperation with local fire authorities, shall identify areas that are Very High Fire Hazard Severity Zones (VHFHSZ) in LRAs based on consistent statewide criteria and the expected severity of fire hazard. Per CGC Section 51178, a local agency may, at its discretion, exclude from the requirements of § 51182 an area within its jurisdiction that has been identified as a VHFHSZ, if it provides substantial evidence in the record that the requirements of Section 51182 are not necessary for effective fire protection within the area. Alternatively, local agencies may include areas not identified as VHFHSZ by CAL FIRE, following a finding supported by substantial evidence in the record that the requirements of Section 51182 are necessary for effective fire protection within the new area. According to Section 51182, such changes made by a local agency shall be final and shall not be rebuttable by CAL FIRE.

4.7.2.3.12 CALIFORNIA FIRE CODE

The 2019 California Fire Code (24 CCR Part 9) establishes regulations to safeguard against the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The Fire Code also establishes requirements intended to provide safety for and assistance to firefighters and emergency responders during emergency operations.

The provisions of the Fire Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout California. Chapter 6 of the Fire Code (Building Services and

Systems) focuses on building systems and services as they relate to potential safety hazards and when and how they should be installed. Building services and systems are addressed, including emergency and standby power systems, electrical equipment, wiring and hazards, and stationary storage battery systems. Chapter 33 (Fire Safety During Construction and Demolition) of the Fire Code outlines general fire safety precautions to maintain required levels of fire protection, limit fire spread, establish the appropriate operation of equipment and promote prompt response to fire emergencies. The Fire Code includes regulations regarding fire-resistance-rated construction, fire protection systems such as alarm and sprinkler systems, fire service features such as fire apparatus access roads, means of egress, fire safety during construction and demolition, and wildland-urban interface (WUI) areas.

4.7.2.3.13 CALIFORNIA BUILDING CODE CHAPTER 7A

Chapter 7 of the 2016 California Building Code details the materials, systems, and/or assemblies used in the exterior design and construction of new buildings located within a WUI Fire Area. A WUI Area is defined in Section 702A as a geographical area identified by the State as an FHSZ in accordance with PRC Sections 4201 through 4204 and California Government Code Sections 51175 through 51189, or other areas designated by the enforcing agency to be at a significant risk from wildfires. The building code details the materials, systems, and assemblies used for structural fire resistance and fire-resistance-rated construction separation of adjacent spaces to safeguard against the spread of fire and smoke within a building and the spread of fire to or from buildings.

4.7.2.3.14 PUBLIC RESOURCES CODE SECTIONS 4291–4299

PRC Sections 4291–4299 et seq. require that brush, flammable vegetation, or combustible growth within 100 feet of buildings be maintained. Vegetation that is more than 30 feet from the building, less than 18 inches high, and important for soil stability may be maintained, as may single specimens of trees or other vegetation that is maintained so as to manage fuels and not form a means of rapid fire transmission from other nearby vegetation to a structure. Additionally, the PRC outlines infraction fees, certification, and compliance procedures applicable with State and local building standards, including those described in California Government Code Section 51189(b).

4.7.2.4 Local

4.7.2.4.1 SAN LUIS OBISPO COUNTY MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN

The *San Luis Obispo County Multi-Jurisdictional Hazard Mitigation Plan* was adopted in 2019 as a condition of future federal funding for mitigation projects under FEMA grant programs. The plan encompasses the unincorporated county and all seven incorporated cities within the county. The goal of this plan is to arrive at practical, meaningful, attainable and cost-effective mitigation solutions to reduce vulnerability to the identified hazards and ultimately reduce both human and financial losses from hazard events.

4.7.2.4.2 CITY OF EL PASO DE ROBLES GENERAL PLAN 2003

Safety Element

The *City of El Paso de Robles General Plan 2003* guides the use and protection of various resources to meet community purposes. The Safety Element is focused on achieving acceptable levels of risk through decisions on land use and the form of development, with consideration for the closely related factor of transportation (City of Paso Robles 2014). The Safety Element includes policies that describe an approach

to achieving the goals of the General Plan. In terms of hazards and hazardous materials, the following policies are pertinent to the project:

Policy S-1C **Hazardous Exposure Minimization.** Minimize hazards to people and property caused by fire, crime, and related services.

Policy S-1D **Structural Safety.** Rely on the City's planning and building permit review process to ensure that existing and proposed structures are adequately designed, and to reduce susceptibility to damage from fire, flooding, and geologic hazards.

Policy S-1E **Hazardous Materials.** The City shall comply with Government Code requirements regarding the use, storage, and transportation of hazardous materials.

The Safety Element includes a map of Fire Severity Zones, LRAs and SRAs as mapped by CAL FIRE and the City. The Safety Element states that after careful review of exiting San Luis Obispo County Fire Hazard Severity Zone Mapping, as supplied by CAL FIRE, the City has determined neither SRAs nor VHFHSZs exist within incorporated areas of the city. According to Figure S-8 of the Safety Element, the project site is located within High, Moderate, and Non-Wildland/Non-Urban LRA designations.

4.7.2.4.3 CITY OF PASO ROBLES LOCAL HAZARD MITIGATION PLAN

The LHMP is included as an annex to the *San Luis Obispo County Multi-Jurisdictional Hazard Mitigation Plan*. The LHMP was updated in 2019 concurrently with the San Luis Obispo County Multi-Jurisdictional Hazard Mitigation Plan (Wood 2019) and builds upon the 2016 LHMP (AECOM 2016). The City's LHMP identifies the City's hazards analysis process which includes identifying, screening, and profiling each hazard, and describes the City's Hazard Profile for hazardous materials. Hazardous materials are substances that may have negative effects on health or the environment. Exposure to hazardous materials may cause injury, illness, or death.

The toxicity of a specific substance is one important factor in determining the risk it poses, but other factors can be just as important, if not more so. Factors affecting the severity of an accidental release include:

- Toxicity
- Quantity
- Dispersal characteristics
- Location of release in relation to population and sensitive environmental areas
- Efficacy of response and recovery actions

Some types of hazardous materials can be found in everyday life including paints, solvents, adhesives, gasoline, household cleaners, batteries, pesticides and herbicides, and even medicines. This profile does not focus on the hazards contained in everyday products, but rather on the hazards associated with potential releases of hazardous substances from transportation corridors (mobile incident) and fixed facilities (fixed incident) within the city.

Hazardous materials are generally classified by their primary health effects on humans. Some common types include the following:

- Anesthetics and narcotics are substances that depress the central nervous system.
- Asphyxiants are substances that interfere with normal breathing and can cause suffocation.

- Explosives are substances that pose a risk of exploding; fires and chemical effects may also be a danger.
- Flammable materials are substances that catch fire easily, though they may also pose other dangers, such as explosion or chemical effects.
- Irritants cause burns or irritation to body tissues such as eyes, nose, throat, lungs, or skin.

The LHMP describes the nature and risks associated with wildfire. Based on previous occurrences, the Central Coast region is likely to experience one major (10,000-acre or more) wildfire every 10 years. Smaller wildfires, such as agricultural or grass fires in Paso Robles, are likely to be experienced within this area on an annual basis. The majority of the city is not located within a fire hazard severity zone according to the LHMP; only three parcels are identified as being within a High Severity zone, which have a combined population of six persons. Despite not being identified as within a fire hazard severity zone, the LHMP identifies the Salinas River riverbed corridor as being heavily forested with a significant source of fuel and as having an unacceptably high risk of fire in the riverbed jumping out of the riverbed and engaging the rest of the community (Wood 2019).

The City has enacted several ongoing programs and policies to reduce fire risk, including a Weed Abatement Program to clear yards and larger land parcels of combustible weeds and debris, implementation of building code requirements for new residential construction that prohibit the use of untreated wood shake roofs and encourage the installation of spark arresting systems on chimneys on homes with wood burning fireplaces, and regulations requiring installation of fire extinguishing sprinklers in new homes and substantial renovations.

4.7.2.4.4 PASO ROBLES MUNICIPAL AIRPORT AIRPORT LAND USE PLAN

The purpose of the Paso Robles Municipal Airport ALUP is to set forth land use compatibility policies applicable to future development in the vicinity of the Paso Robles Municipal Airport (City of Paso Robles 2007). Notwithstanding any other provision of the ALUP, a proposed general plan, general plan amendment, specific plan, specific plan amendment, zoning ordinance, zoning ordinance amendment, building regulation modification, or individual development proposal will be determined to be inconsistent with the ALUP if the proposed local action:

Policy S-1 Would permit or lacks sufficient provisions to prohibit structures and other obstacles within the Runway Protection Zones for any runway at the Airport, as depicted in the Airport Layout Plan of the 2003 Airport Master Plan (see Appendix B) or such succeeding Airport Layout Plan or diagram as may be accepted and deemed valid by the ALUC.

Policy S-3 Would permit or lacks sufficient provisions to prohibit new development which exceeds the density standards set forth in Table 5 of the City's ALUP (see Table 4.7-1 below).

Policy S-4 Would permit or lacks sufficient provisions to prohibit new development with a percentage of open space less than the minimum standards set forth in Table 5 of the City's ALUP (see Table 4.7-1).

Policy S-5 Would permit or lacks sufficient provisions to prohibit special land use functions—either limited mobility occupancies or hazardous materials uses—in Safety Zones 1 through 5. This Policy shall not, however, apply to flight training centers, vocational schools, or other training facilities which are directly related to aviation and which require or benefit from a location in proximity to an airport.

Table 4.7-1. Maximum Allowable Nonresidential Land Use Densities and Minimum Required Open Space

Airport Safety Area	Maximum Land Use Density (person/acre)	Maximum Single Acre Land Use Density (person/acre)	Minimum Percent Open Space (% gross area)
Airport Property	n/a	n/a	n/a
Zone 1 – Runway Protection Zones	0	0	100
Zone 2 – Inner Approach/Departure Zones	20	40	30[1]
Zone 3 – Turning and Sideline Zones	60	120	25[2]
Zone 4 – Outer Approach/Departure Zones	40	120	20[2]
Zones 5 and 6	150	450	10

[1] No structures, congregations of equipment or vehicles, or public venues shall be located within 250 feet of any extended runway centerline and within 6,000 feet of the corresponding runway end.

[2] When feasible, development should be planned in a manner that maintains maximum open space within 50 feet of any extended runway centerline.

[3] From Paso Robles Municipal Airport Airport Land Use Plan (2007)

4.7.2.4.5 CITY OF PASO ROBLES STRATEGIC COMMUNITY WILDFIRE PROTECTION PLAN

The *City of Paso Robles Strategic Community Wildfire Protection Plan* (CWPP) was published in July 2019 and was developed to address fire protection planning efforts occurring in the city in order to minimize wildfire risk to local watershed lands, assets, firefighters, and the public. The CWPP provides a citywide strategic planning framework for hazardous fuel assessment and reduction within the City of Paso Robles so that structures and assets are provided additional protection, reducing the potential of ignitions. The goals of this CWPP include: improving the availability and use of information regarding hazard and risk assessment; providing guidance for land use planning efforts; promoting a shared vision among communities and multiple fire jurisdictions; establishing fire resistance in communities; prioritizing protection of communities and other high-priority watersheds; promoting collaboration between government agencies and a broad representation of stakeholders; improving fire suppression and prevention capabilities; promoting post-fire recovery efforts; and maintaining accountability through performance based monitoring.

4.7.3 Thresholds of Significance

4.7.3.1 Hazards and Hazardous Materials

The determinations of significance of project impacts are based on applicable policies, regulations, goals, and guidelines defined by CEQA and the City. Specifically, the project would be considered to have a significant impact related to hazards and hazardous materials if the project impacts would exceed the significance criteria described below:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

As discussed in the IS/NOP, the City determined that the proposed project is not located within 0.25 mile of an existing or proposed school and therefore would not result in potentially significant hazards or hazardous materials related impacts to those uses. Therefore, this threshold is not discussed further in the EIR. See *Appendix A, Initial Study and Notice of Preparation*, for more information. The remaining thresholds are discussed under *Section 4.7.5, Project-Specific Impacts and Mitigation Measures*, below.

4.7.3.2 Wildfire

A project would have a significant impact with respect to wildfires if it would be located in or near SRAs or lands classified as very high FHSZs, and if the project would:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan;

b. Due to slope, prevailing winds, or other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

The project site and offsite improvement areas are not located in or near SRAs or lands classified as very high FHSZ. Therefore, these Wildfire thresholds are not discussed further in this EIR.

4.7.4 Impact Assessment and Methodology

The significance of potential project impacts associated with hazards and hazardous materials were evaluated by use of the environmental checklist questions included in Appendix G of the CEQA Guidelines, as detailed in *Section 4.7.3, Thresholds of Significance*, above. Potential impacts were evaluated based on a comprehensive review of the proposed project and all associated components, documents and reports prepared for the project, and all applicable regulatory requirements. The analysis provided below is partially based on the information provided in the Phase I Environmental Assessment prepared for the project site (Avocet 2017a; Appendix G), the Phase II Investigation prepared for the project site (Avocet 2017b; Appendix G), and the Additional Phase II Investigation prepared for the project site (Avocet 2018; Appendix G). These reports were prepared in general accordance with the requirements and limitations of American Society for Testing and Materials (ASTM) International Standard E1527-13. Based on these resources, review of the project site and existing background

information and regulatory requirements and thresholds, impacts were determined per the CEQA significance criteria described in *Section 4.7.3, Thresholds of Significance*, above. Additionally, Haro Environmental reviewed and summarized the findings of these investigations and identified any data gaps that may not have previously been addressed or that could have occurred arose since the conclusion of the previous investigations (2021; Appendix G).

Impacts related to valley fever are discussed in *Section 4.3, Air Quality and Greenhouse Gas Emissions*.

The proposed project's potential impacts associated with wildfires have been evaluated using a variety of resources, including CAL FIRE maps showing FHSZs and fire history, vegetation data from the Biological Resources Assessment prepared for the project, project location maps, and project characteristics. Wildfire impacts have been considered on the basis of: (1) offsite wildland fires that could impact the proposed project; and (2) onsite generated combustion that could affect surrounding areas. Using the aforementioned resources, impacts were analyzed according to CEQA significance criteria described in *Section 4.7.3, Thresholds of Significance*, above.

4.7.5 Project-Specific Impacts and Mitigation Measures

4.7.5.1 Hazards and Hazardous Materials

WOULD THE PROJECT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS?

HAZ Impact 1: The project may involve the transport and use of hazardous materials, but compliance with mandatory regulatory requirements pertaining to these activities would ensure that this would not create a significant hazard to the public or the environment. Impacts would be less than significant (Class III).

Construction of Phase 1 would last approximately 1 year, and Phase 2 would be built out over the next 5 years. During construction of the proposed project, diesel fuel and hazardous materials such as paints, fuels, solvents, and adhesives would be routinely used, and an inadvertent release of large quantities of these materials into the environment could adversely affect soil and water quality. As discussed in *Section 4.8, Hydrology and Water Quality*, the project would be required to prepare and implement a SWPPP to minimize construction-related water quality impacts. The SWPPP would identify hazardous materials sources within the construction area and recommend site-specific BMPs to prevent discharge of these materials into stormwater and surface waters (i.e., Huer Huero Creek). The minimum BMPs that would be required under the SWPPP include maintaining an inventory of materials used onsite; storing chemicals in water-tight containers protected from rain; developing a spill response plan and procedures to address hazardous and nonhazardous spills; maintaining spill cleanup equipment onsite; assigning and training spill response personnel; and preventing leaked oil, grease, and fuel from equipment from entering a storm drain or the Huer Huero Creek. In accordance with the Construction General Permit, the Applicant would be required to ensure that the construction site is visually inspected weekly and daily during rain events, and to implement corrective actions if any shortcomings are identified. Implementation of the SWPPP would ensure impacts to groundwater, related to routine use of hazardous materials during construction, are less than significant.

Further, the vendors and contractors responsible for delivery of hazardous materials would be required to comply with the regulations of the California Highway Patrol and Caltrans related to the transportation of hazardous materials during construction (see *Section 4.7.2.3, State*). With implementation of these

mandatory requirements, including any future updates, impacts related to the routine use, transport, and disposal of hazardous materials during construction would be less than significant.

Operation of the project would also involve the routine use and transport of common hazardous materials including cleaning supplies (which may include solvents and corrosives, in addition to soaps and detergents), paints, pesticides and herbicides, fuels (e.g., diesel, gasoline), and oils and lubricants. Transportation of hazardous materials on roadways is regulated by the California Highway Patrol and Caltrans, whereas storage and use of these materials is regulated by DTSC, as outlined in Title 22 of the California Code of Regulations. The use of these potentially hazardous materials would be regulated by federal, state, and local laws, as discussed in *Section 4.7.2, Regulatory Setting*. The project's building users would be required to demonstrate compliance with all applicable regulatory policies regarding the use, storage, and transportation of all hazardous materials routinely during operation. Although common hazardous materials would routinely be transported and used within the project site, the project would not result in the routine transport, use, or disposal of highly hazardous materials outside of those commonly uses in households and businesses. Therefore, potential impacts associated with creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials would be *less than significant*, and no mitigation measures would be necessary.

HAZ Impact 1 (Class III)
The project may involve the transport and use of hazardous materials, but compliance with mandatory regulatory requirements pertaining to these activities would ensure that this would not create a significant hazard to the public or the environment.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to the transport and use of hazardous materials would be less than significant .

WOULD THE PROJECT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT?

HAZ Impact 2: Construction demolition, grading, and trenching activities would have the potential to create a significant hazard to workers and the public and/or the environment through the accidental release of asbestos containing materials, lead-based paint, and/or contaminated soils. Impacts would be less than significant with mitigation (Class II).

Contaminated Soil

Two of the eight USTs on the site had previously leaked fuel and impacted soils below and around the tanks. Soils surrounding these two tanks were over-excavated and subsequent soil testing indicated that remaining soil was not significantly impacted. Both of these leaks were cleared by the CCRWQCB. One of the leaks resulted in groundwater contamination, which is discussed further below (Haro

Environmental 2021). Therefore, impacts related to the disturbance of contaminated soil from these previous two fuel leaks would be less than significant.

The remaining onsite UST held waste brine from the boiler plant that was eventually discharged into a leach field in the southwest corner of the site. The composition of the waste brine solution is unknown, as is the lateral extent, depth, and construction materials, and there does not appear to be any discharge permits associated with the leach field (Avocet 2017a). Brine related from water softening systems usually contains high concentrations of soluble salts up to ten times the salinity of ocean water (North Dakota State University 2017). Grading and trenching activities would result in the physical disturbance of soil in the area of the leach field. High concentrations of salts in soil generally do not present health issues to humans. Therefore, impacts related to brine-contaminated soil would be less than significant. Salt in the soil is eventually diluted by water percolating through the soil, which over time can result in high concentrations of salt in the groundwater. The impacts of the waste brine UST and leach field on groundwater are discussed below.

The 12 ASTs located on the site were used for diesel and gasoline fuel storage. Approximately 250 gallons of diesel fuel from an AST near the boiler plant spilled in 1992. Soil testing identified TPH-d at levels of 28 - 2,800 mg/kg in several locations. However, the soil was not remediated due to concerns about the structural integrity of the boiler plant. A second diesel spill near the boiler plant was documented in 2006, where diesel fuel was observed in the pipe trench inside the boiler plant after removal of a UST. Additionally, TPH as motor oil (TPH-m) was detected in several locations at concentrations ranging from 19 to 900 mg/kg.

Soil vapor was also analyzed at the boiler plant and maintenance building to determine concentration levels of VOCs. VOCs were detected in one sample location at the boiler plant (the two other sample locations encountered groundwater and concentrations could not be collected) and at two sample locations at the maintenance building. Using attenuation factors of 0.0005 and 0.001 for future residential and industrial structures, Avocet estimated the carbon disulfide concentration that could potentially accumulate in indoor air, which were below the EPA regional screening levels for both residential and commercial/industrial indoor air (Avocet 2017b). Updated draft supplemental guidance from the DTSC and SWRCB indicates that an attenuation factor of 0.03 should be applied to soil gas results when calculating potential indoor air vapor concentrations and that use of the Johnson and Ettinger modal is no longer recommended (Haro Environmental 2021).

The disturbance of impacted soils located within the immediate vicinity of the existing boiler plant during project-related construction activities would have the potential to result in hazards to human health and/or the environment if not excavated and properly disposed of. Construction workers would be at risk of breathing in TPH vapors during impacted soil movement, and construction workers and project occupants would be at risk of exposure through skin contact of redistributed contaminated soils. TPH compounds can result in health impacts, such as fatigue, headaches, nausea, drowsiness, or damage to the central nervous system. Mitigation Measure HAZ/mm-2.1 has been identified to require impacted soils associated with the existing boiler plant be fully excavated and disposed of at an approved solid waste facility following the demolition of the existing boiler plant facilities. The measure also requires reevaluation of soil vapor concentrations using the 2020 guidance that calls for an attenuation factor of 0.03.

As noted above, at least one transformer is located in a building in the central portion of the project site. Many transformers are oil-cooled, and in older transformers, the oil may contain PCBs. A complete survey of electrical transformers present at the site, and their PCB content, has not been conducted, but assumed to be present at the project site. If a PCB transformer is present in a building that would be demolished, a release of PCBs could occur, potentially exposing workers and the public to PCBs, or

resulting in a release of PCBs to the environment. Therefore, impacts related to the potential release of PCBs from existing transformers at the site would be significant, if not mitigated. This impact would be reduced to a less-than-significant level with implementation of Mitigation Measure HAZ/mm-2.2 requiring the Applicant to retain a qualified contractor to conduct a survey of electrical transformers for PCBs, remove any identified PCB transformers in accordance with applicable laws and regulations, and conduct subsequent sampling and clean up if a release of PCB-containing dielectric fluid is indicated.

Other potential sources of soil contamination (i.e., paint booths, maintenance building, wash rack) were evaluated in the three site assessments and determined not to have significant soil contamination issues and removal or demolition as a result of the project would result in less than significant impacts to the environment and public.

Contaminated Groundwater

Two shallow water-bearing zones, ranging from 19 to 32 feet below ground underlie the project site. These zones have been monitored since 2000 via nine monitoring wells. Monitoring has indicated that shallow groundwater at the project site is contaminated with TPH from diesel and gasoline fuel due to the previous UST and AST leaks. Deep groundwater, ranging from 40-50 feet below ground, has been monitored with three monitoring wells, which have not detected contaminates of concern (Avocet 2017a).

Grading for the project would result in cuts up to 33.5 feet deep, which could uncover TPH-contaminated shallow groundwater. Dewatering during grading could result in the contaminated groundwater being pumped onto soil, which could then become contaminated, or could release hazardous vapor into the air. Construction workers would be at risk of breathing in TPH compounds and project occupants would be at risk of exposure though skin contact of redistributed contaminated soils. TPH compounds can result in health impacts, such as fatigue, headaches, nausea, drowsiness, or damage to the central nervous system (Agency for Toxic Substances and Disease Registry n.d.).

Mitigation Measure HAZ/mm-2.3 has been identified to require groundwater monitor readings prior to grading or trenching activities and subsequent remediation of contaminated water. Implementation of this measure would result in less than significant impacts.

Additionally, the boiler leach field, in the area of the proposed stormwater basin, has resulted in concentrations of calcium, magnesium, sodium, chloride, and TDS that exceed water quality goals identified in the Paso Robles Groundwater Basin Salt/Nutrient Management Plan. While excessive brine components in the groundwater does not pose a direct threat to human health, it compromises the value of the groundwater resource. The contaminated groundwater is located within the shallow zone, with the TPH contamination. Mitigation Measure HAZ/mm-2.3 would requires consultation with regulatory agencies (i.e., SLOEHD and/or SWRCB or DTSC, as directed by the SLOEHD) regarding the excessive mineral concentrations and would require remediation if directed by the regulatory agencies. Therefore, impacts would be less than significant with mitigation.

Stored Hazardous Materials

Hazardous materials currently stored onsite include relatively small quantities of hydrochloric acid, sodium hypochlorite, lacquer diluent 66, antifreeze, disinfectant chemicals, spent light bulbs, an x-ray machine, and potentially PCB containing light ballasts and mercury switches and thermostats. These materials would be hauled offsite prior to site demolition and disposed of in accordance with federal and state regulations. Therefore, onsite stored hazardous materials would not create a significant hazard to the public or environment through reasonably foreseeable upset or accident conditions and impacts would be less than significant.

Asbestos-Containing Materials

Based on the analysis provided above and the ACM testing conducted by the California Department of General Services, the project would have the potential to result in hazards associated with the handling, demolition, and disposal of ACM, which would be encountered during the demolition of existing structures and potentially in subsurface concrete pipes or pipe insulation. The National Emission Standard for Hazardous Air Pollutants (40 Code of Federal Regulations [CFR] 61, Subpart M, Asbestos NESHAP) and state regulations contained in Title 8 of the California Code of Regulations, Section 1529 and Title 8 of the California Code of Regulations, Section 341.6 through 341.17 require SLOAPCD to approve demolition prior to material disturbance. These requirements include but are not limited to notification within at least 10 business days of activities commencing to the SLOAPCD, an inspection by a Certified Asbestos Consultant, and applicable removal and disposal requirements of identified ACM. Therefore, with compliance of the regulatory requirements described above and implementation of the required procedures prior to demolition, impacts would be less than significant.

The project is not located within an area known to contain serpentine rock formations or naturally occurring asbestos. Therefore, impacts related to release of naturally occurring asbestos during ground-disturbing activities would be less than significant.

Lead-Based Paint

In addition to asbestos, the structures onsite may also have the potential to contain lead-based paint, as most of them were constructed prior to 1979. The project would be required to comply with the requirements stipulated in the DTSC standards for testing, handling, and disposal of lead-based paint. These activities would be subject to the Cal/OSHA Lead in Construction Standard (Title 8 of the California Code of Regulations, Section 1532.1) described above in the State Regulatory Setting. This standard requires development and implementation of a lead compliance plan when materials containing lead would be disturbed during construction. The plan must describe activities that could emit lead, methods that will be used to comply with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. Measures to reduce and maintain low levels of worker exposure to lead include implementing good housekeeping practices, providing adequate hand and face washing facilities, providing worker training, and using proper respirators. Cal/OSHA would require 24-hour notification if more than 100 square feet of materials containing lead would be disturbed.

If during the demolition of existing structures, paint is separated from the construction materials (e.g. chemically or physically), the paint waste shall be evaluated independently from the building material by a qualified hazardous materials inspector to determine its proper management. All hazardous materials shall be handled and disposed of in accordance with local, state and federal regulations. According to the DTSC, if the paint is not removed from the building material during demolition (and is not chipping or peeling), the material can be disposed of as construction debris (a non-hazardous waste). The landfill operator shall be contacted prior to disposal of building material debris to determine any specific requirements the landfill may have regarding the disposal of lead-based paint materials. The disposal of demolition debris would be required to comply with any such requirements. Approval of a lead work plan and permit may be required. Lead work plans, if required, shall be submitted to SLOAPCD ten days prior to the start of demolition.

Aerially Deposited Lead

ADL-contaminated soil still exists along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. The highest lead concentrations are usually found within 10 feet of the edge of the pavement and within the top 6 inches of soil. In some cases, lead is

as deep as 2 to 3 feet below the surface and can extend 20 feet or more from the edge of pavement (DTSC 2016). The project site does not contain and is not in close proximity to roadways that would have supported high levels of vehicular traffic prior to lead being removed from fuels; therefore, the risk of significant levels of ADL occurring onsite is low. However, due to the historic military and airport uses within and proximate to the project site, the risk of ADL is potentially significant.

Improvements to existing roadways would include Airport Road, Dry Creek Road, and Landing Lane (a remnant portion of the abandoned Dry Creek Road). These roadways have not been evaluated for ADL but ADL is assumed to be present. DTSC requires that ADL contaminated soil with concentrations over 80 mg/kg receive separate written approval from DTSC prior to reuse (DTSC 2016). The potential for impacts related to ADL-contaminated soils resulting from project construction and circulation improvements, would be a potentially significant impact. Mitigation Measure HAZ/mm-2.4 would require the Applicant to test soils within the roadway improvement areas collecting soils samples for lead analysis prior to road work. Soils with lead levels exceeding 80 mg/kg would require consultation and approval from DTSC prior to reuse. With implementation of Mitigation Measure HAZ/mm-2.4, impacts would be less than significant.

Radon

Based on the analysis provided in the Phase I ESA prepared for the project, naturally occurring radon levels in the site vicinity are expected to be low and within regulatory agency criteria (Avocet 2017a). Therefore, impacts related to radon would be less than significant.

Upon implementation of mitigation measures identified below, potential impacts related to hazards and hazardous materials would be *less than significant with mitigation*.

HAZ Impact 2 (Class II)	
Construction demolition, grading, and trenching activities would have the potential to create a significant hazard to workers and the public and/or the environment through the accidental release of asbestos containing materials, lead-based paint, and/or contaminated soils.	
Mitigation Measures	
Implement Mitigation Measure AQ/mm-4.1.	
HAZ/mm-2.1	*Prior to demolition and removal of the existing boiler plant facility, the Applicant shall prepare and submit a contaminated soil removal and disposal plan to be reviewed and approved by the City of Paso Robles and the County of San Luis Obispo Environmental Health Services (SLOEHS) and/or State Water Resources Control Board (SWRCB) or California Department of Toxic Substance Control (DTSC), as directed by the SLOEHS. The plan shall describe the volume and extent of all diesel-impacted soils with contamination levels exceeding Department of Toxic Substances Control Screening Levels to be fully excavated and disposed of at a solid waste facility approved to accept it. Should the regulatory agency(ies) require additional soil vapor testing before or after removal of contaminated soils, the Applicant shall use the 2020 Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion prepared by DTSC and the SWRCB, unless directed otherwise by the regulatory agency(ies), and if warranted address vapor conditions to the satisfaction of regulatory agencies prior to the issuance of a building permit in affected areas.*
HAZ/mm-2.2	*Prior to use of the maintenance building, the City of Paso Robles shall evaluate the indoor soil vapor concentrations using the 2020 Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion prepared by California Department of Toxic Substance Control (DTSC) and the State Water Resources Control Board (SWRCB). Specifically, the evaluation shall use an*

HAZ Impact 2 (Class II)	
	attenuation factor of 0.03 and shall include soil sample location within the area of the spray booth, and if warranted address vapor conditions to the satisfaction of regulatory agencies prior to the issuance of a building permit in affected areas.
HAZ/mm-2.3	*Prior to demolition of any structure, the Applicant shall retain a qualified contractor to survey all electrical transformers onsite either in use or in storage. The contractor shall determine the polychlorinated biphenyl (PCB) content using name plate information, or through sampling if name-plate data does not provide adequate information regarding the PCB content of the dielectric equipment. The Applicant shall retain a qualified contractor to remove and dispose of all transformers in accordance with the requirements of Title 40 of the Code Federal of Regulations, Section 761.60 and the Title 22 of the California Code of Regulations, Section 66261.24 or related regulations in effect at the time of demolition. The removal shall be completed in advance of any building demolition.*
HAZ/mm-2.4	*In the event that leakage is observed in the vicinity of a transformer containing greater than 50 parts per million polychlorinated biphenyls (PCBs) (determined in accordance with Title 40 of the Code of Federal Regulations [CFR], Section 761.61(a)), or the leakage has resulted in visible staining of the building materials or surrounding surface areas, the Applicant shall retain a qualified professional to obtain samples of the building materials for the analysis of PCBs in accordance with 40 CFR Part 761. If PCBs are identified at a concentration of 1 part per million, then the Applicant shall retain a contractor to clean the surface to a concentration of 1 part per million or less in accordance with 40 CFR Section 761.61(a) or related regulations in effect at the time of demolition. The sampling and cleaning shall be completed in advance of any building demolition activities in areas containing electrical transformers.*
HAZ/mm-2.5	*In the event that leakage is observed in the vicinity of a polychlorinated biphenyl (PCB)-containing transformer that has resulted in visible staining of the surrounding soil (determined in accordance with Title 40 of the Code of Federal Regulations [CFR], Section 761.61(a)), the Applicant shall retain a qualified professional to obtain soil samples for the analysis of PCBs in accordance with 40 CFR Part 761. If PCBs are identified at a concentration less than the commercial/industrial Environmental Screening Level of 0.94 milligrams per kilogram, then no further action shall be required. If PCBs are identified at a concentration greater than or equal to the commercial/industrial Environmental Screening Level of 0.94 milligrams per kilogram, then the Applicant shall prepare and submit a contaminated soil removal and disposal plan to be reviewed and approved by the City of Paso Robles and County of San Luis Obispo Environmental Health Services (SLOEHS). The plan shall describe the volume and extent of all PCB-impacted soils to be fully excavated and disposed of at a solid waste facility approved to accept it.*
HAZ/mm-2.6	*Prior to grading or trenching activities in areas of potentially contaminated groundwater, the Applicant shall obtain current shallow-zone groundwater monitoring readings from the onsite groundwater monitoring wells. The readings shall be provided to the City of Paso Robles (City) and the County of San Luis Obispo Environmental Health Services (SLOEHS) and/or State Water Resources Control Board (SWRCB) or California Department of Toxic Substance Control (DTSC), as directed by the SLOEHS for evaluation. The readings shall include concentration numbers for both TPH compounds and total dissolved solids, including concentrations of calcium, magnesium, sodium, chloride. The Applicant shall implement all requirements and recommendations of the regulatory agency(ies), if any, related to remediation of contaminated groundwater. Remediation, if required by the regulatory agency(ies) shall occur prior to grading or trenching activities, unless an alternative timeframe is specified by the regulatory agency(ies). The Applicant shall provide written documentation to the City showing that either no remediation is needed as confirmed by the regulatory agency(ies) or the site cleanup has been approved by the regulatory agency(ies).*

HAZ Impact 2 (Class II)	
HAZ/mm-2.7	*Prior to grading, trenching, or excavation of soils within 10 feet of Airport Road, Dry Creek Road, or Landing Lane, the City of Paso Robles (City) shall retain a qualified consultant to determine the lead concentrations of soil that would be disturbed. Soils with lead concentrations less than 80 mg/kg may be excavated and/or reused without restrictions. If soils are encountered with lead concentrations greater than or equal to 80 mg/kg, the Applicant shall request written approval from California Department of Toxic Substance Control (DTSC) prior to reuse of the soils and shall comply with all requirements requested from DTSC. Alternatively, if soils are encountered with lead concentrations greater than or equal to 80 mg/kg, the Applicant may elect to excavate and dispose of such soils at a waste facility approved to accept it. The Applicant shall prepare and submit a contaminated soil removal and disposal plan to be reviewed and approved by the City and the County of San Luis Obispo Environmental Health Services (SLOEHS). The plan shall describe the volume and extent of all lead-impacted soils with contamination levels exceeding Department of Toxic Substances Control Screening Levels to be fully excavated and disposed of at a solid waste facility approved to accept it.*
Residual Impacts	
Potential impacts associated with the accidental release of asbestos-containing materials, lead-based paint, and/or contaminated soils rials into the environment would be less than significant.	

HAZ Impact 3: The project may require the use of anhydrous ammonia if cold storage in the warehouse occurs. Adherence to existing regulations would result in less-than-significant impacts (Class III).

It is anticipated that up to 15% of the proposed warehouse space (199,538.4 square feet) may be allocated for the potential accommodation of cold storage (chilled, cooled, or freezer space). The refrigeration system is anticipated to be cooled by a closed-circuit ammonia-based system. Anhydrous ammonia is a colorless gas or liquid with a very strong, intensely irritating odor and is a regulated substance that can result in hazards to human health and the environment if mishandled. The ammonia refrigeration system would be required to comply with all federal, state, and local standards. This would include all codes and standards established by the American National Standards Institute (ANSI) and International Institute of Ammonia Refrigeration (IIAR), which include, but are not limited to, standards for the safe design of closed-circuit ammonia refrigeration systems, safety protocols and procedures for the startup of such systems, and standards for inspections, testing, and maintenance of such systems. These standards also include general system design requirements, system design pressures, requirements and standards for construction of machinery rooms and machinery room ventilation systems, and required installation of ammonia detection systems and alarms and emergency control switches.

Ammonia refrigeration systems are subject to OSHA General Industry standards including the 29 CFR Section 1910, which includes, but is not limited to, Subpart E, which requires employers to have an emergency action plan and procedures for emergency evacuation, Subpart H, which includes requirements for preventing and minimizing the consequences of catastrophic releases of hazardous chemicals and establishes emergency response requires, and Subpart I, which details required personal protective equipment to be used when transporting and/or handling ammonia.

Under Title 19 of the California Code of Regulations, the California Accidental Release Prevention (CalARP) program is designed to prevent the accidental release of regulated substances and to reduce the consequences in the event a release occurs. The program requires businesses that handle more than 10,000 pounds of anhydrous ammonia or 20,000 pounds of ammonia concentrated by 20% or greater to develop and maintain a Risk Management Plan (RMP), which is required to include safety information, a

hazard review, operating procedures, training requirements, maintenance requirements, compliance audits, and incident investigation procedures.

While the specific design and size of the proposed ammonia-based system is not known at this time, the project would be subject to the safety design standards, inspections, and emergency protocol established by ANSI and IIAR, 29 CFR Section 1910, and CalARP. The proposed warehouse facility would not be located within 500 feet of any residential uses. With adherence to existing regulations, impacts would be *less than significant (Class III)*.

HAZ Impact 3 (Class III)
The project may require the use of anhydrous ammonia if cold storage in the warehouse occurs.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with the use of anhydrous ammonia would be less than significant.

WOULD THE PROJECT BE LOCATED ON A SITE WHICH IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5 AND, AS A RESULT, WOULD IT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT?

HAZ Impact 4: The project would not be located on a site that is included on a list of hazardous materials sites creating a significant hazard to the public or the environment. Impacts would be less than significant (Class III).

Based on the Phase I ESA prepared for the project, two of the underground storage tanks previously located onsite are known to have leaked but the releases have been investigated, remediated, and closed. The SWRCB Geotracker database was queried and identifies two closed Leaking Underground Storage Tank (LUST) clean-up sites within the project area (SWRCB 2021). One of these LUST clean-up sites has been closed since 1987 and the other LUST clean-up site has been closed since October of 2013. No other recorded hazardous materials sites pursuant to Government Code Section 65962.5 occur on or within close proximity to the project site. Therefore, potential impacts associated with location on a site included on a list of hazardous materials sites pursuant to Government Code Section 65962.5 would be *less than significant*.

HAZ Impact 4 (Class III)
The project would not be located on a site that is included on a list of hazardous materials sites creating a significant hazard to the public or the environment.
Mitigation Measures
Mitigation is not required.

HAZ Impact 4 (Class III)
Residual Impacts
Potential impacts associated with location on a site included on a list of hazardous materials sites would be less than significant.

FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT RESULT IN A SAFETY HAZARD OR EXCESSIVE NOISE FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA?

HAZ Impact 5: The project would have the potential to result in an increased potential for wildlife collision hazards associated with the proposed detention basin and proximity to the Paso Robles Municipal Airport. Impacts would be less than significant with mitigation (Class II).

The project site is located in Safety Zones 3 and 5 of the Paso Robles Municipal Airport. The project was reviewed by the San Luis Obispo County Airport Land Use Commission (ALUC) on February 25, 2022, and was found to be consistent with the Paso Robles Municipal Airport ALUP. The project would be constructed within approximately 1,000 feet of the air operations area (AOA) at the Paso Robles Municipal Airport and includes the development of a 5.38-acre stormwater detention basin. If designed improperly or poorly maintained, stormwater detention basins can attract wildlife species that are hazardous to safe air operations. Because the airport serves piston-powered aircraft and turbine-powered aircraft, AC 150/5200-33C recommends that potential hazardous wildlife attractants within 10,000 feet of the AOA should be avoided, eliminated, or mitigated. Mitigation measure HAZ/mm-5.1 has been identified to reduce the potential for the stormwater detention basin to attract hazardous wildlife to the area. Upon implementation of this measure, potential impacts associated with construction of a wildlife attractant in proximity to an airport would be *less than significant with mitigation*.

HAZ Impact 5 (Class II)	
The project would have the potential to result in an increased potential for wildlife collision hazards associated with the proposed detention basin and proximity to the Paso Robles Municipal Airport.	
Mitigation Measures	
HAZ/mm-5.1	*The proposed detention basin shall be designed, engineered, constructed, and maintained for a maximum 48-hour detention period after the design storm and to remain completely dry between storms. To reduce wildlife attraction to the basin, the basin shall be steep sided, concrete (or rip rap) lined, and linear shaped. The City of Paso Robles Engineer shall review and approve the basin design prior to issuance of a permit to construct the basin. The Applicant or its successor in interest shall be required to maintain the detention basin so that it is free of standing water, emergent vegetation, and submergent vegetation.*
Residual Impacts	
Potential impacts related to wildlife collision hazards associated with the proposed detention basin and proximity to the Paso Robles Municipal Airport would be less than significant.	

HAZ Impact 6: The project would not result in excessive airport noise for people working or residing in the project area. Impacts would be less than significant (Class III).

Projects within close proximity to an airport have the potential to expose people to excessive noise hazard from aircraft activity. The eastern boundary of the project site is located adjacent to the Paso Robles Municipal Airport, approximately 1,700 feet away from the edge of the runway. According to the Paso Robles Municipal Airport ALUP, a large majority of the project site is located in Safety Zone 5 with a small area in the southeastern corner of the site located in Safety Zone 3. Also, an eastern portion of the project site is located within the 55 decibel (dB) community noise equivalent level (CNEL) airport noise contour and a portion of the southeast corner of the project site is located within the 60 dB CNEL airport noise contour (see Figure 4.7-3) (City of Paso Robles 2006, 2007).

Based on the Paso Robles Municipal Airport Land Use Compatibility Matrix, Aircraft Fuel, Aircraft Sales and Aircraft Repairs, and Flying Schools are the only prohibited land uses within Zone 5. All other land uses, such as office buildings, hotels and motels, warehouses, shopping centers, and manufacturing and processing are designated as compatible land uses that are not considered to present a significant risk to the safety of persons on the ground or to persons in aircraft overlying the proposed use within Zone 5 (City of Paso Robles 2007). The project does not entail the construction of habitable structures in Zone 3. The project was reviewed by the ALUC on February 25, 2022, and was found to be consistent with the Paso Robles Municipal Airport ALUP.

Portions of the project site proposed to be developed with offices, a winery, a restaurant, parking areas, and retail uses are located within the 55 dB noise contour and 60 dB noise contour of the Paso Robles Municipal Airport. According to the U.S. Department of Labor Occupational Safety and Health Administration (OSHA), noise levels at 60 dB are roughly equivalent to noise levels of a conversation between two people 3 feet from each other (OSHA 2021). Therefore, project construction workers and occupants of proposed land uses located within the 55 dB and 60 dB noise contours of the Paso Robles Municipal Airport would not be subject to excessive noise, and impacts would be *less than significant.*

HAZ Impact 6 (Class III)
The project would not result in excessive airport noise for people working or residing in the project area.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with excessive airport noise would be less than significant.

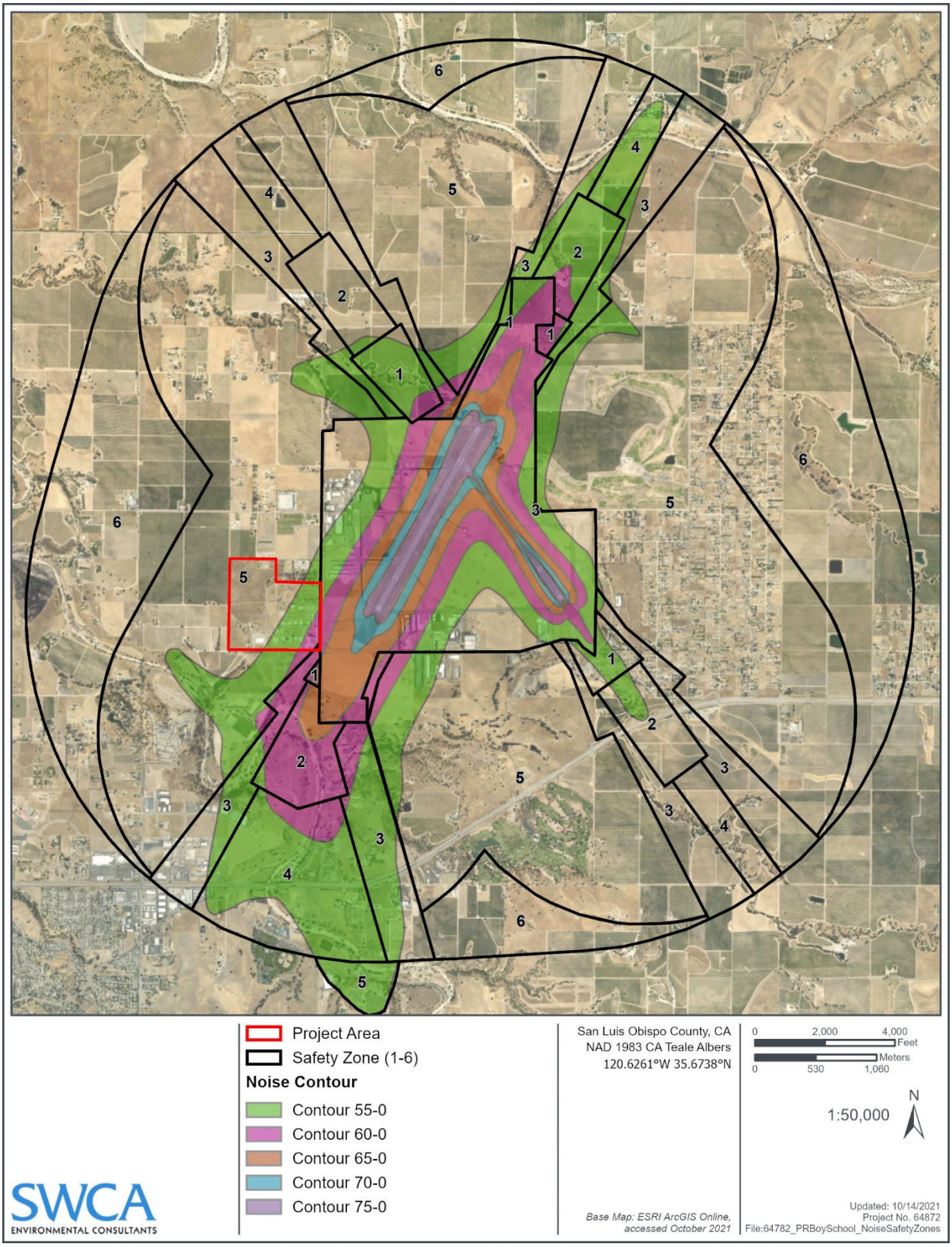


Figure 4.7-3. Paso Robles Municipal Airport noise contours and safety zones.

WOULD THE PROJECT IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?

HAZ Impact 7: The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant (Class III).

The existing structures on the project site are currently unoccupied. No breaks in utility service to the surrounding properties would occur as a result of project implementation. Any construction-related temporary road closures and associated detours would include proper signage, designate alternate routes (if necessary), and notification and would be short-term and limited in nature and duration.

During operation, the project would result in a higher density of development than existing and historical uses. This would result in an increase in vehicle traffic along SR 46E in the event of an evacuation. However, due to the low density of residential uses within the project vicinity and proximity to a major highway (SR 46E), vehicle traffic contributed by the project during emergency evacuations would not be significant enough to impair evacuation of the area. Therefore, potential impacts associated with impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan would be *less than significant*.

HAZ Impact 7
The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan would be less than significant.

WOULD THE PROJECT EXPOSE PEOPLE OR STRUCTURES, EITHER DIRECTLY OR INDIRECTLY, TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES?

HAZ Impact 8: The project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant (Class III).

According to the City's Safety Element, the project site is located within an urban unzoned, non-wildland/non-urban, moderate, and high fire hazard severity zone within the LRA (City of Paso Robles 2014). All proposed development components associated with the project would be required to comply with all applicable fire safety rules and regulations including the California Fire Code and Public Resources Code prior to issuance of building permits. Based on the lack of proximate wildland areas, potential impacts would be *less than significant*, and no mitigation would be necessary.

HAZ Impact 8
The project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires would be less than significant.

4.7.6 Cumulative Impacts

4.7.6.1 Hazards and Hazardous Materials

Existing and foreseeable future projects in and around the city of Paso Robles would expose additional groups of people and the environment to additional hazards common in urban and suburban areas, as well as wildfires that may affect land uses located along the wildland-urban interface. Specific hazards associated with proposed development projects would be identified through discretionary review processes and/or required environmental review and mitigated accordingly. Hazards associated with the presence of toxic substances or other hazardous substances would be tested, handled, transported, and disposed of in accordance with existing state and federal regulations. In most cases, compliance with existing regulations, including building code requirements, DTSC regulations, and City-issued permit conditions would minimize cumulative impacts associated with hazards and hazardous materials. Hazards associated with proximity to airports would be minimized through compliance with the Paso Robles Municipal Airport ALUP and review and approval of projects by the ALUC as applicable. The proposed project would comply with all applicable building code requirements and state and local regulations pertaining to the transport, use, and disposal of hazardous materials and policies set forth in the Paso Robles Municipal Airport ALUP. Mitigation identified to reduce hazards associated with placement of potential wildlife attractants in proximity of an airport would be less than cumulatively considerable with implementation of mitigation identified above. Therefore, the contribution of the project toward cumulative effects related to hazards and hazardous materials would be less than cumulatively considerable.

4.8 HYDROLOGY AND WATER QUALITY

This section discusses the existing water resources within the project area and evaluates the potential for the proposed project to result in impacts related to hydrology, water quality, drainage, impervious surface area, flooding, and other hazards. This section incorporates the setting and impact analysis from the *Water Supply Assessment for The Landing Paso Robles* (Todd Groundwater 2021; Appendix H) and the *Preliminary Stormwater Control Plan for The Landing* (Wallace Group 2021; Appendix H).

4.8.1 Existing Conditions

4.8.1.1 Regional Hydrology

4.8.1.1.1 WATERSHEDS

A watershed is defined as the area of land that catches rain or snow and drains into a marsh, stream, river, lake, or groundwater. Watersheds provide drinking water for people and habitat for wildlife and may affect soils for agricultural activities and recreational waters (County of San Luis Obispo 2021). Most areas of the city are located within the Paso Robles Creek or Huer Huero Creek watersheds, which both flow to the Salinas River and then eventually to the Pacific Ocean. The project site and offsite improvement areas are located within the Huer Huero Creek watershed, which is comprised of approximately 103,496 acres and is divided into two main drainages (Upper and Lower) that are bisected by State Route (SR) 41.

The average rainfall within the Huer Huero Creek watershed is 13 to 18 inches in the northern portion and 18 to 24 inches in the southern portion. The average summer temperature ranges from 54 degrees Fahrenheit (ºF) to 94ºF and the average winter temperatures range from 34ºF to 60ºF. The dominant land uses within the Huer Huero Creek watershed include agriculture and vineyards (County of San Luis Obispo 2014).

4.8.1.1.2 GROUNDWATER

The city of Paso Robles is located in the Salinas Valley Groundwater Basin (Paso Robles Area Subbasin), which is identified as Basin No. 3-004.06 by the California Department of Water Resources (DWR) (DWR 2004). The groundwater basin is located in northern San Luis Obispo County and extends into Monterey County. The Paso Robles Area Subbasin has not been adjudicated but it has been designated as high priority and critically over drafted by DWR, requiring management under the Sustainable Groundwater Management Act (SGMA). The Paso Robles Area Subbasin is under the jurisdiction of the City of Paso Robles Groundwater Sustainability Agency (GSA), which has adopted the Paso Robles Area Subbasin Groundwater Sustainability Plan (Paso Basin GSP) and Paso Robles Groundwater Basin Plan.

Groundwater has been and will continue to be an important component of the City's water supply. In 2016 the Atascadero Area Subbasin was subdivided from the Paso Robles Area Subbasin of the Salinas Valley Groundwater Basin. The City operates 12 deep wells that pump groundwater from the Paso Robles Area Subbasin and also has seven shallow (river) wells in the Atascadero Area Subbasin that utilize a surface water entitlement from the SWRCB (Todd Groundwater 2021).

Paso Robles Area Subbasin

The Paso Robles Area Subbasin is the water-bearing portion of the upper Salinas River drainage area. The Salinas River system drains the basin area and surrounding uplands and flows north along the western edge of the drainage area. The Subbasin is the southernmost portion of the Salinas Valley Groundwater

Basin and had previously been defined by DWR as extending into San Luis Obispo and Monterey Counties. The northern boundary was modified to coincide with the San Luis Obispo–Monterey County line during the 2019 DWR basin boundary modification process. The major aquifers (or water-bearing units) in the subbasin include alluvial deposits and the Paso Robles Formation. These have been identified in the Paso Basin GSP as the basin's principal aquifers (Todd Groundwater 2021). The alluvial deposits are up to 100 feet in depth and include recent stream-laid sands and gravels along the floodplains of the Salinas River and its tributaries and older finer-grained terrace deposits along the Salinas and Estrella Rivers. The Paso Robles Formation is the most extensive aquifer and consists of sedimentary layers extending from the surface to depths of more than 2,000 feet. It is typically unconsolidated and generally poorly sorted. The water-bearing sediments in the basin are 700 to 1,200 feet thick and typically extend to sea level. Paso Robles Formation sediments are relatively thin, often discontinuous sand and gravel layers interbedded with thick layers of silt and clay. Wells generally produce several hundred gallons per minute (Todd Groundwater 2021). Groundwater flow is generally to the northwest and west over most of the subbasin, except in the area north of the city of Paso Robles where groundwater flow is to the northeast toward a pumping depression between the city of Paso Robles and the communities of San Miguel and Whitley Gardens (Todd Groundwater 2021).

A groundwater depression is centered in the Estrella subarea of the basin, which is characterized by declining groundwater levels. The depression centered in the Estrella subarea reflects agricultural, golf course, municipal, rural, and other pumping. This pumping depression is also apparent in City wells. In some cases, groundwater levels have declined more than 100 feet since 1997 (Todd Groundwater 2021). The most recent study of groundwater conditions is the Paso Basin GSP and Water Year 2020 Annual Report (Montgomery 2020; GSI 2021; Todd Groundwater 2021). The Paso Basin GSP estimated that the historical sustainable yield of the Subbasin was 59,800 acre-feet per year (AFY) between 1981 and 2011, and the future sustainable yield was estimated to be 61,100 AFY. Groundwater use is greater than groundwater recharge and groundwater levels are declining in some parts of the subbasin. The water budget developed for the Paso Robles Formation aquifer indicates that the amount of groundwater in storage is in decline and will continue to decline if there is no net decrease in groundwater demand on the aquifer (GSI 2021; Todd Groundwater 2021). Projects and management actions that have been identified to address these declines and help achieve groundwater sustainability by 2040.

Atascadero Area Subbasin

The Atascadero Area Subbasin was subdivided from the Paso Robles Area Subbasin of the Salinas Valley Groundwater Basin in 2016 based on information indicating the Rinconada Fault as a significant barrier to groundwater flow (Todd Groundwater 2021). It has not been adjudicated and was reprioritized as a very low-priority basin by the state. Although not required by the SGMA, the Paso Basin GSP is being developed. The City has seven surface water wells in the Alluvium of the Atascadero Area Subbasin, which is a relatively continuous aquifer of sand and gravel that underlies the Salinas River and tributary streams. Groundwater quality is relatively good in the Alluvium and Paso Robles Formation (Todd Groundwater 2021).

Groundwater Quality

A general measure of groundwater quality is total dissolved solids (TDS). For drinking water purposes, water with a TDS concentration of 500 milligrams per liter (mg/L) or less is recommended but can be usable up to 1,000mg/L (Todd Groundwater 2021). TDS concentrations range between 350 and 1,560 mg/L in the area of the basin that the city overlies (referred to as the Estrella Subarea) (Todd Groundwater 2021). In general, City water quality is good, but has relatively high TDS and hardness. In response to the hardness, many residents use home water softeners. However, use of water softeners results in addition of salts to the City's wastewater. Nacimiento Water Project water is lower in hardness and TDS than groundwater and may reduce the use of residential water softeners. As previously mentioned, the City

currently operates 12 deep wells that are dispersed across the city east of the Salinas River. All are screened in the Paso Robles Formation, as are the many nearby rural residential and agricultural wells surrounding the city. Annual pumping totals for the City's deep wells between 2015 and 2020 have ranged between 656 AFY (2018) to 2,045 AFY (2015). By buildout (2050 or later), deep well pumping is projected to fluctuate between 1,800 AFY and 2,600 AFY.

According to the Paso Basin GSP, groundwater quality is monitored by several different programs and by different agencies, including municipal and community water purveyors, the U.S. Geologic Survey (USGS), the State Water Resources Control Board (SWRCB), and the Central Coast Regional Water Quality Control Board (RWQCB) (County of San Luis Obispo 2019).

4.8.1.1.3 SURFACE WATER

The nearest major surface water features to the project site are Huer Huero Creek, located approximately 0.28 mile southwest of the project site, and the Salinas River, located approximately 2.3 miles west of the project site. Huer Huero Creek is an ephemeral underground stream that flows directly to the Salinas River. The headwaters occur in the Coast Ranges south of Creston and reach elevations of approximately 3,312 feet. The confluence of Huer Huero Creek with the Salinas River occurs in Paso Robles, approximately 2.3 miles northwest of the project site (County of San Luis Obispo 2014).

Water Quality

The project site is located approximately 0.28 mile from Huer Huero Creek, which is a tributary to the Salinas River. The Salinas River, from the confluence of the Nacimiento River to the Santa Margarita Reservoir, is listed as Category 5 on the SWRCB *Final 2018 Integrated Report (CWA Section 303(d) List / 305(b) Report: Category 5 2018 California 303(d) List of Water Quality Limited Segments*. The Category 5 listing describes a water segment where standards are not met and a Total Maximum Daily Load (TMDL) is required, but not yet completed, for at least one of the pollutants being listed for this segment (SWRCB 2018).

4.8.1.2 Project Site Hydrology

The project site consists of a 140.75-acre parcel located in the northeastern portion of Paso Robles, at the northwest corner of the Airport and Dry Creek Roads intersection. The project site does not directly support any significant surface water features. According to the National Wetland Inventory (NWI) Surface Waters and Wetlands mapper, Huer Huero Creek is located 0.28 mile (1,500 feet) southwest of the project site and there are federal wetland features located within the southwestern portion of the project impact area, adjacent to the southwestern parcel boundary, and within an unnamed drainage that extends over the western portion of the site (USFWS 2021; Althouse and Meade 2022). The proposed stormwater basin outfall and modified Class I Multiuse Trail low water crossing are within the Huer Huero Creek.

The project site is characterized by flat topography with 2 percent slopes that generally trend from east to west. Runoff from the site typically flows towards Huer Huero Creek. The eastern portion of the 140.75-acre project site contains the unoccupied development associated with the former Paso Robles Boys School, including buildings, internal paved roads, and paved parking lots. The remaining portions of the project site are undeveloped and currently allow for groundwater recharge.

There are three stormwater discharge locations on the west boundary of the property, including the northern, middle, and southern low points. The northern low point discharges small flows to an existing access road. The middle low point connects to an offsite drainage swale that flows west along the

agricultural fields. The southern low point, which is at the southwest corner of the site, consists of large open space where runoff spreads overland and infiltrates in well-draining soils.

According to Federal Emergency Management Act (FEMA) Flood Insurance Rate Map (FIRM) 06079CO392G (dated 11/16/2010) and 06079CO394G (dated 11/16/2012), the project site is located within Zone X, an area of minimal flood hazard; however, portions of Airport Road south of the project site, and the stormwater outfall are located within Zone A, an area with high flood hazard (FEMA 2020). Peak flows within the Huer Huero Creek are estimated at 13,000 cubic-feet-per-second (cfs) during 100-year storm events (Wallace Group 2017).

4.8.2 Regulatory Setting

Federal, state, and local agencies regulate surface water and groundwater resources and their associated water quality for the protection of watersheds, floodplains, and water quality. These agencies regulate surface water and groundwater so that identified beneficial uses are not impaired. Water quality regulations are designed to limit the discharge of pollutants into the environment, maintain surface water and groundwater quality, protect fish and wildlife and their habitats, and protect beneficial uses.

4.8.2.1 Federal

4.8.2.1.1 FEDERAL CLEAN WATER ACT

The CWA is the primary federal law regulating discharges of pollutants into Waters of the United States and regulating water quality standards for surface waters. The CWA prohibits the discharge of any pollutants from a point source into navigable waters unless a National Pollutant Discharge Elimination System (NPDES) permit is obtained. The following CWA sections include relevant policies for regulating water quality:

- **Section 208** requires all states to assess damages to water quality from nonpoint source pollution, including runoff. Section 208 requires states to develop either regulatory or non-regulatory programs to control nonpoint source pollution.
- **Section 303(d)** authorizes the USEPA to assist states, territories, and other authorized tribes in listing impaired waters and developing TMDLs for the identified waterbodies. A TMDL establishes the maximum amount of a pollutant allowed in a listed waterbody. In addition, a TMDL establishes a starting point for restoring water quality.
- **Section 304(a)(4)** requires the USEPA to designate potential water pollutants as either conventional pollutants or toxic pollutants based on the latest scientific knowledge regarding the effects of pollutants on water quality. Conventional pollutants include biochemical oxygen demand (BOD_5), total suspended solids (TSS), fecal coliform, pH, oil, and grease. The USEPA has designated 126 "priority" toxic pollutants.
- **Section 313** requires that each federal agency that has jurisdiction over any facility or is engaged in an activity that may result in discharge or runoff of pollutants must comply with all federal, state, and local water pollution control requirements. This may include adherence to all requirements, including, but not necessarily limited to, reporting, recordkeeping, and/or permitting requirements.
- **Section 401** requires a water quality certification to be issued or waived by states and other authorized tribes prior to issuance of a permit or license to conduct activities that may result in discharge to Waters of the United States. In cases where a state or tribe does not have authority, the USEPA is responsible for issuing certification. The major federal licenses and permits subject to Section 401 include: (1) CWA Section 402 and 404 permits issued by USEPA or USACE;

(2) Federal Energy Regulatory Commission (FERC) licenses for hydropower facilities and natural gas pipelines; and (3) Rivers and Harbors Act Section 9 and 10 permits.

- **Section 402** establishes the NPDES. Discharge of point source pollutants to the Waters of the United States are prohibited unless they are compliant with provisions of the CWA. Typically, compliance is achieved by obtaining authorization to discharge pursuant to an NPDES permit issued by USEPA or a state agency that has an approved NPDES program. NPDES permits generally contain water quality- and/or technology-based standards for effluent discharges, monitoring requirements, analytical testing methods, and reporting requirements.
- **Section 404** requires facilities that discharge dredged or fill materials into waters of the United States to apply for a permit issued by the USACE.
- **Section 405** requires that facilities that treated domestic sewage must meet federal requirements for the use and disposal of sewage discharge through land application, surface disposal, or incineration. These requirements are incorporated to permits issued under CWA Section 402.

4.8.2.1.2 SAFE DRINKING WATER ACT

Under the Safe Drinking Water Act, the USEPA establishes standards and regulations for several contaminants and chemicals in public drinking water. Under this regulation, the USEPA also monitors the states, local authorities, and other water suppliers who enforce these standards. The USEPA has set maximum contaminant levels, as well as treatment requirements for over 90 different contaminants in public drinking water.

4.8.2.1.3 SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLANS

Spill Prevention, Control, and Countermeasure (SPCC) Plans require that facilities prevent oils spills from reaching navigable Waters of the United States or adjoining shorelines. This regulation applies to owners or operators of certain facilities that drill, produce, gather, store, process, refine, transfer, distribute, use, or consume oil or oil products. This regulation differs from spill contingency plans because it requires facilities to implement prevention measures rather than measures to address accidental spills that may or may not occur.

4.8.2.1.4 FEDERAL EMERGENCY MANAGEMENT AGENCY

FEMA oversees floodplains and manages the National Flood Insurance Program (NFIP). FEMA also prepares the FIRMs for states and other communities participating in the NFIP. FIRMs delineate regulatory floodplains to assist communities with land use and floodplain management decisions. FEMA's floodplain management follows directives set by the Executive Office, including the following:

- **Executive Order 11988: Floodplain Management** requires federal agencies to avoid long- and short-term impacts associated with the occupancy and modification of floodplains to the extent feasible. Executive Order (EO) 11988 also requires agencies to avoid direct and indirect support of floodplain management wherever there is a practicable alternative.
- **Executive Order 11990: Protection of Wetlands** aims to minimize the destruction, loss, or degradation of wetlands and also aims to preserve and enhance the natural and beneficial values of wetlands. EO 11990 requires federal agencies to consider alternatives to wetland sites and limit potential damage if an activity affecting a wetland cannot be avoided during construction.

4.8.2.1.5 FLOOD RISK MANAGEMENT PROGRAM

USACE operates the Flood Risk Management Program, which includes policies and programs aimed at reducing overall flood risk. Typical policies and programs include appropriate use and resiliency of structures (i.e., levees and floodwalls) and the promotion of feasible alternatives to reduce the risk of loss of life, reduce long-term economic damages to the public and private sector, and improve the natural environment.

4.8.2.2 State

4.8.2.2.1 PORTER-COLOGNE WATER QUALITY CONTROL ACT

The Porter-Cologne Act (Water Code Section 13000 et seq.) created the SWRCB and the nine RWQCBs within the state. The SWRCB coordinates responsibilities of water quality and water rights within the state. The proposed project is within the jurisdiction of the Central Coast RWQCB, further discussed in *Section 4.8.2.3.1, Central Coast Regional Water Quality Control Board*, below.

The Porter-Cologne Act requires that Waters of the State are protected. The SWRCB is given authority to enforce the Porter-Cologne Act, as well as CWA Section 401. In California, the SWRCB issues a statewide Construction General Permit to regulate runoff from construction sites involving grading and earth moving in areas over 1 acre. The Construction General Permit also applies to projects of less than 1 acre that are part of a larger plan of common development and requires covered construction projects to use the best available technology economically achievable and the best conventional pollution control technology. Each construction project subject to the Construction General Permit is required to have a SWPPP prepared. A SWPPP identifies likely sources of sediment and pollution and incorporates measures to minimize sediment and pollution in runoff water.

4.8.2.2.2 CALIFORNIA FISH AND GAME CODE SECTION 1602

California Fish and Game Code Section 1602 prohibits an entity from substantially diverting or obstructing the natural flow of a river or stream and also prohibits an entity from substantially altering the material from the bed, channel, or bank of any river, stream, or lake. California Fish and Game Code Section 1602 also prohibits discharge of debris, waste, or other material (i.e., material containing crumbled, flakes, or ground pavement) where it may pass into a river, stream, or lake. The identified activities are prohibited unless the CDFW is notified prior to the commencement of any activities and any requirements established by the CDFW for the specific activity is met.

4.8.2.2.3 INTEGRATED REGIONAL WATER MANAGEMENT

Integrated Regional Water Management (IRWM) is a collaborative effort by DWR to identify and implement water management solutions on a regional scale that increases regional self-reliance, reduces conflict, and manages water to concurrently achieve social, environmental, and economic objectives. IRWM provides multiple benefits, including improved water quality, better flood management, restored and enhanced ecosystems, and more reliable surface and groundwater supplies.

4.8.2.2.4 FLOODSAFE

FloodSAFE is a program managed by the DWR within the state. FloodSAFE includes a flood management and emergency response system throughout California that improves public safety, protects and enhances environmental and cultural resources, and supports economic growth by reducing the likelihood of destructive floods, promoting beneficial floodplain processes, and lowering the risk of damage caused by flooding.

4.8.2.2.5 SUSTAINABLE GROUNDWATER MANAGEMENT ACT

The SGMA is managed by the DWR and provides a long-term statewide framework to protect groundwater resources. The SGMA is comprised from a three-bill legislative package, including AB 1739, SB 1168, and SB 1319. The SGMA requires local agencies to form GSAs for high- and medium-priority basins. It is the responsibility of the GSAs to prepare and implement a GSP to mitigate overdraft.

4.8.2.2.6 CALIFORNIA STATEWIDE GROUNDWATER ELEVATION MONITORING PROGRAM

Since 2009, the California Statewide Groundwater Elevation Monitoring (CASGEM) Program has tracked seasonal and long-term groundwater elevation trends in groundwater basins statewide. The program works to establish a permanent, locally managed program of regular and systematic monitoring in all of California's alluvial groundwater basins to improve overall management of California's groundwater resources.

4.8.2.3 Local

4.8.2.3.1 CENTRAL COAST REGIONAL WATER QUALITY CONTROL BOARD

The protection of water quality within San Luis Obispo County, including the city of Paso Robles, is under the jurisdiction of the Central Coast RWQCB. The Central Coast RWQCB establishes discharge requirements and limitations to maintain water quality objectives identified in the Water Quality Control Plan for the Central Coast Basin (Basin Plan; RWQCB 2019). The Central Coast RWQCB identifies 20 categories of beneficial uses. Each body of water in the state has a set of beneficial uses, each of which requires different water quality control. Each beneficial use has a set of water quality objectives designed to protect that use (RWQCB 2019).

Resolution R3-2013-0032 outlines stormwater management requirements for development projects in the Central Coast region and defines four post-construction requirements to help maintain water quality and overall health and function of watersheds. These requirements are based on the project's type, size, and regional location. The proposed development lies within Watershed Management Zone (WMZ) 1 (Stillwater Sciences 2012). These four post-construction requirements include the following for regulated projects:

1. **Site Design and Runoff Reduction.** Requirements include limiting disturbance to creeks and drainage features, minimizing compaction of permeable soils, limiting clearing and grading of vegetation, and minimizing impermeable surfaces.
2. **Water Quality Treatment.** Requirements include treating urban runoff with onsite source control systems such as Low Impact Development (LID) treatment systems, Biofiltration Treatment Systems, or other Best Management Practices (BMPs) to reduce pollution before runoff enters the Municipal Separate Storm Sewer System (MS4).
3. **Runoff Retention.** Prevent offsite discharge from events up to the 95th percentile 24-hour rainfall event (as determined from local rainfall data).
4. **Peak Flow Management.** Post development peak flows, discharged from the site, shall not exceed peak flows for the 10-year storm event.

4.8.2.3.2 CITY OF EL PASO DE ROBLES GENERAL PLAN 2003

The City addresses hydrology and water quality issues through implementation of adopted *City of El Paso de Robles General Plan 2003* policies and programs. These policies are found in the LUE and Conservation and Safety Elements. The goals and policies from the existing General Plan relate to protecting water quality and managing stormwater.

Land Use Element

The LUE contains the following policy and action item related to stormwater management:

Policy LU-2K Support environmental responsibility. Manage the natural landscape to preserve the natural beauty and rural identity of the community, which enhances ecological functions and maintains environmental and public health.

Action Item 1 Require new development, either on public or private property, to mitigate its share of impacts from storm water on the natural environment through implementation of LID storm water management features.

Conservation Element

The Conservation Element contains the following policies and action items that define the local regulatory setting related to hydrology and water quality:

Policy C-1A Water Source, Supply, and Distribution. Develop and implement various innovative water provision and conservation programs that help to ensure an adequate supply of water for the city.

Action Item 2 Investigate and implement, if feasible, basin recharge programs through non-traditional methods. Such programs may include the following: storm drainage system design integrating LID features to reduce hydromodification from development and other improvements to recharge the ground water aquifer; developing/improving water recharge along historic drainage patterns along/adjacent to creeks and/or rivers; and/or developing recycled wastewater programs including basin recharge.

Action Item 3 Maintain/update the Urban Water Management Plan and implement Best Management Practices (BMP) as feasible.

Action Item 4 Maintain an updated Water Master Plan and develop needed water production, treatment, storage and distribution facilities as part of the Capital Improvement Plan/Budget. As part of the Water Master Plan or Engineering Standards and Specifications, establish water service standards for new development to include, but not be limited to: minimum pressure; provision of two sources of water to subdivisions and large development projects; use of looped systems.

Action Item 5 Maintain potable water quality via the following measures:

a. Continue to monitor city water supplies wells for water quality requirements of the Department of Health Services and other regulatory agencies.

b. Encourage minimization of applications of agricultural chemical fertilizers and pesticides and enforce conservative application of agricultural waters.

c. Provide treatment and distribution systems needed to assure conveyance of potable water that meets all water regulations.

d. Incorporate LID features with all development in compliance with the "Joint Effort" permit requirements to filter and clean storm water through natural systems before it enters surface and groundwater supplies.

Policy C1-C Storm Drainage. Provide storm drain systems that efficiently and safely mitigate flood risk, while effectively managing storm water through implementation of LID features, so that downstream run-off is limited to pre-development volumes and velocity before it is conveyed to the Salinas River, Huerhuero Creek, and their tributaries.

Action Item 1 Maintain and update the Storm Water Master Plan. Implement, as feasible, recommended actions and BMPs described in the Master Plan.

Action Item 2 Establish revised development standards as may be appropriate, that include, but are not limited to the following:

a. For large developments that feature substantial amounts of impervious surfaces, detain water flows to prevent overflow of waterways and inundation of developed areas.

b. Direct surface water runoff from developed areas to LID storm water features on the development site. The facilities should be designed to both mitigate flood flows while providing safe and efficient low-flow conveyance.

c. Maintain natural streams to provide, at minimum, flow capacity for 100-year storm conditions.

d. Conduct floodplain acquisition and promote groundwater recharge to preserve the floodway, protect riparian habitats and to enhance water resource, flood control projects and recharge programs to accommodate increased runoff from new development. These programs should be funded by developers, at rates proportional to the projected increase in runoff associated with their developments.

Safety Element

The Safety Element contains the following policy and action item related to flood hazards:

Policy S-1A Hazard Education. Hazard Education. Continue to inform the public about hazards, hazard avoidance, and disaster response

Action Item 2 Support volunteer training aimed at assisting police, fire, and civil defense personnel during and after a major earthquake, fire, or flood.

Policy S-1D Structural Safety. Rely on the city's planning and building permit review process to ensure that existing and proposed structures are adequately designed, and to reduce susceptibility to damage from fire, flooding, and geologic hazards.

Action Item 2 Maintain a current survey of unreinforced masonry and other hazardous structures.

Action Item 3 Require structures identified as being located in hazardous areas to be brought into conformance with acceptable levels of risk.

Action Item 4 Discourage the locating of critical facilities within identified hazard areas.

Policy S-1G Maintain the structural and operational integrity of essential public facilities during flooding by taking safe guards such as locating new facilities outside of flood zones or areas subject to localized flooding, and audit existing facilities in these areas to determine if building upgrades should be considered to reduce the potential for future flooding.

4.8.2.3.3 CITY OF PASO ROBLES STORMWATER CONTROL

The City has enrolled in the SWRCB Waste Discharge Requirements (WDRs) for Small MS4s (Order No. 2013-0001-DWQ) and the NPDES General Permit No. CAS000004 (general permit). As required by this general permit, the city adopted its Stormwater Control ordinance, which regulates the entry of pollutants and non-stormwater discharges into the city storm drain system. The requirements are set forth in the City's Municipal Code Chapter 14.20 Storm Water Control, and include the following provisions: :

- Construction activities must comply with the statewide general construction permit, which is applicable to construction sites of 1 acre or more.
- Any construction activity requiring a grading permit, regardless of size, must prepare and submit a site-specific erosion and sediment control plan.
- Industrial and commercial activities must comply with the statewide general permit for industrial activities.
- All new development must comply with the post-construction stormwater management requirements in Section V, design guidelines, of the city Public Works standard details and specifications. Those requirements reference the LID guidelines as developed by the Central Coast RWQCB or other performance standards that may superseded them.
- Land uses involving specific pollutant-generating activities identified in the Municipal Code must implement permanent and operation source control measures consistent with BMPs. Example activities included in the project are:

- Parking areas
- Landscape areas with outdoor pesticide use
- Pools, spas, ponds, decorative fountains and other water features
- Fire sprinkler test water
- Drain or wash water from boiler drain lines, condensate drain lines, rooftop equipment, drainage sumps, and other sources
- Building and grounds maintenance

These requirements provide the City with the authority to enforce procedures intended to avoid and minimize the potential for surface water pollutants to enter the storm drain system, and the natural surface waters to which the system discharges. These procedures allow the City to comply with applicable federal and state law and to mitigate the potential water quality impacts from nonpoint source pollutants associated with land development.

The City is also enrolled in the Phase II Municipal Stormwater Program as required by SWRCB. The program requires the City to develop and implement a Stormwater Management Plan (SWMP) to reduce or eliminate pollutants in stormwater runoff and non-stormwater discharges.

4.8.2.3.4 WATER QUALITY CONTROL PLAN FOR THE CENTRAL COAST BASIN

The purpose of the Basin Plan is to provide management objectives for surface and groundwater quality within the central coast region. Chapter 5 of the Basin Plan includes plans and policies for surface and groundwater quality to meet standards set by the state. Specifically, Section 5.3 provides RWQCB management principles for wastewater, discharge, sewer, groundwater, and erosion and sediment control.

4.8.2.3.5 PASO ROBLES AREA SUBBASIN GROUNDWATER SUSTAINABILITY PLAN

The Paso Basin GSP was adopted in January 2020. The purpose of the Paso Basin GSP is to fulfill local requirements of the SGMA for the Paso Robles Area Subbasin of the Salinas Valley Basin and to identify quantifiable groundwater management objectives. The Paso Basin GSP requires monitoring, reporting, and other management tools to maintain groundwater quality and quantity within the Paso Robles Area Subbasin. The overarching goal of the Paso Basin GSP is to sustainably manage the groundwater resources of the Paso Robles Area Subbasin for long-term community, financial, and environmental benefit of Subbasin users by outlining an approach to achieve a sustainable groundwater resource. The Paso Basin GSP has been jointly developed by the City of Paso Robles GSA, Paso Basin – County of San Luis Obispo GSA, San Miguel Community Services District (CSD) GSA, and Shandon - San Juan GSA.

Measurable objectives are target groundwater levels established at each Representative Monitoring Site (RMS). Measurable objective groundwater levels are higher than minimum threshold groundwater levels and provide operational flexibility above minimum threshold levels to ensure that the subbasin can be managed sustainably over a reasonable range of climate and hydrologic variability. Measurable objectives may change after GSP adoption as new information and hydrologic data become available. Initial measurable objectives were established based on historical groundwater level data, along with input and preferences on future groundwater levels from domestic groundwater users, agricultural interests, environmental interests, and other stakeholders.

4.8.3 Thresholds of Significance

The project's potential impacts associated with hydrology and water quality have been analyzed using the environmental checklist questions included in Appendix G of the State CEQA Guidelines. Project impacts may be considered potentially significant if construction and/or operation of the project would result in any of the following:

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    i. result in substantial erosion or siltation on- or offsite;
    ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
    iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
    iv. impede or redirect flood flows?

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

4.8.4 Impact Assessment and Methodology

For the purposes of this analysis, relevant documents were reviewed, particularly the *City of El Paso de Robles General Plan*, *Preliminary Stormwater Control Plan for The Landing* (Wallace Group 2021), and *Final Water Supply Assessment for The Landing Paso Robles* (Todd Groundwater 2021). A discussion of the project's consistency with plans and policies and relevant CEQA significance criteria is provided below.

4.8.5 Project-Specific Impacts and Mitigation Measures

WOULD THE PROJECT VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS OR OTHERWISE SUBSTANTIALLY DEGRADE SURFACE OR GROUND WATER QUALITY?

HYD Impact 1: Construction and operation of the project may have the potential to result in new sources of pollutants that may lead to degradation of water quality within the project area. Impacts would be less than significant with mitigation (Class II).

The project site is characterized by flat topography and consists of previous development associated with the former Paso Robles Boys School on the eastern portion of the site. The project's proposed offsite

improvement areas consist of existing roads and vacant land, including land within the Huer Huero Creek. The project would be constructed in two phases. Phase 1 would include demolition of existing buildings (with the exception of the maintenance facility on the western portion of the site) located on the project site and development of the 1,330,356-square-foot warehouse and distribution center and 5.38-acre stormwater detention basin on approximately 76.87 acres of the western portion of the property. Phase 1 also would also include construction of offsite improvements. Phase 2 would include construction of up to 630,900 square feet of commercial, office, and visitor-serving uses on approximately 63.88 acres of the eastern portion of the property.

Projects that disturb more than 1 acre of ground or would result in substantial degradation to water quality require the preparation and implementation of a SWPPP under the NPDES. The project would disturb the entire 140.75-acre project site with the exception of small areas where existing oak trees would be preserved and 17.31 acres for offsite improvements, which includes 379,891 cubic yards of cut and 337,405 cubic yards of fill materials. In addition, the project would require the use of construction equipment and vehicles that could result in accidental fuel, gasoline, or other pollutant spill. Mitigation Measure HYD/mm-1.1 requires the preparation of a SWPPP to be approved prior to issuance of grading permits and implemented during both phases of project construction activities. The SWPPP would be required to include BMPs for pollutant and erosion control. Preparation of a SWPPP would minimize potential pollutant and erosive runoff from both phases of project construction activities and ensure construction of the project does not result in substantial runoff that could violate water quality standards.

Operation of the project would result in a new warehouse and distribution center and new commercial, office, and visitor-serving uses on the 140.75-acre site. Operational components of the project would be subject to Central Coast RWQCB Post-Construction Requirements (PCRs) 1, 2, 3, and 4 to minimize long-term runoff that may result from implementation of the project. The *Preliminary Stormwater Control Plan for The Landing* (Wallace Group 2021) was prepared and submitted for initial review and will be required to be refined and approved based on construction-level development plans for the project prior to issuance of building permits. The proposed drainage strategy is designed to provide decentralized stormwater detention facilities throughout the site and a 5.38-acre detention/retention facility at the southwest corner of the site to accommodate water from large flood events (Figure 4.8-1). The proposed stormwater basin is designed to retain 95th percentile runoff volume for water quality treatment, to comply with PCR-4 Peak Management, and to retain 100-year flows. The stormwater basin discharge pipe would follow the Dry Creek Road right-of-way directly west and would eventually flow to Huer Huero Creek during periods of intense runoff that exceed the 95th percentile.

Other stormwater detention facilities would include bioretention basins to reduce and treat individual site runoff. Proposed LID design strategies include following existing grades onsite to maintain the east-to-west slopes, minimizing driveways and roads to reduce impervious surface area, and directing runoff into retention facilities (Wallace Group 2021). Approval and implementation of the Stormwater Control Plan to meet required PCRs would ensure long-term runoff from the project does not violate surface water or groundwater quality within the Huer Huero Creek watershed.

Therefore, upon implementation of Mitigation Measure HYD/mm-1.1 and approval of a Stormwater Control Plan, impacts related to degradation of surface water or groundwater quality would be *less than significant with mitigation*.

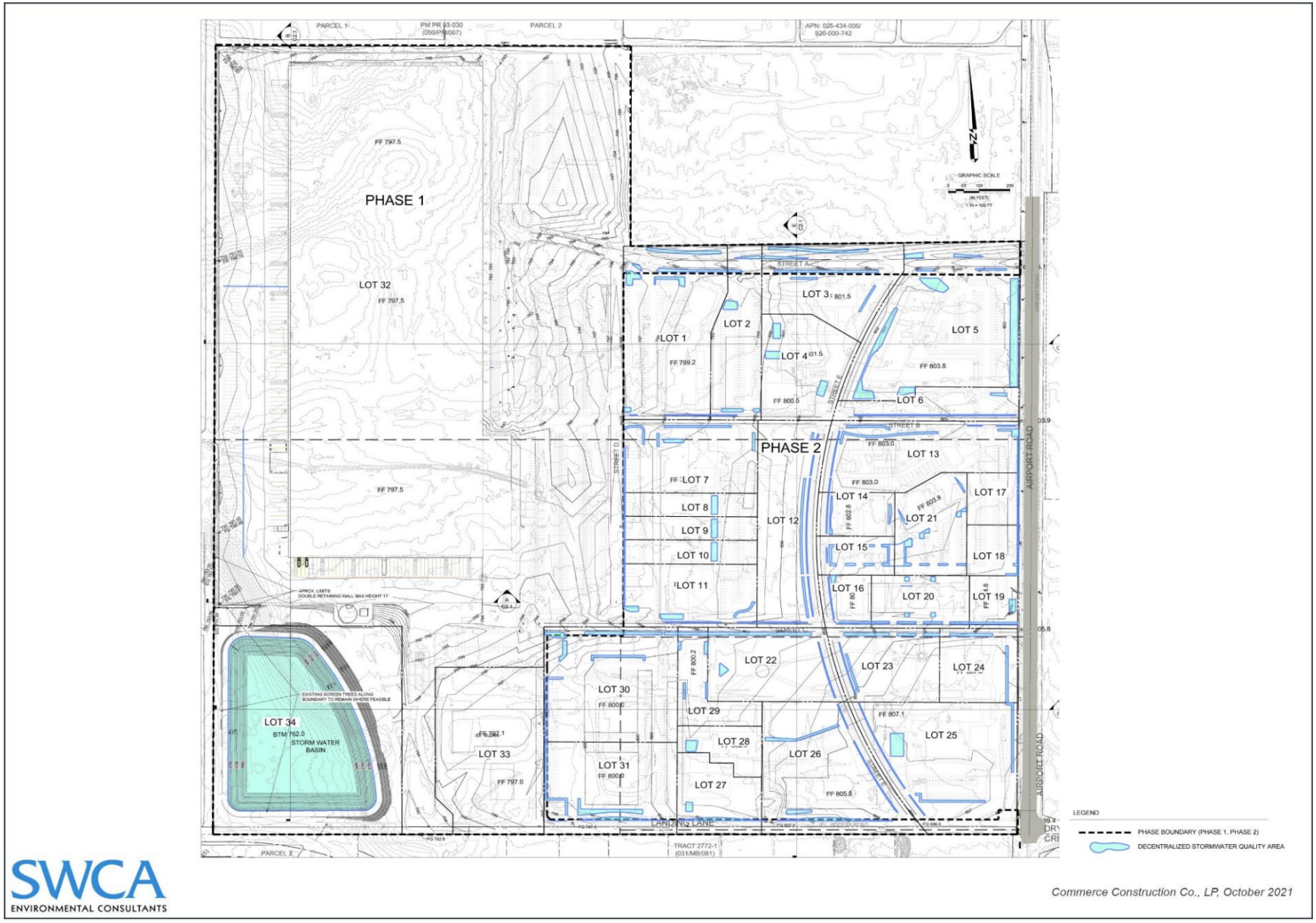


Figure 4.8-1. Proposed Stormwater Management

HYD Impact 1 (Class II)	
Construction and operation of the project may have the potential to result in new sources of pollutants that may lead to degradation of water quality within the project area.	
Mitigation Measures	
HYD/mm-1.1	*Prior to the issuance of tract improvement plans, grading permits, or building permits, the Applicant shall prepare and submit a Stormwater Pollution Prevention Plan (SWPPP) according to General Permit Order 2009-0009 for approval by the City of Paso Robles (City) Public Works Department and the Central Coast Regional Water Quality Control Board (RWQCB). The SWPPP shall include best management practices (BMPs) to reduce erosive and polluted runoff during all phases of project construction. BMPs shall be approved by the City and Central Coast RWQCB along with the SWPPP. BMPs may include, but are not limited to, erosion and sediment controls and vehicle and equipment monitoring and maintenance, as identified below:* 1. *Erosion and sediment controls, including silt fences, straw wattles, berms, sediment basins, runoff diversions, or other erosion control measures approved by the Central Coast RWQCB shall be installed properly to increase effectiveness of the SWPPP and shall be maintained regularly during the project's construction.* 2. *Construction equipment and vehicles shall be checked and maintained daily by the construction contractors to prevent spills of fuel, oil, and other hazardous materials. A designated staging area shall be established on the project site for construction vehicle and equipment parking and storage of fuel, lubricants, and solvents. Any staging areas for the offsite improvements that cannot be accommodated onsite shall be located a minimum of 50-feet from Huer Huero Creek. All fueling and maintenance activities shall take place in the designated staging area(s).* *Compliance with the SWPPP during project construction shall be monitored by the City's Public Works Department during all construction phases.*
Residual Impacts	
Potential impacts associated with new sources of pollutants that may lead to degradation of water quality within the project area would be less than significant.	

WOULD THE PROJECT SUBSTANTIALLY DECREASE GROUNDWATER SUPPLIES OR INTERFERE SUBSTANTIALLY WITH GROUNDWATER RECHARGE SUCH THAT THE PROJECT MAY IMPEDE SUSTAINABLE GROUNDWATER MANAGEMENT OF THE BASIN?

HYD Impact 2: Implementation of the project would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts would be less than significant (Class III).

The project site is located within the Paso Robles Area Subbasin. The Paso Robles Area Subbasin is under the jurisdiction of the City of Paso Robles GSA, which has adopted the Paso Basin GSP and Paso Robles Groundwater Basin Plan. The eastern portion of the 140.75-acre project site currently consists of unoccupied development associated with the former Paso Robles Boys School, including buildings, internal paved roads, and paved parking lots. The remaining portions of the project site are undeveloped and allow for groundwater recharge. The project's proposed offsite improvement areas consist of existing roads and vacant land, including land within Huer Huero Creek. Implementation of the proposed project

would result in 104.78 acres of new impervious surfaces onsite. However, the project is not anticipated to impede groundwater recharge at the project site because the project would be subject to Central Coast RWQCB PCRs and would implement stormwater detention facilities throughout the improved project site (Wallace Group 2021). The proposed drainage strategy is to provide decentralized stormwater detention facilities throughout the site and a 5.38-acre stormwater basin at the southwest corner of the site to mitigate large flood events. The proposed stormwater basin would be designed to retain 95th percentile runoff volume for water quality treatment, to comply with PCR-4 Peak Management, and to retain 100-year flows. The stormwater basin discharge pipe would follow the Dry Creek Road right-of-way directly west and would eventually flow to Huer Huero Creek. Other stormwater detention facilities would include bioretention basins to capture additional runoff water and reduce and treat individual site runoff. Proposed LID design strategies include following existing grades onsite to maintain the east-to-west slopes, minimizing driveways and roads to reduce impervious surface area, and directing runoff into retention facilities (Wallace Group 2021). Therefore, based on the proposed stormwater detention and drainage facilities, the project is not anticipated to significantly interfere with groundwater recharge because increased runoff water would be captured at the project site.

In addition, implementation of the project is not anticipated to substantially decrease groundwater supplies. The project's estimated water demand is 146 AFY (Todd Groundwater 2021). Currently, the City's water supply includes groundwater, surface water, and recycled water. If approved, the project would use potable water from the City's municipal water supply portfolio in lieu of locally pumped groundwater from an onsite well. Further discussion of the City's available water supply is provided in *Section 4.14, Utilities and Service Systems*; however, based on the diversity of the City's water supply, including surface water from the Salinas River that accounts for 60% of the City's water supply, implementation of the project is not anticipated to substantially deplete groundwater within the Paso Robles Area Subbasin. Therefore, implementation of the project would not decrease groundwater supplies or interfere substantially with groundwater recharge and impacts would be *less than significant*.

HYD Impact 2 (Class III)
Implementation of the project would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to a decrease in groundwater supplies or substantial interference with groundwater recharge that may impede sustainable groundwater management of the basin would be less than significant

WOULD THE PROJECT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFFSITE?

HYD Impact 3: Implementation of the project may alter existing drainage patterns or result in new impervious surfaces onsite, in a manner that may result in erosion or siltation on- or offsite. Impacts would be less than significant with mitigation (Class II).

The project area is characterized by flat topography with 2 percent slopes that generally trend from east to west. The project would require 158.06 acres of ground disturbance, including 379,891 cubic yards of cut and 337,405 cubic yards of fill materials; most grading would occur during Phase 1 construction activities. Based on the amount of proposed grading, there is potential for construction activities to temporarily alter existing drainage patterns onsite. The temporary alteration of drainage patterns may result in an increase of erosion and siltation at the project site during construction activities. Mitigation Measure HYD/mm-1.1 would require the project to prepare a SWPPP to be approved prior to the issuance of building permits and to be implemented during both phases of construction activities. The SWPPP would include BMPs to avoid or minimize erosion and siltation during construction activities. Long-term erosion and sedimentation caused by alteration of drainage patterns is not anticipated because project grading would maintain the natural grade of the site. In addition, the project would be subject to Central Coast RWQCB PCRs 1, 2, 3, and 4 to manage long-term erosive and other pollutant runoff from the site. The proposed Stormwater Control Plan for the project identifies strategies to comply with required PCRs, which would be implemented following approval of the plan (Wallace Group 2021). Implementation of stormwater control strategies would avoid or minimize long-term erosive runoff from the site.

Therefore, with implementation of Mitigation Measure HYD/mm-1.1 and approval of the Stormwater Control Plan, short-term and long-term impacts related to increase erosion and siltation would be *less than significant with mitigation*.

HYD Impact 3 (Class II)
Implementation of the project may alter existing drainage patterns or result in new impervious surfaces onsite, in a manner that may result in erosion or siltation on- or offsite.
Mitigation Measures
Implement Mitigation Measures HYD/mm-1.1 and GEO/mm-2.1.
Residual Impacts
Potential impacts related to alteration of existing drainage patterns or new impervious surfaces onsite that may result in erosion or siltation on- or offsite would be less than significant.

WOULD THE PROJECT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN A MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFFSITE?

HYD Impact 4: Implementation of the project may alter existing drainage patterns or result in new impervious surfaces onsite, in a manner that may result in flooding on- or offsite. Impacts would be less than significant with mitigation (Class III).

The project would require 158.06 acres of ground disturbance, including 379,891 cubic yards of cut and 337,405 cubic yards of fill materials during Phase 1 construction activities. Based on the amount of proposed grading, there is potential for Phase 1 construction activities to temporarily alter existing drainage patterns onsite. However, alteration of drainage patterns is not anticipated to result in flooding on- or offsite because the project site would be graded to maintain the natural grade of the site. Following construction activities, the project would increase the amount of impervious surface area onsite. The project would be subject to Central Coast RWQCB PCRs 1, 2, 3, and 4 for long-term stormwater control. A Stormwater Control Plan has been prepared for the project, to be approved prior to issuance of building permits and implemented to control long-term stormwater runoff. The Stormwater Control Plan includes design strategies to retain a 95th percentile storm, which would ensure the increase in impervious surface area onsite does not result in flooding.

Therefore, upon approval of the Stormwater Control Plan, the project would not result in a substantial increase in surface water runoff that could result in flooding and impacts would be *less than significant*.

HYD Impact 4 (Class III)
Implementation of the project may alter existing drainage patterns or result in new impervious surfaces onsite, in a manner that may result in flooding onsite or offsite.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to alterations of existing drainage patterns or new impervious surfaces onsite that may result in flooding onsite or offsite would be less than significant.

WOULD THE PROJECT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD CREATE OR CONTRIBUTE RUNOFF WATER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF?

HYD Impact 5: Implementation of the project may alter existing drainage patterns or result in new impervious surfaces onsite, in a manner that may exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff. Impacts would be less than significant (Class III).

The eastern portion of the140.75-acre project site currently consists of previous development and hardscapes associated with the former Paso Robles Boys School, including buildings, internal paved roads, and paved parking lots. The remaining portions of the project site are undeveloped. The project would result in approximately 104.78 acres of impervious surface area onsite. Increased impervious areas onsite may allow for greater quantities of runoff from the site. Paso Robles is enrolled in the Phase II Municipal Stormwater Program and has developed and implemented an SWMP. New development would be required to demonstrate consistency with the provisions of the SWMP, including BMPs, measurable goals, and timetables for implementation of stormwater control measures (City of Paso Robles 2021b). Stormwater runoff would be treated onsite and would not require connection to the City's stormwater infrastructure. As previously described, a Stormwater Control Plan has been prepared for the project, to be approved prior to issuance of building permits and implemented to control long-term stormwater runoff. The proposed drainage strategy is to provide decentralized stormwater detention facilities throughout the site and a large detention/retention facility at the southwest corner of the site to mitigate large flood events. The proposed stormwater basin would be designed to retain 95th percentile runoff volume for water quality treatment, to comply with PCR-4 Peak Management, and to retain 100-year flows. The stormwater basin discharge pipe would follow the Dry Creek Road right-of-way directly west and would eventually flow to Huer Huero Creek during periods of intense runoff that exceeds the 95th percentile volume. Other stormwater detention facilities would include bioretention basins to reduce and treat individual site runoff throughout the entire site (see Figure 4.8-1). Therefore, implementation of the project would not exceed the capacity of existing or planned stormwater facilities and impacts would be *less than significant*.

HYD Impact 5 (Class III)
Implementation of the project may alter existing drainage patterns or result in new impervious surfaces onsite, in a manner that may exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to alteration of existing drainage patterns or new impervious surfaces onsite that may exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff would be less than significant.

WOULD THE PROJECT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS?

HYD Impact 6: Implementation of the project may alter existing drainage patterns or result in new impervious surfaces onsite, in a manner that would impede or redirect flood flows. Impacts would be less than significant (Class III).

The project site is not located within an identified flood hazard zone (FEMA 2020); therefore, implementation of the project is not anticipated to have an adverse impact on flood flows. In addition, the project includes implementation of long-term stormwater detention facilities throughout the improved project site (see Figure 4.8-1) (Wallace Group 2021). The proposed strategy is to provide decentralized stormwater detention facilities throughout the site and a 5.38-acre stormwater basin at the southwest corner of the site to mitigate large flood events. The proposed 5.38-acre stormwater basin would be designed to retain 95th percentile runoff volume for water quality treatment, to comply with PCR-4 Peak Management, and to retain 100-year flows. The stormwater basin discharge pipe would eventually flow to Huer Huero Creek. Other stormwater detention facilities would include bioretention basins to capture additional runoff water and reduce and treat individual site runoff (Wallace Group 2021).

Therefore, with implementation of the proposed stormwater facilities, potential impacts related to flood flows would be *less than significant*.

HYD Impact 6 (Class III)
Implementation of the project may alter existing drainage patterns or result in new impervious surfaces onsite, in a manner that would impede or redirect flood flows.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related alteration of existing drainage patterns or new impervious surfaces onsite that would impede or redirect flood flows would be less than significant.

IN FLOOD HAZARD, TSUNAMI, OR SEICHE ZONES, WOULD THE PROJECT RISK RELEASE OF POLLUTANTS DUE TO PROJECT INUNDATION?

HYD Impact 7: The project would not be located in a flood hazard, tsunami, or seiche zones, that would put the project at risk of release of pollutants due to project inundation. Impacts would be less than significant (Class III).

According to FEMA FIRMs 06079CO392G (dated 11/16/2010) and 06079CO394G (dated 11/16/2012), the project site is located within Zone X, an area of minimal flood hazard (FEMA 2020). Based on the San Luis Obispo County Tsunami Inundation Maps, the project site is not located in an area with potential for inundation by a tsunami (CGS 2021). In addition, the project site and the offsite improvements areas are not located in an area that would be at risk of seiche. The project site is not

located within an identified flood hazard, tsunami, or seiche zone; therefore, implementation of the project would not result in the risk of pollutant release due to project inundation, and *no impacts* would occur.

HYD Impact 7 (Class III)
The project would not be located in a flood hazard, tsunami, or seiche zones, that would put the project at risk of release of pollutants due to project inundation.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to location in a flood hazard, tsunami, or seiche zones that would put the project at risk of release of pollutants due to project inundation would be less than significant.

WOULD THE PROJECT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN?

HYD IMPACT 8: The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant with mitigation (Class II).

The project would be required to comply with the Basin Plan, which aims to preserve and enhance water quality within the Central Coast Basin. The Basin Plan establishes specific water quality objectives for surface and groundwater resources. Project construction has the potential to increase temporary erosive and pollutant runoff from the site. Mitigation Measure HYD/mm-1.1 requires the project to prepare a SWPPP with appropriate BMPs to be approved prior to issuance of building permits and to be implemented during project construction activities. Construction BMPs would avoid or minimize construction-related erosive or polluted runoff that could runoff and degrade surface water quality. Operation of the project would be required to comply with PCRs for stormwater runoff to reduce potential erosive or polluted discharge from entering the Salinas River. A Stormwater Control Plan has been prepared for approval, which outlines strategies to meet all PCRs. Wastewater for the project would be treated and disposed of using City facilities. A further discussion of wastewater is included in *Section 4.14, Utilities/Service Systems and Energy*. Upon implementation of Mitigation Measure HYD/mm-1.1 and approval of the Stormwater Control Plan, runoff from construction and operational components of the project would be less than significant.

In addition, the project would be required to comply with the Paso Basin GSP and Paso Robles Groundwater Basin Plan. As previously discussed, the project would not interfere with groundwater recharge at the site based on implementation of proposed stormwater detention facilities. As discussed in *Section 4.14, Utilities/Service Systems and Energy*, the project would not significantly decrease groundwater supply based on the City's diverse sources of water supply. Therefore, the project would not result in groundwater use in manner that would conflict with the Paso Basin GSP, no mitigation would be required, and long-term impacts would be *less than significant*.

HYD Impact 8 (Class II)
The project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.
Mitigation Measures
Implement Mitigation Measure HYD/mm-1.1.
Residual Impacts
Potential impacts related to conflicts with, or obstruction of, implementation of a water quality control plan or sustainable groundwater management plan would be less than significant.

4.8.6 Cumulative Impacts

A description of other reasonably foreseeable future projects within the city is included in *Section 3, Environmental Setting.* Future projects would be subject to environmental review to determine potential impacts related to hydrology and water quality and, if necessary, provide mitigation to avoid or reduce the potential for project-specific impacts.

The project, in combination with approved, pending, and other proposed development within the city has the potential to result in cumulative water quality impacts to the Huer Huero Creek watershed and other watersheds within the city. However, implementation of the project would not result in adverse project-specific impacts to the Huer Huero Creek watershed because measures would be implemented during construction and operation of the project to avoid and/or minimize any erosive or polluted runoff from the project site. Other pipeline projects would be required to mitigate any erosive or polluted runoff to be consistent with state and local water quality standards. Therefore, water quality impacts would be less than cumulatively considerable.

The project, in combination with approved, pending, and other proposed development within the city has the potential to decrease groundwater recharge within the city. As previously discussed, the project would not result in significant project-specific impacts because the project includes adequate stormwater detention facilities to allow for long-term recharge at the site. Any future projects would be required to evaluate potential water use impacts and, if necessary, implement measures to encourage groundwater recharge. Therefore, the proposed project and future projects and impacts would be less than cumulatively considerable.

4.9 LAND USE AND PLANNING

This section evaluates impacts related to proposed uses within the project site, offsite improvement areas, and vicinity, including consistency with land use policies and potential impacts that may result from land use conflicts. The analysis of potential land use and planning impacts is based on existing land use pattern in the vicinity of the project site, and the applicable policies and standards in the City's General Plan, Zoning Ordinance, Municipal Code, and ALUP and SLOCOG's 2019 RTP/SCS.

4.9.1 Existing Conditions

4.9.1.1 Regional Setting

The project site is located in the city of Paso Robles, an incorporated city outside the coastal zone. The project site is surrounded on three sides by parcels within the incorporated city and by unincorporated county area to the west. Land uses on the project site and surrounding incorporated areas are dictated by the City's General Plan and Zoning Code and unincorporated areas are governed by the County's Land Use Ordinance. Land to the east of the project site is zoned Airport (AP) by the City and is developed with Airport Road and the Paso Robles Municipal Airport. Land to the north and west is developed with agricultural uses and is zoned Residential Agriculture (RA) by the City (north) and Agriculture (AG) per the County of San Luis Obispo (west). A CAL FIRE station (Station 98) is also located to the north. The Paso Robles Horse Park and an undeveloped industrial winery tract is located to the south and is also zoned AP by the City. SR 46E is located 1.3 miles south of the project site and US 101 is located 2.5 miles west of the project site (Figure 4.9-1).

Foreseeable future projects in the vicinity of the project site are listed in *Table 3-1, Cumulative Development Scenario Project List,* in *Chapter 3, Environmental Setting.* Projects near the project site include winery processing, outdoor storage, and light industrial to the north; an air museum to the east; and light industrial, winery, and equine uses to the south.

4.9.1.2 Project Site Setting

The project parcel is currently designated for Public Facility (PF) land uses under the City's General Plan. The project site is located within Safety Zones 3 and 5 under the ALUP with all but the very far southeastern corner of the site being in Safety Zone 5 (Figure 4.9-2) (City of Paso Robles 2006).

Current development on the site includes 42 buildings and associated infrastructure associated with the former Paso Robles Boys School, including 12 dormitory buildings and six staff residences. The Paso Robles Boys School ceased operation in 2008 and all uses on the site were discontinued at that time, though the state periodically performs maintenance activities. See *Section 4.5, Cultural and Tribal Cultural Resources* for a discussion of the existing structures.

There are two easements that encumber portions of the property: an existing 20-foot-wide sewer easement that traverses the western portion of the property and continues through the CAL FIRE parcel, proposed to be relocated, and an existing 25-foot-wide private roadway easement from Landing Lane to the maintenance building on proposed Lot 33.

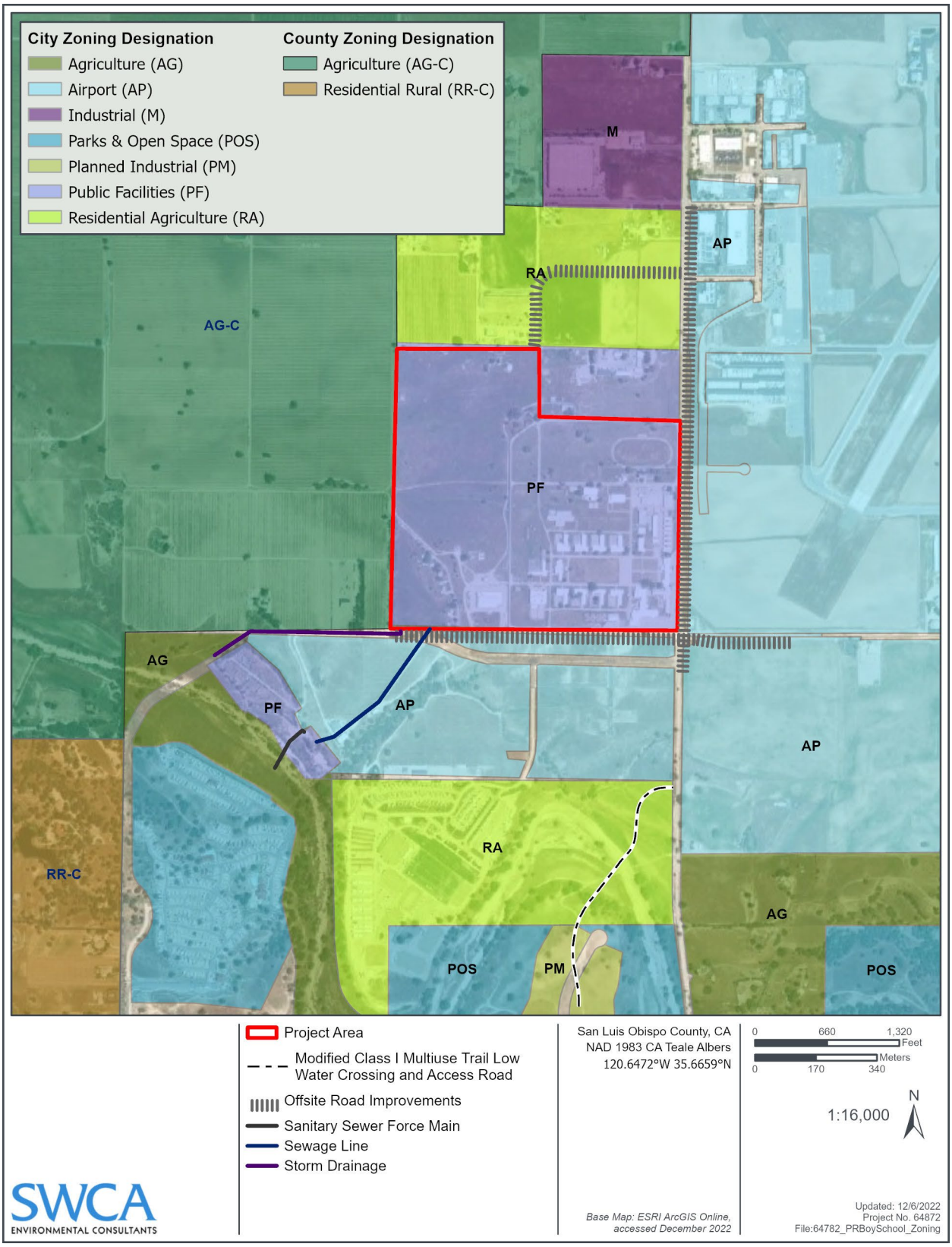


Figure 4.9-1. Existing Zoning Designations

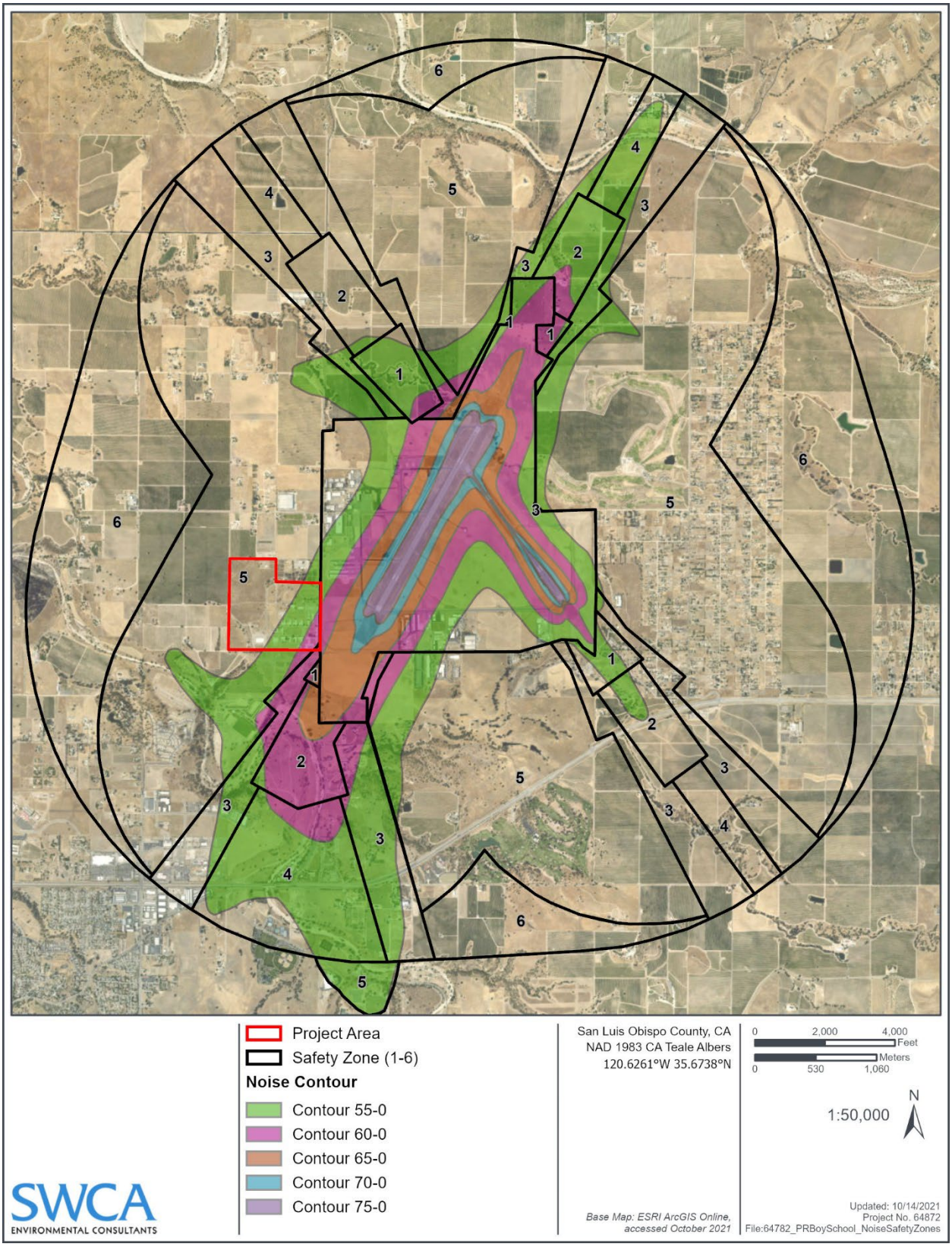


Figure 4.9-2. Paso Robles Municipal Airport Safety Zones

4.9.2 Regulatory Setting

4.9.2.1 Federal

There are no applicable federal regulations that are relevant to the proposed project.

4.9.2.2 State

There are no applicable state regulations that are relevant to the proposed project.

4.9.2.3 Local

Applicable policies from the SLOAPCD 2001 CAP and the 2013 City of Paso Robles Climate Action Plan are discussed in *Section 4.3, Air Quality and Greenhouse Gas Emissions*.

4.9.2.3.1 SAN LUIS OBISPO COUNCIL OF GOVERNMENTS 2019 REGIONAL TRANSPORTATION PLAN / SUSTAINABLE COMMUNITIES STRATEGY

The 2019 RTP, adopted by SLOCOG in June 2019, is a long-term vision for SLOCOG's planning area, which includes both the incorporated and unincorporated areas of San Luis Obispo county. The RTP was adopted in compliance with Senate Bill (SB) 375, which requires agencies such as SLOCOG to adopt an RTP/SCS or Alternative Planning Strategy (APS) within their planning area to demonstrate a reduction in GHG emissions. The primary purpose of the 2019 RTP is to develop a fully intermodal transportation system that maximizes the efficiency of the transportation network. To accomplish this purpose, the plan identifies policy recommendations and action items to the year 2045. SLOCOG's 2019 RTP/SCS is compliant with new requirements of SB 375, which requires agencies to implement transportation strategies that are consistent with land use policies and practices. The SCS, included in the RTP, identifies and describes the "2035 Preferred Growth Scenario," which is intended to decrease strain on natural resources, reduce the amount of travel and GHG emissions, improve air quality, and promote public health by providing efficient options for transportation and housing. The primary strategy included in the SCS is to focus new growth to existing corridors and communities, which is consistent with the preferred growth scenario (SLOCOG 2019). Table 4.9-1, below, identifies applicable policies and goals included in the 2019 RTP/SCS and evaluates the proposed project's consistency with the 2019 RTP/SCS.

4.9.2.3.2 CITY OF EL PASO DE ROBLES GENERAL PLAN 2003

The *City of El Paso de Robles General Plan 2003* is the City's primary guidance tool used to create land use policies and to guide development decisions through the year 2025. The General Plan contains the following eight elements: Land Use (2014b), Circulation (2019a), Housing (2020), Open Space (2003a), Conservation (2014a), Parks and Recreation (2003b), Noise (2019b), and Safety (2014c). The LUE and Circulation Element are the primary document that identify policies related to physical changes within the city. Additionally, the LUE provides the planned land use pattern and long-range planning policies intended to guide growth within the city limits and sphere of influence (SOI). The Housing, Open Space, Conservation, Parks and Recreation, Noise, and Safety Elements do not reflect physical changes to the city and are carried forward through physical changes identified in the LUE. Table 4.9-1, below, identifies applicable policies included in the General Plan and evaluates the proposed project's consistency with the General Plan.

4.9.2.3.3 PASO ROBLES MUNICIPAL AIRPORT AIRPORT LAND USE PLAN

The Paso Robles Municipal Airport ALUP is intended to protect public health, safety and welfare; protect and enhance long-term economic viability; and provide guidance to local agencies. On order to accomplish this, the ALUP identifies policies related to general land use, noise, safety, airspace protection, and overflight. Table 4.9-1, below, identifies applicable policies included in the ALUP and evaluates the proposed project's consistency with the ALUP.

4.9.2.3.4 CITY OF EL PASO DE ROBLES ZONING ORDINANCE

The Zoning Ordinance (Title 21) provides policies to promote the growth of the city in a manner that protects public health, safety, comfort, and general welfare. The Zoning Ordinance identifies 25 zoning districts and overlays in the city. Each zoning district and overlay establishes the general use, density, and type of development allowed in the corresponding area. All buildings, land uses, or other types of physical developments must comply with the regulations for each zoning district. Table 4.9-1, below, identifies applicable policies included in the Zoning Ordinance and evaluates the proposed project's consistency with the Zoning Ordinance.

4.9.2.3.5 CITY OF EL PASO DE ROBLES MUNICIPAL CODE

The Municipal Code provides policies and regulations that are consistent with goals, policies, and implementation strategies included in the General Plan. In addition, policies and regulations included in the Municipal Code are intended to protect public health, safety, and welfare. Table 4.9-1, below, identifies applicable policies included in the Municipal Code and evaluates the proposed project's consistency with the Municipal Code.

4.9.3 Thresholds of Significance

Potential impacts related to land use and planning have been analyzed in relation to the questions contained in Appendix G of the State CEQA Guidelines. The project would have a significant impact with regard to land use and planning if the Project would result in one or more of the following conditions:

a. Physically divide an established community; and/or

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

As discussed in the IS/NOP, the City determined the proposed project would not physically divide an established community. Therefore, this threshold is not discussed further in the EIR. See *Appendix A, Initial Study and Notice of Preparation*, for more information.

4.9.4 Impact Assessment and Methodology

The following analysis is primarily based on review of the City's General Plan, ALUP, Zoning Ordinance, and Municipal Code, as well as SLOCOG's 2019 RTP/SCS. Only those project elements that have the potential to conflict with a stated goal, policy, or program adopted for the purposes of avoiding or mitigating an environmental effect are highlighted in this section. A conflict with an adopted plan or policy is typically identified as a potentially significant impact only if there is a corresponding related adverse physical change in the environment, such as loss of sensitive biological resources, for example. A

project is considered consistent with the provisions of the identified regional and local plans if it is compatible with and will further the objectives and policies of the plans.

4.9.5 Project-Specific Impacts and Mitigation Measures

WOULD THE PROJECT CAUSE A SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO A CONFLICT WITH ANY LAND USE PLAN, POLICY, OR REGULATION ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT?

LUP Impact 1: The project would be inconsistent with land use plans, policies, and regulations related to noise and VMT. The inconsistencies related to VMT policies would result in significant environmental impacts. Impacts would be significant and unavoidable (Class I).

New land use proposals must be consistent with the General Plan, which is the primary tool the City uses when evaluating new land use proposals. The project includes a General Plan Amendment to change from PF to BP and a zoning change from PF to AP with a PD overlay. Table 4.9-1 includes an evaluation of the project's consistency with the goals and policies of the City's General Plan, ALUP, Zoning Ordinance, and Municipal Code, as well as the SLOCOG's 2019 RTP/SCS.

Table 4.9-1. Project Consistency with City Land Use Plans, Policies, and Regulations Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect

Policy	Policy Text	Preliminary Statement of Consistency/Conflict
City of El Paso de Robles General Plan 2003		
Land Use Element		
Policy LU-1B	Airport Land Use Compatibility. As a general policy, new residential development is an undesirable land use within the Airport Influence Area.	**Consistent**. The project is primarily located within Safety Zone 5 under the ALUP. The project does not include residential development that would result in incompatible land uses.
Policy LU-2B	Visual Identity. Promote architectural and design excellence by imposing stringent design and construction standards for commercial, industrial, mixed-use, and multi-family projects.	**Consistent.** The project includes design guidelines typical of Paso Robles and the airport area, including those of agricultural and aviation influences. Utilities for the project would be ungrounded, consistent with the requirements of the City's subdivision ordinance.
Policy LU-2E	"Purple Belt" (Open Space/Conservation Areas Around the City). Create a distinct "Purple Belt" surrounding the City by taking actions to retain the rural, open space, and agricultural areas.	**Consistent.** As discussed in *Section 4.2, Agriculture and Forestry Resources*, the project site and adjacent parcels are not identified as land within a prioritized area of the Purple Belt; however, there is designated high-priority land located to the north and west of the site. In order to reduce conflicts with adjacent lands and uses, the project would be required to comply with standard SLOAPCD dust control measures detailed in Mitigation Measures AQ/mm-1.3 and AQ/mm-2.1, city policies, and Mitigation Measure AG/mm-1.1 to address the loss of Farmland. Development within the project site would also be required to comply with the City's right to farm ordinance, to reduce conflicts with nearby agricultural operations.

Policy	Policy Text	Preliminary Statement of Consistency/Conflict
Policy LU-2K	Support environmental responsibility. Manage the natural landscape to preserve the natural beauty and rural identity of the community, which enhances ecological functions and maintains environmental and public health.	**Consistent.** Development in the project area would be required to preserve healthy, existing vegetation onsite where possible. Oak trees that cannot be avoided would be subject to Mitigation Measure BIO/mm-7.1 to replace impacted and removed oak trees.
Policy LU-4A	Service Levels. Strive to ensure that City services and facilities are maintained at current levels and/or adopted standards and are funded as revenues become available.	**Consistent.** The City's LUE calls for a service ratio of 1.4 to 1.6 sworn police personnel per 1,000 residents and a ratio of 0.8 to 1.3 firefighters per 1,000 residents. As discussed in *Section 4.12, Public Services and Recreation*, the project would not induce a substantial permanent population growth within the city. The project would be subject to standard Development Impact Fees to offset additional demand for these facilities.
Policy LU-4B	Support the public school districts' efforts to ensure that new development mitigates its impacts to public schools, particularly in avoiding overcrowding conditions. The following programs should be implemented unless the City Council finds that specific economic, social, environmental or other considerations make infeasible implementation of the program or aspect of the program in a particular situation.	**Consistent.** As evaluated in *Section 4.12, Public Services and Recreation*, the project does not include new residential uses that would directly increase the number of school-aged children in the area. In addition, the project would be required to pay state-mandated school district impact mitigation fees.
Circulation Element		
Policy CE-1A	Circulation Master Plan. Revise/update the City's Circulation Master Plan to address mobility needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, users of public transportation, and seniors as follows: Improve the circulation network on a prioritized basis; Provide adequate access for emergency vehicles and evacuation; Improve mobility through and access to Downtown Paso Robles by implementing City Council adopted Town center and Uptown Plans; Establish safe pedestrian and bicycle paths, for children and their parents to schools and other major destinations such as downtown, retail, and job centers; Maintain mobility for all modes by encouraging flexible and off-set working hours, transit improvements; pedestrian and bikeway improvements; and public outreach as to the availability and benefit of alternative modes of travel; Require new development to mitigate its impact on the transportation network.	**Consistent.** Access to the project would be provided via Airport Road, Landing Lane, and a potential extension of Rollie Gates Drive that would extend west of Airport Road to provide access to the proposed warehouse building (see Figure 2-7 in *Section 2, Project Description*). Truck access for the proposed warehouse building would be provided via a north/south driveway extending north from Landing Lane to the warehouse building. Emergency access would be available through all proposed access sites during construction and operation. Additionally, Mitigation Measure TR/mm-3.1 requires the construction of a bridge over the Huer Huero Creek with access road connection to Golden Hill Road, for truck trips to and from the site, to relieve congestion and safety at other access routes to the project site. Action Item 11 of this policy requires projects to be evaluated in the context of the City's adopted Transportation Impact Study Guidelines. These guidelines include thresholds for level of service and congestion (queuing). Per Senate Bill 743, level of service and congestion are no longer considered environmental impacts under CEQA. Therefore, the circulation improvements recommended in the Transportation Impact Study (Central Coast Transportation Consultants 2022) that are derived from level of service and congestion impacts are included as project conditions of approval but are not discussed as environmental impacts or mitigation in this EIR.
Policy CE-1B	Reduce Vehicle Miles Traveled (VMT). The City shall strive to reduce VMT generated per household per weekday by making efficient use of existing transportation facilities and by providing direct routes for pedestrians and bicyclists through the implementation of sustainable planning principles.	**Partially Consistent.** As evaluated in *Section 4.13, Transportation*, the project would increase the regional work VMT by 15,671 in the near term and by 5,305 by the year 2045, which would result in a regional net increase in VMT. Mitigation Measure TR/mm-2.1 has been included to reduce VMT as feasible; however, the project is still anticipated to generate a net increase in regional VMT. This inconsistency would result in significant environmental impacts.

Policy	Policy Text	Preliminary Statement of Consistency/Conflict
Policy CE-1D	Transit. Improve and expand transit services.	**Consistent**. As discussed in *Section 4.3, Air Quality and Greenhouse Gas Emissions and Section 4.13, Transportation*, implementation of Mitigation Measures AQ/mm-1.1 and TR/mm-2.1 would require the incorporation of measures for alternative transportation methods, including transit centers, to reduce employee vehicle trips.
Policy CE-1F	Pedestrian and Bicycle Access. Provide safe convenient pedestrian and bicycle access to all areas of the city.	**Consistent.** As discussed in *Section 4.3, Air Quality and Greenhouse Gas Emissions* and *Section 4.13, Transportation*, implementation of Mitigation Measures AQ/mm-1.1 and TR/mm-2.1 would require the incorporation of measures for alternative transportation methods, including bicycle and pedestrian facilities, to reduce employee vehicle trips. Additionally, the project does not include components that would restrict existing bicycle or pedestrian facilities throughout the city. Project frontage improvements and improvements identified in the Transportation Impact Study (Central Coast Transportation Consultants 2022) required as conditions of approval would also improve bicycle and pedestrian facilities in the area, including completing the bicycle lanes on Golden Hill Road between the existing bicycle lanes and Wisteria Lane.
Housing Element		
No applicable policies.		
Parks and Recreation Element		
Policy PR-1A	Strive to achieve a 7-acre per 1,000 population parkland standard.	**Consistent.** As discussed in *Section 4.12, Public Services and Recreation*, the project would not induce a substantial permanent population growth that could exceed the city's adopted performance standard of 7 acres of parkland per 1,000 residents. The project includes designated open space areas within the project site. In addition, the project would be subject to the payment of Quimby fees (through Development Impact Fees), and the CFD special tax for maintenance of recreational facilities as a standard condition of approval for the project.
Conservation Element		
Policy C-1A	Water Source, Supply, and Distribution. Develop and implement various innovative water provision and conservation programs that help to ensure an adequate supply of water for the City.	**Consistent.** As evaluated in *Section 4.14, Utilities/Service Systems and Energy*, the project would result in a new water demand of 146 acre-feet per year (AFY). The City has a diverse water supply portfolio that increases overall City water supply reliability and there would be adequate potable water to supply a reliable long-term water supply for the project under normal and drought conditions.
Policy C-1B	Sewer Service. Provide adequate wastewater conveyance and treatment facilities to serve all parcels in the City.	**Consistent.** As described in *Section 4.14, Utilities/Service Systems and Energy*, the project would result in an annual wastewater generation rate of 162,000 gallons per day, or approximately 0.16 MGD. With the proposed project, total city wastewater flow projections at buildout would be approximately 3.78 MGD, which is below the wastewater treatment plant (WWTP) design capacity of 4.9 MGD. Therefore, the project would be served by a wastewater treatment provider with adequate capacity to serve the project in addition to the provider's existing commitments.

Policy	Policy Text	Preliminary Statement of Consistency/Conflict
Policy C-1C	Storm Drainage. Provide storm drain systems that efficiently and safely mitigate flood risk, while effectively managing storm water through implementation of LID features, so that downstream run-off is limited to pre-development volumes and velocity before it is conveyed to the Salinas River, Huer Huero Creek, and their tributaries.	**Consistent.** As discussed in *Section 4.14, Utilities/Service Systems and Energy*, the project would include construction of a new 5.38-acre stormwater basin in the southwestern corner of the property. The stormwater basin would retain and treat stormwater runoff from the entire project site (Phases 1 and 2) and overflow would be discharged offsite to an outfall within Huer Huero Creek. Phase 1 would include inlets that direct stormwater runoff directly into the stormwater basin, while Phase 2 would direct runoff by sheet flow into smaller bioretention areas. Excess flow from Phase 2 would be directed to the stormwater basin through a gravity storm drain system. All new development would be required to comply with the Central Coast RWQCB's Post-Construction Requirements, including incorporation of best management practices (BMPs) and low-impact development features to improve water quality and control peak flow runoff.
Policy C-1D	Solid Waste. Ensure that the City's landfill maintains sufficient capacity to serve the needs of the City through the year 2025.	**Consistent.** As described in *Section 4.14, Utilities/Service Systems and Energy*, the project is anticipated to generate approximately 13,151 pounds (6.58 tons) of solid waste per day during operation. Based on the available capacity of the Paso Robles Landfill, the waste generation rates of the project, and required compliance with state waste reduction and diversion policies, the project would not generate waste in excess of state or local standards, or in excess of the capacity of local infrastructure.
Policy C-2A	Traffic Congestion Reduction. Implement circulation systems improvements to reduce congestion and associated air contaminant emissions.	**Consistent.** Per Senate Bill 743, level of service and congestion are no longer considered environmental impacts under CEQA. Action Item 11 of Circulate Element Policy 1A requires projects to be evaluated in the context of the City's adopted Transportation Impact Study Guidelines. These guidelines include thresholds for level of service and congestion (queuing). The circulation improvements recommended in the Transportation Impact Study (Central Coast Transportation Consultants 2022) that are derived from level of service and congestion impacts are included as project conditions of approval but are not discussed as environmental impacts or mitigation in this EIR.
Policy C-2B	VMT Reduction. Implement programs to reduce the number of vehicle miles traveled (VMT), especially by single occupant vehicles, including providing opportunities for mixed-use projects. (Note: The Circulation Element also addresses VMT reduction, but the Conservation Element is the one that specifically calls out the connection to air quality).	**Consistent.** As identified in *Section 4.13, Transportation*, Mitigation Measure TR/mm-2.1 has been included to reduce VMT as feasible through provisions of alternative modes of transportation for employees. Additionally, Mitigation Measures AQ/mm-1.1 and AQ/mm-1.2, included in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, have been included to reduce long-term air emissions from operational components of the proposed project, including vehicle trips. Therefore, as it relates to air emissions, the project would be consistent with VMT reduction measures.
Policy C-2C	Emissions Reduction. Take steps to reduce creation of air contaminant emissions.	**Consistent.** Mitigation Measures AQ/mm-1.3, AQ/mm-2.1, AQ/mm-3.1, and AQ/mm-3.2 have been included in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, to reduce construction-related air contaminant emissions, including particulate matter, DPM, ROG, and NOx, and other adverse air emissions, including asbestos and the *Coccidioides immitis* fungus (Valley Fever). Additionally, Mitigation Measures AQ/mm-1.1, AQ/mm-1.2, AQ/mm-2.1 through AQ/mm-2.4, and GHG/mm-1.1 have been included in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, to reduce operational air contaminant emissions.

Policy	Policy Text	Preliminary Statement of Consistency/Conflict
Policy C-3A	Oak Trees. Preserve existing oak trees and oak woodlands. Promote the planting of new oak trees.	**Consistent**. As discussed in *Section 4.4, Biological Resources*, the project would preserve healthy, existing oak trees onsite where possible. The project would be subject to Mitigation Measure BIO/mm-7.1 to replace impacted and removed oak trees.
Policy C-3B	Sensitive Habitat. Incorporate habitats into project design, as feasible, including: oak woodlands, native grasslands, wetlands, and riparian areas.	**Consistent.** As discussed in *Section 4.4, Biological Resources*, Mitigation Measure BIO/mm-4.1 requires the applicant to obtain all necessary federal permits related to impacts to the wetland habitat and also requires the removed wetland habitat be offset through habitat creation and enhancement, which would be implemented through an HMMP. Additionally, Mitigation Measure BIO/mm-7.1 has been included to replace impacted oak trees at a 1:1 ratio and to replace removed oak trees at a 2:1 ratio.
Policy C-5A	Visual Gateways and Landmarks. Identify important visual resources: gateways, corridors, major arterials, natural/open space areas, as shown in Table C-1 and Figure C-3. Table C-1. Important Visual Resources Gateways to the City [includes SR 46 West at US Highway 101]; May be marked with entrance monument signs Limit range of land uses to preclude those commercial and industrial uses with outside processes and storage; Development shall be designed to make a positive visual impression (in terms of design/architecture and landscaping) and incorporate/preserve natural features; Billboards shall be limited in number, shall be located to preserve views of natural features; Visual Corridors [both SR 46 West and US Highway 101]; Development shall be designed to make a positive visual impression and incorporate/preserve natural features; Billboards shall be limited in number, shall be located to preserve views of natural features; Natural Landmarks and Open Space Viewsheds; Oak-covered hillsides	**Consistent**. As discussed in *Section 4.1, Aesthetic Resources,* the project is located along Airport Road, a designated Gateway to the City, and would improve the visual character of the area.
Policy C-6B	Archaeological Resources: Strive to preserve/protect “unique archaeological resources” as defined by the California Environmental Quality Act.	**Consistent.** As discussed in *Section 4.5, Cultural and Tribal Cultural Resources*, the project impact area does not contain any known archaeological resource sites that may be affected by ground-disturbing activities associated with implementation of the project. However, there is potential for unidentified subsurface archaeological resources to be present onsite. Mitigation Measure CUL/mm-2.1 requires worker awareness training to educate project personnel on inadvertent resource discovery and requires monitoring in proximity to known resources. In the event of an inadvertent resource discovery, CUL/mm-2.2 and CUL/mm-2.3 would apply and would require work to cease in the area of the discovery until a City-approved archaeologist can determine the appropriate method of disposition of the resource.
Policy C-7A	Conservation Measures. Investigate and implement as feasible, energy conservation measures.	**Consistent.** Mitigation Measures AQ/mm-1.1, AQ/mm-1.2, and AQ/mm-2.1 through AQ/mm-2.4 have been included in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, to reduce operational energy use where feasible through implementation of green building design and gasoline and other fuel reduction measures. Additionally, Mitigation Measure AQ/mm-2.1 has been included in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, to reduce wasteful energy consumption during the use of construction vehicles and equipment.

Policy	Policy Text	Preliminary Statement of Consistency/Conflict
Open Space Element		
Policy OS-1A	Open Space/Purple Belt. Develop an open space plan/program for establishing an open space/ purple belt (agricultural preserve area) surrounding the City.	**Consistent.** As discussed in *Section 4.2, Agriculture and Forestry Resources*, the project site and adjacent parcels are not identified as land within a prioritized area of the Purple Belt; however, there is designated high-priority land located to the north and west of the site. In order to reduce conflicts with adjacent lands and uses, the project would be required to comply with standard SLOAPCD dust control measures detailed in Mitigation Measures AQ/mm-1.3 and AQ/mm-2.1, city policies, and Mitigation Measure AG/mm-1.1 to address the loss of Farmland. Development within the project site would also be required to comply with the city's right to farm ordinance, to reduce conflicts with nearby agricultural operations.
Noise Element		
Policy 5	All development within the City of Paso Robles shall be consistent with the Noise Policies of the Airport Land Use Plan (ALUP) of the Paso Robles Municipal Airport.	**Consistent.** As discussed in *Section 4.10, Noise*, the project site is located within the 55 dB CNEL airport noise contour, which is less than the acceptable aircraft noise-exposure level for exterior areas. Additionally, Title 24 of the California Code of Regulations (CCR) requires the average exterior-to-interior noise reduction for proposed new development would be approximately 25 a-weighted decibels (dBA). Therefore, aircraft noise levels at proposed development areas would not exceed commonly applied noise-level standards of 65 dBA CNEL day-night average sound level (Ldn) for exterior areas or 45 dBA CNEL/Ldn for interior areas.
Policy 11	For capacity enhancing roadway or rail projects, the construction of new roadways or railways, or projects which will substantially increase traffic on the local roadway network, a noise analysis shall be prepared. If pre-project traffic noise levels already exceed the noise standards of Table N (included in the City's General Plan Noise Element) and the increase is significant as defined below, noise mitigation measures should be considered to reduce traffic and/or rail noise levels to a state of compliance with the Table N standards (included in the City's General Plan Noise Element). A significant increase is defined as follows: 5+ dB from an existing noise environment of less than 60 dB; 3+ dB from an existing noise environment of 60-65 dB; 1.5+ dB from an existing noise environment of greater than 65 dB.	**Inconsistent.** As discussed in *Section 4.10, Noise*, based on the Noise Impact Study prepared for the project, predicted increases in traffic noise levels at the nearest existing residence located along Airport Road (between Dry Creek Road and SR 46E), would exceed the City's exterior noise standard of 65 dBA CNEL. Since the offsite residence located along Airport Road (between Dry Creek Road and SR 46E) is accessed via Airport Road, construction of a sound barrier sufficient to reduce predicted traffic noise levels to within acceptable levels would not be feasible and no other mitigation measures were identified that would reduce this impact to a less-than-significant level.
Policy 23	All projects that propose to use heavy construction equipment that has the potential to create vibrations that could cause structural damage to sensitive structures within 100 feet shall be required to submit a pre-construction vibration study prior to the approval of a building permit. Projects shall be required to incorporate specified measures and monitoring identified to reduce impacts. Pile driving or blasting are illustrative of the type of equipment that could be subject to this policy.	**Consistent.** As discussed in *Section 4.10, Noise*, based on the Noise Impact Study prepared for the project, construction and operation of the proposed project would not exceed the minimum recommended criteria for structural damage or human annoyance related to groundborne noise and/or groundborne vibration. Incorporation of mitigation would not be necessary.

Policy	Policy Text	Preliminary Statement of Consistency/Conflict
Safety Element		
Policy S-1C	Hazardous Exposure Minimization. Minimize hazards to people and property caused by fire, crime, and related services.	**Consistent.** All proposed development would be required to be designed and constructed in accordance with applicable California Fire Code and local fire code requirements, including, but not limited to, installation of smoke detectors and fire sprinklers, provision of fire hydrants, and providing adequate emergency vehicle access onsite. The proposed warehouse would include security lighting throughout the building; security fencing and solid walls surrounding trailer parking areas, truck courts, and loading dock areas; and a check-in gate/security booth upon entry into the facility to reduce the opportunity for criminal activity.
Policy S-1D	Structural Safety. Rely on the City's planning and building permit review process to ensure that existing and proposed structures are adequately designed, and to reduce susceptibility to damage from fire, flooding, and geologic hazards.	**Consistent.** The design of the project would be required to comply with standards of the CBC Title 24, which contains specific requirements on building design to reduce damage from seismically induced ground shaking/ground motions during a seismic event and other ground-failure events. Additionally, all proposed development would be required to be designed and constructed in accordance with applicable California and Fire Code and local fire code requirements to reduce wildfire risk.
Policy S-1E	Hazardous Materials. The City shall comply with Government code requirements regarding the use, storage, and transportation of hazardous materials.	**Consistent.** As discussed in *Section 4.7, Hazards and Hazardous Materials*, the transport, storage, use, or disposal of hazardous materials for the construction and operation of the project would be subject to California Highway Patrol, California Department of Toxic Substance Control, and CCR regulations pertaining to hazardous materials.
Policy S-1G	Maintain the structural and operational integrity of essential public facilities during flooding by taking safe guards such as locating new facilities outside of flood zones or areas subject to localized flooding, and audit existing facilities in these areas to determine if building upgrades should be considered to reduce the potential for future flooding.	**Consistent.** As discussed in *Section 4.8, Hydrology and Water Quality*, the project site is not located within an identified flood hazard zone. Alteration of drainage patterns is not anticipated to result in flooding on- or offsite because the project site would be graded to maintain the natural grade of the site. Additionally, the interim Huer Huero Creek bridge crossing has been designed to be an at-grade crossing, with the bridge bed located 1-foot above the low water channel.
2019 Regional Transportation Plan and Sustainable Communities Strategy		
Regional Transportation Plan		
Policy 1.1	Maintain and maximize efficiency of existing transportation system and operations.	**Consistent.** As discussed in *Section 4.13, Transportation*, the project includes offsite roadway improvements to reduce congestion and maximize efficiency of existing roadways. Additionally, implementation of Mitigation Measure TR/mm-1.1 would require the project to implement additional circulation components to further reduce congestion and maximize efficiency of existing roadways within the area. Other improvements related to congestion and intersection level of service are included as project conditions of approval.
Policy 2.1	Provide reliable, integrated, and flexible travel choices across and between modes.	**Consistent.** Implementation of Mitigation Measure AQ/mm-2.1, included in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, would require the incorporation of measures for alternative transportation methods, including transit, bicycle, and pedestrian facilities to reduce employee vehicle trips. Additionally, the project does not include components that would

Policy	Policy Text	Preliminary Statement of Consistency/Conflict
		impede existing transit, bicycle, or pedestrian facilities throughout the city.
Policy 2.3	Identify and improve major transportation corridors for all users.	**Consistent.** As discussed in *Section 4.13, Transportation*, the project includes offsite roadway improvements of nearby roadways, including Airport Road. Additionally, implementation of Mitigation Measure TR/mm-1.1 would require the project to implement additional circulation improvements to improve existing roadway conditions for all users.
Policy 3.1	Support transportation investments and choices to enhance economic activity, travel, and tourism.	**Consistent.** The project includes development of a new hotel and visitor serving uses near the Paso Robles Municipal Airport.
Policy 4.2	Reduce congestion and increase safety by improving operations.	**Consistent.** As discussed in *Section 4.13, Transportation*, the project includes offsite roadway improvements to reduce congestion within the project area. Additionally, implementation of Mitigation Measure TR/mm-1.1 would require the project to implement additional circulation components to further reduce congestion within the area. Mitigation Measure TR/mm-2.1 includes VMT reduction measures that would reduce vehicle trips to the site, as feasible. Mitigation Measures TR/mm-3.1 through TR/mm-3.3 require additional improvements to reduce congestion associated with operation of the new warehouse building.
Policy 4.3	Enhance public safety and security in all modes of transportation.	**Consistent.** Implementation of Mitigation Measure AQ/mm-2.1, included in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, would require the incorporation of measures for alternative transportation methods, including transit, bicycle, and pedestrian facilities to reduce employee vehicle trips. Additionally, the project does not include components that would impede existing transit, bicycle, or pedestrian facilities throughout the city.
Policy 5.1	Reflect community values while integrating land use and transportation planning to connect communities through a variety of transportation choices that promote healthy lifestyles.	**Consistent.** The project includes mixed-land uses, including business park uses, restaurants, and a hotel within the city. The project also includes access to open space areas within the project area. Additionally, Mitigation Measure AQ/mm-2.1, included *Section 4.3, Air Quality and Greenhouse Gas Emissions*, would require the incorporation of measures for alternative transportation methods, including transit, bicycle, and pedestrian facilities.
Policy 5.4	Make investments and develop programs that support local land use decisions that implement the SCS and other strategies to reduce GHG emissions and make our communities more healthy, livable, sustainable, and mobile.	**Consistent.** The project includes mixed-land uses, including business park uses, restaurants, and a hotel within the city. Additionally, Mitigation Measure AQ/mm-2.1, included in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, would require the incorporation of measures for alternative transportation methods, including transit, bicycle, and pedestrian facilities. Mitigation Measures AQ/mm-1.1, AQ/mm-1.2, AQ/mm-2.1 through AQ/mm-2.4, and GHG/mm-1.1 have been included in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, to reduce air contaminant and GHG-emissions through clean building design and reduction of VMT as feasible.
Policy 6.1	Integrate environmental considerations in all stages of planning and implementation.	**Consistent.** Mitigation measures identified in individual resource sections throughout this EIR have been included to reduce potential environmental impacts during construction and operation of the proposed project as feasible.

Policy	Policy Text	Preliminary Statement of Consistency/Conflict
Policy 6.2	Preserve aesthetic resources and promote environmental enhancements.	**Consistent.** The project includes design features typical of Paso Robles and the airport area, including those of agricultural and aviation influences. Utilities for the project would be ungrounded, consistent with the requirements of the city subdivision ordinance.
Policy 6.3	Reduce GHG emissions from vehicles and improve air quality in the region.	**Consistent.** Mitigation Measure AQ/mm-2.1, included in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, would require the incorporation of measures for alternative transportation methods, including transit, bicycle, and pedestrian facilities, which would promote alternative methods of transportation and reduce vehicle emissions. Mitigation Measures AQ/mm-1.1, AQ/mm-1.2, AQ/mm-2.1 through AQ/mm-2.4, and GHG/mm-1.1 have been included in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, to reduce air contaminant and GHG-emissions through clean building design and reduction of VMT as feasible.
Policy 6.4	Conserve and protect natural, sensitive, and agricultural resources.	**Consistent.** As discussed in *Section 4.4, Biological Resources*, Mitigation Measure BIO/mm-4.1 requires the applicant to obtain all necessary federal permits related to impacts to the wetland habitat and also requires the removed wetland habitat be offset through habitat creation and enhancement, which would be implemented through an HMMP. Mitigation Measure BIO/mm-7.1 has been included to replace impacted oak trees at a 1:1 ratio and to replace removed oak trees at a 2:1 ratio. Additionally, as identified in *Section 4.2, Agriculture and Forestry Resources*, Mitigation Measure AG/mm-1.1 has been included to address the loss of Farmland. Development within the project site would also be required to comply with the city's right to farm ordinance, to reduce conflicts with nearby agricultural operations.
Sustainable Communities Strategy		
Goal 8	Support mixed-use and infill development near existing transit services and activity centers.	**Consistent.** There are no existing transit stops within or adjacent to the project site; however, the project includes development mixed-land uses, including business park uses, restaurants, and a hotel within the city. Additionally, Mitigation Measure AQ/mm-2.1, included in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, would require the incorporation of measures for alternative transportation methods, including transit, bicycle, and pedestrian facilities.
Goal 12	Promote healthy and livable communities and human-scale development that promotes biking and walking.	**Consistent.** Mitigation Measure AQ/mm-2.1, included in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, would require the incorporation of measures for alternative transportation methods, including transit, bicycle, and pedestrian facilities. Additionally, the project includes mixed land uses , which would facilitate walking and biking throughout the site.
Goal 15	As part of agency review and comment on specific plans and significant development projects, encourage healthy and livable community design concepts, and incorporation of multimodal transportation options.	**Consistent.** The project includes development mixed-land uses, including business park uses, restaurants, and a hotel within the city, which would promote walkability throughout the site. Additionally, Mitigation Measure AQ/mm-2.1, included in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, would require the incorporation of measures for alternative transportation methods, including transit, bicycle, and pedestrian facilities.

Policy	Policy Text	Preliminary Statement of Consistency/Conflict
Goal 20	Support expanded transit service and increased frequency of transit service within and between communities to reduce vehicle trips and vehicle miles of travel.	**Consistent**. As discussed in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, implementation of Mitigation Measure AQ/mm-2.1 would require the incorporation of measures for alternative transportation methods, including transit centers, to reduce employee vehicle trips.
Goal 31	Support the incorporation of design features and infrastructure in new projects that support active transportation and transit users.	**Consistent.** The project includes development mixed-land uses, including business park uses, restaurants, and a hotel within the city, which would promote walkability throughout the site. Additionally, Mitigation Measure AQ/mm-2.1, included in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, would require the incorporation of measures for alternative transportation methods, including transit, bicycle, and pedestrian facilities to facilitate the use of alternative modes of transportation.
Goal 36	Support local jurisdictions' policies that protect important farmland	**Consistent.** Development within the project site would also be required to comply with the city's right to farm ordinance, to reduce conflicts with nearby agricultural operations. In order to reduce conflicts with adjacent lands and uses, the project would be required to comply with standard SLOAPCD dust control measures detailed in Mitigation Measures AQ/mm-1.3 and AQ/mm-2.1, city policies, and Mitigation Measure AG/mm-1.1 to address the loss of Farmland.
Goal 37	Support local jurisdictions' policies that protect valuable habitats and natural resources through acquisitions, setbacks, conservation easements, and environmental mitigation programs	**Consistent.** As discussed in *Section 4.4, Biological Resources*, Mitigation Measure BIO/mm-4.1 requires the applicant to obtain all necessary federal permits related to impacts to the wetland habitat and also requires the removed wetland habitat be offset through habitat creation and enhancement, which would be implemented through an HMMP. Additionally, Mitigation Measure BIO/mm-7.1 has been included to replace impacted oak trees at a 1:1 ratio and to replace removed oak trees at a 2:1 ratio.
Goal 42	Maintain and enhance quality aesthetic experiences along transportation corridors and surrounding landscapes through mitigation planting, urban streetscape improvements, removal of billboards, and other visual enhancements.	**Consistent.** The project includes landscaping plans and would be required to implement mitigation plantings for oak trees and wetland impacts.
Paso Robles Municipal Airport Airport Land Use Plan		
4.3 General Land Use Policies: Notwithstanding any other provision of this ALUP, a proposed general plan or general plan amendment, specific plan or specific plan amendment, zoning ordinance or zoning ordinance amendment, building regulation modification, or individual development proposal will be determined to be inconsistent with the ALUP if:		
Policy G-1	The proposed local action would create or permit new residential development in the Planning Area. Residential development is an undesirable land use within the Planning Area. It is the intent of the ALUP to prohibit further subdivision of land or changes to land use zoning that would result in an increase in the number of residential dwelling units within the Planning Area. Existing parcels that are entitled, as of February 16, 2005, to be occupied by existing or new residential dwellings under the current General Plan, Zoning, or other applicable regulations shall not, however, be considered inconsistent with the ALUP under this policy.	**Consistent**. The project is primarily located within Safety Zone 5 under the ALUP. The project does not include residential development that would result in incompatible land uses.

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Policy G-2	The proposed local action would allow development designated as "Prohibited" by the Land Use Policies or Land Use Matrix of the ALUP.	**Consistent.** Based on the Paso Robles Municipal Airport Land Use Compatibility Matrix, Aircraft Fuel, Aircraft Sales and Aircraft Repairs, and Flying Schools are the only prohibited land uses within Zone 5. All other land uses, such as office buildings, hotels and motels, warehouses, shopping centers, and manufacturing and processing are designated as compatible land uses that are not considered to present a significant risk to the safety of persons on the ground or to persons in aircraft overlying the proposed use within Zone 5
4.5 Specific Land Use Policies, 4.5.3 Safety Policies: Notwithstanding any other provision of this ALUP, a proposed general plan, general plan amendment, specific plan, specific plan amendment, zoning ordinance, zoning ordinance amendment, building regulation modification, or individual development proposal will be determined to be inconsistent with the ALUP if the proposed local action:		
Policy S-4	Would permit or lacks sufficient provisions to prohibit new development which exceeds the density standards set forth in Table 5: 150 persons per acre for maximum land use density; 450 persons per acre for maximum single acre land use density; 10% minimum open space (applicable to the project)	**Consistent**. The proposed project would be consistent with density requirements included in the ALUP. The ALUC reviewed the project and found it consistent with the ALUP.
Policy S-5	Would permit or lacks sufficient provisions to prohibit special land use functions - either limited mobility occupancies or hazardous materials uses - in Safety Zones 1 through 5. This Policy shall not, however, apply to flight training centers, vocational schools, or other training facilities which are directly related to aviation and which require or benefit from a location in proximity to an airport.	**Consistent.** As evaluated in *Section 4.7, Hazards and Hazardous Materials*, the transport, storage, use, or disposal of hazardous materials for the construction and operation of the project would be subject to California Highway Patrol, DTSC, and CCR regulations pertaining to hazardous materials.
4.6 Specific Land Use Policies, 4.6.1 Airspace Protection Policies: Notwithstanding any other provision of this ALUP, any proposed general plan, general plan amendment, specific plan, specific plan amendment, zoning ordinance, zoning ordinance amendment, building regulation modification, or individual development proposal will be determined to be inconsistent with the ALUP if the proposed local action:		
Policy A-1	Lacks sufficient provisions to ensure that no structure, landscaping, apparatus, or other feature, whether temporary or permanent in nature shall constitute an obstruction to air navigation or a hazard to air navigation, as defined above	**Consistent.** As evaluated in *Section 4.7, Hazards and Hazardous Materials*, if designed improperly or poorly maintained, the proposed stormwater detention basin could attract wildlife species that are hazardous to safe air operations. Mitigation Measure HAZ/mm-5.1 has been identified to reduce the potential for the stormwater detention basin to attract hazardous wildlife to the area.
City of El Paso de Robles Municipal Code		
Right to Farm Ordinance (22.16J.220)	It is the declared policy of this city to enhance and encourage agricultural operations within the city. It is the further intent of this city to provide to the residents of this city, living within three hundred feet of property in the agricultural district, notification of the city's recognition and support through the ordinance codified in this title of those persons' and/or entities' right to farm; Where non-agriculture land uses occur near agricultural areas, agricultural operations frequently become the subjects of nuisance complaints due to lack of information about such operations. As a result, agricultural operators may be forced to cease or curtail their operations. Such actions discourage investments in farm improvements to the detriment of agricultural uses and the viability of the city's agricultural industry as a whole. It is the purpose and intent of the ordinance codified in	**Consistent.** As evaluated in *Section 4.2, Agriculture and Forestry Resources*, development within the project site would also be required to comply with the city's right to farm ordinance, to reduce conflicts with nearby agricultural operations. The project site and adjacent parcels are not identified as land within a prioritized area of the Purple Belt; however, there is designated high-priority land located to the north and west of the site. In order to reduce conflicts with adjacent lands and uses, the project would be required to comply with standard SLOAPCD dust control measures detailed in Mitigation Measures AQ/mm-1.3 and AQ/mm-2.1, city policies, and Mitigation Measure AG/mm-1.1 to address the loss of Farmland.

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	this title to reduce the loss to the city of its agricultural resources by clarifying the circumstances under which agricultural operations may be considered a nuisance. The ordinance codified in this title is not to be construed as in any way modifying or abridging state law as set out in the California Civil Code, Health and Safety Code, Fish and Game Code, Food and Agricultural Code, Division 7 of the Water Code, or any other applicable provision of state law relative to nuisances. Instead, it is to be utilized only in the interpretation and enforcement of the provisions of this code and city regulations; An additional purpose of the ordinance codified in this title is to promote a good neighbor policy by advising purchasers of residential property, and owners of other property in the city, of the inherent potential problems associated with the purchase of such property. Such concerns may include, but are not limited to, the noises, odors, dust, chemicals, smoke and hours of operation that may accompany agricultural operations. It is intended that, through mandatory disclosures, purchasers and users will better understand the impact of living near agricultural operations and be prepared to accept attendant conditions as the natural results of living in or near agricultural areas.	
Oak Tree Preservation Ordinance (Chapter 10.01)	It is declared that the public interest and welfare requires that the city establish a program for the preservation of oak trees in order to maintain the heritage and character of the city of El Paso de Robles ("The Pass of the Oaks") as well as preserve the beauty and identity of the community. It is the intent of this ordinance to hold private property owners strictly liable for removing oak trees within the city without a required permit. and to avoid endangerment of oak trees that are to be preserved. Further, it is the intent of this ordinance that "tree maintenance services" and "arborists" shall be certified and licensed by the city and should be aware of the provisions of this ordinance and shall be held accountable for violation of the terms of this ordinance. Further, it is the intent of the city of El Paso de Robles to be construed as the "aggrieved party" in regards to any criminal enforcement of this manner in which restitution can be obtained.	**Consistent.** As discussed in *Section 4.4, Biological Resources*, development in the project area would be required to preserve healthy existing vegetation onsite where possible. Where oak tree removal is required, the project would be subject to Mitigation Measure BIO/mm-7.1 to replace impacted and removed oak trees.
Determination of Historic or Architectural Significance (17.16.040)	Upon receipt of an application for a permit to demolish a building or structure, the building official shall forward the application to the planning division of the community development department. The city planner shall determine whether the building or structure is a potential historic or architectural resource, using the following criteria: Inclusion on any list of historic and cultural resources, including, but not limited to, the National Register of Historic Buildings, the state list of significant historic buildings, the 1981-1984 Historic Resources Survey conducted by the community development department or any other recognized source of historic and cultural resources for the city; and An evaluation of the building or structure based	**Consistent.** As evaluated in *Section 4.5, Cultural and Tribal Cultural Resources*, the Paso Robles Boys School is not considered a significant local historic resource because it is not listed in or determined eligible for listing in the NRHP or the CRHR, is not listed in the Paso Robles Historic Resources Inventory, and does not meet at least one of the criteria for designating a historic landmark per Municipal Code Section 17.16.040. Therefore, demolition of existing Paso Robles Boys School buildings would not conflict with Municipal Code Section 17.16.040.

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	upon the following criteria: Whether the building or structure reflects special elements of the city's historical, archaeological, cultural, social, economic, aesthetic, engineering, or architectural development; or Whether the building or structure is identified with persons or events significant in local, state, or national history; or Whether the building or structure embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship; or whether the building or structure represents an established and familiar visual feature of a neighborhood or community of the city. The city planner shall make his/her determination within thirty days from the date the application for demolition is submitted.	
Paso Robles Historic Resources Inventory (21.50.070)	The Paso Robles Historic Resources Inventory identifies buildings, structures, objects that are designated historic resources, appear eligible for historic designation, or are considered historic resources for purposes of CEQA. The historic resources inventory may be used for reference for future determinations for the designation of historic resources, and for evaluating proposed alterations to or removal of historic resources. The Paso Robles Historic Resources Inventory shall collectively consist of buildings, structures, objects, sites, or districts that: Are identified as historic resources or potential historic resources through survey or other evaluation; Are included on any list of historic and cultural resources, including, but not limited to, the National Register of Historic Places, the California Register, and the state historic resources inventory (with a California Historic Resource Status Code of 1-5); or Are designated historic landmarks or contributors to a historic district by the city council. The historic resources inventory shall be kept on file with the community development department, and distributed to the city clerk, the public works director, the emergency services director, the Paso Robles Historical Society, and the Paso Robles Public Library.	**Consistent.** As evaluated in *Section 4.5, Cultural and Tribal Cultural Resources*, the Paso Robles Boys School is not considered a significant local historic resource because it is not listed in or determined eligible for listing in the NRHP or the CRHR, is not listed in the Paso Robles Historic Resources Inventory, and does not meet at least one of the criteria for designating a historic landmark per Municipal Code Section 17.16.040. Additionally, the project impact area does not contain any known archaeological resource sites that may be affected by ground-disturbing activities associated with implementation of the project. However, there is potential for unidentified subsurface archaeological resources to be present onsite. Mitigation Measure CUL/mm-2.1 requires worker awareness training to educate project personnel on inadvertent resource discovery. In the event of an inadvertent resource discovery, Mitigation Measures CUL/mm 2.2 and CUL/mm-2.3 would apply and would require work to cease in the area of the discovery until a City-approved archaeologist can determine the appropriate method of disposition of the resource.
Alteration and Repair to Historic Resources (21.50.150)	Approval Process for Alterations or Repairs to Historic Resources. It shall be unlawful for any person, owner, or entity to directly or indirectly alter, remodel, demolish, grade, remove, construct, reconstruct, or restore; (a) any designated historic resource; or (b) any site, building, structure, object or district listed in the historic resources inventory, without first obtaining a certificate of appropriateness or certificate of no effect.	**Consistent.** As evaluated in *Section 4.5, Cultural and Tribal Cultural Resources*, the Paso Robles Boys School is not considered a significant local historic resource because it is not listed in or determined eligible for listing in the NRHP or the CRHR, is not listed in the Paso Robles Historic Resources Inventory, and does not meet at least one of the criteria for designating a historic landmark per Municipal Code Section 17.16.040, described above. Therefore, demolition of existing Paso Robles Boys School buildings would not conflict with Municipal Code Section 21.50.150.
Grading (Title 20)	The purpose of the provisions of this title is to protect and provide for the health, safety, and general welfare of the public by establishing minimum requirements for the regulation of grading. The intent of these grading provisions is to regulate the planning, design, and development of graded areas within the city	**Consistent.** As discussed in *Section 4.8, Hydrology and Water Quality*, temporary impacts related to increased erosion and sedimentation would be mitigated by implementation of Mitigation Measure HYD/mm-1.1, which requires preparation and implementation of a SWPPP with BMPs to reduce the amount of erosive or other runoff during construction activities. The project

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	preserving the natural terrain by retention of topographic features; such as creeks, flood ways, slopes, ridge lines, rock outcroppings, vistas, and oak forest areas. These provisions are also intended to minimize storm water run-off and accelerated soil erosion and sedimentation problems created by the disturbance of the natural terrain.	site would be graded to maintain the natural grade of the site. Additionally, the interim Huer Huero Creek bridge crossing has been designed to be an at-grade crossing, with the bridge bed located 1 foot above the low water channel.
Exterior and Interior Noise Standards (21.60.060)	It is unlawful for any person at any location within the city to create any noise which causes the noise levels on an affected property, when measured in the designated sensitive exterior or interior location, to exceed the noise standards specified below in Table 1 (see Table 4.10-4 in *Section 4.10, Noise*).	**Inconsistent.** As discussed in *Section 4.10, Noise*, construction-related ambient noise would be short-term, intermittent, and would be reduced where feasible with implementation of Mitigation Measure N/mm-1.1. Mitigation Measure N/mm-1.3 has been included to reduce operational noise from commercial/industrial land uses and is not anticipated to increase long-term ambient noise levels that could disturb occupants of the proposed onsite hotel. However, with implementation of Mitigation Measure N/mm-1.2, predicted operational noise levels associated with the proposed warehouse, including loading dock operations, trash compactors, and diesel pump motor, would still exceed the City's applicable daytime and nighttime noise standards. In addition, predicted increases in traffic noise levels at the nearest existing residence located along Airport Road (between Dry Creek Road and SR 46E), would exceed the City's exterior noise standard of 65 dBA CNEL. Since the offsite residence located along Airport Road (between Dry Creek Road and SR 46E) is accessed via Airport Road, construction of a sound barrier sufficient to reduce predicted traffic noise levels to within acceptable levels would not be feasible.
General Performance Standards for All Uses (21.21.040-C)	No land use shall increase the ambient noise level as measured at the nearest residentially zoned property line to a level that constitutes a public nuisance.	**Inconsistent.** As discussed in *Section 4.10, Noise*, construction-related ambient noise would be short-term, intermittent, and would be reduced where feasible with implementation of Mitigation Measure N/mm-1.1. Mitigation Measure N/mm-1.3 has been included to reduce operational noise from commercial/industrial land uses and is not anticipated to increase long-term ambient noise levels that could disturb occupants of the proposed onsite hotel. However, with implementation of Mitigation Measure N/mm-1.2, predicted operational noise levels associated with the proposed warehouse, including loading dock operations, trash compactors, and diesel pump motor, would still exceed the City's applicable daytime and nighttime noise standards. In addition, predicted increases in traffic noise levels at the nearest existing residence located along Airport Road (between Dry Creek Road and SR 46E), would exceed the City's exterior noise standard of 65 dBA CNEL. Since the offsite residence located along Airport Road (between Dry Creek Road and SR 46E) is accessed via Airport Road, construction of a sound barrier sufficient to reduce predicted traffic noise levels to within acceptable levels would not be feasible.

As evaluated in Table 4.9-1, mitigation measures have been included in individual resource sections throughout this EIR to reduce potential impacts that may be inconsistent with applicable local plans, policies, and ordinances. With implementation of mitigation measures identified throughout this EIR, the project would be mostly consistent with applicable local plans, policies, and ordinances, with the exception of policies related to noise and a regional net increase in VMT. The project's inconsistency with policies related to noise and a regional net increase in VMT would be inconsistent with the City's Noise Element, Circulation Element, and Municipal Code and SLOCOG's 2019 RTP/SCS. Mitigation measures have been included to reduce operational ambient noise impacts and the increase in VMT

generated by the project; however, the identified mitigation measures would not reduce these impacts to less-than-significant levels. Since the project would be inconsistent with the policies included in the City's Noise Element, Circulation Element, and Municipal Code and SLOCOG's 2019 RTP/SCS related to noise and VMT-reduction strategies, and implementation of mitigation would not reduce these impacts to less-than-significant levels, impacts would be considered *significant and unavoidable*.

LUP Impact 1 (Class I)
The project would be inconsistent with land use plans, policies, and regulations related to noise and VMT. The inconsistencies related to VMT policies would result in significant environmental impacts.
Mitigation Measures
Implement the mitigation measures identified in this EIR.
Residual Impacts
With implementation of mitigation measures identified throughout this EIR, the project would be mostly consistent with applicable local plans, policies, and ordinances, with the exception of policies related to noise and a regional net increase in VMT. Mitigation measures have been included to reduce operational ambient noise impacts and the increase in VMT generated by the project; however, the identified mitigation measures would not reduce these impacts to less-than-significant levels. Therefore, impacts would be significant and unavoidable.

4.9.6 Cumulative Impacts

Past, present, and reasonably foreseeable projects in and around the city would also be subject to existing local policies included in the City's General Plan and Municipal Code and the SLOCOG's 2019 RTP/SCS. Additionally, past, present, and reasonably foreseeable projects within the Paso Robles Municipal Airport ALUP review area would be subject to policies included in the ALUP. As discussed in LUP Impact 1, the project would be mostly consistent with applicable local plans, policies, and ordinances, with the exception of policies related to noise and a regional net increase in VMT. Reasonably foreseeable future projects would be subject to separate environmental review to determine each project's consistency with applicable local plans, policies, and ordinances. Other reasonably foreseeable future projects within the vicinity of the proposed project have the potential to add to the increase in ambient noise levels and other reasonably foreseeable projects within the city have the potential to contribute to the regional net increase in VMT, which would be inconsistent with the City's Noise Element, Circulation Element, and Municipal Code and SLOCOG's 2019 RTP/SCS. Therefore, cumulative impacts would be considered potentially significant.

4.10 NOISE

The following setting and impact discussion is based, in part, on the *Noise Impact Assessment for The Landing Project* (AMBIENT 2022). The Noise Impact Assessment includes an in-depth assessment of potential sources of noise generated by the project and the potential for existing sources of noise to disturb proposed land uses. The following setting information also includes applicable noise standards and thresholds established by the *City of El Paso de Robles General Plan 2003 Noise Element* (Noise Element), Municipal Code, and Paso Robles Municipal Airport ALUP.

4.10.1 Existing Conditions

4.10.1.1 Overview of Environmental Noise

Noise is generally defined as sound that is loud, disagreeable, or unexpected. Sound, as described in more detail below, is mechanical energy transmitted in the form of a wave because of a disturbance or vibration. Sound is described in terms of the loudness (amplitude) and pitch (frequency) of the sound.

Amplitude is the difference between ambient air pressure and the peak pressure of the sound wave. Amplitude is measured in decibels (dB) on a logarithmic scale. For example, a 65-dB source of sound, such as a truck, when joined by another 65-dB source results in a sound amplitude of 68 dB, not 130 dB (i.e., doubling the source strength increases the sound pressure by 3 dB). Amplitude is interpreted by the ear as corresponding to different degrees of loudness. Laboratory measurements correlate a 10-dB increase in amplitude with a perceived doubling of loudness and establish a 3-dB change in amplitude as the minimum audible difference perceptible to the average person.

Frequency is the number of fluctuations in the pressure wave per second. The unit of frequency is the Hertz (Hz). One Hz equals one cycle per second. The human ear is not equally sensitive to sound of different frequencies. Sound waves below 16 Hz or above 20,000 Hz cannot be heard at all, and the ear is more sensitive to sound in the higher portion of this range than in the lower. To approximate this sensitivity, the environmental sound is usually measured in A-weighted decibels (dBA). On this scale, the normal range of human hearing extends from about 10 dBA to about 140 dBA (AMBIENT 2022). Figure 4.10-1 details typical community noise levels.

4.10.1.1.1 MEASUREMENT OF ENVIRONMENTAL NOISE

Human hearing is limited in the range of audible frequencies as well as in the way it perceives the sound-pressure level in that range. Typically, people are most sensitive to the frequency range of 1,000 to 8,000 Hz and perceive sounds within that range better than sounds of the same amplitude in higher or lower frequencies. To approximate the response of the human ear, sound levels of individual frequency bands are weighted, depending on the human sensitivity to those frequencies, and is referred to as the "A-weighted" sound level (dBA). The A-weighting network approximates the frequency response of the average ear when listening to most ordinary sounds. Other weighting networks have been devised to address high noise levels or other special problems (e.g., B-, C-, and D-scales), but these scales are rarely used in conjunction with environmental noise.

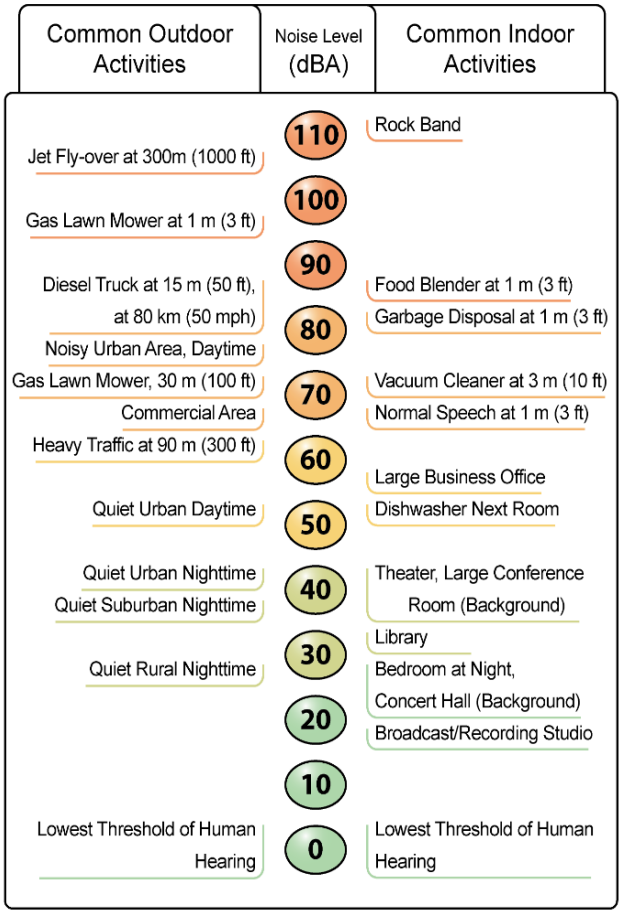


Figure 4.10-1. Typical community noise levels.

The intensity of environmental noise fluctuates over time, and several descriptors of time-averaged noise levels are typically used. Common noise descriptors used for the evaluation of environmental noise include energy-equivalent noise level (Leq), day-night average noise level (Ldn), and community noise equivalent (CNEL). Leq is a measure of the average energy content (intensity) of noise over any given period. Additionally, many communities use 24-hour descriptors of noise levels to regulate noise, including Ldn and CNEL. Ldn is the 24-hour average of the noise intensity, with a 10-dBA reduction added for nighttime noise (10:00 p.m.–7:00 a.m.) to account for the greater sensitivity to noise during this period. CNEL is similar to Ldn but adds an additional 5-dBA penalty for evening noise (7:00 p.m.–10:00 p.m.). Common noise descriptors are included in Table 4.10-1.

Table 4.10-1. Common Noise Descriptors

Descriptor	Definition
Decibel (dB)	A unit-less measure of sound on a logarithmic scale, which indicates the squared ratio of sound pressure amplitude to referenced sound pressure amplitude. The reference pressure is 20 micro-pascals.
A-Weighted Decibel (dBA)	An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
Energy Equivalent Noise Level (Leq)	The energy mean (average) noise level. The instantaneous noise levels during a specific period of time in dBA are converted to relative energy values. From the sum of the relative energy values, an average energy value (in dBA) is calculated.
Minimum Noise Level (Lmin)	The minimum instantaneous noise level during a specific period of time.
Maximum Noise Level (Lmax)	The maximum instantaneous noise level during a specific period of time.
Day-Night Average Noise Level (DNL or Ldn)	The 24-hour Leq with a 10-dBA "penalty" for noise events that occur during the noise-sensitive hours between 10:00 p.m. and 7:00 a.m. In other words, 10 dBA is "added" to noise events that occur in the nighttime hours to account for increased sensitivity to noise during these hours.
Community Noise Equivalent Level (CNEL)	The CNEL is similar to the Ldn described above, but with an additional 5-dBA "penalty" added to noise events that occur between the hours of 7:00 p.m. to 10:00 p.m. The calculated CNEL is typically approximately 0.5 dBA higher than the calculated Ldn.

Source: AMBIENT (2022)

4.10.1.1.2 SOUND PROPAGATION AND ATTENUATION

Sound from a localized source (i.e., a point source) spreads uniformly outward in a spherical pattern. The sound level decreases (attenuates) at a rate of approximately 6 dB for each doubling of distance from a point source. Highways consist of several localized noise sources on a defined path, and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source spreads outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of approximately 3 dB for each doubling of distance from a line source, depending on ground surface characteristics. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receiver, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., soft dirt, grass, or scattered bushes and trees), an excess ground-attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the cylindrical spreading, the excess ground attenuation for soft surfaces results in an overall attenuation rate of 4.5 dB per doubling of distance from a line source.

A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Natural terrain features (e.g., hills and dense woods) and human-made features (e.g., buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receiver specifically to reduce noise. A barrier that breaks the line of sight between a source and a receiver will typically result in an approximate 5 dB of noise reduction. Taller barriers provide increased noise reduction (AMBIENT 2022).

4.10.1.1.3 HUMAN RESPONSE TO NOISE

The human response to environmental noise is subjective and varies considerably between individuals. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to stress and annoyance. The health effects of noise in the community arise from interference with human

activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels. When community noise interferes with human activities or contributes to stress, public annoyance with the noise source increases. The acceptability of noise and the threat to public wellbeing are the basis for land use planning policies preventing exposure to excessive community noise levels.

In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will be judged. Regarding increases in A-weighted noise levels, knowledge of the following relationships will be helpful in understanding this analysis:

- Except in carefully controlled laboratory experiments, a change of 1 dB cannot be perceived by humans;
- Outside of the laboratory, a 3-dB change is considered a just-perceivable difference;
- A change in the level of at least 5 dB is required before any noticeable change in community response would be expected. An increase of 5 dB is typically considered substantial;
- A 10-dB change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

For most noise-sensitive land uses, an interior noise level of 45-dB Leq and an exterior noise level of 60-dBA Leq is typically identified for the protection of speech communication. Based on this information, speech interference begins to become a problem when steady noise levels reach approximately 60 to 65 dBA. Additionally, research conducted by Theodore J. Schultz identifies a correlation between the cumulative noise exposure metric and individuals who were highly annoyed by transportation noise. The Schultz curve, which expresses the correlation between noise exposure and annoyance, indicates that approximately 13% of the population is highly annoyed at a noise level of 65-dBA Ldn. It also indicates that the percentage of people describing themselves as being highly annoyed increases between 55- and 70-dBA Ldn. A noise level of 65-dBA Ldn is a commonly referenced dividing point between lower and higher rates of people describing themselves as being highly annoyed.

Most federal and state regulations and policies related to transportation noise sources establish a noise level of 65-dBA CNEL/Ldn as the basic limit of acceptable noise exposure for residential and other noise-sensitive land uses. For instance, with respect to aircraft noise, both the Federal Aviation Administration (FAA) and the State of California have identified a noise level of 65-dBA Ldn as the dividing point between normally compatible and normally incompatible residential land use generally applied for the determination of land use compatibility. For noise-sensitive land uses exposed to aircraft noise, noise levels in excess of 65-dBA CNEL/Ldn are typically considered to result in a potentially significant increase in levels of annoyance. Allowing for an average exterior-to-interior noise reduction of 20 dB, an exterior noise level of 65-dBA CNEL/Ldn would equate to an interior noise level of 45-dBA CNEL/Ldn. An interior noise level of 45-dB CNEL/Ldn is generally considered sufficient to protect against activity interference at most noise-sensitive land uses, including residential dwellings, and would also be sufficient to protect against sleep interference (AMBIENT 2022).

4.10.1.1.4 CONSTRUCTION NOISE

Noise levels generated by construction equipment may vary based on factors such as the type of equipment, the equipment model, the operation being performed, and the condition of the equipment. Typically, the dominant source of noise from most construction equipment is the engine, often a diesel engine, which usually does not have sufficient muffling. In other cases, actions such as impact pile-driving or pavement-breaking would dominate the noise area. Construction equipment is operated as a stationary noise source or a mobile noise source. Stationary equipment operates in one location for one or more days at a time with a fixed power operation (e.g., pumps, generators, compressors) or intermittent,

variable noises (e.g., pile drivers, pavement breakers). Mobile equipment moves around the site or to and from the site and includes bulldozers, loaders, trucks, etc. (Federal Transit Administration [FTA] 2018). Typical equipment used for construction activities and associated noise levels are included in Table 4.10-2 below.

Table 4.10-2. Typical Construction Equipment Noise Levels

	Typical Noise Level (dBA) 50 feet From Source	
Equipment Type	**Maximum Noise Level (Lmax)**	**Average-Hourly Noise Levels (Leq)**
Backhoe	78	74
Bulldozer	82	78
Compressor	78	74
Cranes	81	73
Concrete Pump Truck	81	74
Drill Rigs	79	72
Dump Trucks	77	73
Excavator	81	77
Generator	81	78
Gradall	83	79
Grader	85	81
Hydraulic Break Ram	90	80
Front End Loader	79	75
Pneumatic Tools	85	82
Pumps	81	78
Roller	80	73
Scraper	84	80
Tractor	84	80

Source: AMBIENT (2022)

4.10.1.2 Groundborne Vibration

Groundborne noise occurs when vibration radiates through the ground and creates a low-frequency sound, often described as a “rumble.” Ground-borne vibration can be a concern for nearby neighbors of a transit system route or maintenance facility. However, ground-borne vibration is not commonly perceived as an environmental problem because it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Construction activities can result in varying degrees of ground vibration, depending on the equipment, model, and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance (FTA 2018).

The threshold at which there is a risk to normal structures from continuous events is 0.3 inches per sec (in/sec) peak particle velocity (PPV) for older residential structures and 0.5 in/sec PPV for newer building construction. No existing historic or fragile structures were identified near the project area. With regard to human perception, vibration levels would begin to become distinctly perceptible at levels of 0.04 in/sec PPV for continuous events. Continuous vibration levels are considered potentially annoying for people in

buildings at levels of 0.2 in/sec PPV. Table 4.10-3 identifies the level at which groundborne noise is perceptible.

Table 4.10-3. Groundborne Noise Levels and Potential Effects

Vibration Level (in/sec PPV)	Human Reaction	Effect on Buildings
0.006–0.019	Threshold of perception; possibility of intrusion.	Vibrations unlikely to cause damage of any type.
0.08	Vibrations readily perceptible.	Recommended upper level of the vibration to which ruins and ancient monuments should be subjected.
0.10	Level at which continuous vibrations begin to annoy people.	Virtually no risk of "architectural" damage to normal buildings.
0.20	Vibrations annoying to people in buildings (this agrees with the levels established for people standing on bridges and subjected to relatively short periods of vibrations).	Threshold at which there is a risk of "architectural" damage to fragile buildings.
0.3–0.6	Vibrations become distinctly perceptible at 0.04 in/sec PPV and considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges.	Potential risk of "architectural" damage may occur at levels above 0.3 in/sec PPV for older residential structures and above 0.5 in/sec PPV for newer structures.

Source: AMBIENT (2022)

Note: The vibration levels are based on PPV in the vertical direction for continuous vibration sources, which includes most construction activities.

4.10.1.3 Existing Ambient Noise Environment

4.10.1.3.1 EXISTING NOISE LEVELS

To document the existing noise levels in the project vicinity, AMBIENT conducted five short-term (i.e., 10-minute) noise measurements and one continuous long-term (i.e., 24-hour) noise measurement. Ambient noise measurement surveys were conducted on October 5 and 6, 2021, using a Larson Davis LxT Type I sound-level meter. Measured short-term noise measurements are summarized in Table 4.10-4. As noted in Table 4.10-4, measured short-term daytime average-hourly noise levels in the project area generally range from approximately 57 dBA Leq to approximately 72 dBA Leq.

Table 4.10-4. Short-Term Noise Measurement Data

Measurement Location	Major Noise Sources	Average-Hourly Noise Level (dBA Leq)
West side of Wing Way roadway edge approximately 140 feet south of Taxi Way	Roadway Traffic, Single Propeller Plane Overflight	56.7
South side of Bunea Vista Drive roadway edge approximately 50 feet west of Airport Road	Roadway Traffic	66.3
West side of Airport Road approximately 10 feet from roadway edge and 115 feet north of Dry Creek Road	Roadway Traffic	71.7
North of Dry Creek Road at roadway edge approximately 2,100 feet west of Airport Road	Roadway Traffic	54.9
South of Buena Vista Drive at roadway edge approximately 2,250 feet west of Airport Road	Single Propeller Planes Overflight	51.3

Source: AMBIENT (2022)

Measured average-hourly noise levels ranged from approximately 53 dBA Leq during the nighttime hours to approximately 68 dBA Leq during the daytime hours. Measured nighttime noise levels were approximately 15 dBA lower than daytime noise levels. The average-daily noise level at this location measured 68.6 dBA CNEL/Ldn. Measured ambient noise levels in the vicinity of the project site were predominantly influenced by vehicle traffic on area roadways, as well as occasional aircraft overflights (AMBIENT 2022).

4.10.1.3.2 SENSITIVE NOISE RECEPTORS

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose (AMBIENT 2022). Single- and multi-family residences, schools, libraries, medical facilities, retirement/assisted living homes, health care facilities, and places of worship are most sensitive to noise intrusion and therefore have more stringent noise exposure targets than commercial or agricultural uses that are not subject to impacts such as sleep disturbance, disruption of conversations, lectures or sermons, or decreased attractiveness of exterior use areas, such as patios, backyards, or parks. Of particular concern is exposure of sensitive receptors to long-term elevated interior noise levels and sleep disturbance, which can be associated with health concerns.

Surrounding land uses include vineyards to the west; vineyards, wineries, and the Paso Robles Horse Park to the south; Airport Road and the Paso Robles Municipal Airport to the east; and a CAL FIRE Station, rural residential, and agricultural uses to the north. SR 46E is located 1.3 miles south of the project site and US 101 is located 2.5 miles west of the project site. The nearest sensitive receptor location includes a residential dwelling, located directly adjacent to the western project boundary. Other nearby sensitive receptor locations include a residential dwelling located approximately 1,100 feet west of the western project boundary and four residential dwelling located approximately 730 to 1,100 feet north of the northern project boundary (Figure 4.10-2).

The nearest existing stationary source of noise to the project site is the Paso Robles Municipal Airport. No major existing sources of groundborne vibration were identified in the project area.

4.10.2 Regulatory Setting

4.10.2.1 Federal

4.10.2.1.1 NOISE CONTROL ACT OF 1972

The Noise Control Act of 1972 establishes a national policy to promote an environment for all Americans that s free from noise that jeopardizes their health and welfare. The act also serves the following purposes (USEPA 2020):

1. Establish a means for effective coordination of federal research and activities in noise control;
2. Authorize the establishment of federal noise emission standards for products distributed in commerce; and
3. Provide information to the public respecting the noise emission and noise reduction characteristics of such products.



Figure 4.10-2. Location of sensitive receptors to the project impact area.

4.10.2.1.2 FEDERAL TRANSIT ADMINISTRATION CRITERIA

The FTA developed methodology and significance criteria to evaluate vibration impacts from surface transportation modes (i.e., passenger cars, trucks, buses, and rail) in the *Transit Noise and Vibration Impact Assessment* (FTA 2018). The Transit Noise and Vibration Impact Assessment provides guidance for preparing and reviewing the noise and vibration sections of environmental documents by setting forth methods and procedures for determining the level the level of noise and vibration impacts resulting from federally funded transit projects and determining appropriate and feasible mitigation.

4.10.2.1.3 FEDERAL HIGHWAY ADMINISTRATION

The Federal Highway Administration (FHWA) is the agency responsible for administering the Federal-aid highway program in accordance with federal statutes and regulations. The FHWA developed noise regulations as required by the Federal-Ad Highway Act of 1970 (Public Law 91-605, 84 Stat. 1713). The Regulation 23 CFR 772 Procedures for Abatement of Highway Traffic Noise and Construction noise, applies to highway construction projects where a state department of transportation has requested Federal funding for participation in the project. The regulation requires the highway agency to investigate traffic noise impacts in areas adjacent to federally aided highways for proposed construction of a highway on a new location or the reconstruction of an existing highway to either significantly change the horizontal or vertical alignment or increase the number of through-traffic lanes. If the highway agency identifies impacts, it must consider abatement. The highway agency must incorporate all feasible and reasonable noise abatement into the project design (FWHA 2011).

4.10.2.2 State

4.10.2.2.1 STATE OF CALIFORNIA'S GUIDELINES FOR THE PREPARATION AND CONTENT OF NOISE ELEMENT OF THE GENERAL PLAN

These guidelines reference land use compatibility standards for community noise environments as developed by the California Department of Health Services, Office of Noise Control. Sound levels up to 70 Ldn or CNEL are determined in these guidelines to be normally acceptable for office building and professional land uses and 75 Ldn or CNEL are determined in these guidelines to be normally acceptable for industrial uses.

4.10.2.2.2 CALIFORNIA BUILDING STANDARDS CODE

The State of California's noise insulation standards are codified in the CCR Title 24, Building Standards Administrative Code, Part 2, and the California Building Standards Code. These noise standards are applied to new construction in California for the purpose of controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are developed near major transportation noise sources, and where such noise sources create an exterior noise level of 60-dBA CNEL or higher. Acoustical studies that accompany building plans for noise-sensitive land uses must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45-dBA CNEL.

4.10.2.2.3 CALIFORNIA ADMINISTRATIVE CODE, TITLE 24, NOISE INSULATION STANDARDS

Interior noise levels for habitable rooms are regulated also by CCR Title 24, California Noise Insulation Standards. Title 24, Chapter 12, Section 1207.4, of the California Building Code requires that interior noise levels attributable to exterior sources not exceed 45 CNEL in any habitable room within a residential structure. A habitable room is a room used for living, sleeping, eating, or cooking. Bathrooms, closets, hallways, utility spaces, and similar areas are not considered habitable rooms for this regulation (24 CCR 1207 2016).

4.10.2.3 Local

4.10.2.3.1 CITY OF EL PASO DE ROBLES GENERAL PLAN 2003

Noise Element

The Noise Element includes the City's transportation source noise standards for outdoor activity areas and interior spaces (City of Paso Robles 2019). The noise compatibility guidelines for various land uses are based on guidelines developed by the California Department of Health Office of Noise Control. The City's noise criteria for determination of future land use compatibility with transportation noise sources are presented in Table 4.10-5. These guidelines are used to assess whether transportation noise would potentially pose a conflict with proposed land uses.

Table 4.10-5. Land Use Compatibility Noise Criteria Transportation Noise Sources

	Noise-Sensitive[1] Outdoor Area	Noise-Sensitive Interior Spaces[2,3]	
Land Use Category	DNL[7]	DNL[7]	Leq[5,8]
Residential	65	45	--
Mixed Use Residential	--	45	--
Uptown Town Center S.P. Area (UTCSP) Residential (review map boundary)	70	45	--
Hotels, Hospitals[4], & Nursing Homes	65	45	--
Theaters & Auditoriums	--	--	35
Churches, Meeting Halls, Libraries	65	--	40
Schools[6]	--	--	40
Office/Professional	65	--	45
Commercial/Retail Buildings	--	--	50
Playgrounds, Parks, etc.	70	--	--
Industrial	--	--	50

Source: City of Paso Robles (2019)

[1] Noise sensitive areas are defined in the acoustic terminology section. Where there are no sensitive exterior spaces proposed as part of the new use, only the interior noise level standards shall apply.

[2] Interior noise level standards are applied within noise-sensitive areas of the various land uses, with windows and doors in the closed positions.

[3] If the proposed use is exposed to railroad noise, in addition to the interior noise standards shown, a maximum (Lmax) noise level standard of 70 dBA shall be applied to all sleeping rooms to reduce the potential for sleep disturbance during nighttime train passages.

[4] Hospitals are often noise-generating uses. The exterior noise level standards for hospitals are applicable only at clearly identified areas designated for outdoor relaxation by either hospital staff or patients.

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

[6] Exterior areas of school uses are not typically noise-sensitive. As a result, the standards for schools are focused on the interior office and classroom spaces.

[7] Represents 24-hour average of noise with noise occurring during nighttime hours (10:00 p.m.–7:00 a.m.) penalized by 10 dBA prior to averaging.

[8] Represents the energy average of all noise occurring during a given period (typically 1-hour).

In addition to the noise criteria for determination of land use compatibility, Noise Element Policy N-1A establishes exterior and interior noise standards for transportation noise sources:

> **Policy N-1A:** **Noise Minimization**. New development shall be designed to comply with the maximum, allowable Noise Exposures of 65-dB CNEL for outdoor activities (except for parks); and 45-dB CNEL for indoor activities.

Noise measurement (dB L_{dn} or CNEL) is calculated using a daily average that takes into account the time of day the noise occurs. Sounds occurring at night are weighted more heavily.

Accordingly, the maximum allowable noise exposure for existing land use outdoor activity areas (except for parks) is 65-dBA CNEL/Ldn. The maximum allowable noise exposure for existing land use interior activity areas is 45-dBA CNEL/Ldn. Assuming a minimum exterior-to-interior noise reduction of 20 dB, an exterior noise level of 65-dBA CNEL/Ldn would provide for an interior noise level of 45-dBA CNEL/Ldn. This interior noise standard applies to various noise-sensitive land uses, including residential dwellings, schools, hotels, motels, auditoriums, meeting halls, office buildings, nursing homes, hospitals, theaters, and libraries (City of Paso Robles 2019a).

The City of Paso Robles has also adopted noise standards for stationary sources. The noise standards are applied at the property line of the receiving land use. The City's noise standards for stationary sources are summarized in Table 4.10-6.

Table 4.10-6. Noise Standards for Locally Regulated (Non-Transportation) Noise Sources

		Exterior Areas[1]		Interior Spaces[2]	
Land Use Category	**Period[3]**	**Lmax[4]**	**Leq[5]**	**Lmax[4]**	**Leq[5]**
Residential	Day	75	55	60	45
	Evening	70	50	55	40
	Night	65	45	45	35
Mixed Use Residential	Day	--	--	60	45
	Evening	--	--	55	40
	Night	--	--	45	35
Hotels, Hospitals[4], & Nursing Homes	Day	75	60	60	45
	Evening	75	55	55	40
	Night	70	50	45	35
Uptown Town Center S.P. Area (UTCSP) Residential (review map boundary)	Day	80	60	60	45
	Evening	75	55	55	40
	Night	70	50	45	35
Theaters & Auditoriums	Day	75	55	40	35
	Evening	70	50	40	35
	Night	--	--	40	35
Churches, Meeting Halls, Libraries	Day	75	55	55	45
	Evening	70	50	55	40
Schools[6]	Day	--	--	55	40
	Evening	--	--	55	40
Office/Professional	Day	80	60	60	45
	Evening	75	55	60	45
Commercial/Retail Buildings	Day	80	80	60	50
	Evening	75	75	60	50

Land Use Category	Period[3]	Exterior Areas[1]		Interior Spaces[2]	
		Lmax[4]	Leq[5]	Lmax[4]	Leq[5]
Playgrounds, Parks, etc.	Day	75	55	--	--
	Evening	75	55	--	--
Industrial	Day	80	60	60	50
	Evening	75	55	60	50

[1] Noise sensitive areas are defined in the acoustic terminology section.

[2] Interior noise level standards are applied within noise-sensitive areas of the various land uses, as defined in the acoustic terminology section, with windows and doors closed.

[3] Daytime hours = 7:00 a.m. to 7:00 p.m.; evening hours = 7:00 p.m.to 10:00 p.m.; night hours = 10:00 p.m. to 7:00 a.m.

[4] Lmax = Highest measured sound level occurring during a given interval of time (Typically 1 hour).

[5] Leq = Average or "Equivalent" noise level during the worst-case hour in which the building is in use.

[6] Hospitals are often noise-generating uses. The exterior noise level standards for hospitals are applicable only at clearly identified areas designated for outdoor relaxation by either hospital staff or patients.

[7] Exterior areas of school uses are not typically noise-sensitive. As a result, the standards for schools are focused on the interior office and classroom spaces.

General notes applicable to all noise standards and land uses:

a. Where the noise source in question consists of speech or music, or is impulsive in nature, or contains a pure tone, the noise standards of this table are reduced by 5 dB.
b. Where ambient noise levels exceed the noise level standards shown above, the noise standards shall be increased in 5-dBA increments to encompass the ambient.
c. Reductions in the noise standards for noise sources identified in general note "A" above shall be applied after any increases warranted by elevated ambient conditions prescribed in general note "B", subject to verification through a noise study.

4.10.2.3.2 PASO ROBLES MUNICIPAL AIRPORT AIRPORT LAND USE PLAN

The ALUP identifies an objective to minimize the number of people exposed to frequent and/or high cumulative noise levels (City of Paso Robles 2007). The basic strategy for achieving noise compatibility is to limit the development of land uses that are particularly sensitive to noise in proximity to airport operations that generate a substantial amount of noise. Extremely noise-sensitive land uses (land uses for which customary or anticipated activities may be disrupted to a significant degree by aviation noise impacts for which sufficient mitigation to ensure compatibility with current or future airport operations is not feasible) include the following:

- Outdoor theatres, amphitheaters, and public assembly areas (not including sports stadiums, athletic fields, playgrounds, public swimming pools, tennis courts, golf courses, or small picnic areas);
- Restaurants, bars, taverns, food takeout, wine and tasting rooms, and similar businesses, if such business includes outdoor eating or drinking areas; and
- Campgrounds (with overnight sleeping facilities).

Moderately noise-sensitive land uses (land uses for which customary or anticipated activities may be disrupted to a significant degree by aviation noise impacts, but for which sufficient mitigation to ensure compatibility with current or future airport operations is feasible) include the following:

- Hotels and motels;
- Restaurants, bars, taverns, food takeout, wine tasting rooms, and similar business, without outdoor eating or drinking areas;
- Temporary sleeping quarters for air crews and other employees in transit;
- Offices and office buildings;

- Hospitals, nursing homes, residential care facilities, and other medical facilities offering 24-hour care;
- Churches, synagogues, temples, monasteries, and convents;
- Mortuaries and funeral parlors;
- Indoor theatres, music halls, meeting halls, and other indoor public assembly facilities (but not including facilities utilized exclusively by pilot organizations, airport or airline employees, or other airport-related groups);
- Studios, radio, television, recording, rehearsal, and performance facilities;
- Schools and day care centers (but not including flight schools, aviation mechanics training schools, airline orientation facilities, or other institutions offering instruction only in aviation-related fields);
- Libraries (excluding aviation-oriented libraries); and
- Museums (excluding air museums).

Notwithstanding any other provision of the ALUP, a proposed general plan, general plan amendment, specific plan, specific plan amendment, zoning ordinance, zoning ordinance amendment, building regulation modification, or individual development proposal will be determined to be inconsistent with the ALUP if the proposed local action:

Policy N-1. Would permit or fail to sufficiently prohibit establishment of any extremely noise sensitive land use inside the projected 60-dB CNEL contour.

Policy N-2. Would permit or fail to sufficiently prohibit any extremely noise-sensitive land use inside the projected 55-dB CNEL contour, with the exception of developments which meet the criteria delineated in Section 4.2.4 for designation as infill.

Policy N-3. Would permit or fail to sufficiently prohibit any moderately noise-sensitive land use inside the projected 55-dB CNEL contour, with the exception of developments which meet the requirements for mitigation of interior noise levels specified in Section 4.4.2.

Policy N-4. Would permit or fail to sufficiently prohibit, in any location which is within or adjacent to an area of demonstrated noise incompatibility or in an acoustic environment substantially similar to an area of demonstrated noise incompatibility:

i. Any extremely noise-sensitive development

ii. Any new moderately noise-sensitive development, unless adequate, specific, and detailed provisions are set forth to mitigate noise incompatibility between allowable or proposed noise-sensitive uses (including foreseeable outdoor activities) and airport operations.

4.10.2.3.3 CITY OF EL PASO DE ROBLES MUNICIPAL CODE

Chapter 21.60 of the Municipal Code establishes general regulations for noise sources within the city. Construction noises are exempt from provisions of the chapter so long as they occur between the hours of 7 a.m. and 7 p.m. Section 21.60.060 of the Municipal Code includes regulations for interior and exterior

noise standards, as identified in Table 4.10-3, above. In addition, Section 21.21.040-C states that no land use shall increase the ambient noise level as measured at the nearest residentially zoned property line to a level that constitutes a public nuisance.

4.10.3 Thresholds of Significance

The following criteria are based on Appendix G of the State CEQA Guidelines. An impact would be considered potentially significant if the project would result in one or more of the following conditions:

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

b. Generation of excessive groundborne vibration or groundborne noise levels; or

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, exposure of people residing or working in the project area to excessive noise levels.

The analysis in this EIR evaluates the potential impacts of the project on the environment. The compatibility of specific Phase 2 land uses with the existing noise environment would be addressed through compliance with applicable City noise regulations and the City's permit approval process.

4.10.4 Impact Assessment and Methodology

The following impact assessment is based, in part, on the Noise Impact Assessment prepared for the proposed project (AMBIENT 2022) and the City's Noise Element, Municipal Code, and ALUP. Short-term noise impacts associated with construction activities were analyzed based on typical construction equipment noise levels and distances to the nearest noise-sensitive land uses. Noise levels were predicted based on an average noise-attenuation rate of 6 dB per doubling of distance from the source. Stationary source (non-transportation) noise levels were predicted based on representative noise levels for similar equipment and assuming an average noise-attenuation rate of 6 dB per doubling of distance from the source. To be conservative, noise levels associated with warehouse operations were calculated assuming loading dock activities, compactor, and diesel pump at the adjacent water basin could potentially occur simultaneously. An average of 16 trucks per hour traveling to and from the project site was assumed based on the traffic analysis prepared for this project (CCTC 2022). Parking lot noise levels were calculated using the FTA Noise Impact Assessment Spreadsheet. Traffic noise levels were calculated using the FHWA roadway noise prediction model (FHWA-RD-77-108) based on California vehicle reference noise levels and traffic data obtained from the traffic analysis prepared for this project (CCTC 2022). Additional input data included day/night percentages of autos, medium and heavy trucks, vehicle speeds, ground attenuation factors, and roadway widths. The project's contribution to traffic noise levels along area roadways was determined by comparing the predicted noise levels with and without project-generated traffic.

Neither the City nor the County has adopted noise standards that specifically apply to short-term construction activities. However, based on screening noise criteria commonly recommended by federal agencies, construction activities would generally be considered to have a potentially significant impact if average-hourly daytime noise levels would exceed 80-dBA Leq at noise-sensitive land uses, such as residential land uses (AMBIENT 2022).

Predicted non-transportation and transportation noise levels that exceed applicable noise standards would be considered a significant impact. For existing residential land uses, predicted exterior traffic noise levels

in excess of 65-dBA CNEL/Ldn at the dwelling or exterior activity areas would be considered a potentially significant impact. Exposure to stationary (non-transportation) noise sources would be considered potentially significant if noise levels would exceed applicable City or County noise exposure standards, depending on the jurisdiction within which the receiving land use is located. The City and County noise standards for stationary noise sources are summarized in Tables 4.10-5 and 4.10-6, respectively.

For determination of land use compatibility for proposed land uses, predicted roadway traffic noise levels in excess of applicable City noise standards would be considered a potentially significant impact (see Table 4.10-5). For noise-sensitive land uses exposed to aircraft noise levels, most federal and state regulations and policies establish an acceptable aircraft noise-exposure level of 65-dBA CNEL/Ldn for exterior areas and 45-dBA CNEL/Ldn for interior areas (Caltrans 2011). Predicted aircraft noise levels exceeding these standards would be considered a potentially significant impact.

Groundborne vibration levels would be considered potentially significant if predicted short-term construction or long-term operational groundborne vibration levels attributable to the proposed project would exceed normally applied groundborne vibration criteria at nearby structures (see Table 4.10-3). No existing historic or fragile structures were identified in the project area. For purposes of this analysis, groundborne vibration levels would be considered to have a potentially significant impact if predicted levels would exceed 0.2 in/sec PPV with regard to human annoyance or 0.5 in/sec PPV for structural damage.

4.10.5 Project-Specific Impacts and Mitigation Measures

4.10.5.1 Noise

WOULD THE PROJECT RESULT IN THE GENERATION OF A SUBSTANTIAL TEMPORARY OR PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE VICINITY OF THE PROJECT IN EXCESS OF STANDARDS ESTABLISHED IN THE LOCAL GENERAL PLAN OR NOISE ORDINANCE, OR APPLICABLE STANDARDS OF OTHER AGENCIES?

N Impact 1: Construction activities for the proposed project would generate a substantial temporary increase in ambient noise levels and operation of the project would result in a permanent increase in ambient noise levels from warehouse and loading dock activities and an increase in roadway and vehicle traffic. Impacts would be significant and unavoidable (Class I).

Construction

The project would generate a short-term, intermittent increase in ambient noise during the construction phase of the project from demolition, site improvements, and construction of the distribution warehouse and business park center. Most construction activities would occur Monday through Saturday between the hours of 7:00 a.m. and 7:00 p.m. per Municipal Code Section 21.60.100 and would cover a period of approximately 18 months for Phase 1 and 5 months per building over a 5-year period for Phase 2. However, if air temperatures are too hot to cure concrete for the warehouse slab and walls, concrete pouring activities relative to the warehouse may occur during nighttime hours (between 7:00 p.m. and 7:00 a.m.), estimated by the Applicant to occur over a maximum period of approximately 65 contiguous nights.

As identified in Table 4.10-2, typical maximum construction noise levels range from approximately 77- to 90-dBA Lmax at 50 feet from the noise source and average-hourly noise levels associated with construction equipment generally range from approximately 72- to 82-dBA Leq at 50 feet from the noise source. During construction equipment use, typical equipment operating cycles involve 2 minutes of full power followed by 3 or 4 minutes at lower settings (AMBIENT 2022).

The nearest sensitive receptor location includes a residential dwelling, located directly adjacent to the western project boundary and proposed warehouse. Other nearby sensitive receptor locations include a residential dwelling located approximately 1,100 feet west of the western project site boundary and four residential dwellings located approximately 730 to 1,100 feet north of the northern project site boundary.

Assuming a minimum noise attenuation rate of 6 dB per doubling of distance from the source and the equipment noise levels noted above, construction-related noise levels could reach 80-dBA Leq at roughly 50 feet from onsite activities (at the nearest sensitive receptor location located adjacent to the western project site boundary) and 64-dBA Leq at roughly 400 feet. Therefore, depending on the type of construction activities being conducted, noise levels at sensitive receptor locations could potentially exceed 80-dBA Leq when more intensive activities, such as site grading, occur near the western boundary of the project site (AMBIENT 2022). Additionally, if air temperatures are too hot during the daytime hours of 7:00 a.m. and 7:00 p.m. to cure concrete for the warehouse slab and walls, concrete pouring activities relative to the warehouse may occur during nighttime hours (between 7:00 p.m. and 7:00 a.m.), estimated by the Applicant to occur over a maximum period of approximately 65 nights, which could result in nighttime noise levels that exceed 70-dBA Leq at the nearest sensitive receptor location.

Due the proximity of the nearest sensitive receptor location, there is potential for short-term construction-related noise to temporarily increase ambient noise levels that may result in disturbance, including the potential for nighttime disturbance from concrete slab and wall pouring during periods of high ambient air temperatures. In addition, with regard to residential land uses, noise levels associated with construction activities occurring during the more noise-sensitive evening and nighttime hours (7:00 p.m.–7:00 a.m.) are also of increased concern. Because exterior ambient noise levels typically decrease during the evening and nighttime hours, as community activities (e.g., commercial activities, vehicle traffic) decrease, construction activities performed during these more noise-sensitive periods of the day may result in increased annoyance and potential sleep disruption for occupants of nearby residential dwellings (AMBIENT 2022). Mitigation Measure N/mm-1.1 has been included to reduce short-term construction noise through implementation of construction noise best management practices. Additionally, the project includes the construction of a permanent 8- to 12-foot-tall masonry-block screening wall along the western, southern, and northern boundary of the warehouse portion of the project site to reduce noise from long-term warehouse and distribution activities; Mitigation Measure N/mm-1.1 requires that construction of the proposed wall occur prior to the start of building construction activities to reduce noise from the construction activities. Construction-related noise would be temporary and would not result in a permanent increase in ambient noise levels within the vicinity of the proposed project area. Further, construction-related noise would be reduced, to minimize disturbance to nearby sensitive receptor locations; however, because there is a sensitive receptor within 65 feet of the project site's western property line, there is no assurance that the temporary construction-related noise levels would be reduced to below significant. Therefore, construction-related noise impacts would be *significant and unavoidable.*

Operation

The project site is currently unoccupied; therefore, implementation of the proposed project would result in new long-term sources of ambient noise from activities, including, but not limited to, truck and vehicle transportation, warehouse activities, commercial uses, and business park uses.

PHASE 1 WAREHOUSE

New sources of noise associated with the proposed warehouse would be generated by loading dock activities, including the sounding of back-up alarms, material handling activities, forklift operations, and truck engine, air brake, and idling noise; operation of a trash compactor; and operation of a diesel fuel generator for the stormwater basin pump house. Loading dock operations are anticipated to generate average-hourly noise levels of approximately 65-dBA Leq at 50 feet, unenclosed trash compactors are anticipated to generate average-hourly noise levels that range of approximately 55-dBA Leq at 50 feet, and diesel pump engines are anticipated to generate average-hourly noise levels of approximately 65-dBA Leq at 50 feet (AMBIENT 2022). The proposed project includes the installation of a permanent 8- to 12-foot-tall screening wall constructed of concrete, masonry block, or material of similar density and with similar noise attenuation characteristics, along the western, southern, and northern boundary of the warehouse to shield loading dock areas and reduce associated noise.

As previously identified, the nearest sensitive receptor location is a residential dwelling, located directly adjacent to the western boundary of the project site. This sensitive receptor location would be located approximately 240 feet from the proposed warehouse loading dock and approximately 345 and 600 feet from the proposed trash compactor and diesel pump house, respectively. Assuming development of a minimum screening wall height of 8 feet and the proximity of the nearest sensitive receptor location, the highest predicted operational average-hourly noise levels at the nearest offsite residential dwelling would be approximately 47-dBA Leq. Additionally, predicted operational noise levels at other nearby offsite residential land uses, including those located approximately 730 to 1,100 feet north and 1,100 feet west of the project site and proposed onsite hotel and office uses, would be 40-dBA Leq, or less (AMBIENT 2022).

An increase in noise from traffic is further discussed below; however, based on the Transportation Impact Study prepared for the proposed project (CCTC 2022), the project would generate a total of approximately 766 tractor trailer (truck) trips per day, which would result in an average of approximately 16 trucks trips per hour over a 24-hour period. Based on reasonable assumptions and assuming a maximum of 16 trucks trips per hour located along the western loading dock of the warehouse, predicted operational noise levels could reach approximately 57-dBA Leq at the nearest residential sensitive receptor location (AMBIENT 2022).

The City's noise standards require that noise levels at noise-sensitive land uses (measured at the property line of the receiving use) do not exceed 50-dBA Leq during the daytime and 45-dBA Leq during the nighttime. Predicted operational noise levels at nearby offsite residential land uses, including those located approximately 730 to 1,100 feet north and 1,100 feet west of the project site and proposed onsite hotel and office uses, would not exceed the City's daytime and nighttime noise standards; however, predicted operational noise levels at the nearest residential sensitive receptor location, located directly west of the western project boundary, could reach levels of approximately 57-dBA Leq, which would exceed the City's applicable daytime and nighttime noise standards. Mitigation Measure N/mm-1.2 has been included to reduce operational noise where feasible. Implementation of Mitigation Measure N/mm-1.2 would reduce operational noise at the nearest sensitive receptor location to approximately 54-dBA Leq, which would still exceed the City's daytime and nighttime noise standards. Therefore, with implementation of Mitigation Measure N/mm-1.2, operational impacts related to an increase in ambient noise-levels near sensitive receptor locations would be *significant and unavoidable*.

PHASE 2 COMMERCIAL OFFICE, HOTEL, AND RETAIL USES

Noise levels associated with the Phase 2 commercial/industrial, office, retail, and hotel land uses primarily consist of vehicle activities within parking lots and the operation of building mechanical systems, including air heating, ventilation, and air conditioning (HVAC) systems and trash compactors.

Noise levels associated with building mechanical systems, such as larger air conditioning units and unenclosed trash compactors, can range from 60 to 79-dBA Leq at 5 feet. Assuming a maximum noise level of 79-dBA Leq at 5 feet and a noise attenuation rate of 6 dB per doubling of distance, predicted operational noise levels would be approximately 50-dBA Leq at approximately 150 feet and approximately 45-dBA Leq at 265 feet (AMBIENT 2022). As previously identified, the nearest sensitive receptor location includes a residential dwelling, located directly adjacent to the western project boundary and other nearby sensitive receptor locations include a residential dwelling located approximately 1,100 feet west of the western project boundary and four residential dwelling located approximately 730 to 1,100 feet north of the northern project boundary. Therefore, there are no offsite noise-sensitive land uses are located within 265 feet of the proposed Phase 2 land uses that would be adversely impacted by an increase in ambient noise levels associated with the proposed development of commercial land uses.

Proposed commercial/industrial land uses would not exceed the City's noise standards at offsite sensitive receptor locations; however, proposed commercial/industrial land uses would be located within 150 feet of the proposed hotel. Depending on the specific equipment to be installed, site design, and hours of operation, predicted operational noise levels associated with proposed commercial land uses have the potential to exceed the City's noise standard of 50-dBA Leq at the proposed onsite hotel. Mitigation Measure N/mm-1.3 has been included to reduce operational noise from proposed commercial land uses where feasible. With implementation of Mitigation Measure N/mm-1.3, operational noise from commercial/industrial land uses is not anticipated to result in exceedances of the City's noise standards at the proposed onsite hotel; therefore, impacts would be *less than significant with mitigation*.

PARKING LOTS

The proposed project includes multiple parking lots dispersed throughout the project site. In total, these parking areas would provide approximately 1,347 passenger vehicle parking spaces. The largest of the proposed parking lots would be located in the northern portion of the proposed project site, adjacent to the eastern portion of the proposed warehouse, providing approximately 925 spaces. The nearest offsite sensitive receptor location to the parking lot is located approximately 730 feet north of the northern project site boundary, which is approximately 800 feet north of the nearest proposed parking lot. Based on this distance and assuming that all parking spaces would be accessed over a one-hour period, predicted average-hourly noise levels at this nearest offsite residence would be approximately 30-dBA Leq, or less. Based on these same assumptions, predicted parking lot noise levels at the nearest proposed onsite land uses would be approximately 35-dBA Leq, or less. Operational noise levels associated with other smaller onsite parking areas would be less. Therefore, predicted parking lot noise levels would not exceed the City's daytime or nighttime noise standards at existing offsite or proposed onsite noise-sensitive land uses and impacts would be *less than significant*.

Roadway Traffic Noise

Implementation of the proposed project would result in an increase in truck and employee vehicle trips to and from the proposed project site. Typically, perceptible changes in ambient noise levels do not typically occur at levels below 3 dBA (AMBIENT 2022). Existing traffic noise levels and estimated increases associated with implementation of the proposed project for weekday and weekend conditions are summarized in Tables 4.10-7 and 4.10-8 .

Table 4.10-7. Predicted Increases in Existing Traffic Noise Levels (Weekdays)

Roadway	Predicted CNEL, 50 Feet from Near Travel Lane Centerline		Predicted Change	Significant Increase
	Without Project	With Project		
Airport Road (Buena Vista to Wing Way)	63.2	65.2	2.0	No
Airport Road (Wing Way to Dry Creek Road)	63.3	71.3	7.8	Yes
Airport Road (Dry Creek Road to SR 46)	65.4	72.0	6.6	Yes
Dry Creek Road (Airport Road to Jardine Road)	59.3	63.8	4.5	Yes
Jardine Road (north of Dry Creek Road)	65.1	66.0	0.9	No
Buena Vista Drive (west of Airport Road)	53.2	55.6	2.4	No
Buena Vista Road (north of SR 46)	65.6	66.3	0.7	No
Golden Hill Road (Wisteria Lane to Tractor Street)	58.6	58.5	0.7	No
Golden Hill Road (Tractor Street to SR 46)	65.1	66.0	0.9	No
Union Road (Golden Hill Road to Union Road Connector)	64.8	67.1	2.3	No

Source: AMBIENT 2022

As shown in Table 4.10-7, implementation of the proposed project would increase roadway and traffic noise above 3 dBA along Airport Road (Wing Way to Dry Creek Road), Airport Road (Dry Creek Road to SR 46), and Dry Creek Road (Airport Road to Jardine Road).

Table 4.10-8. Predicted Increases in Existing Traffic Noise Levels (Saturday and Sunday)

Roadway	Predicted CNEL, 50 Feet from Near Travel Lane Centerline		Predicted Change	Significant Increase
	Without Project	With Project		
Airport Road (Buena Vista to Wing Way)	59.4	62.7	3.2	No
Airport Road (Wing Way to Dry Creek Road)	59.7	69.8	13.1	Yes
Airport Road (Dry Creek Road to SR 46)	63.4	70.8	7.5	Yes
Dry Creek Road (Airport Road to Jardine Road)	52.7	61.4	8.7	Yes
Jardine Road (north of Dry Creek Road)	62.5	63.7	1.3	No
Buena Vista Drive (west of Airport Road)	49.9	53.4	3.5	Yes
Buena Vista Road (north of SR 46)	63.3	64.2	0.9	No
Golden Hill Road (Wisteria Lane to Tractor Street)	53.9	54.8	0.9	No
Golden Hill Road (Tractor Street to SR 46)	65.1	65.6	0.3	No
Union Road (Golden Hill Road to Union Road Connector)	63.3	65.8	2.5	No

Source: AMBIENT 2022

As shown in Table 4.10-7, implementation of the proposed project would increase roadway and traffic noise above 3 dBA along Airport Road (Wing Way to Dry Creek Road), Airport Road (Dry Creek Road to SR 46), and Dry Creek Road (Airport Road to Jardine Road) on weekdays and weekends, and along Buena Vista Drive (west of Airport Road) on Sundays. Based on Tables 4.10-7 and 4.10-8, implementation of the proposed project would result in predicted increases in existing traffic noise levels of up to approximately 72-dBA CNEL on weekdays and up to approximately 71-dBA CNEL on weekends. Increases in traffic noise levels above 3 dBA would occur along Airport Road (Wing Way to

Dry Creek Road), Airport Road (Dry Creek Road to SR 46), Dry Creek Road (Airport Road to Jardine Road), and Buena Vista Drive (west of Airport Road) (AMBIENT 2022).

Following implementation of the proposed project, predicted traffic noise levels along Airport Road (Wing Way to Dry Creek Road and Dry Creek Road to SR 46E) would increase to approximately 72-dBA CNEL at 50 feet from the near-travel-lane centerline. Existing land uses along this roadway segment consist predominantly of residential land uses, the nearest of which is located approximately 100 feet from the roadway. Based on this distance and assuming a noise attenuation rate of 6 dBA per doubling of distance, predicted traffic noise levels at the nearest residence would be approximately 67-dBA CNEL, which would exceed the City's exterior noise standard of 65-dBA CNEL. Other land uses located along Airport Road include the Wine Country RV Resort. Predicted traffic noise levels at the RV resort would be 66-dBA CNEL and would not exceed the City's noise standard for transient lodging of 70-dBA CNEL (AMBIENT 2022).

Along Dry Creek Road (Airport Road to Jardine Road), predicted traffic noise levels would increase to approximately 64-dBA CNEL at 50 feet from the near-travel-lane centerline. Land uses along this roadway segment consist predominantly of residential land uses, the nearest of which is located approximately 50 feet from the roadway (AMBIENT 2022). Therefore, predicted traffic noise levels at residences located along Dry Creek Road would not exceed the City's exterior noise standard of 65-dBA CNEL.

Predicted increases in traffic noise levels at the nearest existing residence located along Airport Road (between Dry Creek Road and SR 46E), would exceed the City's exterior noise standard of 65-dBA CNEL; therefore, implementation of the proposed project would result in a significant increase in traffic noise levels at nearby noise-sensitive land uses (AMBIENT 2022). Since the offsite residence located along Airport Road (between Dry Creek Road and SR 46E) is 50 feet from Airport Road, construction of a sound barrier sufficient to reduce predicted traffic noise levels to within acceptable levels would not be feasible due to existing driveway cuts and other features of the property's yards. No other mitigation measures were identified that would reduce this impact to a less-than-significant level. Therefore, this impact would be *significant and unavoidable*.

ROADWAY TRAFFIC NOISE AND PROPOSED LAND USES

Predicted roadway traffic noise levels at the project site's eastern boundary (along Airport Road) would be approximately 72-dBA CNEL. The nearest proposed onsite land uses include an office building located approximately 170 feet from Airport Road, and a proposed hotel located approximately 250 feet from Airport Road. The City's corresponding noise standards for new noise-sensitive land uses affected by roadway traffic noise is 65- and 70-dBA CNEL, respectively. Predicted roadway traffic noise levels would be approximately 61-dBA CNEL at the nearest proposed office building and approximately 57-dBA CNEL at the nearest proposed hotel building (AMBIENT 2022). Therefore, predicted roadway traffic noise levels would not exceed the City's noise standards and impacts would be *less than significant*.

Conclusion

Construction-related ambient noise would be short-term, intermittent, and reduced with implementation of Mitigation Measure N/mm-1.1; however, construction-related noise impacts affecting sensitive receptors to the immediate west cannot be reduced to less than significant with mitigation and a significant and unavoidable short-term noise impact would occur. Mitigation Measure N/mm-1.3 has been included to reduce operational noise from the Phase 2 land uses and is not anticipated to increase long-term ambient noise levels that could disturb occupants of the proposed onsite hotel. However, even with implementation of Mitigation Measure N/mm-1.2, predicted operational noise levels associated with the

proposed warehouse, including loading dock operations, trash compactors, and diesel pump motors, would still exceed the City's applicable daytime and nighttime noise standards as experienced by sensitive receivers to the west of the project site. Additionally, predicted increases in traffic noise levels at the nearest existing residence located along Airport Road (between Dry Creek Road and SR 46E), would exceed the City's exterior noise standard of 65-dBA CNEL that is not feasible to mitigate. Therefore, impacts related to an increase in long-term ambient noise would be *significant and unavoidable*.

N Impact 1 (Class I)	
Construction activities for the proposed project would generate a substantial temporary increase in ambient noise levels and operation of the project would result in a permanent increase in ambient noise levels from warehouse and loading dock activities and an increase in roadway and vehicle traffic.	
Mitigation Measures	
N/mm-1.1	*The following measures shall be implemented to reduce short-term construction noise impacts:* *1. The proposed screening wall to be located along the western boundary of the project site shall be constructed after the completion of onsite demolition, site preparation, and site grading activities for the Phase 1 Warehouse (Lot 32) and prior to the issuance of building permits for the Phase 1 Warehouse (Lot 32). (Note: per N/mm-1.2(3), if the loading docks are adjacent to the western property line, the wall shall be constructed to a minimum height of 12 feet above ground level as measured from the inside face of the wall and shall be constructed of concrete, masonry block, or material of similar density and usage.)* *2. Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday, where possible. Construction activities are prohibited on Sundays and legal holidays. In the event concrete pouring is necessitated during nighttime hours due to ambient air temperatures that are too hot to cure the concrete during daytime hours, the Applicant shall inform the occupants of the nearest offsite residence to the west a minimum of 30 days before nighttime construction commences and shall provide for alternative overnight accommodations (e.g., hotel room) for the occupants of the offsite residence to the west over the course of the nighttime work. Whether the occupants choose to accept the alternative overnight accommodations or not is beyond the control of the Applicant.* *3. Construction equipment shall be properly maintained and equipped with exhaust mufflers and engine shrouds in accordance with manufacturers' recommendations.* *4. To the extent locally available, electrified or alternatively powered construction equipment shall be used.* *5. Construction equipment staging areas shall be located at the furthest distance possible on the construction site from nearby noise-sensitive land uses.* *6. Stationary construction noise sources such as generators, pumps, and pavement crushers, shall be located at the furthest distance possible from noise sensitive uses.*
N/mm-1.2	*The following measures shall be implemented to reduce long-term exposure of sensitive receptors to stationary-source noise levels associated with the Phase 1 Warehouse:* *1. Warehouse loading docks shall be fitted with door seals and bumpers, which the City of Paso Robles (City) shall verify are included as part of the building permits issues for the warehouse. When loading docks are not in use, loading dock doors shall remain closed, which shall be made a requirement of the warehouse operator(s) lease agreement.* *2. Loading docks that service refrigerated warehouse space shall be equipped with electrical hookups for trailers equipped with transport refrigeration units (TRU) or*

N Impact 1 (Class I)	
	auxiliary power units to minimize truck idling, which the City shall verify will be included as part of the building permit issuance process. 3. *If loading docks are located adjacent to the western property line, or face the western property line without intervening development, the proposed screening wall shall be constructed to a minimum height of 12 feet above ground level. The proposed screening wall shall be constructed of concrete, masonry block, or material of similar density and usage.* 4. *The proposed trash compactors and diesel pump motor shall be enclosed.* 5. *The City shall require the preparation of acoustical assessments for the installation of major stationary noise sources (e.g., back-up power generators, air conditioning condensers) to be located within exterior areas and within 600 feet of a sensitive receptor. The acoustical assessments shall evaluate potential noise impacts to nearby noise-sensitive land uses. Where the acoustical analysis determines that stationary-source noise levels would exceed applicable noise standards of 50 A weighted decibel (dBA) energy-equivalent noise level (Leq) during the daytime and 45-dBA Leq during the nighttime at the project site property line, site-design features/noise-reduction measures shall be incorporated sufficient to reduce operational noise levels to below these applicable noise standards. Such measures may include, but are not limited to, the incorporation of setbacks of from the property line to the stationary noise source, installation of sound barriers, the imposition of operation limitations on equipment producing stationary source noise during nighttime hours, or the provisions of equipment enclosures.*
N/mm-1.3	*The following measures shall be implemented to reduce long-term exposure to stationary-source noise levels associated with the Phase 2 Commercial Office, Hotel, and Retail Uses:* 1. *For development proposed within 150 feet of the hotel planned in the Phase 2 area, the City of Paso Robles (City) shall require acoustical assessments to be prepared and submitted for City review and approval as part of the land use or building permit approval process. The acoustical assessments shall evaluate potential noise impacts to the hotel if it exists or the planned hotel site if the hotel has not yet been constructed. Where the acoustical analysis determines that stationary source noise levels would exceed applicable noise standards, site-design features/noise-reduction measures shall be incorporated sufficient to reduce operational noise levels to below applicable noise standards. Such measures may include but are not limited to, the incorporation of setbacks from the hotel to the stationary noise source, the installation of sound barriers, the imposition of operational limitations on equipment producing stationary source noise during nighttime hours, or the provision of equipment enclosures. The emphasis of such measures shall be placed upon site planning and project design.*
Residual Impacts	
With implementation of mitigation measure N/mm-1.1, impacts associated with construction-related noise would be significant and unavoidable. The proposed screening wall to be constructed along the western boundary of the project site (see Figure 4.10-2) would reduce construction-generated noise levels at the nearest residential land use by approximately 8 dBA. Additional measures would also be required to further reduce the potential for noise exposure, including the use of alternatively powered equipment, exhaust mufflers, and engine shrouds. Implementation of these noise-reduction features can reduce construction noise levels by approximately 10 dBA, or more. However, there is no assurance that the temporary construction-related noise levels would be reduced to below significant. Therefore, impacts would remain significant unavoidable *With implementation of Mitigation Measure N/mm-1.2, operational noise from the warehouse would be reduced where feasible; however, the project would still result in impacts related to the generation of a permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, impacts would remain significant unavoidable.*	

N Impact 1 (Class I)
With implementation of Mitigation Measure N/mm-1.3, operational noise from commercial/industrial land uses is not anticipated to result in exceedances of the City of Paso Robles' noise standards at the proposed onsite hotel. Therefore, impacts would be less than significant with mitigation

WOULD THE PROJECT RESULT IN GENERATION OF EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS?

N Impact 2: The project would not result in the generation of excessive short- or long-term groundborne vibration or noise levels. Impacts would be less than significant (Class III).

Typically, groundborne noise and groundborne vibration occurs as a result of the excitation of a structure or surface. Most types of typical construction equipment generally do not create groundborne noise or vibration that is perceptible to humans. Construction equipment that has the potential to generate groundborne noise includes large bulldozers, loaded trucks, jackhammers, and small bulldozers. Proposed construction activities associated with the project would require the use of various tractors, trucks, and jackhammers that could result in intermittent increases in groundborne vibration levels. The use of major groundborne vibration-generating construction equipment/processes (i.e., blasting, pile driving) is not anticipated to be required for construction of future onsite land uses. Groundborne vibration levels generated by construction equipment would have a PPV of approximately 0.09 in/sec, or less, at 25 feet. Therefore, predicted groundborne vibration levels are not reasonably expected to exceed the minimum recommended criteria for structural damage (0.5 in/sec PPV) or human annoyance (0.2 in/sec PPV) at nearby land uses (AMBIENT 2022).

During operation, the project would generate an increase in loaded truck trips for distribution activities. Loaded trucks generate a PPV of approximately 0.076 in/sec and would not exceed the minimum recommended criteria for structural damage (0.5 in/sec PPV) or human annoyance (0.2 in/sec PPV) at nearby land uses. In addition, based on the evaluation of existing development surrounding the project area, no major stationary sources of groundborne vibration were identified that would result in the long-term exposure of proposed onsite land uses to unacceptable levels of ground vibration (AMBIENT 2022). Construction and operation of the proposed project would not exceed the minimum recommended criteria for structural damage or human annoyance related to groundborne noise and/or groundborne vibration; therefore, potential impacts would be *less than significant*.

N Impact 2 (Class III)
The project would not result in the generation of excessive short- or long-term groundborne vibration or noise levels.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with the generation of excessive groundborne vibration or groundborne noise levels would be less than significant.

FOR A PROJECT LOCATED WITHIN THE VICINITY OF A PRIVATE AIRSTRIP OR AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?

N Impact 3: The project is located within the vicinity of an airport; however, aircraft noise levels would be below the established exposure threshold for interior and exterior areas for noise-sensitive land uses and implementation of the proposed project would not expose people residing or working in the project area to excessive noise levels. Impacts would be less than significant (Class III).

The acceptable aircraft noise-exposure levels for noise-sensitive urban land uses are 65-dBA CNEL/Ldn for exterior areas and 45-dBA CNEL/Ldn for interior areas (AMBIENT 2022). According to the ALUP, the project site is primarily located in Safety Zone 5, which is located within the 55 dB CNEL airport noise contour, which is less than the acceptable aircraft noise-exposure level for exterior areas (City of Paso Robles 2006). The project would result in the development of a distribution and warehousing center, business park uses, a hotel, visitor-serving uses, and commercial and office space, which are moderately sensitive land uses.

New development associated with the proposed project would be required to comply with current building standards, including the CCR Title 24, to ensure the average exterior-to-interior noise reduction for proposed new development would be approximately 25 dBA. Based on this reduction and assuming an exterior noise level of 55-dBA CNEL/Ldn, predicted interior noise levels for proposed development would be approximately 30-dBA CNEL/Ldn. Additionally, with a maximum exterior noise level of 65-dBA CNEL/Ldn, predicted interior noise would be 40-dBA CNEL/Ldn, which is less than the acceptable aircraft noise-exposure levels for sensitive urban land uses (AMBIENT 2022). Therefore, aircraft noise levels at proposed development areas would not exceed commonly applied noise-level standards of 65-dBA CNEL/Ldn for exterior areas or 45-dBA CNEL/Ldn for interior areas and impacts would be *less than significant*.

N Impact 3 (Class III)
The project is located within the vicinity of an airport; however, aircraft noise levels would be below the established exposure threshold for interior and exterior areas for noise-sensitive land uses and implementation of the proposed project would not expose people residing or working in the project area to excessive noise levels.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to exposure of people or workers to excessive aircraft noise levels would be less than significant.

4.10.6 Cumulative Impacts

Past, present, and reasonably foreseeable projects in and around the city have the potential to expose people to an increase in ambient noise, vibration, and airport noises. Construction of reasonably foreseeable present and future projects have the potential to increase short-term ambient noise; however, construction-related noise generated by reasonably foreseeable present and future projects would be short-term, intermittent, and required to comply with the City's Municipal Code Section 21.60.100 for acceptable construction hours. Reasonably foreseeable present and future projects would be subject to separate environmental review to determine potential sources of short- or long-term increases in ambient noise levels that may exceed established City noise standards and would be required to reduce noise impacts where feasible. Project-specific construction-related noise impacts have been mitigated to a less-than-significant level; however, with implementation of mitigation to reduce operational noise where feasible, operational noise and traffic-related noise generated by the proposed project would result in a permanent increase in ambient noise levels within the vicinity of the project. Therefore, other reasonably foreseeable future projects within the vicinity of the proposed project have the potential to add to this increase in ambient noise levels, which would further exceed the City's established noise standards. Therefore, cumulative impacts would be significant and unavoidable.

Project-specific impacts related to the generation of groundborne noise and groundborne vibration and the exposure of project occupants to excessive aircraft noise would be less than significant, and no mitigation is required. Typical construction activities do not generate groundborne noise or vibration in a manner that would be perceptible to humans; therefore, other reasonably foreseeable future projects are not anticipated to result in significant impacts related to the generation of groundborne noise or groundborne vibration. Nevertheless, reasonably foreseeable present and future projects would be subject to separate environmental review to determine potential sources of groundborne noise and groundborne vibration that and to reduce potential impacts as necessary. Additionally, reasonably foreseeable future projects within the vicinity of the Paso Robles Municipal Airport would be required to comply with the ALUP and applicable building code standards to reduce airport-related noise disturbances to project occupants. Reasonably foreseeable present and future projects would be subject to separate environmental review to determine the project's consistency with the ALUP and to reduce potential impacts related to exposure of aircraft noise as necessary. Therefore, impacts related to the generation of groundborne noise and groundborne vibration and the exposure of project occupants to excessive aircraft noise would be less than cumulatively considerable.

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4.11 POPULATION AND HOUSING

This section discusses the City's existing population and housing inventory and evaluates the potential for the proposed project to result in impacts related to unplanned population growth and displacement of people or housing. Population, housing, and employment data are available on a state, regional, county, and city level. This EIR uses data collected and provided at the city level and compares it to state and county trends.

4.11.1 Existing Conditions

4.11.1.1 Population

The City's LUE, adopted in 2003 and updated in 2014, established a population planning threshold of 44,000 persons based on the existing number of dwelling units and the maximum number of potential dwelling units authorized by the LUE and assumption of 2.66 persons per household. The 2014 LUE update projects that the population of the city will be approximately 34,400 persons in 2025, 37,700 persons in 2030, 41,900 persons in 2040, and 42,800 persons in 2045. The LUE projects the number of dwelling units within the city will be approximately 13,602 in 2025, 14,993 in 2030, 16,586 in 2040, and 16,924 in 2045 (City of Paso Robles 2014).

In 2020, the city of Paso Robles had a population of approximately 31,490 persons, which represents a growth rate of 5.7% over the 2010 population; this population growth was slightly higher than the county growth rate and slightly lower than the state growth rate of the same period (U.S. Census Bureau 2019, 2020). Table 4.11-1 shows population growth in the city, county, and state since census year 2010. SLOCOG estimates that the city's population will increase by 6,299 residents by 2050 (SLOCOG 2017).

Table 4.11-1. Population Growth in the City, County, and State

Year	Paso Robles	San Luis Obispo County	California
2010	29,747	269,597	37,254,519
Current (2019)	31,490 (2020)	283,111	39,512,223
Percent Change	5.7%	5.0%	6.1%

Source: U.S. Census Bureau (2019)

4.11.1.2 Housing Supply

The City estimates there were 11,711 housing units within the city in 2019 and that, based on the City's Housing Element buildout conditions, there is potential for 2,752 single-family units, 2,355 multi-family units, 2,010 fractional multi-family units, and 345 surplus units for a total of 16,818 potential housing units. Since 2018, 1,947 extremely low/very low-, low-, moderate-, and above moderate-income housing units have been approved (City of Paso Robles 2020). This is largely in part due to the approval of the Olsen-South Chandler Ranch Specific Plan, which is expected to break ground in fall 2021. An additional 911 housing units in the Beechwood Specific Plan project area were approved in October 2020, after publication of the Housing Element, and are not included in the above 1,947 count. As shown in Table 4.11-2, there is a 57.3% owner-occupied housing unit rate within the city.

The project site currently includes 12 youth dormitories and six residential homes formerly occupied by staff members, which are all vacant.

Table 4.11-2. Paso Robles Housing Inventory

	Paso Robles	San Luis Obispo County	California
2019 Housing Units	11,711	123,963	14,366,336
2019 Owner-Occupied Housing Unit Rate	57.3%	61.6%	54.8%
2021 Vacancy Rate[1]	3.6%	12%	7.6%

Source: U.S. Census Bureau (2019); City of Paso Robles (2020); California Department of Finance (DOF) (2021)

[1] The 2019 and 2021 City and County vacancy rates are within 0.1% of each other and the state vacancy rate is the same.

4.11.1.3 Employment

The current number of employees in Paso Robles is approximately 15,043 (Paso Robles Chamber of Commerce 2021). The California Employment Development Department (EDD) projects that the total number of jobs in San Luis Obispo County will increase by 12,600 between 2018 and 2028, a 9.5% increase (EDD 2018).

According to the U.S. Bureau of Labor Statistics (BLS), the average hourly wage for the county is $27.09, which is consistent with the nationwide average of $27.07 (BLS 2020). According to the EDD, as of June 2021, the county's unemployment rate is 5.8%, compared to the state's unemployment rate of 8.0% and the national rate of 6.1% (EDD 2021). The unemployment rate is higher than the typical rate (3.8% in 2018) due to the Coronavirus Disease 2019 (COVID-19) pandemic.

4.11.1.4 Jobs-to-Housing Balance

Jobs-to-housing balance refers to the ratio of the number of jobs to the number of housing units in a given community, city, or region. Typically, a ratio close to 1.00 means a community has a close number of jobs as it relates to the amount of housing to support the workforce. A community with a ratio below 1.00 suggests a community may have more housing than jobs, and a community with a ratio above 1.00 may suggest a community has more jobs than it does housing. This scenario is not always accurate, but a 1.00 ratio typically suggests a balanced community as it relates to jobs and housing (SLOCOG 2019). The jobs-to-housing ratio for the city of Paso Robles was modeled using the SLOCOG Regional Land Use Model and estimated the job-to-housing ratio in the city is 1.27 and is 0.95 in the region (SLOCOG 2019; CCTC 2022).

4.11.2 Regulatory Setting

4.11.2.1 Federal

There are no applicable federal regulations relevant to the proposed project.

4.11.2.2 State

4.11.2.2.1 STATE HOUSING ELEMENT STATUTES

Since 1969, the State of California (State) requires that all local governments adequately plan to meet the housing needs of everyone in the community. Local governments meet this requirement by adopting Housing Elements as part of the local General Plan, which is also required by the State. The California Department of Housing and Community Development (HCD) is responsible for reviewing local governments' Housing Elements to determine if it is compliant with State law. Following approval from the HCD, a local government may adopt its Housing Element. Jurisdictions may opt to update their

Housing Element every 5 to 8 years. California is currently in its sixth Housing Element update cycle. The City adopted the current Housing Element in December 2020.

4.11.2.3 Local

4.11.2.3.1 REGIONAL HOUSING NEEDS ASSESSMENT

California's Housing Element law requires that each county and city develop local housing programs to meet their "fair share" of existing and future housing growth needs for all income groups, as determined by the DOF. SLOCOG is tasked with distributing the total State-projected housing need for the San Luis Obispo region among SLOCOG's seven cities and the county's unincorporated communities by four income categories—extremely low and very low, low, moderate, and above moderate. This fair-share allocation is referred to as the RHNA process. This RHNA allocation represents the minimum number of housing units by income level each community is required to plan for through a combination of: (1) zoning "adequate sites" at suitable densities that foster affordability; and (2) housing programs to support retention, rehabilitation, and production of lower income units with a reasonable degree of entitlement certainty. The allocation from the SLOCOG RHNA Plan (SLOCOG 2019) for Paso Robles, covering 2020 through 2028 and distributed among the four income categories, is shown in Table 4.11-3.

Table 4.11-3. Paso Robles Regional Housing Needs Assessment 2020–2028

Income Group	RHNA Allocation (units)	% of Total
Very Low	356	24.6%
Low	224	15.5%
Moderate	259	17.9%
Above Moderate	607	42.0%
Total	**1,446**	**100.0%**

Source: SLOCOG (2019)

4.11.2.3.2 CITY OF EL PASO DE ROBLES GENERAL PLAN 2003

Land Use Element

The LUE provides for the opportunity for infill development within the city limits and expansion of the city limits to incorporate potential annexation areas. The most recent LUE update occurred in 2014 (City of Paso Robles 2014). The 2014 LUE update accounts for the annexation of the Olsen-South Chandler Ranch, Beechwood, and Linne Road (Our Town) properties, which increased the city limits to 19.9 square miles. The LUE consists of goals and policies for development within the city based on population and housing projections. The following LUE goals and policies are specific to population and housing:

Goal LU-1 **Land Uses.** Strive to maintain a balanced community, where the majority of residents can live, work, and shop.

Policy LU-1A **Land Use Categories.** Provide an appropriate mix and diversity of land uses.

Goal LU-2 **Image/Identity.** Maintain/enhance the City's image/identity.

Policy LU-2F **Planning Impact Area (PIA).** Maintain and periodically update a Planning Impact Area (PIA) to indicate the

maximum potential geographical boundaries to which the city may grow in the foreseeable future (within the 2003-2025 planning period and beyond) or areas within which development patters would have an immediate impact upon the City, and identify land use categories that would be assigned if unincorporated land were annexed.

Policy LU-2I **Infill.** Encourage infill development as a means of accommodating growth, while preserving open space areas, reducing vehicle miles traveled, and enhancing livability/quality of life. Infill includes:

1. Mixed use development in the Downtown and/or in areas within walking distance to transit, employment centers, and commercial services where the environmental impacts of the development would be minimized;
2. Residential infill in/near established neighborhoods;
3. Increased densities on sites which can accommodate the increases without having an adverse effect on adjacent properties;
4. Targeted residential infill to help address the needs of Cuesta College students and employees, City and school district employees, seniors, lower income households and other special needs groups; and rehabilitation of older apartment complexes.

Housing Element

In accordance with the State Housing Element Statutes, the City submitted its sixth cycle Housing Element to the HCD in August 2020. Prior to submission to the HCD, the City's Planning Commission and City Council reached out to the public, local stakeholders (developers, service providers, neighboring jurisdictions, and housing advocates), and other interested parties in order to promote public participation and ensure the housing concerns of low- and moderate-income and special needs residents were specifically addressed.

The City adopted the Housing Element in December 2020, for the December 31, 2020, to December 31, 2028, period. The Housing Element is a mandatory General Plan Element that sets forth long-term goals and policies and defines specific programs to meet the housing needs of all economic segments in the community. The Housing Element update identifies strategies and programs to: (1) encourage the development of a variety of housing opportunities; (2) provide housing opportunities for persons of lower and moderate incomes; (3) preserve the quality of the existing housing stock in Paso Robles; (4) minimize governmental constraints; and (5) promote equal housing opportunities for all residents.

The following Housing Element goals and policies are intended to preserve affordable units and ensure all housing types to all persons in Paso Robles as follows:

Goal H-1 Develop a range of housing types, densities, and affordability levels to meet the diverse needs of the community, maintain a balanced supply of ownership and rental units.

Policy H-1.1 Provide an adequate number of housing sites to accommodate the City's share of regional housing needs and its special housing needs.

Policy H-1.2 Implement land use policies and standards that allow for a range of residential densities and products that will enable households of all types and income levels the opportunity to find suitable ownership and rental housing.

Goal H-2 Assist in the development of adequate housing to meet the needs of extremely low-, very low-, low-, and moderate-income households.

Policy H-2.1 Facilitate housing development affordable to lower-income households by providing technical assistance, regulatory incentives and concessions, and financial resources as funding permits. San Luis Obispo County and all seven cities are working collaboratively to develop the region's first Regional Infrastructure and Housing Strategic Action Plan (Regional Plan) to identify actions to address future planning issues including inadequate supply of affordable housing and the need to ensure resilient water, wastewater, and transportation infrastructure and resources. The following policies are included in the City's LUE toward the regional collaborative effort towards affordable housing:

R-1 Promote awareness and support of regional efforts that further housing and infrastructure resiliency by utilizing community engagement, and consistent and transparent communication.

R-2 Encourage an adequate housing supply and resilient infrastructure, services, and resources to improve the balance of jobs and housing throughout the Region.

R-3 Develop inter-agency partnerships as appropriate to implement goals and policies related to housing and infrastructure.

R-4 Coordinate State, federal, and other funding opportunities for housing and infrastructure development throughout the Region.

R-5 Encourage developers to sell newly constructed housing units to individuals residing or employed within the area of the development (a city or the County) first before selling to individuals from outside the County, to promote local preference.

R-6 Encourage rental units be prioritized for long-term residents rather than short-term users or vacation rentals.

R-7 Support housing development that is located within existing communities and strategically planned areas.

R-8 Encourage regional collaboration on a menu of housing types, models, and efforts to support streamlined approvals for such developments (i.e., Accessory Dwelling Units, etc.).

4.11.3 Thresholds of Significance

The following thresholds are based on Appendix G of the State CEQA Guidelines. For purposes of this EIR, impacts related to population and housing are considered significant if implementation of the proposed project would:

a. Induce substantial unplanned population growth either directly or indirectly; or

b. Displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere.

As discussed in the IS/NOP, the City determined the proposed project would not result in displacement of substantial numbers of housing or people and would not result in the need for construction of replacement housing elsewhere. Therefore, this threshold is not discussed further in the EIR. See *Appendix A, Initial Study and Notice of Preparation*, for more information.

4.11.4 Impact Assessment and Methodology

State CEQA Guidelines Section 15064(e) states that an economic or social change by itself would not be considered a significant effect on the environment unless they lead to an adverse physical effect on the environment. Projects that result in population growth are generally not considered to have a significant impact on the environment unless the growth is unplanned and also results in significant physical impacts (e.g., such as the need for new infrastructure). For purposes of this analysis, "substantial" population growth is defined as growth exceeding SLOCOG regional growth forecasts.

Population and housing trends in the city were evaluated by reviewing the most current data available from the U.S. Census Bureau and DOF, as well as the current General Plan and SLOCOG RHNP, as discussed above. Under CEQA, impacts related to population would be considered significant if an increase in population would be directly associated with a physical change, which may include inducing substantial population growth that would require new or expanded infrastructure or displace a number of people and housing units that would require construction of new housing elsewhere.

Growth-inducing impacts are addressed and discussed in *Chapter 5, Other CEQA Considerations*.

4.11.5 Project-Specific Impacts and Mitigation Measures

WOULD THE PROJECT INDUCE SUBSTANTIAL UNPLANNED POPULATION GROWTH EITHER DIRECTLY OR INDIRECTLY?

PH Impact 1: The project would not result in direct unplanned population growth. Impacts would be less than significant (Class III).

The proposed project would not have a direct impact on population growth in the city because it does not propose the development of new residential units. Additionally, the ALUP prohibits new residential development within the ALUP planning area, which includes the project site, and the AP zone designation that would apply to the project site does not permit or conditionally permit residential units.

Therefore, the project would not directly create housing opportunities that would lead to population growth and impacts would be *less than significant*.

PH Impact 1 (Class III)
The project would not result in direct unplanned population growth.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with unplanned population growth would be less than significant.

PH Impact 2: Construction-related activities would necessitate up to 1,052 construction workers. These workers would not induce substantial unplanned population growth because their duration at the project site would be short-term and/or temporary. Impacts would be less than significant (Class III).

The proposed project has the potential to result in new short-term sources of employment during the 6-year construction period. As noted in *Chapter 2, Project Description*, the proposed project would employ approximately 539 construction workers during construction of the Phase 1 development, with an estimated 350 workers on-site at any one time. Phase 2 buildout is anticipated over a 5-year period and would be based on market demand. It is anticipated that full buildout of Phase 2 would require approximately 513 construction workers, with significantly fewer construction workers on-site at any one time than Phase 1 (BW Research Partnership 2021). These employees would likely be sourced from the local construction industry or would commute from the surrounding central California region. Construction workers typically commute to job sites throughout their home-based region. Additionally, many construction workers are specialized in some skill (e.g., plumbers, steel workers, etc.) and are only on a specific job site for a limited duration to exercise their skill, and generally are not on-site for the entire construction duration. In some instances, workers may seek transient lodging options (e.g., hotels, motels) for some or all of the construction duration. The employment generated by the construction of the proposed project would be temporary and is not expected to result in significant permanent relocation of workers into the city. Therefore, impacts would be *less than significant*.

PH Impact 2 (Class III)
Construction-related activities would necessitate up to 1,052 construction workers. These workers would not induce substantial unplanned population growth because their duration at the project site would be short-term and/or temporary.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with unplanned population growth due to construction-related activities would be less than significant.

PH Impact 3: The project would increase the City's job-to-housing ratio by creating more permanent jobs and not creating new housing units. The increase in the job-to-housing ratio would not result in adverse physical changes to the environment or unplanned population growth. Impacts would be less than significant (Class III).

The city's population was 31,490 in 2020, is projected to be 34,400 in 2025, and continues to trend upward with a projected population of 42,800 in 2045 (U.S. Census Bureau 2020; City of Paso Robles 2014). According to the LUE, the City has planned for a total buildout population of 44,000 in 2045 or later (City of Paso Robles 2014). The 2020 population of Paso Robles is generally consistent with the population projections included in the LUE.

The proposed project is limited to construction and operation of industrial, commercial, and professional land uses; however, it has the potential to induce indirect population growth in the proposed project area through the establishment of new businesses that would create new sources of employment.

The proposed project would generate new long-term sources of employment through the creation of new businesses and job sectors. Full buildout of the proposed project is anticipated to result in approximately 3,561 new employees (BW Research Partnership 2021; CCTC 2022). Based on the EDD projections for employment growth, an increase of 12,600 jobs is anticipated in San Luis Obispo County by 2028.

The proposed Phase 1 warehouse would employ approximately 1,200 workers. According to the BLS, warehouse workers in the county earn wages that are below the county's average wage of $27.07 per hour, averaging around $18.89 per hour (transportation and material moving occupation group) (BLS 2021). While exact Phase 2 businesses are unknown at this time, food and beverage and restaurant workers in the county earn approximately $15.02 per hour and retail and sales workers earn approximately $20.50. As a result, lower-wage workers typically commute longer distances to go to work. U.S. Census Bureau data indicates that employees that work in Paso Robles and earn less than $1,250 per month are 10% more likely to commute more than 25 miles to work than employees earning $3,333 per month (U.S. Census Bureau 2019). Additionally, the north county region, which includes the city, is currently experiencing a jobs-to-housing imbalance, wherein there are currently more housing units than there are jobs available. For this reason, north county communities are known as "bedroom communities," wherein residents must travel out of the region for employment (often to San Luis Obispo, which has a high jobs-to-housing ratio with more jobs than housing units). The addition of jobs created by this project would increase the jobs-to-housing ratio and bring it closer to the goal ratio of 1 (one job per housing unit). Therefore, it is anticipated that many of the new employees generated by implementation of the proposed project may commute from outside the city or county from lower average wage-earning communities and are not expected to reside in or require housing within the county or city. In addition, currently unemployed or lower-wage workers within the local workforce (city and county) would likely fill new warehouse positions and would not require permanent housing within the city.

Given the county's unemployment rate of 5.8% (approximately 7,600 persons), the job opportunities created by the proposed project could potentially be accommodated by existing unemployed county residents. Additionally, it is reasonable to anticipate that a number of workers currently residing in the city employed in lower-wage occupations (e.g., food preparation and service [$15.02 per hour], farming [$15.18 per hour]) would seek the relatively higher-paying employment opportunities provided by the proposed project (BLS 2021). In turn, these vacated jobs would likely be backfilled primarily by workers who commute into the area or already reside in the area and are unemployed. It is unlikely that workers would move into the area to obtain these lower-paying opportunities, especially given the shortage of housing and affordable housing.

The north county region, which includes the city, had a 2015 job-to-housing ratio of 0.44 and the county's current job-to-housing ratio was 0.99 (SLOCOG 2019). According to the USEPA, a job-to-housing ratio of 0.75 to 1.5 is beneficial for reducing VMT and associated GHG and air quality emissions (USEPA 2014). Both the region and county have job-to-housing ratios that fall within the 0.75 to 1.5 range. Implementation of the project would create demand for 1,052 short-term (construction) jobs and 3,561 long-term jobs and is not anticipated to significantly skew the city or regional job-to-housing ratio in a manner that would exceed a ratio of 1.5. As discussed in *Chapter 3, Environmental Setting*, there are other planned and approved housing projects within the city that would ultimately maintain a job-to-housing ratio between 0.75 and 1.5. Therefore, the proposed project would not result in adverse environmental impacts associated with a significantly skewed jobs-to-housing ratio. Impacts of the project related to air quality and GHG emissions and VMT are discussed further in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, and *Section 4.13, Transportation*, respectively.

Although full buildout of the proposed project is anticipated to result in 3,561 new employees, it is also anticipated that the majority of the workers would not reside within the city, which could induce permanent population growth or require permanent housing. As previously mentioned, according to the LUE, the planned buildout population of the city is 44,000 in the year 2045 or later. The 2019 population of Paso Robles was 32,153, which is below the planned full buildout population (U.S. Census Bureau 2019). Therefore, a slight increase in population from some new workers generated by the proposed project would be consistent with planned population growth within the city. A slight increase in population may increase the use of other city resources, including public services, which is further evaluated in *Section 4.12, Public Services and Recreation*.

Although the proposed project may result in a slight increase in population through development of new businesses, the increase would be consistent with the LUE population projections and impacts would be *less than significant*.

PH Impact 3 (Class III)
The project would increase the City's job-to-housing ratio by creating more permanent jobs and not creating new housing units. The increase in the job-to-housing ratio would not result in adverse physical changes to the environmental or unplanned population growth.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with indirect population growth would be consistent with the City's LUE and impacts would be less than significant.

4.11.6 Cumulative Impacts

The potential for the proposed project to induce new growth is discussed in *Chapter 5, Other CEQA Considerations*. The proposed project does not propose new residential units that could directly induce population growth within the city; however, implementation of the project would result in new short- and long-term employment opportunities that may result in indirect population growth within the city. However, as previously mentioned, full buildout of the proposed project is anticipated to result in 3,134 new employees. It is also anticipated that the majority of new warehouse workers would not reside within the city, which could induce permanent population growth or require permanent housing. As previously

mentioned, according to the LUE, the planned buildout population of the city is 44,000 in the year 2045 or later. The 2020 population of Paso Robles was 31,490, which is below the planned full buildout population (U.S. Census Bureau 2020). Therefore, a slight increase in population from any new workers generated by the proposed project would be consistent with planned population growth within the city. Buildout would be consistent with the LUE and any indirect population growth would be consistent with the estimated population projections. Therefore, the proposed project would not contribute to a significant cumulative impact related to population growth or housing displacement in the city or in the greater cumulative impact analysis area (San Luis Obispo County).

4.12 PUBLIC SERVICES AND RECREATION

This section discusses existing public services and recreation facilities and evaluates the project's potential impacts on fire protection, police protection, schools, libraries, and recreational facilities. For information regarding public transportation and roadways, see *Section 4.13, Transportation*, and for public utilities, such as water, wastewater, solid waste, and energy utilities, see *Section 4.14, Utilities, Service Systems, and Energy*.

4.12.1 Existing Conditions

4.12.1.1 Public Services

4.12.1.1.1 FIRE PROTECTION

The City of Paso Robles Fire and Emergency Services Department (Paso Robles Emergency Services) provides emergency medical and fire protection services to the city. Paso Robles Emergency Services has automatic and mutual aid contractual agreements with CAL FIRE and the other surrounding municipal departments for emergency response to areas outside, but in close proximity to the city. According to the *Paso Robles Fire and Emergency Services 2020 Annual Report*, there are two fire stations serving the city and planned Fire Station 3 to be constructed in 2021. The nearest Paso Robles Emergency Services station to the project site is Paso Robles Fire Station Number 2, located approximately 4.4 miles south of the site. Future Fire Station 3 would be located approximately 1.4 miles south of the site (Paso Robles Emergency Services 2020). The City prepared and adopted a MND for Station 3 in summer 2021 and commenced construction in September 2021; construction is expected to be completed in August 2023. CAL FIRE Station 98 is located adjacent to the project site, in the northeast corner of the parcel. However, this station is a maintenance facility and is staffed with a state fire engine only during wildfire season; when staffed, the fire engine is often out of the county responding to wildfires, and therefore cannot be counted on for response to incidents within the city. Based on correspondence with Paso Robles Emergency Services, current average response times to calls within the city are 7 minutes from the existing fire stations (Fire Stations 1 and 2) and would be reduced to 5 minutes with the inclusion of the proposed station (Fire Station 3) (Paso Robles Emergency Services 2021). Paso Robles Emergency Services supports 39 sworn employees, 33 of whom are firefighters, and two civilian employees to serve the community. The LUE calls for a ratio of 0.8 to 1.3 firefighters per 1,000 residents (City of Paso Robles 2014b). Based on the city's 2020 population of 31,490 people approximately 26 firefighters are needed to provide at least 0.8 firefighters for each 1,000 residents, and approximately 41 firefighters are needed to provide 1.3 firefighters for each 1,000 residents.

The 2001 *Growth Management Plan* and 2003 *City of Paso Robles General Plan Safety Element* include an adopted response time goal of 4 minutes or less at least 90% of the time (Paso Robles Emergency Services 2020). This goal was achieved 56% of the time, with an average response time of 5 minutes 24 seconds in 2020. In 2020, Paso Robles Emergency Services received 3,625 calls, with Fire Station 1 responding to 2,109 calls and Fire Station 2 responding to 1,516 calls; 179 of these calls were instances of simultaneous calls. The current fire department services have a utilization rate of 122 incidents per 1,000 population. This rate is higher than a typical community of similar size due to the high number of citizens over 50 years in age (Paso Robles Emergency Services 2020). It is estimated that by 2029, Paso Robles Emergency Services will reach 6,049 calls and responses and future incidents will increase to 7,722 calls annually following implementation of projects identified in the "2020 Project Pipeline," which identifies approved and proposed future projects for buildout of the city (Paso Robles Emergency Services 2020).

Wildfire hazards are discussed in *Section 4.8, Hazards, Hazardous Materials, and Wildfire*.

4.12.1.1.2 POLICE PROTECTION

Police protection in the city of Paso Robles is provided by the Paso Robles Police Department (PRPD). The PRPD service area consists of over 19.9 square miles with a service population of approximately 32,496 (City of Paso Robles 2018; PRPD 2021). PRPD's police station is located approximately 4.7 miles southwest of the project site at 900 Park Street. Based on correspondence with the PRPD, in 2020, the PRPD authorized 39 sworn and 21 non-sworn staff, which equates to a staffing level of 1.2 sworn police personnel per 1,000 residents (PRPD 2021). The LUE calls for a ratio of 1.4 to 1.6 sworn police personnel per 1,000 residents (City of Paso Robles 2014b). Based on correspondence with the PRPD, based on the city's current population of 31,490 people, approximately 45 police personnel are needed to provide at least 1.4 sworn police personnel for each 1,000 residents, and approximately 51 police personnel are needed to provide 1.6 sworn police personnel for each 1,000 residents. The PRPD is currently not maintaining the ratio goal established in the LUE.

There are currently eight public safety dispatchers plus a dispatch supervisor staffed to provide services to the city 24/7. These dispatchers send both police and fire personnel to emergencies in addition to fielding and dispatching non-emergency calls. Based on current sworn personnel staffing levels, this equates to approximately one dispatcher for every 4.8 sworn police personnel. Based on the LUE ratio goal of 51 sworn police personnel, public safety dispatcher staffing would need to increase by approximately 2.5 dispatch personnel to support the LUE response time goal. (Note that this does not take into account the additional number of public safety dispatchers needed if Paso Robles Emergency Services increases their personnel to 1.3 firefighters for each 1,000 residents (seven additional firefighters).)

The PRPD has an adopted response time goal of 4 minutes (City of Paso Robles 2014b) and an average response time of approximately 14.8 minutes to the project vicinity between 2019 and 2021 (PRPD 2021). Based on correspondence with the PRPD, there have not been many calls to the project area over the last 2 years (PRPD 2021).

A new police department substation is planned at 4305 and 4317 Second Wind Way, within an existing vacant office building and airport hangar, which will be renovated to accommodate law enforcement uses. A contract for design services for the renovations was approved December 7, 2021.

4.12.1.1.3 PUBLIC SCHOOLS

Public school facilities serving the city of Paso Robles, including the project site, are provided and maintained by the Paso Robles Joint Unified School District (PRJUSD). The PRJUSD includes 11 schools providing educational opportunities: a universal preschool program called the Early Learning Academy (Marie Bauer Early Education Center), six elementary schools, two middle schools, one comprehensive high school, and two alternative education high schools. The nearest schools to the project site include Kermit King Elementary School (2.3 miles southwest), Daniel E. Lewis Middle School (3.25 miles southwest), and Paso Robles High School (3.7 miles southwest). Private schools are considered alternative and optional sources of education and are not funded by the state; therefore, they are not considered in this analysis.

PRJUSD provides public education to over 6,900 students at 11 school sites (PRJUSD 2021a). The *Paso Robles Joint Unified School District 2016 District Facilities Master Plan* provides information about the existing conditions and enrollment at each school site within the PRJUSD (PRJUSD 2016). The purpose of the plan is to inform the PRJUSD in planning for future construction, modernization, and deferred maintenance projects. The 2016 enrollments of each of the school sites, as well as the projected 2022 enrollments and capacities of the schools, within PRJUSD are shown in Table 4.12-1.

Table 4.12-1. PRJUSD Existing Capacities and Projected Enrollment

School	2016 Enrollment	2022 Projected Enrollment	2022 Projected Capacity	2022 Projected Capacity (% Remaining)
Preschools				
Marie Bauer Early Education Center	188	TBD	TBD[1]	TBD
Preschools Subtotal	*188*	--	--	--
Elementary Schools				
Pat Butler Elementary School	441	571	504	(13%)
Kermit King Elementary School	492	604	644	6%
Georgia Brown Dual Immersion Magnet School	577	644	644	0%
Winifred Pifer Elementary School	439	537	560	4%
Virginia Peterson Elementary School	452	579	588	2%
Glen Speck Academy of the Arts	512	661	588	(12%)
Elementary Schools Subtotal	*2,913*	*3,596*	*3,528*	*(13%)*
Middle Schools				
Daniel E. Lewis Middle School	757	866	836	(4%)
George H. Flamson Middle School	680	836	836	0%
Middle Schools Subtotal	*1,437*	*1,702*	*1,672*	*(4%)*
High Schools				
Paso Robles High School	1,956	2,116	3,168	33%
Liberty/Independence High School	229	316	128	(24.7%)
High Schools Subtotal	*2,185*	*2,432*	*3,296*	*8.3%*
District Facilities Total	**6,723**	**7,730**	**8,496**	**(-8.7%)**

Source: PRJUSD (2016a)

[1] Based on programming.

Based on the projected 2022 enrollment shown in Table 4.12-1, Kermit King Elementary School, Winifred Pifer Elementary School, Virginia Peterson Elementary School, and Paso Robles High School are the only schools that would not be operating at or over 100% capacity. Of the four schools that would be operating under 100% capacity based off the 2022 projected enrollment, three would be above 90% capacity. Measure M is a $95 million general obligation bond that was approved in November 2016 to fund projects in the 2016 District Facilities Master Plan (PRJUSD 2021b). The Facilities Master Plan prioritizes projects into Priority A and Priority B level projects, as shown in Table 4.12-2.

Table 4.12-2. PRJUSD Measure M Priority List

Facility Name	Priority List A	Priority List B	Total Cost
Preschools			
Marie Bauer Early Education Center	Remove existing buildings, parking and drop-off, ten new classrooms and support, new play area, and new parking.	N/A	$11,080,000
Preschools Subtotal			*$11,080,000*
Elementary Schools			
Pat Butler Elementary	Four new classrooms, ADA compliance form blacktop to field, removal of one relocatable, re-grading fields, and student drop-off , reconfigure of parking and retaining wall.	Move ball wall and renovate current shade structure.	$3,850,000
Kermit King Elementary School	Six new classrooms, removal of one relocatable, and field renovation.	Renovate current shade structure, student drop-off, and reconfigure parking.	$4,460,000
Georgia Brown Dual Immersion Magnet School	Ten new classrooms, removal of six relocatables, renovate fields, modernize kindergarten, major modernization, expand hard court, and improve student and bus drop-off.	Renovate current shade structure and gazebo and construct new library and Multi-Purpose Room (MPR).	$19,720,000
Winifred Pifer Elementary School	Improve student drop-off and renovate current shade structure and fields.	N/A	$590,000
Virginia Peterson Elementary School	Six new classrooms, removal of two relocatables, field renovation, ramp to playfields, and ADA-flatwork improvements.	Bus drop-off.	$4,880,000
Glen Speck Academy of the Arts	20 new classrooms, removal of 14 relocatables, demolish structures/antiquated buildings, major modernization of library, construct computer lab, student restrooms, school office and support, renovate fields, hard court improvements, parking and drop-off, major modernization, and expand hard court.	Performing arts/MPR (500 seat capacity).	$30,890,000
Elementary Schools Subtotal			*$64,390,000*
Middle Schools			
Daniel E. Lewis Middle School	New two story classroom entry, five new classrooms, removal of two relocatables, demolish of five antiquated buildings, parking drop-off, modernize library, restrooms, and locker rooms.	MPR/computer lab and expand library.	$18,470,000

Facility Name	Priority List A	Priority List B	Total Cost
George H. Flamson Middle School	Nine new classrooms, demolish nine antiquated buildings, major modernization of classrooms, re-grade fields, and replace locker rooms, fitness, and wrestling rooms.	New cafeteria and snack bar.	$17,987,000
Glen Speck Academy of the Arts	Twenty new classrooms, removal of 14 relocatables, demolish structures/antiquated buildings, major modernization of library, construct computer lab, student restrooms, school office and support, renovate fields, hard court improvements, parking and drop-off, major modernization, and expand hard court.	Performing arts/MPR (500 seat capacity).	$30,890,000
Middle Schools Subtotal			*$67,347,000*
Other School Facilities			
Aquatics Complex at Paso Robles High School	50-meter pool and pool equipment room.	25-meter lap pool, pool deck, bleachers, concessions, changing room, locker room, restrooms, and solar water heating.	$4,870,000
Other School Facilities Subtotal			*$4,870,000*
High Schools			
Paso Robles High School			*$0*
Liberty/Independence High School			*$0*
High Schools Subtotal			*$0*
District Facilities Total			**$95,000,000**

Source: PRJUSD (2016b)

Based on the *Measure M 2016-2017 Annual Report to the Community*, the playing field at George H. Flamson Middle School was completed in December 2017 (PRJUSD 2018). Projects that were in the planning process at the time of the Measure M Annual Report include the Aquatic Complex at Paso Robles High School; modernization of classrooms at Marie Bauer Childhood Education Center, Glen Speck Academy of the Arts, Georgia Brown Dual Immersion Magnet School, and Pat Butler Elementary School; and additional classrooms for George H. Flamson Middle School. Future projects identified in the Measure M Annual Report include other proposed improvements such as George H. Flamson Middle School, Kermit King Elementary School, Winifred Pifer Elementary School, and Daniel E. Lewis Middle School (PRJUSD 2018). There are no updates on the project list approved in October 2017. The priorities of the previously approved project list include replacing relocatable classrooms, construction of 80 new classrooms and demolition of 46 relocatable classrooms, playfield renovations, and parking lot/drop off improvements (PRJUSD 2021b).

Since adoption of the 2016 Facilities Master Plan, enrollment rates of the PRJUSD have stayed relatively consistent or decreased. The 2018/2019 capacity is shown in Table 4.12-3.

Table 4.12-3. PRJUSD Existing Capacities and Projected Enrollment

School Level	2018/2019 Facilities Capacity	2018/2019 Student Enrollment	Excess or (Shortage) Capacity
Elementary School (Grades K–6)	3,672	3,431	241
Middle School (Grades 7–8)	1,210	993	217
High School (Grades 9–12)	2,719	2,382	337
Total	**7,601**	**6,802**	**795**

Source: PRJUSD (2021a)

4.12.1.1.4 OTHER

There is one public library in the city—the Paso Robles City Library. The library provides reading materials, online resource databases, a study center for children after school, computer use services, and various reading programs and related events. The Paso Robles Library Five-Year Plan establishes a goal for the year 2025, which is to plan for the future library needs of the City's projected population of 44,000 (Ravatt, Albrecht & Associates, Inc. [RA Architects and Engineers] 2021). The Paso Robles Library Five-Year Plan includes expanding the existing library building and implementing new design strategies to increase public programming, efficiency, and overall capacity. The strategies include reorganizing the stack floors and expanding spaces to improve access to newer and more diverse collections, creating flexible space to increase opportunities for public programs, introducing modern technology, expanding staff areas, increasing shelf capacity, introducing collaborative spaces for working and studying and an alternative quiet space, and creating a teen space.

4.12.1.2 Recreation

According to the LUE, there are approximately 1,630 acres of combined parks and open space area within the city (City of Paso Robles 2014b). The City categorizes these spaces into regional, community, district, neighborhood, mini parks, and recreation centers. There are no existing parks in the project area; the nearest designated public park is Barney Schwartz Park (1.5 miles south). The general characteristics of the City's recreational facilities are described below and based on information from the Parks and Recreation Element (City of Paso Robles 2003b).

4.12.1.2.1 PARKS

Regional Parks

Regional parks are defined in the Parks and Recreation Element as unique recreational centers characterized by extensive park areas that serve the entire urban population. Regional parks provide services and facilities to meet the recreational needs of citizens at a citywide or regional level. Regional parks typically include large open space areas, large group picnic facilities, restrooms, water-oriented facilities, competitive sports fields, play equipment for varied age groups, and concessions (City of Paso Robles 2003b). Barney Schwartz Park is the only regional park in the city and is also the nearest park to the project site, located 1.5 miles south (City of Paso Robles 2003b).

Community Parks

Community parks are characterized as large parks that are greater than 30 acres in size. Centennial Park is the only community park in the city. Centennial Park includes open space areas, a playground, outdoor amenities, and indoor recreational facilities to support the needs of the city (City of Paso Robles 2003b).

The project site is not located within the vicinity of Centennial Park, which is located approximately 4 miles to the southwest.

District Parks

District parks are medium-sized parks that generally vary from 8 to 12 acres in size. District parks within the city include Pioneer Park (6.1 acres), Sherwood Park (12.3 acres), and Oak Creek Park (10.5 acres) (City of Paso Robles 2003b). The nearest district park is Pioneer Park, which is located approximately 4.2 miles to the southwest.

Neighborhood Parks

Neighborhood parks are described as landscaped parks of limited size for passive recreation of all ages. Neighborhood parks typically provide scenic and aesthetic value and include athletic fields, multi-use turf areas, hard courts, and playground equipment. Neighborhood parks generally range from 3 to 10 acres in size. Neighborhood parks within the city include Paso Robles City Park (4.8 acres), Melody Park (3 acres), Turtle Creek Park (4.5 acres), Lawrence Moore Park (2 acres), and Robbins Field (2.4 acres) (City of Paso Robles 2003b). The nearest neighborhood park is Melody Park, which is located approximately 4 miles to the southwest.

Mini Parks

Mini parks are generally less than 3 acres in size and designed to serve a concentrated or limited population. They are typically developed for a unique or single purpose, such as a recreation facility for a neighborhood or a recreation or eating location for employment uses, or to preserve an isolated open space resource, such as a small clustering of oak trees. Mini parks generally include play areas, picnic tables, and landscaping. Desirable locations for mini parks include neighborhoods, high-density residential development (apartments, condominium complexes, and housing for the elderly), and business districts. Mini parks within the city include Royal Oak Meadows Park (2.4 acres), Lenco Park (Casa Robles) (0.25 acre), and Mandella Park (0.25 acre) (City of Paso Robles 2003b).

4.12.1.2.2 RECREATION CENTERS

Recreation centers within the city include the Senior Center, Veterans Facility, Centennial Park Recreation Activity Center, George Stephan Community Center, and Youth Arts Foundation (City of Paso Robles 2003b). All the identified recreation centers are located approximately 5 miles from the project site.

4.12.1.2.3 TRAILS

There are 12 identified trails within the city, including the Almendra Trail, Barney Schwartz Park Loop, Centennial Park Trail, Charolais Corridor Trail, Larry Moore Park Trail, Paso Robles City Park Loop, Royal Oak Meadows Trail, Salinas River Parkway Trail, Sherwood Forest Loop, Snead/Rambouillet Trail, Turtle Creek Loop, and Water Tank Loop (City of Paso Robles 2021a). The nearest trail to the project site is Barney Schwartz Park and the associated trail, which is located 1.5 miles south of the project site.

4.12.2 Regulatory Setting

4.12.2.1 Federal

There are no applicable federal regulations.

4.12.2.2 State

4.12.2.2.1 LEROY F. GREENE SCHOOL FACILITIES ACT OF 1998

The Leroy F. Greene School Facilities Act of 1998 (AB 331) authorizes a state bond to provide funds for school facilities within the state in order to modernize facilities, develop new facilities, employ additional staff members, and provide hardship funding. In order for the state to provide these funds, the state requires payment of school fees on all new development types (California Education Code Section 17620), typically payable at the time of building permits.

California Education Code 17620

California Education Code Section 17620 authorizes the governing board of any school district to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the school district, for the purpose of funding the construction or reconstruction of school facilities.

4.12.2.2.2 THE QUIMBY ACT

The Quimby Act (AB 1191) authorizes the legislative body of a county or city to require the dedication of land or to impose fees for park and recreational purposes as a condition of the approval of a tentative or parcel subdivision map if specified requirements are met. Existing laws require fees collected to be committed within 5 years after the payment of fees or issuance of building permits on half of the lots created by the subdivision, whichever occurs later. Existing law also requires fees not committed to be distributed and paid to the then record owners of the subdivision, as specified.

4.12.2.3 Local

4.12.2.3.1 CITY OF EL PASO DE ROBLES GENERAL PLAN 2003

Land Use Element

The LUE provides for the opportunity for infill development within the City limits and expansion of the City limits to incorporate potential annexation areas (City of Paso Robles 2014b). The LUE establishes a population planning threshold of 44,000 persons, which was calculated based on the assumption that the sum of existing and maximum number of potential future dwelling units would be occupied by an average of 2.7 persons per household. The following LUE policies and action items are specific to public services and recreation:

Policy LU-4A **Service Levels.** Strive to ensure that City services and facilities are maintained at current levels and/or adopted standards and are funded as revenues become available. These standards are summarized as follows:

Police	Maintain a ratio of 0.5 non-sworn personnel per 1,000 population. Maintain a ratio of 1.4 to 1.6 sworn personnel per 1,000 population.
Emergency Services	Strive to achieve a 4 minute response to 90% of the calls for service. Maintain a ratio of 0.8 to 1.3 firefighters per 1,000 population.
Library	Maintain 0.5 square feet per capita of library facilities.

Action Item 1 Direct City revenues toward continuing to fund public services and on-going maintenance/operation of public facilities and utilities provided by the City (water, sewer,

storm drains, police, emergency services, library, recreational services, and solid waste).

Action Item 2 Require new development in annexation areas and/or specific plan areas to establish funding mechanisms to pay for the construction, maintenance, and operation of required City services and facilities on an on-going basis: (1) at current levels; or (2) per adopted City standards, as well as in compliance with state and federal mandates; and/or (3) as deemed necessary during the environmental review and/or fiscal impact review process.

Action Item 3 Require a fiscal impact analysis for new development in annexation areas and/or specific plan areas and condition projects accordingly so as to ensure that they will be fiscally neutral and not result in net loss for the City.

Action Item 4 As part of implementation of the General Plan Update:

- Review/refine the existing Growth Management Plan to address Emergency service needs on a periodic basis.
- Revise/update the City's Master Plans of Water, Sewer, Storm Drainage, and Solid Waste and City standards and specification for public facilities.
- Update the Capital Improvement Program so that it is in conformance with the revised master plans.
- Investigate expansion of branch libraries to serve outlying areas and adding new outreach programs, including a book mobile.
- Implement planned City library expansion into the 2nd floor of the existing library and develop City hall relocation plans, as feasible.
- Maintain the Youth Arts Center satellite library.

Policy LU-4B Support the public-school districts' efforts to ensure that new development mitigates its impacts to public schools, particularly in avoiding overcrowding conditions. The following programs should be implemented unless the City Council finds that specific economic, social, environmental or other considerations make infeasible implementation of the program or aspect of the program in a particular situation.

Action Item 1 Enable the collection of those impact fees for development of capital facilities for public schools that are permitted by state law to be applied to the issuance of building permits.

Action Item 2 Investigate and implement, if feasible, means to eliminate shortfalls that may result from the insufficiency of those impact fees to fund the acquisition of sites and construction of public schools. Such means may include, but would not be limited to, the following:

1. Conditioning legislative actions such as specific plans and rezones upon payment of supplemental

fees, or making dedications of land in lieu of fees; arrangements should be investigated to enable such fees to be paid or dedications to be made at either the time of building permit issuance or prior to issuance of a Certificate of Occupancy.

2. Formation of Community Facilities (Mello-Roos) Districts or equivalent tools which include funding for acquisition of sites for and construction of public schools.

Action Item 3 Support the school districts' request that public school sites be located in accordance with the following standards:

1. Elementary Schools (grades K-5) need 10 acres of relatively flat or gently rolling land located in the center of an area with approximately 590 students, on a collector street and preferably not on an arterial street;
2. Middle Schools (grades 6-8) need 20 acres of relatively flat or gently rolling land located in the center of an area with approximately 900 students, on either a collector or an arterial street;
3. High Schools (grades 9-12) need 40 acres of relatively flat or gently rolling land located in the center of an area with approximately 2,250 students and on an arterial street.

Action Item 4 Refer development applications to the Paso Robles Union School District, Paso Robles Joint Union High School District, and Templeton Unified School Districts for comments and information. Seek to minimize traffic and circulation problems in the vicinity of school sites.

Action Item 5 Facilitate the provision of schools by continuing to work closely with the school districts during the site selection and development process. For example, when development proposals are submitted for large projects triggering needs for additional schools, the districts should determine which parcels would be appropriate school sites, and specify appropriate location, accessibility and land use compatibility standards for school site selection.

Open Space Element

The Open Space Element identifies goals, policies, and action items to conserve open space within and around the city (City of Paso Robles 2003a). The purpose of conserving open space is to contribute to the quality of life within the city, preserve agricultural and recreational lands, and protect scenic lands. The following Open Space Element goals and action items are specific to public services and recreation:

Goal OS-1 Preserve/expand the amount and quality of open space in and around Paso Robles.

Action Item 2 Reserve easements for public access, preferable trail access, to large units of public land.

Parks and Recreation Element

As population, disposable income, and leisure time increases, the demand for parks and recreational facilities also increases. The Parks and Recreation Element identifies goals, policies, and action items to develop and manage parks and recreational facilities as demand for these facilities increase (City of Paso Robles 2003b). The following Parks and Recreation Element policies are specific to public services and recreation:

Policy PR-1A **Park and Recreation Facilities.** Strive to achieve a 7-acre per 1,000 population parkland standard.

Policy PR-1B **Master Plan.** Develop a Master Plan, Recreational Facility, & Trails Plan addressing Citywide needs and financing for development, maintenance, and operation through the year 2025.

4.12.2.3.2 CITY OF PASO ROBLES DEVELOPMENT IMPACT FEES

The City has adopted Development Impact Fees for all development within the city as established in Resolution 19-017 Exhibit "A-2," effective July 1, 2021 (City of El Paso de Robles 2021b). The payment of Development Impact Fees is dependent on the type of development (e.g., residential, commercial, industrial) and is justified in the *City of El Paso de Robles Development Impact Fee Justification Study* (City of Paso Robles 2014a). Development Impact Fees are used for: (1) the purposes described in the Development Impact Fee Justification Study; (2) reimbursing the city for the development's fair share of those capita; (3) improvements already constructed by the City; or (4) reimbursing developers who have already constructed public facilities described in the Development Impact Fee Justification Study, the Master Facilities Plan, or other facilities master plans adopted from time to time by the City Council. Based on the type of proposed development, the project would be expected to pay Development Impact Fees for transportation, police, fire, and general governmental services.

4.12.3 Thresholds of Significance

4.12.3.1 Public Services

In accordance with Appendix G of the State CEQA Guidelines, the project would result in potentially significant impacts relating to public services if it would:

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
    - Fire protection
    - Police protection
    - Schools
    - Parks
    - Other

4.12.3.2 Recreation

The following criteria are based on Appendix G of the State CEQA Guidelines. The effects of the project on recreation would be significant if the project would:

a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and

b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

4.12.4 Impact Assessment and Methodology

The following impact assessment is based on review of public services facility planning documents, information obtained from Paso Robles Emergency Services and PRPD personnel, and General Plan documents. Goals identified in the City's General Plan are used as the basis for determining thresholds for levels of significance. Impacts would be significant if deterioration of service ratios, response times, or other performance objectives would result in the need for new facilities or the physical alteration of existing facilities would be required as a result of the project, and whether the physical effects of any such facilities can be ascertained at this time.

4.12.5 Project-Specific Impacts and Mitigation Measures

4.12.5.1 Public Services

WOULD THE PROJECT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED GOVERNMENTAL FACILITIES, NEED FOR NEW OR PHYSICALLY ALTERED GOVERNMENTAL FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, IN ORDER TO MAINTAIN ACCEPTABLE SERVICE RATIOS, RESPONSE TIMES OR OTHER PERFORMANCE OBJECTIVES FOR ANY OF THE PUBLIC SERVICES?

PS Impact 1: The project would increase demand on Paso Robles Emergency Services for fire protection services, but new or expanded facilities would not be needed. Impacts would be less than significant (Class III).

As described above, there are two fire stations serving the city and planned Fire Station 3, which will be operational by August 2023. The nearest City station to the project site is Paso Robles Fire Station Number 2, located approximately 4.4 miles south of the site, with an average response time of 7 minutes, and future Fire Station 3 would be located approximately 1.4 miles south of the site, with an average response time of 5 minutes (Paso Robles Emergency Services 2020, 2021). Fire Station 3 commenced construction in September 2021 and is anticipated to be fully operational by August 2023. Potential environmental impacts associated with Fire Station 3 were assessed in an MND adopted by the City in summer 2021. The MND identified potential impacts and mitigation related to Air Quality, Biological Resources, and Greenhouse Gas Emissions. As described in *Chapter 2, Project Description,* Phase 1 of the proposed project is expected to be operational by 2024 and Phase 2 is expected to be at full occupancy by 2029. Therefore, it is expected Fire Station 2 would primarily serve the project during construction of Phase 1, and Fire Station 3 would primarily serve the project during construction of Phase 2 and operation of both Phases 1 and 2.

As discussed in *Section 4.11, Population and Housing*, the proposed project would generate new short- and long-term sources of employment through the creation of new businesses and job sectors. The proposed project would employ approximately 539 construction workers during construction of the Phase 1 development. Phase 2 buildout would be based on market demand and is expected to require 513 construction workers, though these workers would be spread out over the 5-year buildout period. Full buildout of the proposed project is anticipated to result in approximately 3,561 operational employees.

The project would not significantly increase the City's projected 2025 population of 34,400, which would require 28 firefighters to provide at least 0.8 firefighters for each 1,000 residents and 45 firefighters to provide 1.3 firefighters for each 1,000 residents. The project would not result in a significant increase in permanent population growth and would be consistent with the estimated population projection identified in the City's LUE. Current fire protection services, with 39 staff members, have an adequate number of staff to serve the City's projected 2025 population. Fire protection services are consistent with the LUE in providing adequate number of staff to serve the City's population. Buildout of planned Fire Station 3 would not increase the number of firefighters serving the city, as it would be staffed with existing personnel that would be redistributed.

The project would increase the number of calls for service and would incrementally increase the average response time to calls by Paso Robles Emergency Services and could result in increased simultaneous calls where a call must wait for the current call to clear, or for a mutual aid response. This would contribute to the need for Fire Station 3, the construction of which would result in physical environmental impacts. An MND was prepared and adopted for Fire Station 3 (Union Road Safety Training Center) and concluded that impacts related to construction of the facility would be less than significant with mitigation.

Potential impacts related to an increased demand on Paso Robles Emergency Services for fire protection services would be reduced through the required payment of Development Impact Fees per the July 2021 Development Impact Fee Summary Resolution 19-017 Exhibit "A-2" (City of El Paso de Robles 2021b), which would be required as standard conditions of approval. Additionally, project plans would be reviewed by Paso Robles Emergency Services personnel for compliance with the California Fire Code to ensure structures are design to minimize fire risk and that adequate emergency access is provided on the site. As part of this process, a registered Fire Protection Engineer (FPE) will be required to provide a comprehensive technical analysis of all fire suppression system related components including water storage, fire hydrants and pumps, and sprinkler systems. Compliance with the California Fire Code would ensure the quality and safety of the project's structures, which would reduce demand on Paso Robles Emergency Services to respond to incidents. Paso Robles Emergency Services is required to conduct annual fire pump inspections and annual inspections on buildings deemed high hazard. Every 5 years, Paso Robles Emergency Services conducts an in-depth test of the fire sprinkler system and underground fire line system. Therefore, the city would have adequate fire protection facilities to accommodate buildout of the proposed project, and payment of Development Impact Fees would further reduce impacts. Therefore, impacts would be *less than significant*.

PS Impact 1 (Class III)
The project would increase demand on Paso Robles Emergency Services for fire protection services, but new or expanded facilities would not be needed.
Mitigation Measures
Mitigation is not required.

PS Impact 1 (Class III)
Residual Impacts
Potential impacts related to fire protection services would be less than significant .

PS Impact 2: The project would increase demand on the Paso Robles Police Department for police protection services, but new or expanded facilities would not be needed. Impacts would be less than significant (Class III).

As described above, the PRPD police station is located approximately 4.7 miles southwest of the project site at 900 Park Street. No additional police facilities are currently planned. The PRPD has a current citywide staffing level of 1.2 sworn police personnel per 1,000 residents, which is below the LUE's ratio of 1.4 to 1.6 sworn police personnel per 1,000 residents (PRPD 2021; City of Paso Robles 2014b). The projected population of the city in 2025 is 34,400, which would require 48 police personnel to provide at least 1.4 police personnel for each 1,000 residents and 55 police personnel to provide 1.6 police personnel for each 1,000 residents.

As discussed in *Section 4.11, Population and Housing*, the proposed project would generate new short- and long-term sources of employment through the creation of new businesses and job sectors. The proposed project would employ approximately 539 construction workers during construction of the Phase 1 development. Phase 2 buildout would be based on market demand and is expected to require 513 construction workers over a 5-year period. Full buildout of the proposed project is anticipated to result in approximately 3,561 new operational employees. Although the project would result in an increase in employment opportunities, it is not expected to result in a significant increase in permanent population growth within the city because most of the estimated workers are expected to commute into the city based on estimated average wages of the workers and cost of living within the city. Therefore, the project is not anticipated to result in a significant increase in permanent population growth within the city that would significantly degrade the established service ratios for police protection services.

The project would introduce a substantial number of employees into an otherwise sparsely occupied area, which would increase the demand for police protection services. In addition to project employees, temporary visitors to the project site for construction activities or events would result in temporary impacts to police protection services. Potential road improvements may involve temporary street closures and/or detours that would be temporary and intermittent, which could also adversely affect police response to emergencies at or near the project site. Though the project site is located in a relatively remote location surrounded by undeveloped land, agricultural, and the airport, the project may attract vandals or present other security risks that could increase demand on police protection services at the site, when compared to existing conditions. Individual commercial and office spaces would employ individual security measures, such as alarm systems or video cameras, to reduce the opportunity for criminal activity that would increase demand on police protection services. The warehouse would include security lighting throughout the building; security fencing and solid walls surrounding trailer parking areas, truck courts, and loading dock areas; and a check-in gate/security booth upon entry into the facility to reduce the opportunity for criminal activity, which in-turn would be expected to reduce the demand on police protection services.

Traffic volumes in the vicinity of the project site, including along SR 46E and US 101, would increase temporarily during construction of the proposed project and would increase permanently during operation. Project employees commuting to the proposed project site via these transportation corridors would be required to adhere to all traffic laws. The added traffic associated with workers commuting to the proposed project site during construction and operation would be along major transportation corridors

and would not be expected to adversely affect the PRPD's ability to patrol. The additional traffic is not expected to result in the need for new or altered facilities.

Based on implementation of individual security measures and limited permanent population growth within the city, the project would result in new demand on police protection services, which is currently operating under the personnel ratio and adopted response time goal established in the LUE. However, the increased demand on police protection services generated by the project would be offset by the required payment of Development Impact Fees per the July 2021 Development Impact Fee Summary Resolution 19-017 Exhibit "A-2" (City of El Paso de Robles 2021b), which would be required as standard conditions of approval. The Development Impact Fees allow the City to build new public facilities, purchase new equipment for those facilities, and pay for staffing. Development Impact Fees are not intended to correct service-level deficiencies caused by existing development. Additional staffing supported by Development Impact Fees would help the City meet its personnel ratio and adopted response time goal for police protection services. As discussed above, the project is not anticipated to significantly degrade the established service ratios for police protection services and therefore would not trigger the need for new or expanded police protection facilities.

Therefore, the city would have adequate police protection facilities to accommodate buildout of the proposed project and impacts would be *less than significant*.

PS Impact 2 (Class III)
The project would increase demand on the Paso Robles Police Department for police protection services, but new or expanded facilities would not be needed.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to police protection services would be less than significant .

PS Impact 3: The project would not significantly increase demand on school facilities, new or expanded facilities would not be needed, and impacts would be offset by collection of state-mandated Development Impact Fees. Impacts would be less than significant (Class III).

The project would be subject to the payment of state taxes for public schools established by the Leroy F. Greene School Facilities Act of 1998 and implemented by California Education Code Section 17620. As described in *Section 4.11, Population and Housing*, the project has the potential to increase short- and long-term employment opportunities within the city. Proposed construction would result in approximately 1,050 construction workers. These employees would likely be sourced from the local construction industry or commute from the surrounding central California region and would not contribute to permanent population growth in the city. Operation of the project has the potential to result in 3,134 new employees within the city; however, based on the below average wages of warehouse and distribution workers (transportation and material moving occupation group), most new employees are anticipated to commute from outside the city or come from the local unemployment pool. Since the project would not result in a significant increase in permanent population growth within the city, the project is also not anticipated to result in a significant number of new school-aged children within the city.

According to Table 4.12-1, above, based on the projected enrollment of the PRJUSD, only four schools are anticipated to be under 100% capacity—three elementary schools and one high school. Of the four schools operating under capacity, the three elementary schools are over 90% capacity. Therefore, existing public school facilities have limited capacity to adequately support an increase in school-aged children in the city. However, Measure M, described in Table 4.12-2, above, was approved in November 2016 to expand existing public school facilities, as identified in the PRJUSD Facilities Master Plan, to accommodate the projected number of students in 2022. As described above, the project is not anticipated to result in a significant number of new permanent employees that could contribute to an increase in population growth within the city. Therefore, approved PRJUSD improvements identified in Measure M would likely accommodate any school-aged children generated by the proposed project.

California Government Code Section 65995(h) states that payment of mandatory school Development Impact Fees " . . . is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Therefore, with the payment of state-mandated impact mitigation fees, impacts would be *less than significant*.

PS Impact 3 (Class III)
The project would not significantly increase demand on school facilities, new or expanded facilities would not be needed, and impacts would be offset by collection of state-mandated Development Impact Fees.
Mitigation Measure
Mitigation is not required.
Residual Impacts
Potential impacts related to an increased demand on the PRJUSD would be less than significant.

PS Impact 4: The project would not significantly increase demand on public park facilities and new or expanded facilities would not be needed. Impacts would be less than significant (Class III).

The Parks and Recreation Element establishes a goal to provide 7 acres of parkland per 1,000 population. Based on the population of 31,490 (U.S. Census Bureau 2020), the city should provide approximately 225 acres of parkland to reach this goal. According to the LUE, there are approximately 1,630 acres of combined parks and open space within the city (City of Paso Robles 2014b). There are 104.5 acres of public parkland and an additional 136 acres of school parkland facilities within the city (City of Paso Robles 2003b). There is no existing designated parkland or public open space within the project site. The proposed project design includes open space and green spaces within the project area to accommodate businesses, commercial uses, and visitor-serving uses proposed on-site. The project includes a proposed subdivision map and would be subject to the payment of fees under the Quimby Act (through Development Impact Fees). As described in *Section 4.11, Population and Housing*, the project has the potential to increase short- and long-term employment opportunities within the city.

As described in *Section 4.11, Population and Housing*, implementation of the project would not require a significant number of new workers to relocate into the city that would require new or expanded public recreation facilities.

The development of new visitor-serving uses may contribute to a slight increase in persons in the area that could increase demand on public recreation facilities, though project visitors and employees would have access to the on-site open space and green space amenities, which could reduce off-site recreational facility use. Therefore, the project may result in a slight increase in demand on public recreational facilities. The project would be subject to the payment of Development Impact Fees. The payment of Development Impact Fees would be included as a standard condition of approval for the project. Therefore, with payment of required fees, impacts related to public recreation facilities would be *less than significant*.

PS Impact 4 (Class III)
The project would not significantly increase demand on public park facilities and new or expanded facilities would not be needed.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to recreation facilities would be less than significant.

PS Impact 5: The project would increase demand for library services, but new or expanded facilities would not be needed. Impacts would be less than significant (Class III).

The existing City Library is planned to be internally expanded in order to meet the needs for the LUE-projected full buildout city population of 44,000 people in the year 2045 or later (RA Architects and Engineers 2021). Implementation of the project has the potential to result in an increase in short- and long-term employment opportunities within the city.

As described in *Section 4.11, Population and Housing*, although the project would result in an increase in employment opportunities, it is not expected to result in a significant increase in permanent population growth within the city because most of the estimated 3,134 workers are expected to commute into the city. Therefore, the project is not anticipated to result in a significant increase in population due to relocation of workers into the city that would require additional library facilities.

Upon planned expansion of the library, the existing facility would be capable of supporting the projected population associated with full buildout of the city. The slight population increase generated by new employment opportunities of the project would incrementally increase the need for library services, but not to the extent that new or additional library facilities would be required. The project would be required to pay Development Impact Fees as a standard condition of approval for the project. Therefore, existing library facilities would be capable of supporting a marginal indirect increase in population and no expanded or new facilities would be needed. Therefore, impacts would be *less than significant*.

PS Impact 5 (Class III)
The project would increase demand for library services, but new or expanded facilities would not be needed.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to the City Library would be less than significant.

4.12.5.2 Recreation

WOULD THE PROJECT INCREASE THE USE OF EXISTING NEIGHBORHOOD AND REGIONAL PARKS OR OTHER RECREATIONAL FACILITIES SUCH THAT SUBSTANTIAL PHYSICAL DETERIORATION OF THE FACILITY WOULD OCCUR OR BE ACCELERATED?

REC Impact 1: The project would not significantly increase demand on the public park and recreation facilities resulting in substantial physical deterioration of such facilities. Impacts would be less than significant (Class III).

The Parks and Recreation Element establishes a goal to provide 7 acres of parkland per 1,000 population. Based on the population of 31,490 (U.S. Census Bureau 2020), the city should provide approximately 225 acres of parkland to reach this goal. According to the LUE, there are approximately 1,630 acres of combined parks and open space within the city (City of Paso Robles 2014b). There is currently 104.5 acres of public parkland and an additional 136 acres of school parkland facilities within the city for a total of 240.5 acres of parkland within the city (City of Paso Robles 2003b). There are no City parks or open space areas located north of SR46 in the vicinity of the proposed project. The project design includes green and open spaces within the project area to accommodate businesses, commercial uses, and visitor-serving uses proposed on-site.

As discussed in *Section 4.11, Population and Housing*, the proposed project would generate new short- and long-term sources of employment through the creation of new businesses and job sectors. The proposed project would employ approximately 539 construction workers during construction of the Phase 1 development, with an estimated 350 workers on-site at any one time. Phase 2 buildout would be based on market demand and would require significantly fewer construction workers and is expected to require 513 construction workers. These employees would likely be sourced from the local construction industry or commute from the surrounding central California region. In some instances, workers may seek transient lodging options for some or all of the construction duration and these workers may utilize City park and recreation facilities. The employment generated by the construction of the proposed project would be temporary and is not expected to result in significant permanent relocation of construction workers into the city.

As described in *Section 4.11, Population and Housing*, the project would generate approximately 3,134 new jobs, 692 of them being warehouse jobs. Although the project would result in an increase in employment opportunities, it is not expected to result in a significant increase in permanent population growth within the city because most of the estimated 692 warehouse workers are expected to commute into the city based on estimated average wages of the workers and cost of living within the city. In

addition, the county's current unemployment rate is 5.8% (approximately 7,600 persons) and the job opportunities created by the proposed project could be accommodated by existing unemployed county residents. Additionally, it is reasonable to anticipate that a number of workers currently residing in the city employed in lower-wage occupations (e.g., food preparation and service, farming) could seek the relatively higher-paying employment opportunities provided by the proposed project. Therefore, the project is not expected to significantly increase demand on public recreation facilities based on proposed green and open spaces within the project area and a limited population increase.

The project would be subject to the payment of Quimby fees (through Development Impact Fees as a standard condition of approval for the project. Therefore, with the implementation of designated open space on-site to accommodate new workers and visitors and the payment of required fees for continued maintenance of city facilities, implementation of the project would not result in a significant increase in the usage of public parks or other recreational facilities that could result in substantial deterioration of existing facilities. Therefore, impacts would be *less than significant*.

REC Impact 1 (Class III)
The project would not significantly increase demand on the public park and recreation facilities resulting in substantial physical deterioration of such facilities.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts related to the increase in use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated would be less than significant.

WOULD THE PROJECT INCLUDE RECREATIONAL FACILITIES OR REQUIRE THE CONSTRUCTION OR EXPANSION OF RECREATIONAL FACILITIES WHICH MIGHT HAVE AN ADVERSE PHYSICAL EFFECT ON THE ENVIRONMENT?

REC Impact 2: The project would not require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. Impacts would be less than significant (Class III).

The Parks and Recreation Element establishes a goal to provide 7 acres of parkland per 1,000 population. Based on the population of 31,490 (U.S. Census Bureau 2020), the city should provide approximately 225 acres of parkland to reach this goal. According to the Parks and Recreation Element, there are 104.5 acres of parkland in the city, 136 acres of school parks and recreation facilities, and various indoor recreation facilities for a total of more than 240.5 acres of parkland and recreation facilities, which is consistent with the parkland goal established in the Parks and Recreation Element. The project includes designated grass and open space areas to accommodate project occupants but does not include construction of any public parks or other public recreation facilities.

The city has adequate parks and recreation facilities to support the indirect increase in population that may result from implementation of the project. The project also includes implementation of open space areas to serve project occupants. Further, the project would be subject to the payment of Development Impact Fees, which would further reduce the need for new recreation facilities to serve the project and

other potential impacts related to public recreation facilities. These fees would be included as a standard condition of approval for the project. Therefore, implementation of the project would not require the expansion or construction of new recreation facilities, and impacts would be *less than significant*.

REC Impact 2 (Class III)
The project would not require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with construction of new or expanded of recreational facilities would be less than significant.

4.12.6 Cumulative Impacts

As discussed in *Chapter 3, Environmental Setting*, the cumulative impact analysis is based on the City's cumulative project's list. Cumulative projects would generate both residential and commercial development.

4.12.6.1 Public Services

Buildout of the proposed project and other planned projects would result in an increased demand on fire protection services, police protection services, public school facilities, recreational facilities, and library services, which has the potential to result in decreasing public service levels. The project includes a proposed subdivision and would be subject to the payment of Development Impact Fees for fire protection services, police protection services, recreational facilities, and library services. The project would be required to pay the state school tax established by the Leroy F. Greene School Facilities Act of 1998. Payment of Development Impact Fees and the state school tax would allow funding for the maintenance of public facilities and the continuation of public services. Payment of these fees and taxes would be included as standard conditions of approval and the project would not be required to implement additional mitigation measures because the proposed project's incremental impacts related to demand on public services and facilities would be offset.

4.12.6.1.1 FIRE PROTECTION

The City has existing fire protection services that would be capable of supporting new buildings and the slight population increase generated by implementation of the project. The fire station is currently maintaining the planned service ratio goal identified in the LUE. Additionally, Fire Station Number 3 is planned to be developed, which would further increase fire protection service levels within the city and would be capable of supporting the proposed project and other future and planned development. As described above, the proposed project's incremental demand on fire services would be offset by the payment of Development Impact Fees, and therefore the projects contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts to fire protection services would be less than significant.

4.12.6.1.2 POLICE PROTECTION

The PRPD is currently operating at a service level that is lower than the ratio goal established in the LUE. Therefore, police protection service levels would decrease with implementation of planned future projects that would increase population and new buildings within the city. Cumulative future development would necessitate the need for new and/or expanded police protection services, primarily as a result of population increase. As described above, the proposed project would not substantially increase population within the city, and therefore the project's incremental demand on police services would be offset by the payment of Development Impact Fees, and cumulative impacts to police protection would be less than significant.

4.12.6.1.3 PUBLIC SCHOOLS

Currently, the PRJUSD is operating at or over capacity, with four of the 11 schools operating below capacity. Of the four schools below capacity, three schools are over 90% capacity. Therefore, public school facilities would not have the capacity to serve additional school-aged children facilitated by implementation of new projects that would increase population within the city. Future development that results in population growth would necessitate the need for new or expanded public school facilities. The adoption of Measure M would allow existing facilities to expand in order to meet the projected number of school-aged children in 2022. As described above, the proposed project's incremental demand on public school facilities would be offset by the payment of State school taxes, and cumulative impacts to public schools would be less than significant.

4.12.6.1.4 LIBRARY

The current City Library is planned to be expanded in order to meet the needs for the projected full buildout city population of 44,000 people (RA Architects and Engineers 2021). Therefore, upon expansion, the existing facility would be capable of supporting the projected population associated with full buildout of the city. As described above, the proposed project's incremental demand on public school facilities would be offset by the payment of Development Impact Fees, and the project impacts would not be cumulatively considerable.

4.12.6.1.5 PARKS

Based on the Parks and Recreation Element, approximately 225 acres of total parkland should be provided in the city. There is currently approximately 240.5 acres of school and public parkland and recreation facilities in the city. Future development of the city may necessitate the need for additional public recreation facilities. The proposed project includes implementation of on-site green and open space areas to serve the project and its occupants and, as described above, the proposed project's incremental demand on public recreational facilities would be offset by the payment of Development Impact Fees.

The proposed project would offset any cumulative impacts through payment of Development Impact Fees and Quimby fees. Other proposed and planned future development within the city would be subject to environmental reviews and payment of required state and local Development Impact Fees and taxes in order to maintain and provide necessary services. Therefore, project impacts would be less than cumulatively considerable.

4.12.6.2 Recreation

The city of Paso Robles has a population of 31,490 (U.S. Census Bureau 2020). Based on the Parks and Recreation Element, approximately 225 acres of total parkland should be provided in the city. There are currently approximately 240.5 acres of parkland and recreation facilities in the city. Without inclusion of

school facilities, there are currently 104.5 acres of parkland. As discussed in *Chapter 3, Environmental Setting*, of this EIR, there are several proposed and planned future developments within the city that may increase population or otherwise result in the need for new or expanded recreational facilities. Although new development may increase demand on public recreation facilities, some future planned development includes construction or expansion of parks and open space that would contribute to the City's parkland and open space inventory to serve the public. Future projects would be subject to payment of Development Impact Fees.

The proposed project includes designated open space to serve businesses, visitor-serving uses, and office uses within the area. The proposed project includes implementation of additional open space areas to accommodate the slight population increase from implementation of new employment and visitor-serving uses. Further, payment of Development Impact Fees. With payment of this tax and implementation of designated open space to serve the project, the project would not be required to implement additional mitigation measures because the project's incremental impacts related to demand on recreational facilities would be offset. Therefore, impacts would be less than cumulatively considerable.

4.13 TRAFFIC AND TRANSPORTATION

This section evaluates the potential transportation-related impacts associated with the project. The impact analysis examines the roadway, transit, bicycle, and pedestrian components of the project's roadway network and offsite transportation improvements. The information in this section is based on *The Landing Transportation Impact Study* prepared for the project (CCTC 2022) who was retained by the City to evaluate potential transportation-related impacts of the project in conformance with the requirements of CEQA and the City's *2013 Transportation Impact Analysis Guidelines* (TIAG) and 2022 TIAG Supplement. Note that the Transportation Impact Study identifies the project as occurring over three phases by dividing Phase 2 as identified in this EIR into two separate phases (Phase 2 and Phase 3). The retail uses were analyzed separately from the offices/flex industrial uses and hotel to identify timing of potential impacts and necessary circulation system improvements.

4.13.1 Existing Conditions

4.13.1.1 Existing Circulation Network

Arterial roadways include freeways, multilane highways, and other important roadways that supplement the Interstate System. They connect, as directly as practicable, the Nations principal urbanized areas, cities, and industrial centers. Land access is limited. Posted speed limits on arterials usually range between 50 and 70 miles per hour (FHWA 2000).

Collector roadways are major and minor roads that connect local roads and streets with arterials. Collectors provide less mobility than arterials at lower speeds and for shorter distances. They balance mobility with land access. The posted speed limit on collectors is usually between 35 and 55 miles per hour (FHWA 2000).

Local roadways provide limited mobility and are the primary access to residential areas, businesses, farms, and other local areas. Local roads, with posted speed limits usually between 20 and 45 miles per hour, comprise most roads in the U.S. (FHWA 2000).

Class I bikeways (bike path) provide a completely separated right-of-way for the exclusive use of bicycles and pedestrians with crossflow by motorists minimized.

Class II bikeways (bike lane) provide a striped lane for one-way bicycle travel on the side of the street adjacent to vehicle traffic.

Class III bikeways (bike route) consist of a roadway that is shared between bicycle and vehicle traffic.

4.13.1.1.1 ROADWAYS

The project site is located within the northern portion of the City of Paso Robles, adjacent to unincorporated San Luis Obispo County land to the west. Regional access to the project site is provided by SR 46E and local access is provided primarily by Airport Road. Based on consultation with the City, the County, and Caltrans staff, the Transportation Impact Study identified 17 roadways adjacent to and within the immediate vicinity of the project site:

1. *Airport Road* is a discontinuous north-south arterial with two travel lanes which runs north of SR 46E and between Linne Road and Meadowlark Road.
2. *Golden Hill Road* is a north-south arterial with two travel lanes north of Union Road that expands into four travel lanes between Mesa Road and Dallons Drive.

3. *Jardine Road* is a north-south arterial with two travel lanes that intersects with Dry Creek Road.
4. *Union Road* is a northeast-southwest arterial with two travel lanes between SR 46E and Creston Road. Union Road also splits into a second arterial in the northwest-southeast direction just before connecting to SR 46E.
5. *SR 46E* is an east-west expressway with two travel lanes per direction connecting the Central Valley with the Central Coast.
6. *US 101* is a north-south freeway with two travel lanes per direction connecting the Central Coast with San Francisco and Los Angeles.
7. *Estrella Road* is an east-west local road with two travel lanes running through various vineyards.
8. *Wellsona Road* is an east-west local road with two travel lanes.
9. *Buena Vista Drive* is a north-south arterial with two travel lanes north of SR 46E.
10. *Rollie Gates Road* is an east-west collector with two travel lanes.
11. *Wing Way* is a collector with two travel lanes.
12. *Dry Creek Road* is a collector with two travel lanes that joins with Jardine Road to the east.
13. *Winery Row* is an east-west collector with two travel lanes divided by a raised vegetated median.
14. *Wisteria Lane* is an east-west collector with two travel lanes.
15. *Tractor Street* is an east-west collector with two travel lanes.
16. *Dallons Drive* is an east-west collector with two travel lanes divided by a center median.
17. *Mill Road* is an east-west local road with two travel lanes south of SR 46E.

4.13.1.1.2 INTERSECTIONS

Based on consultation with City, County, and Caltrans staff, the Transportation Impact Study evaluated 25 roadway intersections for consistency with City transportation policies. The following intersections were evaluated during peak hours for both AM (7:00 a.m.–9:00 a.m.) and PM (4:00 p.m.–6:00 p.m.) weekdays, Friday PM, and Sunday PM.

1. Airport Road/Estrella Road
2. Airport Road/Wellsona Road
3. Airport Road/Buena Vista Drive
4. Airport Road/Rollie Gates Road
5. Airport Road/Wing Way
6. Airport Road/Dry Creek Road
7. Airport Road/Winery Row
8. Airport Road/New Airport Road
9. Golden Hill Road/Wisteria Lane
10. Golden Hill Road/Tractor Street/Dallons Drive
11. Golden Hill Road/Golden Hill Plaza
12. River Road/Wellsona Road
13. New Airport Road/Wisteria Lane
14. New Airport Road/Tractor Street
15. Jardine Road/Dry Creek Road
16. US 101 SB Ramps/SR 46E
17. US 101 NB Ramps/SR 46E
18. SR 46E/Buena Vista Drive
19. SR 46E/Golden Hill Road
20. SR 46E/Union Road
21. SR 46E/Airport Road
22. SR 46E/Mill Road
23. SR 46E/Jardine Road
24. Golden Hill Road/Union Road
25. Union Road/Union Road

4.13.1.1.3 BICYCLE FACILITIES

The project vicinity is largely unserved by dedicated bikeways. Of the 17 roadways identified above, only 3 contain bikeways. Union Road has a Class II bikeway along the entirety of the northbound side of the northeast-southwest arterial segment and on both sides of the road along the frontage of Barney Schwartz Park along the northwest-southeast segment of the road. Buena Vista Drive contains a Class II bikeway on both sides of the road between Experimental Station Road and Cuesta College. Dallons Drive contains a Class II bikeway on both sides of the road for most of the length of the road.

4.13.1.1.4 PEDESTRIAN FACILITIES

Of the roadways listed above, six have pedestrian sidewalk facilities. Golden Hill Road includes a sidewalk that runs along the northbound side of the road, Union Road contains a sidewalk that runs along the northbound side of the road, Buena Vista Drive contains sidewalks on both sides of the road, Wisteria Lane contains sidewalks on both sides of the road, Tractor Street contains a sidewalk along the northern side of the road, and Dallons Drive contains sidewalks on both sides of the road in most locations.

4.13.1.1.5 PUBLIC TRANSIT FACILITIES

The Paso Express provides fixed route and dial-a-ride transit service for the City. The fixed route service operates Routes A and B, which run clockwise and counterclockwise, respectively. The closest stops to the project site are located over three miles away. Hourly service is provided from 6:45 a.m. to 7:05 p.m. on weekdays and 7:45 a.m. to 6:05 p.m. on Saturdays. The dial-a-ride service provides curb-to-curb service on weekdays from 7:00 a.m. to 1:00 p.m. (CCTC 2022).

The San Luis Obispo Regional Transit Authority (RTA) provides regional fixed-route service to San Luis Obispo County. Route 9 serves the North County region, providing regional access between San Luis Obispo, Santa Margarita, Atascadero, Templeton, and Paso Robles. The closest stop to the project site is located over three miles away at Cuesta College North, which is served on weekdays with hourly service (CCTC 2022).

4.13.1.2 Existing Circulation Network Operations

4.13.1.2.1 EXISTING TRAFFIC VOLUMES

Traffic levels in the study area vary substantially throughout the year. In addition to typical weekday commute periods and on-going goods transport there are major traffic increases related to tourism, mainly visitors from the Central Valley. These conditions typically peak on summer weekends when travelers visit the coast. Intersection turning movement counts were collected at the study intersections in June and/or July 2021 during the weekday AM, weekday PM, Friday PM, and Sunday PM peak hours.[1] The traffic count data sheets are included in Appendix B of the Transportation Impact Study (CCTC 2022).

Extensive traffic volume data has been collected in the study area as a part of past studies and the 2021 counts were compared to available counts from Caltrans databases, the *SR 46 E/Union Road Project Approval and Environmental Determination Traffic Operations Analysis Report* (PA&ED TOAR), and various development project traffic studies.

[1] Initial PM peak hour data collection in June 2021 occurred on the last day of school. Per Caltrans request, additional data collection occurred in July 2021 (summer peak travel season). Due to the COVID-19 pandemic, intersection counts on SR 46E were also compared to historic data on SR 46E, as shown in Table 7 of the Transportation Impact Study.

4.13.1.2.2 EXISTING COLLISION RATES

Between 2017 and 2019 there were 143 traffic collisions reported along the SR 46E corridor between US 101 and Jardine Road, of which 35 resulted in injury or fatality (see Table 2 of the Transportation Impact Study; CCTC 2022). Nearly half of the collisions along the corridor included unsafe speeds, and two-thirds occurred within 250 feet of an intersection. The three fatalities along this corridor between 2017 and 2019 all involved vehicles turning left onto the highway (CCTC 2022). Based on traffic collision data from 2017 through 2019 from the Statewide Integrated Traffic Records System and the Caltrans Traffic Accident Surveillance and Analysis System, both the Golden Hill Road segment from Wisteria Lane to 100 feet north of SR 46E and SR 46E from the US 101 northbound ramps to Union Road have collision rates above the state average (CCTC 2022). While the Golden Hill Road segment has a collision rate higher than the state average, the number of total collisions does not exceed the number of significant collisions. The SR 46E segment exceeds both the state average rate for similar facilities and the number of total collisions exceeds the number of significant collisions (CCTC 2022).

The Caltrans Traffic Accident Surveillance and Analysis System data did not include collisions where the primary road was a City-maintained road. Therefore, the Caltrans Traffic Accident Surveillance and Analysis System collision analysis was supplemented with Statewide Integrated Traffic Records System data which shows more collisions than the Caltrans Traffic Accident Surveillance and Analysis System. All intersections which could be used for project access to SR 46E were analyzed and intersection collision rates exceeded the state average rates at SR 46E and Buena Vista Drive, SR 46E and Golden Hill Road, SR 46E and Union Road, SR 46E and Airport Road, and SR 46 and Jardine Road (CCTC 2022).

No study intersections or roadways were included in the City's Local Road Safety Plan high incident locations. However, the City's Local Road Safety Plan does not evaluate Caltrans-controlled facilities like SR 46E. Caltrans' SR 46 Corridor System Management Plan reports that the SR 46E between US 101 and Airport Road experiences collision rates higher than the statewide average at both the segment and intersection level. Therefore, the SR 46E corridor is considered a high-priority safety location (CCTC 2022).

4.13.2 Regulatory Setting

4.13.2.1 Federal

4.13.2.1.1 U.S. DEPARTMENT OF TRANSPORTATION

The U.S. Department of Transportation (USDOT) was established in 1966 and is responsible for planning and coordinating federal transportation projects. The USDOT is also responsible for implementing safety regulations for all major modes of transportation, including automobile, transit, maritime, rail, and air.

4.13.2.1.2 FEDERAL HIGHWAY ADMINISTRATION

The FHWA is a USDOT agency and supports state and local governments in the design, construction, and maintenance of the nation's highway system. The FHWA provides financial and technical assistance to state and local governments in order to construct safe and technologically sound roads, highways, intersections, and bridges.

4.13.2.2 State

4.13.2.2.1 CALIFORNIA DEPARTMENT OF TRANSPORTATION

Caltrans maintains over 50,000 miles of public highway and freeway lanes, provides inter-city rail services, permits more than 400 public-use airports and special-use hospital heliports, and works with local agencies. Caltrans has six primary programs, including Aeronautics, Highway Transportation, Transportation Planning, Administration, and the Equipment Service Center. Caltrans works to maintain and promote the safety, modality, innovation, and efficiency of the State's transportation system. Caltrans provides guidelines, manuals, and policies related to the development of highways, bikeways, bridges, and other transportation facilities, including but not limited to the California Manual on Uniform Traffic Control Devices, Highway Design Manual, and Active Transportation Program (ATP).

Caltrans manages the operation of SR 46E, which passes through the northern portion of the city and can be accessed in the project vicinity via Golden Hill Road, Union Road, Airport Road, or Jardine Road. Caltrans also maintains annual traffic data on state highways and interchanges within San Luis Obispo County.

Caltrans has eliminated LOS consistent with SB 743 and now relies on VMT and safety to evaluate transportation impacts. Caltrans published a *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (VMT Focused TIS Guide) in May 2020 which replaced the prior guide reliant on LOS. The VMT Focused TIS Guide notes that lead agencies have the discretion to choose VMT thresholds and methods, and generally conforms to the California Governor's Office of Planning and Research (OPR) guidance. Caltrans also issued Traffic Safety Bulletin 20-02-R1 in December 2020 providing guidance for intergovernmental review for potential safety impacts of land use projects and plans affecting the State Highway System. The Bulletin describes the procedure for Caltrans staff to review potential safety impacts and develop mitigation measures as appropriate.

4.13.2.2.2 SENATE BILL 743

SB 743 requires that the analysis of transportation impacts under CEQA include the evaluation of transportation impacts that better promote the State's goals in reducing GHG emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing clean and efficient methods of travel. SB 743 modifications, which are now in effect, change the focus of transportation impact analysis in CEQA from measuring impacts to drivers, to measuring the impact of driving. The change replaces LOS with VMT and provides a streamlined review of land use and transportation projects that will help reduce future VMT growth. SB 743 requires projects to reduce VMT and aims to balance the needs of congestion management with the statewide goals related to infill development, active transportation, reduction of GHG, and consistent land uses.

4.13.2.2.3 ASSEMBLY CONCURRENT RESOLUTION 211

Assembly Concurrent Resolution (ACR) 211 encourages all cities and counties to implement Caltrans policies related to the integration of bicycling and walking when developing transportation infrastructure. Integration of walking and bicycling would promote physical health, reduction of air emissions, and reduction of fuel and gasoline use.

4.13.2.3 Local

4.13.2.3.1 SAN LUIS OBISPO COUNTY COUNCIL OF GOVERNMENTS 2019 REGIONAL TRANSPORTATION PLAN

SLOCOG holds several key roles in transportation planning within the county. As the Regional Transportation Planning Agency, SLOCOG is responsible for conducting a comprehensive, coordinated transportation program; preparing an RTP; programming state funds for transportation projects; and administering and allocating transportation development act funds required by state statutes. As the Metropolitan Planning Organization, SLOCOG is also responsible for all transportation planning and programming activities required under federal law. This includes development of long-range transportation plans and funding programs, and the approval of transportation projects using federal funds.

The SLOCOG 2019 RTP is a long-range planning document for the region's transportation system. The 2019 RTP analyzes the transportation needs of the region and identifies necessary improvements for the transportation system. The 2019 RTP offers options for alternative modes of transportation and aims to create a sustainable transportation system through investments in public transportation, active transportation, highways, streets, and roads, and system efficiency.

SLOCOG 2019 RTP includes goals, policies, and objectives for the region's transportation system in order to meet the needs of transit-dependent individuals and encourage the increasing use of alternative modes by all travelers that choose public transportation. The following policy objectives aim to improve the region's transportation system and other land use strategies:

Policy Objective 2.1 Provide reliable, integrated, and flexible travel choices across and between modes.

Policy Objective 2.2 Improve opportunities for businesses and citizens to easily access goods, jobs, services, and housing.

Policy Objective 5.4 Make investments and develop programs that support local land use decisions that implement the SCS and other strategies to reduce GHG emissions and make our communities more healthy, livable, sustainable, and mobile.

Policy Objective 6.1 Integrate environmental considerations in all stages of planning and implementation.

Policy Objective 6.2 Preserve aesthetic resources and promote environmental enhancements.

Policy Objective 6.3 Reduce GHG Emissions from vehicles and improve air quality of the region.

Policy Objective 6.4 Conserve and protect natural, sensitive, and agricultural resources.

4.13.2.3.2 CITY OF EL PASO DE ROBLES GENERAL PLAN 2003

Circulation Element

The Circulation Element was recently updated and adopted by the City Council in 2019. The priority of the City's 2019 Circulation Element is to provide mobility to people. The following policies and action items are included to provide mobility to people:

Policy CE-1A Circulation Master Plan. Revise/update the City's Circulation Master Plan to address the mobility needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, users of public transportation, and seniors as follows:

a) Improve the circulation network on a prioritized basis

b) Provide adequate access for emergency vehicles and evacuation

c) Improve mobility through and access to Downtown Paso Robles by implementing the City Council adopted Uptown/Town Center Specific Plan

d) Establish safe pedestrian and bicycle paths for children and their parents to schools and other major destinations such as downtown, retail and job centers

e) Maintain mobility for all modes by encouraging flexible and off-set working hours, transit improvements; pedestrian and bikeway improvements; and public outreach as to the availability and benefit of alternative modes of travel

f) Require new development to mitigate its impact on the transportation network

Action Item 1 Develop a multimodal transportation mitigation fee program so that new development contributes to improvements that offset cumulative impacts to mobility. The impact fee program will list needed improvements to automobile, pedestrian, bicycle, and transit facilities. To encourage the reduction of city-wide vehicle miles traveled, the mitigation fee program will recognize and support Transportation Demand Management (TDM) strategies associated with new development. Fees shall be assessed in relation to cumulative impacts and shall be proportional to the number of auto trips generated by the development.

Action Item 2 Set conditions of approval of development applications to provide access for all modes of travel and to make appropriate improvements to the transportation system serving subject sites including frontage improvements and all improvements needed to mitigate transportation impacts.

Action Item 5 Maintain the Zoning, Subdivision, Streets and Sidewalk chapters of the Municipal Code, as well as the Standard Conditions of Approval and Standard Specifications and

Details, for consistency with a "complete street" approach where all modes of travel are routinely accommodated.

Action Item 8 Construct roundabouts in lieu of traffic signals where appropriate conditions exist to maximize the efficiency of streets, maintain continuous but moderate traffic flow, reduce accident severity, and enhance pedestrian and cyclist activity.

Action Item 9 Install all transportation improvements in accordance with current accessibility standards.

Action Item 14 Maintain and/or improve emergency vehicle access on all existing streets. New development shall provide emergency vehicle access as required by all applicable codes and the Emergency Services Department.

Action Item 16 View all transportation improvements, new or retrofit, as opportunities to improve safety, access, and mobility for all travelers and recognize bicycle, pedestrian, and transit modes as integral elements of the transportation system.

Action Item 18 Transportation systems and facilities should be planned, designed and constructed so as not to serve as barriers to community resources.

Action Item 19 Transportation improvements shall improve accessibility and promote physical activity.

Policy CE-1B: Reduce Vehicle Miles Traveled (VMT). The City shall strive to reduce VMT generated per household per weekday by making efficient use of existing transportation facilities and by providing direct routes for pedestrians and bicyclists through the implementation of sustainable planning principles.

Action Item 1 New development shall conform to the following guidelines to the maximum extent possible.

a) New streets and intersections shall be designed for continuous flow at moderate speeds. Low volume residential streets should be designed for speeds of 25 miles per hour or less. Higher order roadways shall be designed for 35 mph or less with stable flows. Roundabouts shall be considered in lieu of traffic signals for intersection control as needed.

b) To the extent practical, new residential streets shall provide a grid roadway system with block lengths of 300 feet or more and not longer than 600 feet. Cul-de-sac streets shall be discouraged. Street widths shall be no greater than as needed to accommodate emergency service vehicles. Design standards compatible with traditional neighborhood shall be developed.

c) Lane configurations for new intersections shall be limited to provide for moderate speeds and pedestrian and cyclist safety. Congestion during

certain time periods shall be accepted in exchange for shorter pedestrian and cyclist crossing distances, less overall paved area, reduced costs and preservation of small-town character.

d) Circulation systems shall provide for all modes of travel and shall typically include sidewalks, bicycle lanes, and transit stop amenities. Continuous paths of travel shall be established and connected for walking and bicycling from and throughout new developments to downtown and other key destinations. As appropriate and practical, all development shall conform to the most current Bike Master Plan adopted by the City Council and the most current trail system plan. Impact fees shall be assessed to mitigate impacts and to contribute to the development of the bike and pedestrian master plans.

e) New specific plans shall include a mix of uses that are well connected for all modes and built at higher densities to help minimize the number of single occupant vehicle trips and reduce vehicle miles traveled.

Policy CE-1D Transit. Improve and expand transit services.

Action Item 9 Support convenient transit service to employment, education, and government centers as funding allows. Work with San Luis Obispo Regional Transit Authority (SLORTA) to provide fixed route and/or commuter bus service as appropriate.

Policy CE 1F Pedestrian and Bicycle Access. Provide safe and convenient pedestrian and bicycle access to all areas of the City.

4.13.2.3.3 CITY OF PASO ROBLES BICYCLE AND PEDESTRIAN MASTER PLAN

The *City of Paso Robles Bicycle and Pedestrian Master Plan* was recently updated and approved by City Council in December 2018. The Bicycle and Pedestrian Master Plan identifies priorities for improving bicycle and pedestrian infrastructure within the city to provide for future growth. The following goals are included in the City's Bicycle and Pedestrian Master Plan:

Goal 1 Develop a comprehensive system of bicycle and pedestrian facilities to provide a safe, fun, convenient, healthy, and environmentally friendly mode of travel throughout the City for all ages and abilities.

Goal 2 Develop bicycle and pedestrian facilities that are accessible to commercial and employment centers, neighborhoods, parks, and schools to provide a viable alternative for transportation to reduce vehicle miles traveled and traffic congestion.

Goal 3 Develop bicycle and walking safety program to encourage non-motorized travel within the City of Paso Robles.

Goal 4 Develop bicycle and pedestrian facilities that will meet both commuter and recreation needs, including bicycle support facilities once they meet their destinations.

Goal 5 Increase public awareness of the benefits of bicycling and walking and develop programs to encourage residents to ride bikes and walk to work, school, and for recreation.

Goal 6 Coordinate City bicycle and pedestrian improvement plans with interagency transportation plans and funding programs.

Goal 7 Promote inclusive and sustainable economic growth and tourism through the City by developing bicycle and pedestrian facilities and improving existing infrastructure.

4.13.2.3.4 CITY OF PASO ROBLES 2013 TRANSPORTATION IMPACT ANALYSIS GUIDELINES AND 2022 SUPPLEMENT

The City's 2013 TIAG provides project applicants with traffic impact study methodology required to develop traffic studies. The guidance includes intersection level of service and roadway segment capacity utilization metrics. In response to SB 743, the City updated the TIAG to establish new VMT metrics to replace LOS as a metric for determining CEQA impacts of a project. The new metrics include VMT per capita, VMT per employee, and net VMT. (The City still uses LOS and roadway segment capacity utilization to assess non-CEQA transportation facility impacts and needs related to a project.)

The TIAG provides guidance on how to measure VMT, which is typically measured using a Travel Demand Model (TDM). A TDM measures the likely change in the VMT resulting from a project. The change in the amount of VMT is evaluated to determine if the project has a regional impact. Projects that show an increase in regional VMT will be required to mitigate the increase. Typical mitigations include carpooling, vanpooling, and many other trip reductions strategies. The TIAG includes guidance on the preferred TDM for analyses, which is currently the SLOCOG TDM. However, many projects will have unique attributes requiring engineering judgment in determining the appropriate approach. This flexibility is built into the TIAG so that projects impacts are not estimated in an overly conservative manner. The TIAG does not specify thresholds number for each type of project. Instead, each project study will define the baseline VMT without the project. The project's VMT will then be calculated to determine the overall change in VMT and the overall change in VMT will then be used to determine if the project has an impact under CEQA. Projects that show a decrease in regional VMT would have a less than significant impact under CEQA.

4.13.3 Thresholds of Significance

The following thresholds are based on Appendix G of the State CEQA Guidelines. For purposes of this EIR, impacts related to transportation are considered significant if implementation of the proposed project would:

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

b. Conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b),

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

d. Result in inadequate emergency access.

The City still requires evaluation of queuing and LOS and site access management to guide local circulation system planning and recommended conditions of approval for development projects. Although not used as a metric to identify a significant impact under CEQA, the LOS analysis is used to determine project consistency with the City's LUE and Circulation Element. While vehicular LOS is a component of the evaluation criteria for stop-controlled intersections, it is not identified as a mobility deficiency criterion for signalized intersections. LOS is a qualitative description of traffic flow based on such factors as speed, travel time, delay, and freedom to maneuver. Six levels are defined, from LOS A, with the best operating conditions, to LOS F, with the worst operating conditions. The LOS analysis is considered outside of the CEQA process and is not used as a metric to determine the significance of an impact.

4.13.4 Impact Assessment and Methodology

In accordance with the City's 2022 TIAG Supplement, which is consistent with guidance from OPR, the project would have a significant VMT impact pursuant to Section 15064.3(b) of the State CEQA Guidelines if retail projects would cause a net increase in regional VMT. Because the OPR guidance does not specifically address hotels, the hotel portion of the proposed project has been evaluated under the retail category. Office and industrial projects may have a significant impact if the work VMT per employee exceeds 85% of the regional average. Industrial projects include the warehouse use. Office VMT captures home-based-work attractions (trips from homes to workplaces) (CCTC 2022).

State CEQA Guidelines Section 15064.3(a), states, "For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty truck VMT could be included for modeling convenience and ease of calculation (OPR 2018). The SLOCOG model includes heavy-duty trucks so they are reflected in the VMT analysis. Heavy duty trucks, such as the proposed goods transport trucks, are not required to be considered in the evaluation of VMT impacts under the requirements of State CEQA Guidelines Section 15064.3 or City policy. Heavy-duty trucks are addressed in other CEQA sections (air quality, GHG, and noise analysis) and are subject to regulation in a separate collection of rules under CARB jurisdiction (OPR 2018).

The County adopted Transportation Impact Analysis Guidelines which include VMT thresholds calculated as 85% of the baseline VMT metric. The baseline VMT is based on the average VMT for unincorporated areas in the County. This baseline is higher than the overall regional average VMT since unincorporated areas tend to generate higher VMT than incorporated areas. Therefore, the County's threshold is less restrictive than the City of Paso Robles' thresholds, and projects having a less-than-significant VMT impact according to the City's thresholds would not trigger the County's threshold (CCTC 2022).

Caltrans has eliminated LOS metrics consistent with SB 743 and now relies on VMT and safety to evaluate transportation impacts. Caltrans issued a series of policy documents related to transportation impacts and CEQA determinations. Caltrans published a VMT Focused TIS Guide in May 2020 which replaced the prior guide reliant on LOS. The TIS Guide notes that lead agencies have the discretion to choose VMT thresholds and methods, and generally conforms to OPR guidance. Caltrans issued Traffic Safety Bulletin 20-02-R1 in December 2020 providing guidance for intergovernmental review for potential safety impacts of land use projects and plans affecting the State Highway System. The Bulletin describes the procedure for Caltrans staff to review potential safety impacts and develop recommendations as appropriate and notes that "A proposed project should not be required to mitigate for impacts caused by factors such as other projects, existing operational conditions or where economic growth not related to the project is a cause of the traffic safety impact." (CCTC 2022).

Caltrans documents note that queues spilling back and affecting mainline traffic flow may have a safety impact. Projects may have a significant impact if they exacerbate an existing high-priority or similar

safety location, introduce a design feature that substantially increases hazards, or proposes features that do not meet City design standards (CCTC 2022).

4.13.5 Project-Specific Impacts and Mitigation Measures

WOULD THE PROJECT CONFLICT WITH A PROGRAM, PLAN, ORDINANCE OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE AND PEDESTRIAN FACILITIES?

TR Impact 1: The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant with mitigation (Class II).

San Luis Obispo County Council of Governments 2019 Regional Transportation Plan

The 2019 SLOCOG RTP identifies that San Luis Obispo has a jobs-to-housing imbalance across the county. Specifically, the central portion of the county (i.e., San Luis Obispo) has more jobs than housing units, with more than two jobs per housing unit, and the rest of the county, including the Paso Robles region, has more housing units than jobs, with less than one job per housing unit. This regional imbalance results in congestion on regional roadways during the AM and PM peak hours as commuters travel to and from the central portion of the county for work (CCTC 2022).

The 2019 SLOCOG RTP considered multiple future land use scenarios with different development patterns. Future Year 2035 Scenario 3, which was adopted as the preferred growth scenario by the SLOCOG Board, seeks to improve the jobs-to-housing imbalance by increasing jobs in the northern portion of the county. This preferred growth scenario anticipates adding 5,982 new jobs in the north county and changes the north county's jobs-housing ratio from 0.87 in 2015 to 0.89 in 2035. The project would add 3,561 employment opportunities to the north county, which would increase the jobs-to-housing ratio for the north county to 0.95 by 2035 (Table 4.13-1).

Table 4.13-1. North County Jobs-to-Housing Balance

Year	Jobs	Housing Units	Jobs/Housing Unit
2015	33,455	38,542	0.87
2035	39,437	44,311	0.89
2035 + project	42,041	44,311	0.95

Source: SLOCOG (2019); CCTC (2022)

Note: Housing units in 2035 were calculated from population estimates using ratios in the 2019 SLOCOG RTP Figure 13-21.

The project would improve the north county's jobs-to-housing balance, consistent with the RTP's adopted preferred growth scenario.

The 2019 SLOCOG RTP identifies SR 46E as a priority regional corridor and references Caltrans' *SR 46 East Comprehensive Corridor Study and SR 46 Corridor System Management Plan* as the basis for recommendations for the corridor (CCTC 2022). These recommendations include:

- Improve capacity on the US 101/SR 46E northbound off-ramp to address summer and weekend peak traffic conditions.

- Construct and connect local frontage roads north and south of SR 46E to separate local and regional traffic.
- Enhance TDM strategies and programs to alleviate some local demand on the corridor.
- Expand transit services to education, business, and shopping destinations.
- Improve SR 46E/Union Road at-grade intersection.
- Improve access (phased implementation strategy) at the Airport Road and Union Road interfaces with SR 46E.
- Improve acceleration and deceleration lanes.
- Consolidate access where feasible and improve left- and right-turn channelization.

The project would be consistent with the recommendations of the RTP regarding the SR 46E because the project would construct circulation improvements that would allow project truck traffic to use a parallel route and connect to SR 46E at the signalized intersection at Golden Hill Road rather than at Airport Road.

City of Paso Robles Circulation Element and Transportation Impact Analysis Guidelines

The City's TIAG provide criteria for identifying mobility deficiencies reflecting the City's Circulation Element Goals. Vehicular queues that exceed existing or planned lengths of turn pockets are a deficiency criterion. However, while vehicular LOS is a component of the evaluation criteria for stop-controlled intersections, it is not identified as a mobility deficiency criterion for signalized intersections (CCTC 2022).

The project is estimated to generate 17,206 external trips (trips outside the project site) per weekday, including 1,318 trips during the AM peak hour and 1,967 trips during the PM peak hour. The project is estimated to generate 11,273 external trips on Sundays, including 1,566 trips during the PM peak hour. The Phase 2 market hall, restaurant, winery, and retail (food and beverage) uses are the largest trip generator, constituting approximately 69% of total daily trips (CCTC 2022).

ONSITE CIRCULATION AND PARKING

Onsite circulation deficiencies would occur if project designs (including project frontage improvements) fail to meet appropriate standards, fail to provide adequate passenger vehicle and truck access, or would result in hazardous conditions. The project would construct left turn lanes and a traffic signal or roundabout at the intersection of Airport Road and Landing Lane, which would serve as the southernmost access point to the project site and would be the only access for the project's truck traffic if the Rollie Gates Drive extension is not constructed. Three driveways with side street stop control are proposed along Airport Road north of this signalized/roundabout intersection, with a two-way left turn lane constructed along the project frontage. Left turns out of the project site would only be allowed at the Landing Lane intersection (accessed via a driveway along Landing Lane) and at the northernmost stop-controlled driveway.

The Transportation Impact Study identified several measures to reduce onsite (and frontage) circulation deficiencies (see Transportation Impact Study Section 5.2). For a traffic signal to operate acceptably under Cumulative Conditions with the project at Airport Road and Dry Creek Road, a center left turn lane and two travel lanes in each direction would be needed on Airport Road. The additional southbound through lane would need to extend past the southern project driveway for acceptable operations. At the northernmost project driveway, two outbound lanes would be needed for acceptable operations. A partial

dual lane roundabout with two northbound and southbound approach lanes and one eastbound and westbound approach lanes would allow the intersection to operate acceptably.

TRAFFIC OPERATIONS

A project would result in traffic operation policy conflicts if it causes vehicle queues that exceed turn pocket lengths, increases safety hazards, causes stop-controlled intersection to operate below LOS D and meet signal warrants, or causes vehicle demand greater than the roadway capacity. The Transportation Impact Study evaluated the project's impact on traffic operations with existing conditions, near term conditions, and cumulative conditions (see Transportation Impact Study Sections 5.0, 6.0, and 7.0). Both queuing deficiencies and level of service deficiencies were identified at various intersections. The Transportation Impact Study provided recommended improvements for the project to maintain consistency with City traffic operations standards (see Transportation Impact Study Table 15, Table 20, and Table 25). The traffic operations recommendations for this project are consistent with the measures planned in the RTP and are required of the project through land use permit conditions of approval and tract map conditions. Impacts would be *less than significant with mitigation*.

TR Impact 1 (Class II)	
The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	
Mitigation Measures	
TR/mm-1.1	*Prior to the issuance of any permit or approval that authorizes road construction in the project site, the following design features shall be indicated on the plans and shall be installed as part of road construction.* *1. Internal intersections shall be designed to reduce skew angles and provide adequate sight distance consistent with the California Department of Transportation (Caltrans) Highway Design Manual. Roads shall intersect as close to 90 degrees as possible and shall not be less than 75 degrees.* *2. Direct sidewalk connections shall be accommodated between all buildings and along the internal roadway network. Crosswalks at roadway intersections internal to the project site shall be required to be marked at delineated crosswalks. The marking type (by paint or other material) shall be approved by the City of Paso Robles (City).* *3. The City shall review and approve turning templates at intersections to confirm that two-way truck traffic with the largest anticipated truck size can be accommodated without overlapping turning movements.* *4. A north–south roadway shall be installed at the border of Phase 1 and 2 to connect to Landing Lane to provide an improved connection to Hughes Parkway to the south.* *5. A connection to the Winery Row/Hughes Parkway intersection shall be provided for.* *6. Outbound left turns shall be restricted at project driveways except the northernmost driveway and Dry Creek Road (Landing Lane).* *7. Two outbound lanes shall be provided at the northernmost east/west driveway.* *8. A traffic signal or roundabout shall be installed at the intersection of Airport Road/Dry Creek Road (Landing Lane) that will accommodate cumulative traffic volumes with project traffic. The Applicant shall be responsible for the installation of the signal or roundabout prior to the issuance of an occupancy permit for the Phase 1 warehouse or for any other building that would take driveway access from Dry Creek Road.*
Residual Impacts	
Potential impacts associated with consistency with a program, plan, ordinance, or policy would be less than significant with mitigation.	

WOULD THE PROJECT CONFLICT OR BE INCONSISTENT WITH STATE CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B)?

TR Impact 2: The Phase 2 retail and hotel uses would result in a net increase in regional VMT and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b). Additionally, a substantial number of Phase 1 warehouse employees are anticipated to live outside of Paso Robles, which would result in long commute trips. Impacts would be significant and unavoidable (Class I).

As discussed above, retail projects (which include hotels), are considered to have a significant impact on VMT if they would cause a net increase in the total regional VMT. The SLOCOG TDM was applied to estimate VMT under multiple land use and horizon year scenarios to evaluate the VMT impact of individual project components (CCTC 2022). The project's Phase 2 hotel and retail components (market hall, restaurant, winery, and retail [food and beverage]) would generate over 40% of the overall project's daily vehicle trips, which would increase the regional VMT by 53,125 in the near term and by 77,735 by 2045 (Table 4.13-2) (CCTC 2022). This net increase in regional VMT would be significant and unavoidable.

Table 4.13-2. Regional VMT Analysis

Scenario	Total Regional VMT	Regional Employees	Regional Work VMT
2020 Baseline (no project)	8,899,234	117,276	1,595,434
2020 Phase 1 and Phase 2 Office and Industrial	8,901,908	119,684	1,585,145
Change from 2020 Baseline	2,675	2,408	-10,289
2020 Phase 2 Hotel and Retail	8,952,358	118,429	1,588,801
Change from 2020 Baseline	***53,125***	*1,153*	*-6,633*
2020 Full Project (Phases 1 and 2)	8,976,969	120,837	1,579,763
Change from 2020 Baseline	*77,735*	*3,561*	*-15,671*
2045 Baseline (no project)	10,295,957	138,473	1,687,578
2045 Phase 1 and Phase 2 Office and Industrial	10,356,184	140,881	1,682,320
Change from 2045 Baseline	*11,539*	*2,110*	*-5,258*
2045 Hotel and Retail	10,408,747	139,626	1,678,916
Change from 2045 Baseline	***112,791***	*1,153*	*-8,662*
2045 Full Project	10,445,268	142,034	1,682,273
Change from 2045 Baseline	*149,311*	*3,561*	*-5,305*

Source: SLOCOG (2019); CCTC (2022)

Note: Regional Work VMT is attracted to workplaces and is the sum of home-based-work attractions. Negative values indicate a reduction in VMT from baseline conditions.

Office and industrial projects may have a significant impact if the work VMT (trips from home to the workplace) per employee exceeds 85% of the regional average. Although the SLOCOG TDM projected that the project would reduce regional work VMT, data from the Bureau of Labor Statistics, the U.S. Census Bureau, and BW Research Partnership (see *Section 4.11, Population and Housing*) indicate that a significant number of employees generated by Phase 1 warehouse would likely commute from outside the city or county from lower average wage-earning communities and lower housing cost communities, which would result in increased commute lengths and increased regional work VMT and overall VMT.

AQ/mm-1.1 has been identified to require that the project prepare and implement a Transportation Demand Management Plan to help reduce VMT generated by the project by incentivizing carpool, transit, and other alternative methods of transportation. No other feasible mitigation measures to reduce project VMT were identified. (Adding residential uses to the project theoretically could help lower some portion of VMT, but such uses at the project site are prohibited by airport policies.) Impacts would be *significant and unavoidable*.

TR Impact 2 (Class I)
The Phase 2 retail and hotel uses would result in a net increase in regional vehicle miles traveled (VMT) and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b). Additionally, a substantial number of Phase 1 warehouse employees are anticipated to live outside of Paso Robles, which would result in long commute trips.
Mitigation Measures
Implement Mitigation Measure AQ/mm-1.1.
Residual Impacts
Implementation of travel demand model measures through a Transportation Demand Management Plan would reduce impacts related to VMT but would not reduce them to less than significant levels. Impacts would remain significant and unavoidable.

WOULD THE PROJECT SUBSTANTIALLY INCREASE HAZARDS DUE TO A GEOMETRIC DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT)?

TR Impact 3: The project would introduce additional unprotected left-turning truck and vehicle traffic onto State Route 46 East (SR 46E), which has high speeds and collision rates greater than the state average. Impacts would be significant and unavoidable (Class I).

Per the City's TIAG, projects may have a significant impact if they exacerbate an existing high-priority safety or similar location, introduce a design feature that substantially increases hazards, or proposes features that do not meet City design standards.

As noted in *Section 4.13.1.2.2, Existing Collision Rates*, the SR 46E corridor is considered a high-priority safety location with collision rates above the state average for similar facilities. Two-thirds of all accidents in the corridor occurred near intersections and all three recent fatalities involved left-turning vehicles.

The project would introduce 676 new truck trips and 15,178 vehicle trips per day to the circulation network. (Note that the 676 truck trips have a vehicle equivalent of 2,028 trips, for a project total of 17,026 trips.) The two most likely access routes for truck and vehicle traffic to the project site from SR 46E include Airport Road and Jardine Road (to Dry Creek Road), both of which are un-signalized and allow for unprotected left-turning movements. Additionally, a small amount of local traffic may access the project site from Mill Road, which is also un-signalized allowing for unprotected left-turning movements. Project-related left-turning movements at these intersections, during the weekday AM, weekday PM, Friday PM, and Sunday PM peak hours are shown in Table 4.13-3.

Table 4.13-3. Project Unprotected Left-Turning Movements on the SR 46E Corridor

Intersection	Weekday		Friday PM	Sunday PM
	AM	PM		
Airport Road	754	671	671	594
Jardine Road	0	0	0	0
Mill Road	21	15	15	14
Total	**775**	**686**	**686**	**608**

Source: CCTC (2022); Appendix A Figures 5a and 5b

Acceleration lanes currently serve the southbound to eastbound left-turning vehicles at Jardine Road and Airport Road. These two intersections would be used for eastbound vehicle traffic generated by the project. The Jardine Road acceleration lane is 300 feet long and the Airport Road acceleration lane is 625 feet. Neither acceleration lane has tapers. The National Cooperative Highway Research Program *Report 505 Review of Truck Characteristics* and *Report 650 Median Intersection Design for Rural High-Speed Divided Highways* recommend an acceleration length of 960 feet (900 feet without tapers) for vehicles starting from 0-15 miles per hour (mph) on 55 mph roadways and 1,200 feet (1,140 feet without tapers) for 60 mph roadways. Therefore, neither of these existing intersections would provide adequate acceleration length for left-turning vehicle or truck traffic to enter the mainline flow at a speed similar to prevailing traffic (CCTC 2022). This is considered a significant impact because of SR 46E's high speeds, current high collision rates, and projected number of daily trucks associated with the project.

The Transportation Impact Study recommends that project truck traffic be restricted to only making left turns at the Golden Hill Road signal to avoid entering SR 46E mainline flow at substantially lower speeds than prevailing traffic (see Transportation Impact Study Section 2.7). The City's Circulation Element and Parallel Routes Study (Fehr & Peers Transportation Consultants 2008) identifies an alignment between Airport Road and Golden Hill Road via an extension of Airport Road (identified as New Airport Road), a bridge over Huer Huero Creek, and Wisteria Lane (existing), which connects to Golden Hill Road approximately 2,000 feet north of the SR 46E signalized intersection. The City is currently working to obtain additional necessary right-of-way to construct this project.

For the past several years, the City has been in the process of designing and conducting environmental review for vehicular and multi-use infrastructure improvements that would reduce traffic on SR 46E near Airport Road (Huer Huero Bridge and Roundabout Project). The proposed New Airport Road extension and bridge over the Huer Huero Creek would connect businesses and residences west of the creek with the Paso Robles Municipal Airport, businesses, and residences east of the creek and allow traffic to access the signalized intersection at Golden Hill Road. The Huer Huero Bridge and Roundabout Project consists of three main components located within a project area of approximately 13.3 acres: the New Airport Road extension and bridge across Huer Huero Creek, realignment of a portion of Airport Road and a new roundabout intersection with New Airport Road, and a Class I trail extending from Union Road at Barney Schwartz Park to the Cava Robles RV Resort. The Huer Huero Bridge and Roundabout Project underwent separate environmental review and the draft CEQA document was published in June 2022 (SCH Number 2022060295).

Because of the Huer Huero Creek Bridge's unknown construction timing, an interim crossing must be constructed to serve project truck traffic if the permanent bridge is not constructed and operational in time for project occupancy. The interim crossing would be in a location currently designated for a future Class I Multiuse Trail low water crossing associated with the permanent Huer Huero Creek Bridge, the design of which would be modified to accommodate project truck traffic. The modified Class I Multiuse Trail low water crossing and access roads would generally run perpendicular to and across the Huer Huero

Creek. The modified Class I Multiuse Trail low water crossing would include connecting roadways from Airport Road to the modified Class I Multiuse Trail low water crossing and from the modified Class I Multiuse Trail low water crossing to New Airport Road. Preliminary design drawings prepared by the Applicant show that the interim bridge would likely need to be constructed as a two-lane, 32-foot-wide, at-grade (low water) crossing to not obstruct significant flood flows within the Huer Huero Creek channel. (Note that water flow in this portion of the Huer Huero Creek is typically subterranean.) After completion of the permanent Huer Huero Creek Bridge, project traffic would use the permanent Huer Huero Creek Bridge to Golden Hill Road, and the modified Class I Multiuse Trail low water crossing and connecting roadways would be converted for use in the Class I Multiuse Trail. (As noted above, the permanent Huer Huero Creek Bridge underwent separate environmental review and will be required to adhere to the mitigation measures identified in that review.) Impacts would be *significant and unavoidable*.

TR Impact 3 (Class I)	
The project would introduce additional unprotected left-turning truck and vehicle traffic onto State Route 46 East (SR 46E), which has high speeds and collision rates greater than the state average.	
Mitigation Measures	
TR/mm-3.1	*Prior to occupancy of any use on the project site, except the existing maintenance building, that would cause more than 30 PM weekday peak hour outbound trips to be generated by uses on the project site, the parallel route north of State Route 46 East (SR 46E) (Huer Huero Creek Bridge and New Airport Road) or functional equivalent shall be constructed. Southbound left turns at the Airport Road and SR 46E intersection shall be restricted.*
TR/mm-3.2	*The Applicant shall install improvements at the Airport Road intersection restricting southbound left turns onto State Route 46 East (SR 46E). The southbound left turn restrictions shall be operational prior to issuance of occupancy for any building except the existing maintenance building. The Applicant is responsible for design, permitting, and construction of the improvements. An encroachment permit shall be obtained from the California Department of Transportation (Caltrans) prior to construction.* *The Applicant may submit a request to the City of Paso Robles (City) City Council to approve a reimbursement agreement for the installation of the left turn restriction improvements, which the City Council may approve or deny at their sole discretion. The reimbursement agreement will apply to other development projects benefiting from the improvements. The reimbursement agreement cost allocation shall be based on total building square footage, or another appropriate cost allocation method, as determined by the City Engineer. The City Engineer has evaluated the proposed and pending projects in the area and building square footage is a reasonable means of determining traffic payments as the square footage correlates reasonably to those project's trip generation derived from the Institute of Transportation Engineers (ITE) trip estimates for similar sizes and uses. The Applicant is responsible for all costs associated design and construction of the identified and constructed improvement.* *If the intersection improvements are constructed by others, the Applicant shall be responsible for payment of any reimbursement agreement cost allocation in place, prior to occupancy for any building except the existing maintenance building.*
Residual Impacts	
By limiting project truck traffic to making eastbound and southbound left turns at the signalized Golden Hill Road intersection, impacts related to project truck traffic making left-turning movements onto SR 46E would be less than significant with mitigation. Restricting southbound left turns from Airport Road to SR 46E would reduce impacts related to vehicles making left-turning movements onto SR 46E to less than significant. However, these improvements fall under the jurisdictional authority of Caltrans and would require coordination with and approval	

TR Impact 3 (Class I)
from Caltrans. Because the City does not have jurisdictional authority over these locations, and the timing and implementation of improvements requiring Caltrans oversight cannot be assured, impacts related to vehicles making left-turning movements onto SR 46E would remain significant and unavoidable.
Secondary Impacts
Impacts resulting from construction of the permanent Huer Huero Creek Bridge and Class I Multiuse Trail low water crossing have been evaluated separately as part of that project and were determined to be less than significant with mitigation (see Huer Huero Bridge and Roundabout Project MND [SCH No. 2022060295]). Impacts resulting modifying the Class I Multiuse Trail low water crossing to accommodate project truck traffic are discussed within the individual sections of this EIR.

TR Impact 4: The project would exacerbate queuing deficiencies and create new queuing deficiencies at intersections during peak travel hours. The queuing deficiencies would exceed the storage capacity of the intersections and would create safety issues from queuing spillover into through lanes or into deceleration areas. Impacts would be significant and unavoidable (Class I).

Per the City's TIAG, projects may have a significant impact if they exacerbate an existing high-priority safety or similar location, introduce a design feature that substantially increases hazards, or proposes features that do not meet City design standards.

The SR 46E corridor experiences high traffic volumes on weekends, including the Friday PM peak hour and Sunday PM peak hour, because of visitors from the Central Valley. These volumes are exacerbated during the summer travel season. The Transportation Impact Study identified that with Phase 2 development, the project would generate 17,206 daily weekday trips, including 1,318 during the AM peak hour and 1,967 during the PM peak hour, and 11,273 trips on Sundays, including 1,566 during the Sunday PM peak hour (CCTC 2022).

The trips generated by the project would result in queuing deficiencies at the following intersections:

- Golden Hill Road/Golden Hill Plaza (#11). The northbound left turn queue length currently exceeds storage length during the weekday and Sunday PM peak hours. This queue deficiency is existing but would be exacerbated by both phases of the project. Additionally, both phases of the project would create a queuing deficiency at the northbound left turn during the Friday PM peak hour.
- US 101 SB Ramps/SR 46E (#16). The westbound left turn queue length currently exceeds storage length during the Friday PM peak hours. This queue deficiency is existing but would be exacerbated by both phases of the project. Additionally, both phases of the project would create a queuing deficiency at the westbound left turn during the weekday and Sunday PM peak hours.
- US 101 NB Ramps/SR 46E (#17). The northbound right turn currently exceeds storage length during the Friday and Sunday PM peak hours, and the westbound through queue length currently exceeds storage length during the Friday PM peak hour. This queue deficiency is existing but would be exacerbated by both phases of the project. Additionally, both phases of the project would create queuing deficiencies at the northbound right turn during the weekday PM peak hour and at the westbound through during the Sunday PM peak hour. Phase 2 of the project would create a queuing deficiency at the westbound through during the weekday PM peak hour.
- SR 46E/Golden Hill Road (#19). The southbound left turn queue length currently exceeds storage length during the Friday PM peak hour. This queue deficiency is existing but would be

exacerbated by both phases of the project. Additionally, both phases of the project would create a queuing deficiency at the southbound left turn during the weekday and Sunday PM peak hours.

- SR 46 E/Union Road (#20). The northbound right turn queue currently exceeds storage length during the weekday, Friday, and Sunday PM peak hours. This queue deficiency is existing but would be exacerbated by both phases of the project. Additionally, both phases of the project would create a queuing deficiency at the westbound left turn during the weekday and Friday PM peak hours.
- SR 46 E/Airport Road (#21). The southbound right turn queue currently exceeds storage length during the weekday AM and PM, Friday PM, and Sunday PM peak hours. This queue deficiency is existing but would be exacerbated by both phases of the project. Additionally, both phases of the project would create a queuing deficiency at the eastbound left turn during the weekday AM, weekday PM, and Friday PM peak hours.
- Golden Hill Road/Union Road (#24): This intersection does not have any existing queuing deficiencies. Both phases of the project would create a queuing deficiency at the northbound right turn during the weekday AM, weekday PM, and Friday PM peak hours, and queuing deficiency at the westbound left turn during the weekday PM and Friday PM (Phase 2 only) peak hours.

The above-noted queuing and storage capacity issues would result in new or increased backup onto the SR 46E mainline, US 101 mainline, or onto City streets (see Transportation Impact Study Tables 13, 14, 18, 19, 23, and 24). These queues would exceed the storage length capacity from several feet to several thousand feet, which would extend into the through lanes where travel speeds are high.

To address congestion and capacity issues on SR 46E, in 2009 the City, SLOCOG, the County, and Caltrans completed a Comprehensive Corridor Study for a 5-mile section of SR 46E from approximately Buena Vista Drive to Jardine Road. The Comprehensive Corridor Study identified several improvement concepts for the portion of SR 46E within the City limits that would enhance local connectivity, reduce congestion, and improve traffic movement and safety. A major improvement identified in the Comprehensive Corridor Study is to address the intersection of Union Road and SR 46E. In 2014, the City completed, and Caltrans approved, the *SR 46/Union Road Improvements Project Study Report-Project Development Report*, which evaluated five improvement alternatives at this intersection. In September 2015, the City retained Mott MacDonald to perform the PA&ED for the project, to further evaluate three alternatives: no-build, overcrossing, and full interchange. This PA&ED phase is intended to obtain Project Report approval for improvements at the intersection in order to proceed with capital programming for the design and construction of the preferred alternative. The PA&ED process is focused on obtaining preliminary design, right-of-way, and environmental approvals of a "preferred" project alternative that can then be carried forward to detailed design and construction (Mott MacDonald 2019). The first phase of the PA&ED included the preparation of a TOAR to evaluate technical traffic operations for each of the three alternatives.

The circulation network would not be able to accommodate vehicles from the project without the SR 46E at Union Road TOAR Alternative 1 Overcrossing, unless the project's Transportation Demand Management Plan proves effective at reducing trips during peak hours, or if the project generates less traffic than anticipated. Impacts would be *significant and unavoidable*.

TR Impact 4 (Class I)
The project would exacerbate queuing deficiencies and create new queuing deficiencies at intersections during peak travel hours. The queuing deficiencies would exceed the storage capacity of the intersections and would create safety issues from queuing spillover into through lanes or into deceleration areas.
Mitigation Measures
TR/mm-4.1 *The Applicant shall prepare a focused traffic evaluation that evaluates the State Route 46 East (SR 46E) corridor between Golden Hill Road and Jardine Road, the Golden Hill Road corridor from Wisteria Lane to Union Road, and the Airport Road corridor between the project site and SR 46E. The Applicant shall prepare the focused traffic evaluation once any of the following occur:* *1. After construction and completion of the modified Class I Multiuse Trail low water crossing or Huer Huero Creek Bridge (TR/mm-3.1), whichever occurs first, and occupancy of the Phase 1 Warehouse.* *2. After construction and completion of the modified Class I Multiuse Trail low water crossing for vehicular use or the Huer Huero Creek Bridge (TR/mm-3.1) and issuance of any building permit(s) that would cumulatively exceed 965 weekday PM peak hour trips based on the Transportation Impact Study prepared by Central Coast Transportation Consulting and used for evaluation in the Environmental Impact Report for the project. For purposes of the focused traffic evaluation, PM peak hour trips shall include PM peak hour trips from truck traffic, which shall be converted to passenger car equivalents.* *The focused traffic evaluation shall collect, at a minimum, 24-hour driveway counts to determine trip generation numbers for the uses already constructed and in operation. The evaluation shall identify whether any additional development may be constructed and operated, based upon the above noted threshold levels and pursuant to City of Paso Robles (City) and California Department of Transportation (Caltrans) standards. The focused traffic evaluation shall also evaluate:* *1. SR 46E/Union Road: evaluate operations and implement left turn lane restrictions if storage capacity is exceeded.* *2. SR 46E/Golden Hill Road: evaluate signal timing, reflective backplates, additional dynamic signage, overlap phases, turn lane extensions, and additional lanes. The analysis shall include added traffic from SR 46E/Union Road turn restrictions (see 1., above).* *3. SR 46E/Airport Road: evaluate intersection operations and implement left turn lane restrictions if storage capacity is exceeded.* *4. SR 46E/Jardine Road: evaluate intersection operations and implement intersection control changes or turn restrictions if storage capacity is exceeded.* *5. Golden Hill Road/Golden Hill Plaza: evaluate signal timing and phasing and consider turn restrictions.* *6. Golden Hill Road/Tractor Street: evaluate operations and traffic signal warrants.* *7. Golden Hill Road/Tractor Street and Golden Hill Road/Wisteria: evaluate operations and all-way stop control and traffic signal warrants.* *8. Golden Hill Road/Union Road: evaluate operations and determine if a dual lane roundabout is needed with future project traffic.* *9. Airport Road/Dry Creek Road (Landing Lane): evaluate intersection operations and restrict eastbound left turns on Winery Road if needed. Determine if intersection improvements will accommodate future project traffic.* *10. SR 46E Overcrossing (Traffic Operations Analysis Report [TOAR] Alternative 1 or functional equivalent as determined by Caltrans and the City Engineer): evaluate if queuing on SR 46 E, Golden Hill Road, and/or Airport Road can be accommodated with intersection improvements. If queuing cannot be accommodated with intersection improvement, construct TOAR Alternative 1 or a functional equivalent.*

TR Impact 4 (Class I)
If the City Engineer finds that the focused traffic evaluation determines that additional uses may be constructed and operational without additional circulation system improvements, the occupancy permit may be issued. If additional circulation system improvements are needed, the occupancy permit shall not be issued until subsequent additional focused traffic evaluations are prepared for each successive use and the Applicant either contributes fair share funding for the needed improvements or constructs the improvements. The City Engineer shall be responsible for determining which improvements are subject to fair share payments or construction.
Residual Impacts
Providing a grade-separated crossing of SR 46E and implementing the additional intersection control and capacity improvements would mitigate queueing issues. However, these improvements fall under the jurisdictional authority of Caltrans and would require coordination with and approval from Caltrans. Because the City does not have jurisdictional authority over these locations, and the timing and implementation of the improvements cannot be assured, impacts related to queue spillback would remain significant and unavoidable.
Secondary Impacts
Impacts associated with implementing SR 46E at Union Road TOAR Alternative 1 Overcrossing are being evaluated separately as part of the PA&ED process. Though not yet adopted, the June 2022 Draft PA&ED (and Draft MND) TOAR Alternative 1 would have no effect on Land Use and Planning and Mineral Resources, and that impacts to Aesthetics, Agriculture and Forest Resources, Air Quality, Cultural Resources, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire would be less than significant. Mitigation is proposed to reduce potential impacts to Biological Resources (wetlands) and Geology and Soils (paleontological resources) to less than significant.

WOULD THE PROJECT RESULT IN INADEQUATE EMERGENCY ACCESS?

TR Impact 5: The project would not result in inadequate emergency access. Impacts would be less than significant (Class III).

The nearest Emergency Services station to the project site is Paso Robles Fire Station Number 2, located approximately 4.4 miles south of the site. Future Fire Station 3 would be located approximately 1.4 miles south of the site (Paso Robles Fire and Emergency Services 2020). Through construction permits, Emergency Services approval will be required for access as well as other proposed improvements. The existing roadway network adjacent to the project site and the connecting roads in the area are currently able to accommodate emergency vehicles.

At full buildout emergency vehicles would be able to access the project site from four driveways along Airport Road: two with full access and two with right-in right-out-left-in access. All access points would be constructed in compliance with Emergency Services and the City's Public Improvement Standards.

The project would have the highest risk of emergencies during construction which would be temporary. The project would not result in road closures during short-term construction activities or long-term operations. The project would not block or alter egress routes for surrounding residents. Individual access to adjacent properties would be maintained during construction activities and throughout the project area. Project implementation would not affect long-term access through the project area and sufficient alternative access exists to accommodate regional trips. Therefore, impacts related to emergency access would be *less than significant.*

TR Impact 5 (Class III)
The project would not result in inadequate emergency access.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with inadequate emergency access would be less than significant.

4.13.6 Cumulative Impacts

As discussed in Chapter 3, Environmental Setting, the cumulative impact analysis is based on the City's cumulative projects list. Cumulative projects would generate both residential, industrial, and commercial development. This project, along with other foreseeable future projects located in the vicinity, would have the potential to result in increased regional VMT and safety hazards.

Other future projects would be required to undergo environmental analysis to ensure potential transportation impacts are mitigated to the greatest extent feasible and that they are consistent with the City's transportation policies, including traffic operations.

Despite implementation of mitigation to reduce VMT impacts to the greatest extent feasible, Phase 2 retail and hotel uses associated with the project would result in an increase in the regional VMT. Therefore, the project would result in a cumulatively considerable contribution to VMT increase within the city and county, and potential cumulative impacts would be significant and unavoidable (Class I).

Under cumulative conditions, several circulation improvements, including the permanent Huer Huero Creek bridge and the SR 46E and Union Road overcrossing (TOAR Alternative 1), would be constructed. TOAR Alternative 1 includes the closure of the Airport Road at SR 46E median, which would eliminate left turning movements across traffic. With these improvements, project truck and vehicle traffic heading eastbound on SR 46E would be required to use alternative routes, including the Huer Huero Creek bridge to the SR 46E and Union Road overcrossing or to Golden Hill Road. Neither of these routes would include unprotected left-turning traffic onto SR 46E. Additionally, the SR 46E and Union Road overcrossing would include the construction of acceleration lanes which would be constructed to Caltrans standards and NCHRP guidelines. Therefore, safety impacts resulting from additional left-turning truck and vehicle traffic would not be cumulatively considerable.

Based on cumulative conditions, including key circulation improvements, the following queuing deficiencies would occur:

- Airport Road/Dry Creek Rd (#6). The westbound left turn queue would exceed storage length during the weekday AM (Phase 2 only), weekday PM, Friday PM peak hour. The northbound left turn queue would exceed storage length during the weekday PM and Friday PM (Phase 2) peak hours of the project. The southbound left turn queue would exceed storage length during the weekday PM and Friday PM peak hour with Phase 2 of the project. These deficiencies would occur as a result of the project.
- Golden Hill Road/Golden Hill Plaza (#11). The northbound left turn queue would exceed storage length during the weekday AM, weekday PM, and Friday PM peak hours. These deficiencies would occur without the project but would be exacerbated by Phase 2 of the project.

- US 101 SB Ramps/SR 46 E (#16). The westbound left turn queue would exceed storage length during the weekday AM, weekday PM, and Friday PM peak hours. The eastbound right turn lane queue would exceed storage length during the Friday PM peak hour. These deficiencies would occur without the project but would be exacerbated by both phases of the project.
- US 101 NB Ramps/SR 46 E (#17). The northbound right turn queue would exceed storage length during the weekday AM, weekday PM, and Friday PM peak hours. The eastbound through queue would exceed storage length during the weekday AM peak hour. The westbound through queue would exceed storage length during the weekday AM, weekday PM, and Friday PM peak hours. These deficiencies would occur without the project but would be exacerbated by both phases of the project.
- SR 46E/Golden Hill Road (#19). The northbound left turn, southbound left turn, eastbound left turn, and westbound left turn queues would exceed storage lengths during the weekday AM, weekday PM, and Friday PM peak hours. The southbound through queue would exceed storage length during the weekday PM and Friday PM peak hours. These deficiencies would occur without the project but would be exacerbated by both phases of the project.
- SR 46 E/Airport Road (#21). The southbound right turn queue would exceed storage length during the weekday PM peak hour. This deficiency would occur as a result of Phase 2 of the project. The southbound right turn queue would also exceed storage capacity during the Friday PM peak hour. This deficiency would occur as a result of both phases of the project.

The above-noted queuing and storage capacity issues would result in new or increased backup onto the SR 46E mainline, US 101 mainline, or onto City streets. These queues would exceed the storage length capacity from several feet to nearly one thousand feet, which would extend into the through lanes where travel speeds are high. The TOAR prepared for the SR 46E at Union Road Improvement identifies that by 2045 (cumulative conditions/general plan buildout), additional capacity (widening) improvements will be needed for the Alternative 1 overcrossing to increase the overcrossing from three lanes to five lanes (Mott MacDonald 2019). The project would contribute to or cause the queuing deficiencies noted above. Due to the uncertainty associated with additional improvements to these intersections, project impacts would be cumulatively considerable and would be significant and unavoidable.

4.14 UTILITIES/SERVICE SYSTEMS AND ENERGY

This section analyzes the project's potential impacts to the City's water system, wastewater conveyance infrastructure system, stormwater control facilities, solid waste management system, and other utility service systems, as well as the project's potential impacts associated with energy demand. The analysis provided in this section is partially based on the *Water Supply Assessment for The Landing Paso Robles* (WSA) (Todd Groundwater 2021; Appendix H) and *Energy Use Assessment* prepared for the project (AMBIENT 2021b; Appendix K).

4.14.1 Existing Conditions

4.14.1.1 Utilities and Service Systems

4.14.1.1.1 EXISTING SITE CONDITIONS

The project site is currently developed with approximately 47 buildings associated with the former CDCR Paso Robles Boys School, which has not been in commission since July 2008. Between 1992 and 2008, a maximum of 247 AFY was pumped from on-site wells. Since 2010, on-site groundwater use has been below 20 AFY and this water use has been used for upkeep and maintenance of the facility only.

4.14.1.1.2 CITY OF PASO ROBLES MUNICIPAL WATER SUPPLY

The City's Water Division provides potable water to approximately 9,200 residential and 1,200 non-residential service connections in the city of Paso Robles. The City's water service area is generally consistent with the city boundaries. The Water Division is responsible for providing the city with a reliable, high-quality water supply through treatment, distribution, and resource planning.

The city of Paso Robles is located in the Paso Robles Area Subbasin of the Salinas Valley Groundwater Basin, which is identified as Basin No. 3-004.06 by the DWR. The Paso Robles Subbasin is under the jurisdiction of the City of Paso Robles GSA, which has adopted the Paso Robles Area Subbasin GSP and Paso Robles Groundwater Basin Plan. As discussed in the *City of Paso Robles 2020 Urban Water Management Plan* (2020 UWMP) (City of Paso Robles 2021a), the City has relied primarily on Basin No. 3-4.06,the Salinas River, and water from Lake Nacimiento for its municipal water supply. While recycled water is not currently used as a water supply source in the city, the City is currently designing a recycled water distribution system that will offset irrigation demands in the city and allow for regional agricultural irrigation.

Water Supply Sources

Paso Robles Groundwater Basin

The City operates 12 basin wells east of the Salinas River that pump percolating groundwater from the Paso Robles Area Subbasin. All the groundwater wells are screened in the Paso Robles Formation along with many nearby rural residential and agricultural wells surrounding the city. The Paso Robles Groundwater Basin has been designated as high priority and critically overdrafted by the state, requiring management under the Sustainable Groundwater Management Act (SGMA) (City of Paso Robles 2021a). The Paso Robles Groundwater Basin has been informally subdivided into subareas, based on water quality, source of recharge, groundwater movement, and contours on the base of permeable sediments. See *Section 4.8, Hydrology and Water Quality,* for additional information regarding the hydrology of the project area. Between 2011 and 2015, the City has historically pumped up to 4,000 AFY from these wells (City of Paso Robles 2016). While the City has the infrastructure to continue pumping groundwater at this

historical rate, the City has decreased its pumping of Paso Robles subbasin wells by half this amount to optimize utilization of available supplies. Between 2015 and 2020, the City pumped up to 2,045 AFY from these wells.

Salinas River Wells

The City pumps Salinas River water from river wells pursuant to appropriative surface water rights and a permit issued by the SWRCB. The City has seven river wells and one Nacimiento water recovery well. This operation allows Nacimiento water to be turned into the Salinas River channel and captured through the recovery well (as distinct from river water). Approximately 60% of the City's current groundwater supply comes from its shallow Salinas River wells in the Atascadero subarea of the Paso Robles Groundwater Basin (City of Paso Robles 2021a). The City's permit with the SWRCB (Permit 5956), allows for a maximum surface water diversion of 4,600 AFY.

Nacimiento Water Project

The City holds a 6,488 AFY delivery entitlement for Lake Nacimiento water with the San Luis Obispo County Flood Control and Water Conservation District. In order to directly use its Nacimiento supply, the City constructed a 2.4-million-gallon-per-day (MGD) surface water treatment plant, which became fully operational in late 2015. The City anticipates operating the plant approximately 5 to 9 months out of the year to satisfy peak season demands, yielding approximately 1,120 AFY to 2,017 AFY. If operated year-round at full capacity, the treatment plant can provide up to 2,688 AFY.

Nacimiento water can also be utilized by the City through a recovery well. This operation allows Nacimiento water to be turned into the Salinas River channel and recaptured. According to the 2020 UWMP, the recovery well will be operated at a rate of 400 gallons per minute for 5 months out of the year, averaging 269 AFY (City of Paso Robles 2021a).

In drought years, Nacimiento water can be used to augment surface water and improve water supply reliability. Similar to the operation of the recovery well, Nacimiento water can be routed into the Salinas River channel adjacent to city's river wellfield. This allows the river wells to operate when native supplies are low (City of Paso Robles 2021a).

City Water Demands and Supply

Water demand projections for the city in the 2020 UWMP were developed using representative water demand factors, anticipated future conservation and projected water savings, and City General Plan growth assumptions and buildout conditions. Table 4.14-1 shows the city's available water supply. Table 4.14-2 shows the city's projected population and water demands through buildout in 2045. These figures in Table 4.14-2 represent the water source planned to supply projected demands and do not represent the total supply available to the city from each source.

Table 4.14-1. City of Paso Robles Current Water Supply Availability

Source	Amount
Groundwater Basin Wells	4,000 AFY[1]
Salinas River Wells	4,600 AFY
Nacimiento Water	6,488 AFY
Total Water Supply	**15,088 AFY**

[1] Note that 4,000 AFY is the historical pumping amount by the City and does not reflect any limits on the City's groundwater rights or pumping ability.

Table 4.14-2. City of Paso Robles Proposed Supply Sources through 2050

	2025	2030	2035	2040	2045	Buildout (2050 or later)
Population	34,400	37,700	39,900	41,900	42,800	44,000
Water Demands (AFY)	6,515	7,102	7,689	8,277	8,863	9,451
Proposed Water Supply Sources to Meet Demands (AFY)[1]						
Groundwater Basin Wells	2,1126	2,333	2,550	2,378	1,797	2,127
Salinas River Wells	3,000	3,200	3,500	4,200	4,400	4,558
Nacimiento Water from Water Treatment Plant	1,120	1,120	1,120	1,120	2,017	2,017[2]
Nacimiento Water from the Recovery Well	269	269	269	269	269	269
Recycled Water for Potable Offset	0	180	250	310	380	450
Total Proposed Supply to Meet Demands	**6,515**	**7,102**	**7,689**	**8,277**	**8,863**	**9,451**

Source: City of Paso Robles (2021)

[1] Supply volumes represent the water planned to supply projected demands, but do not reflect total supply available to the city from each source or limits on the City's groundwater rights.

[2] The City anticipates operating the plant 5 to 9 months out of the year to satisfy peak season demands (providing 1,120 AFY to 2,017 AFY). If operated year-round the treatment plant can provide up to 2,688 AFY.

The SGMA provides for sustainability of the Paso Robles Groundwater Basin by 2040. If less groundwater is available to the city from the basin than anticipated at that time, the City's water portfolio provides for additional water availability to meet demand (e.g., through increased delivery and treatment of Nacimiento water).

4.14.1.1.3 WASTEWATER

The City owns and operates the El Paso de Robles Wastewater Treatment Plant (WWTP), a Class IV Tertiary Treatment wastewater facility located at the northern end of the city adjacent to the Salinas River. Service is provided to approximately 32,000 people through a network of sewer mains that connect to the WWTP. The City maintains 14 lift stations to pump or lift the wastewater from low-lying areas to higher areas, so gravity can carry the flow to the WWTP. The facility currently operates under Order No. R3-2011-0002 issued by the Central Coast RWQCB (City of Paso Robles 2021b).

During 2020, the WWTP treated approximately 773 million gallons of influent wastewater. It has been noted that 2020 was an unprecedented year and, due to a lack of tourism, school closures, shelter in place orders, and shutdowns that affected many different industries, a reduction of approximately 200,000 gallons per day of wastewater influent to the WWTP from 2015 flows. In 2020, the average daily influent flow was 2.11 MGD and the maximum influent flow was 2.39 MGD in August, which is well below the WWTP design capacity of 4.9 MGD (City of Paso Robles 2021b). The WWTP has a peak wet weather capacity of 12.7 MGD. The WWTP is currently limited to a permitted discharge of 4.9 MGD (average dry weather design capacity) and 12.7 MGD (peak wet weather capacity) aggregated at Discharge Points 001B, 001C, 002A, and 002B pursuant to Waste Discharge Requirement (WDR) Order No. R3-2021-0001 (National Pollutant Discharge Elimination System [NPDES] Permit No. CA0047953) issued by the Central Coast RWQCB (Central Coast RWQCB 2021). According to the City's 2020 UWMP, wastewater flows at buildout of the city (2045 or later) are projected to be 4,946 AFY or 4.4 MGD (City of Paso Robles 2021b).

4.14.1.1.4 STORMWATER

The City Public Works Department maintains storm drainage facilities in the city to accommodate stormwater runoff; these lines empty into storm drains or natural drainage courses. The City is enrolled in the Phase II Municipal Stormwater Program, which is managed by the SWRCB and requires the City to develop a plan to reduce or eliminate stormwater pollution.

The project site is located within the Huer Huero Creek watershed, which is located in the eastern portion of San Luis Obispo's North County Region. The Huer Huero Creek watershed is discussed in detail in *Section 4.8, Hydrology and Water Quality*. Huer Huero Creek is an ephemeral underground stream located 0.28 mile southwest of the project site and is a direct tributary to the Salinas River. The Salinas River is located approximately 0.3 mile southwest of the project site.

According to FEMA FIRMs 06079CO392G (dated 11/16/2010) and 06079CO394G (dated 11/16/2012), the project site is located within Zone X, an area of minimal flood hazard; however, portions of Airport Road are located within Zone A, an area with high flood hazard (FEMA 2021).

4.14.1.1.5 SOLID WASTE

The City contracts with private service providers for solid waste services in the city. Paso Robles Waste & Recycle provides residential and commercial solid waste collection service, and Pacific Waste Services, Inc. operates the City-owned Paso Robles Landfill.

Solid waste generated in the city of Paso Robles, including that collected by Paso Robles Waste & Recycle, is disposed of at the Paso Robles Landfill located on SR 46E and Union Road, 6 miles east of the project site. The landfill is classified by the SWRCB as a Class III waste management unit, approved for discharge of nonhazardous municipal solid waste. Municipal solid waste currently delivered to the Paso Robles Landfill is generated by the residents and businesses of the city of Paso Robles and community of Templeton. The landfill has a maximum permitted capacity of 6,495,000 cubic yards and a maximum permitted throughput of 450 tons of solid waste per day and 75,000 tons per year, through October 1, 2051. As of December 31, 2017, the landfill had a remaining capacity of 4,216,402 cubic yards or approximately 65% of the maximum permitted capacity (CalRecycle 2019).

4.14.1.2 Energy

Energy use can adversely affect air quality and can generate GHG emissions that contribute to climate change. Fossil fuels are burned to create electricity that powers residences, heats and cools buildings, and powers vehicles. Transportation energy use is dependent on the fuel efficiency of cars, trucks, and public transportation; the different travel modes such as auto, carpool, and public transit; and vehicle miles traveled (VMT). Construction and routine operation and maintenance of transportation infrastructure also consume energy.

4.14.1.2.1 ELECTRICITY

The smallest scale at which energy consumption information is readily available is the county level. Therefore, energy consumption in San Luis Obispo County is used herein to characterize the city's existing consumption of electricity. According to the California Energy Commission (CEC), San Luis Obispo County consumed 1,707.39 million kilowatt-hours (kWh) of electricity in 2019 (CEC 2019a).

Electric services in the city of Paso Robles are provided by Pacific Gas & Electric Company (PG&E) and Central Coast Community Energy (3CE). Participation in PG&E as an electricity distributor is mandatory. In 2019, PG&E energy generation was supplied from approximately 29% of renewable energy sources (i.e., biomass and waste, geothermal, small hydroelectric, solar, and wind), 27% of large hydroelectric sources, and 44% of nuclear sources (Pacific Gas & Electric 2020).

On December 4, 2019, the City of Paso Robles became a Joint Partners Authority (JPA) member of 3CE, formerly Monterey Bay Community Power. 3CE is based on a local energy model called Community Choice Energy that partners with the local utility (i.e., PG&E) which continues to provide consolidated billing, electricity transmission and distribution, customer service, and grid maintenance services. 3CE provides rate benefits and local GHG reducing energy programs for residential, commercial, and agricultural customers. Participation in 3CE as an electricity provider is voluntary and all customers are provided the option to opt out and utilize PG&E electricity services instead. In 2019 3CE energy generation was supplied from approximately 31% renewable energy sources and 69% large hydroelectric sources. 3CE will provide 100% carbon-free electricity by the year 2030, which is 15 years ahead of California's SB 100 requirement of zero-carbon energy by 2045 (3CE 2021).

4.14.1.2.2 NATURAL GAS

As discussed in *Section 4.14.1.2.1, Electricity*, the smallest scale at which energy consumption information is readily available is the county level. Therefore, energy consumption in San Luis Obispo County is used herein to characterize the city's existing consumption of natural gas. According to the California Energy Commission (CEC), San Luis Obispo County consumed 89.73 million therms of natural gas in 2019 (CEC 2019b).

Natural gas services in the City of Paso Robles are purchased from PG&E and Southern California Gas Company (SoCalGas). PG&E's natural gas system encompasses approximately 70,000 square miles in Northern and Central California. Natural gas throughput provided by PG&E totals approximately 2.6 billion cubic feet per day (PG&E 2020b). SoCalGas's natural gas system encompasses approximately 20,000 square miles in Southern and Central California (SoCalGas 2020). Natural gas throughput provided by SoCalGas totals approximately 2.8 billion cubic feet per day (SoCalGas 2013). SoCalGas has committed to replacing 20% of its traditional natural gas supply with renewable natural gas by 2030 (Sempra Energy 2019). Renewable natural gas (RNG) would be sourced from decomposing organic matter found generally found in dairies, WWTPs, and landfills and would significantly cut GHG emissions from natural gas usage (SoCalGas 2021).

4.14.1.2.3 PETROLEUM

There are 14 oil refineries for diesel fuel and gasoline in California, located in the Bay Area, Los Angeles, and the Central Valley (CEC 2019c). There are no oil refineries in the city of Paso Robles. In 2019, 29,968,439 gallons of gasoline were sold in the city of Paso Robles (CEC 2019d).

4.14.1.2.4 RENEWABLE ENERGY

The state of California uses a wide range of renewable energy resources to meet applicable clean energy, climate change, and sustainable energy use goals. Different renewable energy sources include biomass, geothermal energy, hydroelectric power, solar energy, and wind energy (CEC 2021c). The City uses renewable energy resources to generate some of its 100% carbon-free electricity and SoCalGas, which plans to source 20% of natural gas from renewable energy sources by 2030.

4.14.2 Regulatory Setting

4.14.2.1 Utilities and Service Systems

4.14.2.1.1 FEDERAL

Safe Water Drinking Act

The Safe Water Drinking Act authorizes the USEPA to set national health-based standards for drinking water to protect against both naturally occurring and human-made contaminants that may be found in drinking water. The USEPA, individual states, and water systems work in coordination to ensure that these standards are met. The 1996 amendments enhanced the existing law by recognizing source water protection, operator training, funding for water system improvements, and public information as important components of safe drinking water.

4.14.2.1.2 STATE

The Subdivision Map Act (California Government Code Section 66410 et seq.)

Title 7, Division 2 of the California Government Code (referred to as the Subdivision Map Act) describes general provisions, procedures, and requirements for the division of land, including the provision of public services and roadway and utilities improvements.

Urban Water Management Planning Act (California Water Code Section 10610 et seq.)

The Urban Water Management Planning Act was developed to support suppliers' long-term resource planning and to ensure that adequate water supplies are available to meet existing and future water needs. It establishes the requirement that every urban water supplier (a supplier providing water for municipal purposes either directly or indirectly to 3,000 customers or supplying more than 3,000 AF of water annually) shall prepare and adopt a UWMP. Each plan shall include a description of the service area, existing and planned sources of water available to the supplier, how much water the agency has on a reliable basis, how much it needs for the foreseeable future, what the agency's strategy is for meeting its water needs, the challenges facing the agency, and any other information necessary to provide a general understanding of the agency's plan. In addition, every urban water supplier shall prepare and adopt a water shortage contingency plan as part of its UWMP that includes, but is not limited to, an analysis of water supply reliability over a 20-year planning timeframe, the procedures used in conducting an annual water supply and demand assessment, define standard water shortage levels corresponding to progressive ranges of up to 50% shortages and greater than 50% shortages, and shortage response actions that align with the defined shortage levels.

California Senate Bill 610

SB 610 requires an assessment of whether available water supplies are sufficient to serve the demand generated by a proposed project, as well as the reasonably foreseeable cumulative demand in the region over the next 20 years under average normal year, single dry year, and multiple dry year conditions. Under SB 610, water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects (as defined in California Water Code Section 10912[a]) subject to CEQA.

For the purposes of SB 610, "project" means any of the following:

- A proposed residential development of more than 500 dwelling units.
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
- A proposed hotel or motel, or both, having more than 500 rooms.
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
- A mixed-use project that includes one or more of the projects specified in this subdivision.
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project.

California Integrated Waste Management Act of 1989 (Assembly Bill 939)

The California Integrated Waste Management Act was enacted to reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible (PRC Sections 40050-40063). Specifically, the act requires counties and cities to adopt a Source Reduction and Recycling Element of their Waste Management Plans to describe actions to be implemented to achieve waste reduction goals (PRC Section 41750).

California Solid Waste Reuse and Recycling Access Act of 1991 (Assembly Bill 1327)

The California Solid Waste Reuse and Recycling Access Act requires each local jurisdiction to adopt an ordinance requiring commercial, industrial, or institutional building, marina, or residential buildings having five or more living units to provide an adequate storage area for the collection and removal of recyclable materials (PRC Chapter 18). The sizes of these storage areas are to be determined by the appropriate jurisdictions' ordinance. If no such ordinance exists with the jurisdiction, the CalRecycle model ordinance shall take effect (PRC Section 42911).

Mandatory Commercial Recycling Program (Assembly Bill 341)

AB 341 directed CalRecycle to develop and adopt regulations for mandatory commercial recycling. AB 341 requires all commercial businesses and public entities that generate 4 cubic yards or more of waste per week to have a recycling program in place.

Construction and Demolition Waste Materials Diversion Requirements (Senate Bill 1374)

The Construction and Demolition Waste Materials Diversion Requirements (SB 1374) added Section 42912 to the PRC requiring public agencies to include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste (PRC Section 42912). The legislation also requires that CalRecycle adopt a model ordinance for diverting 50% to 75% of all construction and demolition waste from landfills (PRC Section 42912).

4.14.2.1.3 LOCAL

City of El Paso de Robles General Plan 2003

Conservation Element

The Conservation Element includes goals, policies, and action items for the provision and maintenance of public utilities, facilities, and services in the city. The following policy and action items are relative to water services and supply in the city:

Policy C-1A Water Source, Supply, and Distribution. Develop and implement various innovative water provision and conservation programs that help to ensure an adequate supply of water for the city.

Action Item 1 Investigate and implement if feasible, development of supplementary water supplies to provide diversified resources and receive aquifer demand. Supplementary water supplies may include the following: State Water Project; dams and reservoirs on local creeks; Lake Nacimiento water; other water importation; regional conjunctive storage/use agreements; and/or developing water reuse.

Action Item 2 Investigate and implement, if feasible, basin recharge programs through non-traditional methods. Such programs may include the following: storm drainage system design integrating Low-Impact Development (LID) features to reduce hydromodification from development and other improvements to recharge the ground water aquifer; developing/improving water recharge along historic drainage patterns along/adjacent to creeks and/or rivers; and/or developing recycled wastewater programs including basin recharge.

Action Item 3 Maintain/update the Urban Water Management Plan and implement Best Management Practices as feasible.

Action Item 4 Maintain an updated Water Master Plan and develop needed water production, treatment, storage and distribution facilities as part of the Capital Improvement Plan/Budget. As part of the Water Master Plan or Engineering Standards and Specifications, establish water service standards for new development to include, but not be limited to: minimum pressure; provision of two sources of water to subdivisions and large development projects; use of looped systems.

The Conservation Element contains the following policy and action items relative to wastewater services and treatment in the city:

Policy C-1B Sewer Service. Provide adequate wastewater conveyance and treatment facilities to serve all parcels in the City.

Action Item 1 Maintain an updated Sewer Master Plan and develop needed sewer conveyance and treatment facilities as part of the Capital Improvement Plan/Budget.

Action Item 2 Require sewer connection for all new buildings except where topography and/or other physical constraints would make sewer connection unreasonable and sufficient parcel sizes provide for adequate leach systems.

Action Item 3 Require the abandonment of all septic systems at such time that a sewer becomes reasonably available to a parcel.

Action Item 4 The City shall not provide nor permit delivery of City sewer services to areas outside the existing City limits until such areas are annexed.

Action Item 5 Investigate and, if feasible, develop wastewater effluent discharge alternatives including land percolation/evaporation and/or recycling.

The Conservation Element contains the following policy and action items relative to stormwater services and infrastructure in the city:

Policy C-1C **Storm Drainage.** Provide storm drain systems that efficiently and safely mitigate flood risk, while effectively managing storm water through implementation of LID features, so that downstream run-off is limited to pre-development volumes and velocity before it is conveyed to the Salinas River, Huero Huero Creek, and their tributaries.

Action Item 1 Maintain and update the Storm Water Master Plan. Implement, as feasible, recommended actions and Best Management Practices described in the Master Plan.

Action Item 2 Establish revised development standards as may be appropriate, that include, but are not limited to the following:

a. For large developments that feature substantial amounts of impervious surfaces, detain water flows to prevent overflow of waterways and inundation of developed areas.

b. Direct surface water runoff from developed areas to LID storm water features on the development site. The facilities should be designed to both mitigate flood flows while providing safe and efficient low-flow conveyance.

c. Maintain natural streams to provide, at minimum, flow capacity for 100-year storm conditions.

d. Conduct floodplain acquisition and promote groundwater recharge to preserve the floodway, protect riparian habitats and to enhance water resource, flood control projects and recharge programs to accommodate increased runoff from new development. These programs should be funded by developers, at rates proportional to the projected increase in runoff associated with their developments.

The Conservation Element contains the following policy and action items related to solid waste services in the city:

Policy C-1C **Solid Waste.** Ensure that the City's landfill maintains sufficient capacity to serve the needs of the City through the year 2025.

- **Action Item 1** Support and participate in an update to the County Solid Waste Management Plan (reviewed September 2002).
- **Action Item 2** Reduce the amount of solid waste to be taken to the landfill by implementing the City's Source Reduction and Recycling Program.
- **Action Item 5** Develop a City-specific solid waste master plan.

Paso Robles Municipal Code

Chapter 14.02, Water Conservation and Water Shortage Contingency Plan, of Title 14, Waters and Sewers, of the Paso Robles Municipal Code establishes mandatory and permanent water management requirements in order to conserve water, enable effective water supply planning, assure reasonable and beneficial use of water, prevent water waste and unreasonable use and methods of use of water, and further the public health, safety, and welfare within the city service area. This chapter also establishes regulations to be implemented during times of declared water shortages or declared water shortage emergencies. Chapter 14.04 establishes the water rates and regulations for the city service area. Chapter 14.06 provides the minimum requirements for construction, reconstruction, repair, and destruction of water wells, cathodic protection wells, monitoring wells, and other wells of similar type to ensure that that groundwater will not be polluted or contaminated.

Chapter 14.08, Sewerage System Operations, of Title 14, Waters and Sewers, of the Paso Robles Municipal Code sets uniform requirements for discharges of domestic and industrial waste in the city sewer system. These requirements provide for compliance with the administrative provisions of the clean water regulations, water quality requirements set by the RWQCBs and the applicable effluent limitations, national standards of performance, pretreatment effluent standards, and any other discharge criteria that are required or authorized by federal and state law, and to derive the maximum public benefit by regulating the quality and quantity of wastewater discharged into those systems. Chapters 14.12 and 14.16 specify the applicable sewer rates and sewer main connection requirements for users in the city service area.

Sections 14.20.180 through 250 of the Paso Robles Municipal Code includes regulation of stormwater and non-stormwater discharges into and from the storm drain system, established construction and post-construction stormwater management requirements, and provides additional enforcement authority for violations.

Central Coast Post-Construction Stormwater Requirements

The Central Coast RWQCB establishes requirements that prescribe the discharge limits and establish water quality objectives through the Water Quality Control Plan for the Central Coast Basin (Central Coast RWQCB 2019). The RWQCB defines post-construction requirements for the Central Coast Region to help maintain water quality and the hydrologic health of the watersheds. These requirements are based on the project's type, size, and regional location.

Urban Water Management Plan

The 2020 UWMP was prepared to help guide the City's water management efforts for the next 20 years and beyond. This plan documents the City's sources of water supply, defines water demands, presents a water shortage contingency plan, and describes implementation of water demand measures. The plan also projects water supply and demand to buildout and includes a drought risk assessment.

Chapter 9 of the 2020 UWMP provides a description of the water conservation programs that the City has implemented, is currently implementing, and anticipates implementing. The City has implemented several demand management measures, including water waste prevention ordinances, metering, conservation pricing, public education and outreach, school education programs, programs to assess and manage distribution systems loss, implementation of a conservation manager, landscape and irrigation system ordinance, and other incentives to reduce water use within homes and business (City of Paso Robles 2021a).

Paso Robles Groundwater Basin Management Plan

Section 4.3 of the Paso Robles Groundwater Basin Management Plan identifies general basin management objectives, including maintaining and improving groundwater levels, maintaining and improving groundwater quality, protecting against subsidence, protecting against adverse impacts to surface water flows, groundwater monitoring and assessment, and evaluating and implementing feasible water conservation measures. The goal of the Paso Robles Groundwater Basin Management Plan is to locally manage and protect groundwater resources for all beneficial uses in a long-term sustainable, environmentally sound, economical, and equitable manner (City of Paso Robles 2011).

4.14.2.2 Energy

4.14.2.2.1 FEDERAL

Energy Policy Act of 2005

The Energy Policy Act of 2005 was signed into law on August 8, 2005. Generally, the Act provides for renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

Energy Independence and Security Act of 2007

Signed on December 19, 2007, by President George W. Bush, the Energy Independence and Security Act (EISA) of 2007 aims to:

- Move the United States toward greater energy independence and security;
- Increase the production of clean renewable fuels;
- Protect consumers;
- Increase the efficiency of products, buildings, and vehicles;
- Promote research on and deploy GHG capture and storage options;
- Improve the energy performance of the federal government; and
- Increase U.S. energy security, develop renewable fuel production, and improve vehicle fuel economy.

The EISA reinforces the energy reduction goals for federal agencies put forth in Executive Order (EO) 13423, as well as introduces more aggressive requirements. The three key provisions enacted are the Corporate Average Fuel Economy (CAFE) Standards, Renewable Fuel Standard (RFS), and appliance/lighting efficiency standards (USEPA 2019).

Regulations for Greenhouse Gas Emissions from Passenger Cars and Trucks and Corporate Average Fuel Economy Standards

In October 2012, the USEPA and the National Highway Traffic Safety Administration (NHSTA), on behalf of the USDOT), issued final rules to further reduce GHG emissions and improve CAFE standards for light-duty vehicles for model years 2017 and beyond. NHTSA's CAFE Standards have been enacted under the Energy Policy and Conservation Act since 1978. This national program requires automobile manufacturers to build a single light-duty national fleet that meets all requirements under both federal programs and the standards of California and other states. This program would increase fuel economy to the equivalent of 54.5 miles per gallon, limiting vehicle emissions to 163 grams of CO_2 per mile for the fleet of cars and light-duty trucks by the model year 2025.

In January 2017, USEPA Administrator Gina McCarthy signed a Final Determination to maintain the current GHG emissions standards for the model year 2022–2025 vehicles. However, on March 15, 2017, USEPA Administrator Scott Pruitt and USDOT Secretary Elaine Chao announced that the USEPA intends to reconsider the Final Determination. On April 2, 2018, USEPA Administrator Pruitt officially withdrew the January 2017 Final Determination, citing information that suggests that these current standards may be too stringent due to changes in key assumptions since the January 2017 Determination. According to the USEPA, these key assumptions include gasoline prices and overly optimistic consumer acceptance of advanced technology vehicles. The April 2nd notice is not the USEPA's final agency action. The USEPA intends to initiate rulemaking to adopt new standards. Until that rulemaking has been completed, the current standards remain in effect (USEPA 2018).

Energy Star Program

The Energy Star Program is a government upheld voluntary labeling program that provides simple, credible, and unbiased information for consumers and businesses regarding energy efficiency. The USEPA plays a significant role in the Energy Star Program. Energy Star can be applied to several products, including, but not limited to, lightbulbs, appliances, electronics, and machinery. Further, Energy Star is a tool to reduce GHG emissions, improve air quality, and protect public health (Energy Star 2021).

Construction Equipment Fuel Efficiency Standard

The USEPA has adopted multiple tiers of emission standards. Most recently adopted was a comprehensive national program to reduce emissions from nonroad diesel engines by integrating engine and fuel controls. To meet Tier 4 emission requirements, engine manufacturers are to produce new engines with advanced emission control technologies. Because the emission control devices can be damaged by sulfur, the USEPA requires in-use diesel fuel to decrease sulfur levels by more than 99% (USEPA 2021).

4.14.2.2.2 STATE

Integrated Energy Policy Report

SB 1389 requires the CEC to prepare a biennial integrated energy policy report (IEPR). The IEPR contains an integrated assessment of major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors. The IEPR provides policy recommendations to conserve resources,

protect the environment, ensure reliable, secure, and diverse energy supplies, enhance the state's economy, and protect public health and safety (CEC 2021a).

Assembly Bill 32: Climate Change Scoping Plan and Update

In October 2008, the CARB published its Climate Change Proposed Scoping Plan, which is the State's plan to achieve GHG reductions in California as required by AB 32. This initial Scoping Plan contained the main strategies to be implemented to achieve the target emission levels identified in AB 32. The Scoping Plan included CARB-recommended GHG reductions for each emissions sector of the state's GHG inventory. The largest proposed GHG reduction recommendations were associated with improving emissions standards for light-duty vehicles, implementing the Low Carbon Fuel Standard program, implementation of energy efficiency measures in buildings and appliances, the widespread development of combined heat and power systems, and developing a renewable portfolio standard for electricity production.

The initial Scoping Plan was first approved by CARB on December 11, 2008, and is updated every five years. The first update of the Scoping Plan was approved by the CARB on May 22, 2014, which looked past 2020 to set mid-term goals (2030–2035) on the road to reaching the 2050 goals (CARB 2014). The most recent update released by CARB is the 2017 Climate Change Scoping Plan, which was released in November 2017. The measures identified in the 2017 Climate Change Scoping Plan have the co-benefit of increasing energy efficiency and reducing California's dependency on fossil fuels.

Assembly Bill 1007: State Alternative Fuels Plan

AB 1007 (Chapter 371, Statues of 2005) required CEC to prepare a state plan to increase the use of alternative fuels in California. CEC prepared the State Alternative Fuels (SAF) Plan in partnership with CARB and in consultation with other federal, state, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes the costs to California and maximizes the economic benefits of in-state production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuel use, reduce GHG emissions, and increase in-state production of biofuels without causing significant degradation of public health and environmental quality.

Assembly Bill 1493: Vehicular Emissions and Greenhouse Gases

AB 1493 Chapter 200, Statutes of 2002, was adopted in 2002 to recognize global warming as a public health concern, that motor vehicles are a major source of the state's GHG emissions, and that reducing these emissions will protect public health and the environment while stimulating the economy and enhancing job opportunities. The bill directs the CARB to adopt regulations that achieve the maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles, beginning with the 2009 model year (CARB 2021).

Assembly Bill 2076: Reducing Dependence on Petroleum

Pursuant to AB 2076 (Chapter 936, Statutes of 2000), CEC and the CARB prepared and adopted a joint agency report in 2003, Reducing California's Petroleum Dependence. Included in this report are recommendations to increase the use of alternative fuels to 20% of on-road transportation fuel use by 2020 and 30% by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita VMT (CARB 2003). Further, in response to the CEC's 2003 and 2005 Integrated Energy Policy Reports, Governor Davis directed CEC to take the lead in developing a long-term plan to increase alternative fuel use. A performance-based goal of AB 2076 was to reduce petroleum demand to 15% below 2003 demand by 2020.

Senate Bill 350: Clean Energy and Pollution Reduction Act of 2015

SB 350 created the Clean Energy and Pollution Reduction Act, which requires the amount of electricity generated and sold to retail customers per year from eligible energy resources to be increased to 50% by December 21, 2030. This objective will increase the use of Renewables Portfolio Standard (RPS) eligible resources, including solar, wind, biomass, geothermal, and others. This act also requires a doubling of the energy efficiency savings in electricity and natural gas for retail customers through energy efficiency and conservation by December 31, 2030 (CEC 2021b).

Senate Bill 100: Acceleration of Renewable Portfolio Standard Goals

SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33% of total retail sales by 2020, 60% by 2030, and 100% by 2045. SB 100 accelerates the state's RPS program, which was last updated by SB 350 in 2015.

Senate Bill 1078: California Renewables Portfolio Standard Program

SB 1078 (Public Utilities Code Sections 387, 390.1, 399.25 and Article 16) addresses electricity supply and required that retail sellers of electricity, including investor-owned utilities and community choice aggregators, provide a minimum of 20% of their supply from renewable sources by 2017. This SB will affect statewide GHG emissions associated with electricity generation. In 2008, Governor Schwarzenegger signed Executive Order (EO) S-14-08, which set the RPS target to 33% by 2020. It directed state government agencies and retail sellers of electricity to take all appropriate actions to implement this target. EO S-14-08 was later superseded by EO S-21-09 on September 15, 2009. EO S-21-09 directed the CARB to adopt regulations requiring 33% of electricity sold in the State to come from renewable energy by 2020. Statute SB X1-2 superseded this EO in 2011, which obligated all California electricity providers, including investor-owned utilities and publicly owned utilities, to obtain at least 33% of their energy from renewable electrical generation facilities by 2020.

Executive Order B-48-18: Zero Emissions Vehicles and Infrastructure

In January 2018, Governor Brown signed EO B-48-18 which required all State entities to work with the private sector to put at least 5-million zero-emission vehicles on the road by 2030, as well as install 200 hydrogen fueling stations and 250,000 zero-emissions chargers by 2025. In addition, State entities are also required to continue to partner with local and regional governments to streamline the installation of zero-emission vehicle infrastructure. Additionally, all State entities are to support and recommend policies and actions to expand infrastructure in homes, through the Low-Carbon Fuel Standard.

California Code of Regulations Title 24, Part 6 – California's Energy Efficiency Standards for Residential and Non-Residential Buildings

The California Building Energy Efficiency Standards were first adopted in 1976 and have been updated periodically since then as directed by statute. The standards consist of energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. PRC Sections 25402(a)–(b) and 25402.1 emphasize the importance of building design and construction flexibility by requiring the CEC to establish performance standards, in the form of an "energy budget" in terms of the energy consumption per square foot of floor space (CEC 2018).

California Building Code and Green Building Standards

The purpose of the CBC Green Building Standards is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts to promote sustainable construction practices within the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality (California Building Standards Commission [CBSC] 2019). The CBC standards apply statewide; however, a local jurisdiction may amend a CBC standard if it makes a finding that the amendment is reasonably necessary due to local climatic, geological, or topographical conditions.

"Green" buildings standards are virtually indistinguishable from any other building standards, are contained in the California Building Code, and regulate the construction of new buildings and improvements. Whereas the focus of traditional building standards has been protecting public health and safety, the focus of green building standards is to improve environmental performance.

The green buildings standards were most recently updated in May 2018. Referred to as the 2019 Building Energy Efficiency Standards, these most recent updates focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to the exterior and vice versa), residential and nonresidential ventilation requirements, and non-residential lighting requirements. Under the newly adopted standards, nonresidential buildings will use about 30% less energy due mainly to lighting upgrades (CEC 2018).

Advanced Clean Cars Program

In January 2012, CARB approved the Advanced Clean Cars program which combines the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of zero-emission vehicles, into a single package of standards for vehicle model years 2017 through 2025. The new rules strengthen the GHG standard for 2017 models and beyond. This will be achieved through existing technologies, the use of stronger and lighter materials, and more efficient drivetrains and engines. The program's zero-emission vehicle regulation requires a battery, fuel cell, and/or plug-in hybrid electric vehicles to account for up to 15% of California's new vehicle sales by 2025. The program also includes a clean fuels outlet regulation designed to support the commercialization of zero-emission hydrogen fuel cell vehicles planned by vehicle manufacturers by 2015 by requiring increased numbers of hydrogen fueling stations throughout the state. The number of stations will grow as vehicle manufacturers sell more fuel cell vehicles. By 2025, when the rules will be fully implemented, the statewide fleet of new cars and light trucks will emit 34% fewer global warming gases and 75% fewer smog-forming emissions than the statewide fleet in 2016 (CARB 2016).

4.14.2.2.3 LOCAL

City of El Paso de Robles General Plan 2003

Conservation Element

The Conservation Element contains the following policy and action items related to energy resources in the city:

Goal C-7 **Energy Conservation.** Encourage the conservation of energy resources.

Policy C-2B **VMT Reduction.** Implement programs to reduce the number of VMT, especially by single occupant vehicles, including providing opportunities for mixed-use projects.

Policy C-7A **Conservation Measures.** Investigate and implement as feasible, energy conservation measures.

Other General Plan goal and policies for VMT reduction, pedestrian and bicycle access, expansion of transit services, mixed us and infill development, and other fuel reduction strategies would also reduce energy use within the city.

City of Paso Robles Climate Action Plan

The 2013 *City of Paso Robles Climate Action Plan* (2013 CAP) is a long-range plan to reduce GHG emissions from City government operations and community activities within Paso Robles (City Paso Robles 2013). The 2013 CAP seeks to achieve multiple community goals, such as lowering energy costs, reducing air pollution, supporting local economic development, and improving public health and quality of life. All standards presented in the 2013 CAP respond to the needs of development through achieving more efficient and sustainable use of resources, including energy.

4.14.3 Thresholds of Significance

The determinations of significance of project impacts are based on applicable policies, regulations, goals, and guidelines defined by CEQA and the City.

4.14.3.1 Utilities and Service Systems

In accordance with Appendix G of the State CEQA Guidelines, the project would be considered to have a significant effect on utilities and service systems if the effects exceed the significance criteria described below:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Each of these thresholds is discussed under *Section 4.14.5, Project-Specific Impacts and Mitigation Measures*, below.

4.14.3.2 Energy

In accordance with Appendices F and G of the State CEQA Guidelines, the project would be considered to have a significant effect on energy if the effects exceed the significance criteria described below:

a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Each of these thresholds is discussed under *Section 4.14.5, Project-Specific Impacts and Mitigation Measures*.

4.14.4 Impact Assessment and Methodology

4.14.4.1 Utilities and Service Systems

Assessment of impacts associated with utilities and service systems was based on a review of site information and conditions, project plans and application information, analysis provided in the WSA (Todd Groundwater 2021; see Appendix H), the *City of Paso Robles Lift Station 12 and Adjacent Gravity Sewer Main Evaluations* (Wallace Group 2021), the 2020 UWMP (City of Paso Robles 2021a), and City information regarding utilities. Projected demand on utility service systems was compared to projected available supply and capacity to determine whether new or modified utilities would be required as a result of the project.

4.14.4.2 Energy

The evaluation of project impacts associated with consumption of energy resources is primarily based on the Energy Impact Assessment prepared for the project (AMBIENT 2022). State CEQA Guidelines Appendix F requires environmental analyses to include a discussion of potential energy impacts associated with a proposed project. Where necessary, CEQA requires that mitigation measures be incorporated to reduce the inefficient, wasteful or unnecessary consumption of energy. The State CEQA Guidelines, however, do not establish criteria that define inefficient, wasteful or unnecessary consumption. Compliance with the State's building standards for energy efficiency would result in decreased energy consumption for proposed buildings. However, compliance with building codes may not adequately address all potential energy impacts associated with project construction and operation. As a result, this analysis includes an evaluation of electricity and natural gas usage requirements associated with future development, as well as energy requirements associated with the use of on-road and off-road vehicles. The degree to which the proposed project would comply with existing energy standards, as well as applicable regulatory requirements and policies related to energy conservation was also taken into consideration for the evaluation of project-related energy impacts.

4.14.4.2.1 CONSTRUCTION IMPACTS

Regarding energy use (e.g., fuel use) during construction, it is assumed that only diesel fuel would be used in construction equipment. On-road vehicles for hauling materials and worker commute trips assumed a mix of diesel and gasoline fuel use. Construction schedules, equipment numbers, horsepower ratings, and load factors were used to calculate construction-related fuel use, based on default assumptions contained in the California Emissions Estimator Model (CalEEMod), version 2020.4.0. Diesel fuel use was estimated based on a factor of 0.05 gallons of diesel fuel per horsepower-hour derived from the South Coast Air Quality Management District's (SCAQMD) CEQA Air Quality Handbook (SCAQMD 1993). Energy uses were quantified for demolition, site preparation, underground utilities, grading, building construction, paving, and architectural coating of Phase 1 construction and Phase 2. It is assumed that construction on Phase 1 would begin in 2023 and end in 2024, while Phase 2 would begin in 2024 and end in 2028.

4.14.4.2.2 OPERATIONAL IMPACTS

The long-term operation of the proposed project would require electricity and natural gas usage for lighting, water conveyance, and landscaping maintenance equipment. Indirect energy use would include solid waste removal. Project operation would include the consumption of diesel and gasoline fuel from on-road vehicles. Building energy use was estimated using CalEEMod, version 2020.4.0. With continued improvements in building energy efficiencies, energy use in future years would be less. Transportation fuel-use estimates were calculated by applying average fuel usage rates per vehicle mile to VMT associated with the proposed project. Annual energy usage was quantified based on CalEEMod default assumptions for PG&E, including compliance with renewable portfolio standards. Average fuel usage rates by vehicle class, fuel type (e.g., diesel, gasoline, electric, and natural gas), and calendar year were obtained from San Luis Obispo County's emissions inventory that's derived from CARB's Emissions Factors (EMFAC) 2021, version 1.0.1 (CARB 2021).

4.14.5 Project-Specific Impacts and Mitigation Measures

4.14.5.1 Utilities and Service Systems

WOULD THE PROJECT REQUIRE OR RESULT IN THE RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED WATER, WASTEWATER TREATMENT OR STORM WATER DRAINAGE, ELECTRIC POWER, NATURAL GAS, OR TELECOMMUNICATIONS FACILITIES, THE CONSTRUCTION OR RELOCATION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?

USS Impact 1: The project would not require relocation or construction of new or expanded City water facilities. Impacts would be less than significant (Class III).

A WSA was prepared for the project to evaluate the project's water needs and impacts on City water supplies. The CDCR Paso Robles Boys School was active on the project site until 2008 and relied on private groundwater wells for its water supply. Between 1992 and 2008, a maximum of 247 acre-feet per year (AFY) was pumped from on-site wells. Since 2010, groundwater use has been below 20 AFY and this water use has been used for upkeep and maintenance of the facility.

The project would result in the proper abandonment of all on-site groundwater wells. The existing water conveyance system on-site is over 50 years old and comprised of primarily 6- and 8-inch water mains. With the connection to the City's water system, there will be a 20-psi water pressure increase, which would likely cause a significant rise in system breaks and leaks to the on-site system, which are already prevalent based on comments from field staff (Wallace Group 2018). Therefore, new on-site water infrastructure to serve the project would be installed, and all proposed development would be connected to the City's potable water system. Impacts associated with on-site water infrastructure have been evaluated in the correlating issue area sections of this EIR.

At buildout, total project water demand is estimated to be 146 AFY, which would be supplied by the City potable water system. Although the additional 146 AFY of water demand associated with the project was not explicitly accounted for in the 2020 UWMP, the City has this supply available from its water supply portfolio of Nacimiento water, groundwater from the Paso Robles Area Subbasin, and water from the Salinas River (Todd Groundwater 2021). The City has existing 16-inch ductile cast iron water main within Airport Road, which is adequately sized to provide the water demand to the site. Therefore, the project would not require the modification or expansion of existing City water system facilities. Impacts would be *less than significant*.

USS Impact 1 (Class III)
The project would not require relocation or construction of new or expanded City water facilities.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Impacts would be less than significant.

USS Impact 2: The project would require installation of a new, increased capacity wastewater line from the project site to City Lift Station #12. Impacts would be less than significant with mitigation (Class II).

The existing sewer collection system is comprised of primarily 6- and 8-inch vitrified clay (VC) sewer main. It is assumed that it was installed in the 1940s with the original construction of the CDCR Paso Robles Boys School (Wallace Group 2018). Therefore, the project would require the installation of new sewer lines in addition to utilizing the existing site connection to the City's wastewater collection and treatment system. The project is anticipated to generate approximately 162,000 gallons per day of wastewater. Wastewater from the site currently flows southwest to Lift Station #12. While City staff have stated that Lift Station #12 has adequate capacity to serve the project's proposed development (Wallace Group 2018), the City is currently requiring an upgrade to the pumps, mechanical equipment, and controls of Lift Station #12 to their latest lift station standard. The project would not trigger the need for physical expansion of Lift Station #12.

Regarding the capacity of the gravity sewer main, the project's wastewater generation would result in a peak flowrate of 450 gallons per minute. At 450 gallons per minute, the existing 8-inch VC sewer line would be surcharged, which exceeds the City's design criteria of the ratio of flow depth over sewer diameter (d/D). The existing 8-inch VC sewer is approximately 1,600 feet long and extends from the proposed project property line southwest to Lift Station #12 (Figure 4.14-1) (Wallace Group 2021). The project would require the installation of a new, increased capacity wastewater line (12-inch polyvinyl chloride [PVC] pipe) to convey wastewater from the project site to Lift Station #12, the final design and specifications of which would be determined by the City Department of Public Works. This sewer line installation would result in approximately 0.48 acre of site disturbance within an existing 30-foot-wide agricultural road corridor.

Installation of this sewer line would potentially result in erosion, sedimentation, air quality, biological, and GHG emissions associated with construction. Additionally, construction could potentially impact unknown subsurface archaeological or paleontological resources. Construction-related mitigation measures to reduce these impacts are discussed in the relevant resource sections. Potential impacts associated with installation of on-site wastewater infrastructure have been evaluated in the correlating issue area sections of this EIR. Impacts would be *less than significant with mitigation*.

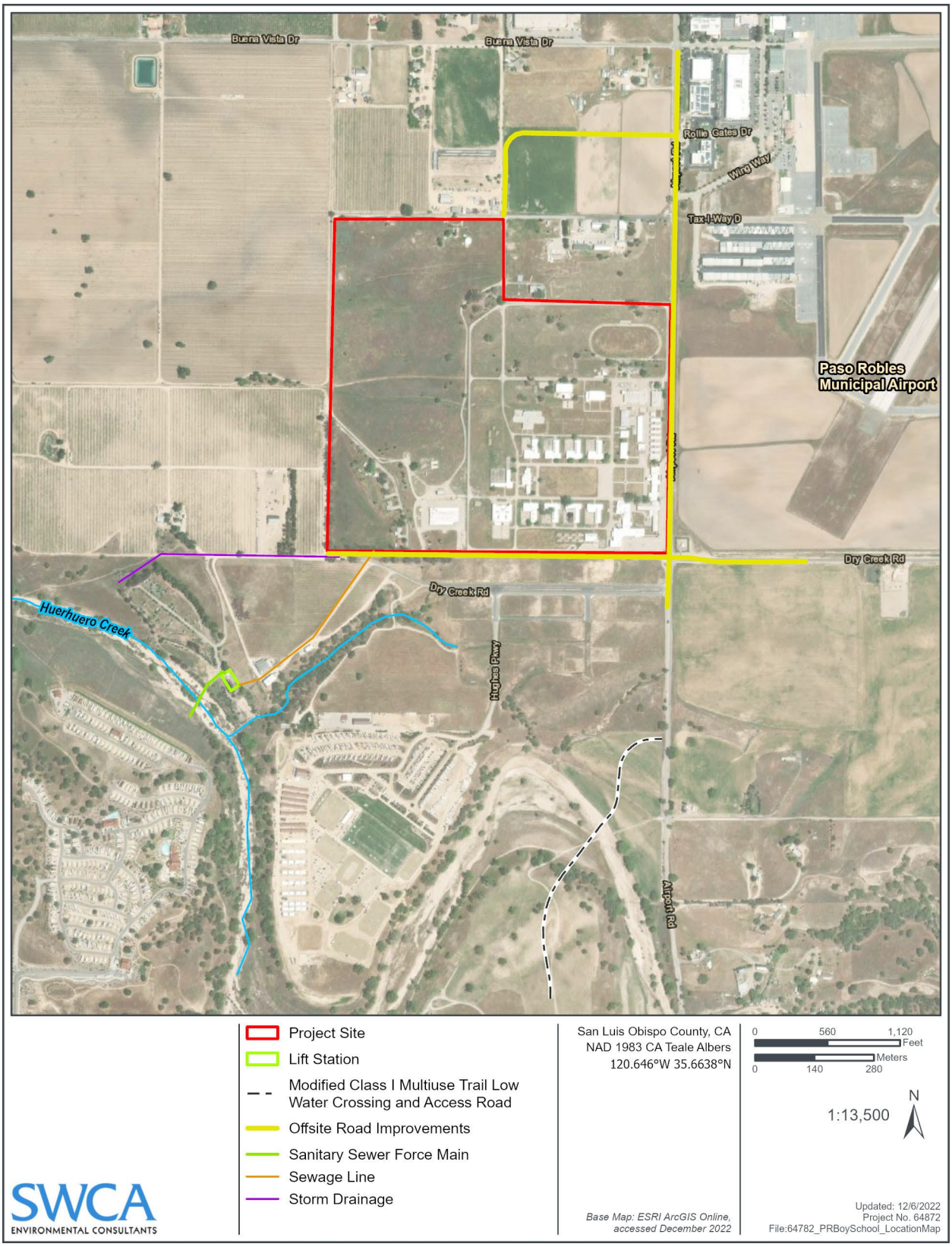


Figure 4.14-1. Off-site utility improvements and limits of disturbance.

USS Impact 2 (Class II)
The project would require installation of a new, increased capacity wastewater line from the project site to City Lift Station #12.
Mitigation Measures
Implement Mitigation Measures AQ/mm-1.3, AQ/mm-2.1, AQ/mm-2.2, AQ/mm-6.1, BIO/mm-3.1 through BIO/mm-3.5, BIO/mm-3.7, BIO/mm-3.8, BIO/mm-3.10 through BIO/mm-3.13, CUL/mm-2.1 through CUL/mm-2.3, GEO/mm-5.1, GEO/mm-5.2, HAZ/mm-2.4, and N/mm-1.1.
Residual Impacts
Impacts would be less than significant.

USS Impact 3: The project would require installation of a storm drain line from the project site's stormwater basin to a new outfall within the Huer Huero Creek. Impacts would be less than significant with mitigation (Class II).

The project site currently supports a network of storm drains and stormwater pipes ranging from 6 to 24 inches in diameter. The requirements for new development and design of stormwater systems have changed significantly since the site was originally developed. The project would include construction of a new 5.38-acre stormwater basin in the southwestern corner of the property. The stormwater basin would retain and treat stormwater runoff from the entire project site (Phases 1 and 2) and overflow would be discharged off-site to an outfall within Huer Huero Creek. Phase 1 would include inlets that direct stormwater runoff directly into the stormwater basin, while Phase 2 would direct runoff by sheet flow into smaller bioretention areas. Excess flow from Phase 2 would be directed to the stormwater basin through a gravity storm drain system.

The basin would be approximately 15 feet deep and designed to retain the 95th percentile runoff and up to 5.01 AF of water, and also has capacity to retain a 100-year 24-hour storm. Project stormwater main lines would be installed within Landing Lane and within the internal circulation system and parking lot areas and would lead to the new stormwater basin.

A new storm drain line would be installed in City ROW from the stormwater basin to a new outfall location within the Huer Huero Creek channel. Trenching for the storm drain line would impact approximately 2,200 linear feet by 50 linear feet within the ROW (1.37 acres). All new development would be required to comply with the Central Coast RWQCB's Post-Construction Requirements, including incorporation of BMPs and low-impact development features to improve water quality and control peak flow runoff.

Installation of the stormwater line and outfall would potentially result in erosion, sedimentation, air quality, biological, and GHG emissions associated with construction. Additionally, construction could potentially impact unknown subsurface archaeological or paleontological resources. Construction-related mitigation measures to reduce these impacts are discussed in the relevant resource sections. Potential impacts associated with installation of on-site wastewater infrastructure have been evaluated in the correlating issue area sections of this EIR. Impacts would be *less than significant with mitigation*.

USS Impact 3 (Class II)
The project would require installation of a storm drain line from the project site's stormwater basin to a new outfall within the Huer Huero Creek.
Mitigation Measures
Implement Mitigation Measures AQ/mm-1.3, AQ/mm-2.1, AQ/mm-2.2, AQ/mm-6.1, BIO/mm-3.1 through BIO/mm-3.5, BIO/mm-3.7, BIO/mm-3.8, BIO/mm-3.10 through BIO/mm-3.13, CUL/mm-2.1 through CUL/mm-2.3, GEO/mm-5.1, GEO/mm-5.2, HAZ/mm-2.4, and N/mm-1.1.
Residual Impacts
Impacts would be less than significant.

USS Impact 4: The project would not require the installation of new or expanded electric power, natural gas, or telecommunication facilities. Impacts would be less than significant (Class III).

The project site is currently serviced with a metered 5 kilovolt (kV) primary service and the distribution system is owned and maintained by the state. The 5 kV system extends all throughout the existing campus of buildings and consists of both underground and overhead distribution (Thoma Electric, Inc. 2018). The project proposes to underground existing aboveground electrical facilities on-site and along the project frontage. Electricity would be provided by PG&E. Natural gas service would be extended to the eastern portion of the project site within Airport Road and would be provided by SoCalGas. All new internet, telephone, and cable lines would be undergrounded within proposed internal roadways. Charter Communications would provide internet and television services. American Telephone and Telegraph Company (AT&T) would provide telephone services. The project would not require or result in the construction of new electrical distribution lines, natural gas transmission pipelines, or telecommunication facilities or expansion of existing facilities beyond those designed specifically for the project. The physical impacts of on-site development, which includes electric power, natural gas, and telecommunications facilities, are evaluated throughout the correlating issue area sections of this EIR. Impacts would be *less than significant*.

USS Impact 4 (Class III)
The project would not require the installation of new or expanded electric power, natural gas, or telecommunication facilities.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Impacts would be less than significant.

WOULD THE PROJECT HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT AND REASONABLY FORESEEABLE FUTURE DEVELOPMENT DURING NORMAL, DRY AND MULTIPLE DRY YEARS?

USS Impact 5: The City has sufficient water supplies available to serve the project during both normal and drought years. Impacts would be less than significant (Class III).

At buildout, total project water demand is estimated to be 146 AFY. Historically, the project site used groundwater from private wells as a source of supply with maximum demand at 226.7 AFY in 2000, an average of 183 AFY between 1992 and 2007 during operation of the CDCR Paso Robles Boys School, and 19 AFY after its closure in 2008. The proposed project use of 146 AFY is more than recent water use on-site but less than historical water use on-site during operation of the CDCR Paso Robles Boys School. If approved, the project would use potable water from the City's municipal water supply portfolio in lieu of locally pumped groundwater.

Table 4.14-3 compares City supply and demand projections, including the project, in 5-year increments between 2025 and anticipated General Plan buildout (2050 or later) for normal and dry climatic years. This table is based on 2020 UWMP tables. On an annual basis, the City has been able to provide sufficient supplies to meet demand during normal, single-dry, and multiple-dry year periods. Historical annual pumping has not been greatly affected by drought.

Table 4.14-3. City of Paso Robles Single and Multiple Dry Year Supply and Demand Projections

AFY	2025	2030	2035	2040	2045	Buildout (2050 or later)
2020 UWMP Demand Totals	6,515	7,102	7,689	8,277	8,863	9,451
2020 UWMP Demand Totals and Project Demand	6,661	7,248	7,835	8,423	9,009	9,597
City Water Supply Availability[2]	15,088	15,088	15,088	15,088	15,088	15,088
City Water Supply Availability with Project Demand[2]	14,942	14,942	14,942	14,942	14,942	14,942
Difference	-146	-146	-146	-146	-146	-146

[1] Water for the project was not explicitly included in the 2020 UWMP projections under the Public Facilities General Plan zoning because water demands have historically been satisfied by on-site private well use. The City has the additional 146 AFY of water supply available but the supply amounts in this table were kept at 2020 UWMP-listed supplies.

[2] Note that supply is based on the historical groundwater pumping amount by the City and does not reflect any limits on the City's groundwater rights or pumping ability.

Tables 4.14-1 and 4.14-2 above summarize projected population and water demands up to buildout and the supplies projected to be used to meet those demands. Water demand projects were based on the 2020 UWMP, which were developed using representative water demand factors, anticipated future conservation, and City General Plan growth assumptions and buildout conditions.

The City's surface water supplies are not dependent on snowmelt, which is most likely to be affected by climate change. However, effects of climate change may include increased evaporation from Lake Nacimiento and increased evapotranspiration losses, including increased irrigation water demand. Effects on the water system of increased irrigation demand can be minimized through water conservation measures and provision of recycled water.

The City has a diverse water supply portfolio that increases overall City water supply reliability. Although the additional 146 AFY of water demand associated with the project was not explicitly accounted for in the 2020 UWMP, the City has this supply available from its water supply portfolio of Nacimiento water, groundwater from the Paso Robles Area Subbasin, and water from the Salinas River. It is important to note that the UWMP documents projected water demands and identifies supplies that the City plans to use to serve those demands, but it does not identify the total water supply available. Based on an evaluation of current and future water supplies available to the City, the City has sufficient water supply available to serve the project under normal rainfall conditions (Todd Groundwater 2021).

Although customer water use in drought years may increase initially as a result of increased irrigation, water use in a drought year was assumed to be the same as a normal year because water use restrictions would limit additional water use, especially for landscape irrigation. Similarly, the amount of water supply available in times of drought was deemed to be the same as that available during normal years, and within historical pumping volumes. This is because in drought years, Nacimiento water can be used to augment surface water and improve water supply reliability. Similar to the operation of the recovery well, Nacimiento water can be routed into the Salinas River channel adjacent to the City's river wells. This allows the river wells to operate when native supplies are low (City of Paso Robles 2021a).

Therefore, based on the City's various water supplies and reliability of those supplies, the City has adequate potable water to supply a reliable long-term water supply for the project under normal and drought conditions, and no mitigation is necessary. Impacts would be *less than significant*.

USS Impact 5 (Class III)
The City has sufficient water supplies available to serve the project during both normal and drought years.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with having sufficient water supplies during normal, dry, and multiple dry years would be less than significant.

WOULD THE PROJECT RESULT IN A DETERMINATION BY THE WASTEWATER TREATMENT PROVIDER WHICH SERVES OR MAY SERVE THE PROJECT THAT IT HAS ADEQUATE CAPACITY TO SERVE THE PROJECT'S PROJECTED DEMAND IN ADDITION TO THE PROVIDER'S EXISTING COMMITMENTS?

USS Impact 6: The City Wastewater Treatment Plant has adequate capacity to serve the project's wastewater demands. Impacts would be less than significant (Class III).

The project's generated wastewater flows would ultimately flow to the WWTP. In 2020 the average daily influent flow to the WWTP was 2.11 MGD and the maximum influent flow was 2.39 MGD in August, which is well below the WWTP design capacity of 4.9 MGD. During the last 4 years (2017–2020), there has been a reduction in daily and annual plan influent flows due to drought, water conservation, and the disconnection of the Templeton Community Services District from the Paso Robles sewer system (City of Paso Robles 2021b). The WWTP has a peak wet weather capacity of 12.7 MGD. The WWTP is currently limited to a permitted discharge of 4.9 MGD (average dry weather design capacity) and 12.7 MGD (peak wet weather capacity) pursuant to WDR Order No. R3-2021-0001 (NPDES Permit No. CA0047953)

issued by the Central Coast RWQCB (Central Coast RWQCB 2021). Based on the 2020 UWMP, wastewater flows at buildout are projected to be 0.09 AFY per capita based on an average annual flow of 3.62 MGD and a population of 44,000 at buildout (City of Paso Robles 2021b).

Based on an evaluation conducted by Wallace Group, the project would result in an annual wastewater generation rate of 162,000 gallons per day, or approximately 0.16 MGD. With the proposed project, total city wastewater flow projections at buildout would be approximately 3.78 MGD, which is below the WWTP design capacity of 4.9 MGD. In addition, at the time the project property was being sold in 2019, the City provided a Will-Serve Letter stating that the City is willing and able to serve water, sewer, and refuse/recycling services to the project site. Based on an evaluation of the proposed project's wastewater generation rates, available treatment capacity of the City WWTP, and the Will-Serve Letter provided by the City, the project would be served by a wastewater treatment provider with adequate capacity to serve the project in addition to the provider's existing commitments. Impacts would be *less than significant*, and no mitigation would be necessary.

USS Impact 6 (Class III)
The City Wastewater Treatment Plant has adequate capacity to serve the project's wastewater demands.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with being served by a wastewater treatment provider with inadequate capacity to serve the project's demand in addition to the provider's existing commitments would be less than significant.

WOULD THE PROJECT GENERATE SOLID WASTE IN EXCESS OF STATE OR LOCAL STANDARDS, OR IN EXCESS OF THE CAPACITY OF LOCAL INFRASTRUCTURE, OR OTHERWISE IMPAIR THE ATTAINMENT OF SOLID WASTE REDUCTION GOALS?

USS Impact 7: The project would not generate waste in excess of the capacity of local landfills. Impacts would be less than significant (Class III).

Approximately 279,706 square feet of on-site structures would be demolished prior to project construction, which would result in solid waste requiring disposal. Demolition of existing structures would generate approximately 22,096.77 tons of debris requiring disposal (279,706 sf x 158 lbs/sf ÷ 2,000 lbs/ton = 22,096.77 tons; USEPA 2009). All demolition debris and construction waste that is not contaminated with asbestos, lead, or other hazardous materials would be subject to AB 939 and other waste diversion requirements to ensure that a portion of those materials are recycled and/or reused. Demolition waste would be accumulated, transported, and disposed of sequentially over the course of the 7-month demolition period.

Phase 1 of project development would generate approximately 1,629.73 tons of solid waste per year (CalRecycle 2021). This equates to roughly 4.47 tons of solid waste per day, or 8,930 pounds per day. Table 4.14-4 provides estimated solid waste generation rates for Phase 2 of the project site based on generation rates found on the CalRecycle Estimated Solid Waste Generation Rates webpage from the reference source that included comparable use types for each proposed project component.

Table 4.14-4. Estimated Solid Generation Rates for Phase 2 Development

Project Component	Unit of Measure	Solid Waste Generation Rate[1]	Pounds per Day
Industrial Flex and Maker Space	lb/employee/day	5	1,744[2]
Loft-Style Offices	lb/1,000 sf/day	6	1,500
Commercial Retail	lb/employee/day	2.5	544[2]
Winery	lb/employee/day	5	193[2]
Hotel	lb/room/day	2	240
Total			**4,221**

[1] Source: CalRecycle Estimated Solid Waste Generation Rates webpage; Stevenson Ranch Draft EIR (Phase IV), Los Angeles County 1992.

[2] Based on employment estimates by industry type (TischlerBise 2019).

The project would be required to comply with mandatory waste reduction requirements of the California Integrated Waste Management Act (AB 939) and the California Solid Waste Reuse and Recycling Act of 1991. Centralized solid waste facilities would be provided throughout the project site. Solid waste would be picked up and hauled off by Paso Robles Waste Disposal and would be taken to the Paso Robles Landfill. The landfill has a maximum permitted capacity of 6,495,000 cubic yards and a maximum permitted throughput of 450 tons of solid waste per day and 75,000 tons per year, through October 1, 2051. As of December 31, 2017, the landfill had a remaining capacity of 4,216,402 cubic yards or approximately 65% of the maximum permitted capacity (CalRecycle 2019). In addition, in 2019, the City provided a Will-Serve Letter stating that the City is willing and able to serve water, sewer, and refuse/recycling services to the project site.

Based on the estimated solid waste generation for each proposed development phase, the project as a whole is anticipated to generate approximately 13,151 pounds (6.58 tons) of solid waste per day during operation. Based on the available capacity of the Paso Robles Landfill, the waste generation rates of the project, and required compliance with state waste reduction and diversion policies, the project would not generate waste in excess of state or local standards, or in excess of the capacity of local infrastructure, and impacts would be *less than significant*.

USS Impact 7 (Class III)
The project would not generate waste in excess of the capacity of local landfills.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with generation of waste in excess of state or local standards or in excess of the capacity of local infrastructure would be less than significant.

WOULD THE PROJECT COMPLY WITH FEDERAL, STATE, AND LOCAL MANAGEMENT AND REDUCTION STATUTES AND REGULATIONS RELATED TO SOLID WASTE?

USS Impact 8: The project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant (Class III).

The project would comply with all federal, state, and local regulations and diversion requirements pertaining to solid waste disposal, including those intended for reduction, reuse, and recycling of waste to the extent practicable. Non-recyclable demolition debris and construction waste generated by the project would be disposed of at the Paso Robles Landfill, which had a remaining capacity of 4,216,402 cubic yards, or 65% of the maximum permitted capacity as of 2019. In addition, the project demolition and construction activities would be subject to applicable federal, state, and local regulations pertaining to the remediation, removal, and disposal of contaminated soils as described in *Section 4.7, Hazards, Hazardous Materials, and Wildfire*. Therefore, the project would not increase solid waste generation in a manner that would conflict with federal, state, or local management or reduction statutes, and impacts would be *less than significant*.

USS Impact 8 (Class III)
The project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with compliance with solid waste regulations would be less than significant.

4.14.5.2 Energy

WOULD THE PROJECT RESULT IN A POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY RESOURCES?

ENG Impact 1: The project would result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant with mitigation (Class II).

Implementation of the proposed project would increase electricity, diesel, gasoline, and natural gas consumption associated with construction activities, as well as long-term operational activities. Energy consumption associated with short-term construction and long-term operational activities are discussed in greater detail below.

Construction-Related Energy Consumption

Energy consumption would occur during construction, including fuel use associated with the on-site operation of off-road equipment and vehicles traveling to and from the construction site. Table 4.14-5 summarizes the estimated energy consumption associated with project construction. As depicted, the

operation of off-road construction equipment would use an estimated total of 236,274 gallons of diesel for Phase 1 and 157,851 gallons for Phase 2 of construction. On-road vehicles would use an estimated total of 86,878 gallons of gasoline and 33,837 gallons of diesel for Phase 1. On-road vehicles would use an estimated total of 166,194 gallons of gasoline and 25,514 gallons of diesel for Phase 2. In total, construction fuel use would equate to approximately 47,562 million British thermal units (MMBTU) for Phase 1 and 45,190 MMBTU for Phase 2.

Construction equipment use and associated energy consumption would be typical of that commonly associated with the construction of new land uses. In addition, mitigation measures have been identified in *Section 4.3, Air Quality and Greenhouse Gas Emissions* that would reduce construction-related fuel use, including the use of newer and alternatively fueled vehicles and equipment. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading would be limited to five minutes in accordance with San Luis Obispo Air Pollution Control District (SLOAPCD) requirements. Energy use associated with construction of the proposed project would be temporary and would not be anticipated to result in the need for additional energy infrastructure capacity, nor would construction be anticipated to result in increased peak-period demands for electricity. Project construction would not be anticipated to require the use of construction equipment that would be less energy efficient than those commonly used for the construction of similar facilities. As a result, the construction of the proposed project would not result in an inefficient, wasteful, or unnecessary consumption of energy; therefore, construction-related impacts would be *less than significant*.

Table 4.14-5. Construction Energy Consumption

Source	Total Fuel Use (gallons)	Total MMBTU
Phase 1		
Off-Road Equipment Use (Diesel)	236,274	32,460
On-Road Vehicles (Gasoline)	86,878	10,454
On-Road Vehicles (Diesel)	33,837	4,649
	Total	**47,562**
Phase 2		
Off-Road Equipment Use (Diesel)	157,851	21,686
On-Road Vehicles (Gasoline)	166,194	19,999
On-Road Vehicles (Diesel)	25,514	3,505
	Total	**45,190**

Notes: MMBTU = Million British thermal units

Fuel use was calculated based, in part, on default construction schedules, the equipment uses, and vehicle trips identified for the construction of similar land uses contained in the CalEEMod output files prepared for the air quality analysis conducted for this project.

Refer to Appendix K for modeling assumptions and results.

Operational Mobile-Source Energy Consumption

Operational mobile-source energy consumption would be primarily associated with truck trips to and from the project and passenger vehicle trips associated with project employees and customers. Energy use associated with commute trips are discussed in greater detail below.

Table 4.14-6 summarizes the estimated annual fuel use at build-out of Phase 1 and Phase 2. As noted in Table 4.14-6, the operational vehicle trips associated with Phase 1 of the proposed land uses would consume an annual estimated 1,683,380 gallons of diesel and 551,423 gallons of gasoline, and trips

associated with Phase 2 would consume an annual estimated 133,592 gallons of diesel and 690,675 gallons of gasoline. The ongoing development of increasingly efficient automobile engines would result in increased energy efficiency and energy conservation in future years. Mitigation measures have been identified in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, and *Section 4.13, Traffic and Transportation*, that would require the project applicant to implement a Traffic Demand Management Plan to further reduce the project's VMT and fuel consumption by requiring implementation of a commute trip reduction program, implementation of a shuttle system from centralized locations, offering financial incentives to employees who carpool or use alternative transportation, modification of shift schedules, etc. In addition, additional air quality mitigation measures have also been identified that would further reduce long-term mobile source fuel consumption, including, but not limited to, limitations on vehicle idling use of newer, more efficient haul trucks, providing a pedestrian-friendly streetscape, implanting rideshare programs for employees, providing employee lockers and showers, and exceeding CALGreen standards for on-site bicycle parking by 25%. With implementation of these measures and compliance with applicable state and local regulations, the long-term operation of the proposed project would not result in consumption of energy resources that would be unnecessary, inefficient, or wasteful; therefore, impacts would be *less than significant.*

Table 4.14-6. Operational Fuel Consumption

Source	Annual Fuel Use (gallons)	Annual MMBTU
Phase 1[1]		
Non-Truck Mobile Fuel – Diesel	5,094	700
Non-Truck Mobile Fuel – Gasoline	551,423	66,328
Truck Fuel – Diesel	1,678,286	230,565
Phase 2[1]		
Mobile Fuel (Diesel)	133,592	18,353
Mobile Fuel (Gasoline)	690,675	83,079
	Total (Phases 1 and 2)	**399,025**

Notes: MMBTU = Million British thermal units

Fuel use was calculated based, in part, on project trip generation rates derived from the traffic analysis for the project (CCTC 2022)

Refer to Appendix K for modeling assumptions and results.

[1] Phase 1 operation begins under 2024 conditions and Phase 2 begins in 2028.

Operational Building-Use Energy Consumption

The proposed project would result in increased electricity and natural gas consumption associated with the long-term operation of the buildings associated with the proposed land uses. Estimated electricity and natural gas consumption associated with the proposed facilities are summarized in Table 4.14-7. As depicted, buildings associated with Phase 1 would result in the annual consumption of approximately 6,032,362 kWh of electricity, 861,343 kWh of water, and 4,644,289 kilo British thermal units (kBTU) of natural gas. Buildings associated with Phase 2 would be completed by 2028 which would result in the total projects annual consumption being approximately 14,567,132 kWh of electricity, 1,155,534 kWh of water, and 17,656,335 kBTU of natural gas. In total, the proposed facilities would consume an annual total of approximately 28,166 MMBTU for Phase 1, and 71,302 MMBTU once Phase 2 is operational.

Table 4.14-7. Operational Building Energy Consumption

Source	Total Fuel Use (gallons)	Total MMBTU
Phase 1 (2024)		
Electricity (kWh)	6,032,362	20,582
Water (kWh)	861,343	2,939
Natural Gas Use (kBTU)	4,644,289	4,644
	Total	**28,166**
Phases 1 and 2 (2028)		
Electricity (kWh)	14,567,132	49,703
Water (kWh)	1,155,534	3,943
Natural Gas Use (kBTU)	17,656,335	17,656
	Total	**71,302**

Notes: MMBTU = Million British thermal units; kWh = Kilowatt hour; kBTU = Kilo British thermal unit

The development of increasingly efficient building fixtures would result in increased energy efficiency and energy conservation. The project would be subject to energy conservation requirements in the CBC (24 CCR Part 6, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and CALGreen (24 CCR Part 11). In addition, mitigation measures have been identified in *Section 4.3, Air Quality and Greenhouse Gas Emissions* that would further reduce building energy use. Adherence to Title 24 requirements and identified mitigation measures would further ensure that the project would not result in wasteful and inefficient use of non-renewable resources due to building operation. Therefore, potential impacts would be *less than significant with mitigation.*

ENG Impact 1 (Class II)
The project would result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources.
Mitigation Measures
Implement Mitigation Measures AQ/mm-2.1 and GHG/mm-1.1.
Residual Impacts
Potential impacts associated with wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant with mitigation.

WOULD THE PROJECT CONFLICT WITH OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY?

ENG Impact 2: The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant (Class III).

The project would be required to be in full compliance with the CBC, including applicable green building standards and building energy efficiency standards. Furthermore, the City's General Plan and Conservation Element ensure the conservation and preservation of energy resources by increasing the energy efficiency of buildings, appliances, and buildings to the use of alternative forms of energy. The

project would not conflict with other goals and policies set forth in the general plan pertaining to renewable energy and energy efficiency. Furthermore, implementation of mitigation measures identified in *Section 4.3, Air Quality and Greenhouse Gas Emissions* would further ensure that the proposed project meets or exceeds building code requirements related to building energy efficiency. Therefore, the proposed project would not conflict with state or local plans for renewable energy or energy efficiency and potential impacts would be *less than significant.*

ENG Impact 2 (Class III)
The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.
Mitigation Measures
Mitigation is not required.
Residual Impacts
Potential impacts associated with conflict with a state or local plan for renewable energy or energy efficiency would be less than significant.

4.14.6 Cumulative Impacts

4.14.6.1 Utilities and Service Systems

The project would require water, wastewater, and solid waste disposal utility services and infrastructure that would be shared with other existing and future development uses.

The 2020 UWMP water demand projections were developed using representative water demand factors, anticipated future conservation, and City General Plan growth assumptions and buildout conditions. As described in the analysis above, while the additional 146 AFY of water demand associated with the project was not explicitly accounted for in the 2020 UWMP, the City has this supply available from its water supply portfolio of Nacimiento water, groundwater from the Paso Robles Area Subbasin, and water from the Salinas River. Therefore, based on the analysis of existing and future water demand of the City's service area, and the existing and future water supplies available, the City would have sufficient water supply to service the project during normal, dry, and multiple dry years for the foreseeable future (2050 or when the city reaches buildout).

The project would contribute wastewater to the existing City wastewater conveyance system and WWTP. The analysis provided under the thresholds above included evaluation of the project's contribution to existing wastewater service systems under a cumulative development scenario. Based on an evaluation of the proposed project's wastewater generation rates, available treatment capacity of the WWTP, and the Will-Serve Letter provided by the City, the project would be served by a wastewater treatment provider with adequate capacity to serve the project in addition to the provider's existing and foreseeable future commitments.

The project's solid waste generation would be disposed of at the Paso Robles Landfill, which serves existing and foreseeable future development within the city and surrounding unincorporated areas of San Luis Obispo County. The project would generate approximately 13,151 pounds (6.58 tons) of solid waste per day during operation. Based on the current available capacity of the landfill, the waste generation rates of the project, and required compliance with state waste reduction and diversion polities, the project would not result in a cumulatively considerable impact associated with exceeding the capacity of local infrastructure or conflict with applicable solid waste regulations.

4.14.6.2 Energy

The project's contribution to an increased need for energy is considered in the context of other past, present, and reasonably foreseeable future projects within proximity to the proposed project site. Significant cumulative impacts would occur if the proposed project and/or surrounding projects identified would overburden energy facilities and/or contribute to the inefficient and negative impacts of increased energy usage, thereby resulting in significant combined impacts related to the need for development of new facilities and increased energy production.

As discussed in *Section 4.14.5, Project-Specific Impacts and Mitigation Measures*, energy resources consumed during construction would be temporary, typical of other construction projects within the project vicinity, and subject to state and local regulations, which would prohibit and/or minimize wasteful energy consumption practices. Energy use associated with construction of the proposed project would not be anticipated to result in the need for additional energy infrastructure capacity, nor would construction be anticipated to result in increased peak-period demands for electricity. Therefore, construction energy use would be less than cumulatively considerable.

Energy consumption associated with operation of the proposed project would be primarily associated with truck trips and passenger vehicle trips to and from the project site, in addition to energy consumption associated with the ongoing operation of on-site buildings and facilities. The ongoing development of increasingly efficient automobile engines and state and local regulations associated with provision of zero-emission vehicles and zero-emission vehicle infrastructure would result in increased energy efficiency and energy conservation in future years. The project and other new development projects in the vicinity would be required to be designed and constructed in full compliance with the CBC, including applicable green building standards and building energy efficiency standards. New development within the project vicinity would be required to be designed to meet current state energy efficiency standards; therefore, the project would not result in a cumulatively considerable impact on energy resources. Therefore, operational project energy consumption would be less than cumulatively considerable.

CHAPTER 5. OTHER CEQA CONSIDERATIONS

This chapter discusses other issues for which the California Environmental Quality Act (CEQA) requires analysis in addition to the specific issue areas discussed in *Chapter 4, Environmental Impact Analysis*. These additional issues include the potential to induce population growth and/or economic expansion, establishment of a precedent-setting action, development or encroachment in an isolated or adjacent area of open space, removal of obstacles to growth, and significant and irreversible impacts on the environment.

5.1 GROWTH-INDUCING IMPACTS

State CEQA Guidelines Section 15126.2(d) requires that Environmental Impact Reports (EIRs) provide a discussion of the growth-inducing impacts of the proposed project. Growth-inducing impacts could be caused by projects that foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth-inducing impacts can also be caused by removing obstacles to population growth, such as an expansion of a wastewater treatment plant. Growth-inducing impacts can result from population increases that require the construction of new community services facilities.

In general terms, a project may induce spatial, economic, or population growth in a geographic area if it meets any of these four criteria:

- Removal of an impediment to growth (e.g., establishment of an essential public service or the provisions of new access to an area);
- Economic expansion or growth (e.g., changes in revenue base, employment expansion);
- Establishment of a precedent-setting action (e.g., an innovation, a change in zoning or general plan amendment approval); or
- Development or encroachment in an isolated area or adjacent to open space (being different from an "infill" type of project).

Should a project meet any one of the above-listed criteria, it can be considered growth-inducing. The impacts of the proposed project are evaluated below with regard to these four criteria. The evaluation below is based on buildout of the project, which includes development of The Landing, a distribution warehouse and business park center, including redevelopment of the former California Department of Corrections and Rehabilitation (CDCR) Estrella Youth Correctional Facility (Paso Robles Boys School) site, a General Plan Amendment (GPA), a Zone Change, a Vesting Tentative Tract Map (VTTM), a Conceptual Master Development Plan, a specific Development Plan for Phase 1, an Oak Tree Removal Permit, and future Conditional Use Permits (CUPs) or Planned Development (PD) applications, as well as a Development Agreement between Majestic Realty Co. (Applicant) and the City of El Paso de Robles (City) for individual projects on a 140.75-acre site.

5.1.1 Population Growth

As discussed in *Chapter 2, Project Description*, the proposed project includes the development of a business park center that would include a distribution warehouse and a mix of employment and visitor-serving uses, including but not limited to industrial and flex/maker-space, loft-style offices, commercial retail uses, a market hall, hotel, winery(ies), a visitor center and museum (both with retail components), and passive park and green spaces with agricultural elements on a 140.75-acre parcel. The project does not include the development of any residential units. Site preparation would result in the demolition of the

former Paso Robles Boys School (with the exception of the existing maintenance facility), including six residential homes formerly occupied by staff.

The project would not directly induce substantial population growth because it would not result in new residential units. However, new industrial, professional, and commercial development has the potential to indirectly induce population growth due to an increase in new employment opportunities. It is anticipated that many of the new employees generated by implementation of the proposed project may commute from outside the city or county from lower average wage-earning communities and are not expected to reside in or require housing within the county or city. Given the county's unemployment rate of 5.8% (approximately 7,600 persons), the job opportunities created by the proposed project could potentially be accommodated by existing unemployed county residents. These workers would likely fill new warehouse positions and would not require new permanent housing within the city.

Anticipated indirect population growth would be consistent with the *City of Paso Robles General Plan*. Full buildout (year 2045) of the city has a projected population of 44,000 people. Therefore, population growth that may result from the project would not conflict with local growth management policy or result in exceedance of local and regional growth projections, and impacts would be *less than significant*.

5.1.2 Economic Growth

The proposed project includes development of a business park center that would include a distribution warehouse and a mix of employment and visitor-serving uses, a GPA for a land use change from Public Facilities (PF) to Business Park (BP), and a Zone Change from PF to Airport (AP). The GPA for the BP land use would allow for clean and attractive businesses, industries, and visitor-serving uses. As such, the proposed project would contribute to economic growth by providing additional space for business within the city.

Buildout of The Landing is estimated to result in the generation of 3,561 new full-time equivalent jobs, as well as short-term construction employment opportunities. According to the San Luis Obispo Council of Governments (SLOCOG) Regional Land Use Model, the estimated job-to-housing ratio in the city is 1.27 and 0.95 in the region (SLOCOG 2018; Central Coast Transportation Consulting 2022). This jobs-to-housing ratio makes the city a housing-rich community, with a majority of local workers commuting to other localities for work (largely to the city of San Luis Obispo). According to the Bureau of Labor Statistics (BLS 2021), the county's average wage is $27.07 per hour. BLS estimates that warehouse, food and beverage, restaurant, and retail/sales workers in the county earn less than the county's average wage. Therefore, new employment opportunities would be anticipated to be primarily filled by out-of-town workers who would commute from lower average wage-earning communities, or by current unemployed or below average wage earning residents within Paso Robles or the North County region and would not induce significant population growth within Paso Robles or the North County region; impacts would be *less than significant.*

5.1.3 Precedent Setting Action

As described in *Chapter 2, Project Description*, the project includes changing the land use and zoning designations of the project site that would allow businesses, industries, and visitor-serving uses within the vicinity of the Paso Robles Municipal Airport. The project would be required to comply with existing General Plan, Municipal Code, and applicable zoning and land use designations for the BP land use designation. Since the project would be required to be consistent with applicable planning parameters, it would not set precedent that would have growth-inducing factors in the area. Additionally, the proposed uses are not precedent-setting, as the City currently allows for, and houses, several warehouses and business parks, including in the airport area.

5.1.4 Development in an Isolated Area

Development is considered growth-inducing when it occurs outside urban boundaries or in isolated locations instead of infill areas. The project site is located within the northeastern portion of the city. The project is bordered by unincorporated county land to the west, comprised largely of vineyards; vineyards, wineries, and the Paso Robles Horse Park to the south; Airport Road and the Paso Robles Municipal Airport to the east; and a California Department of Forestry and Fire Protection (CAL FIRE) Station, rural residential, and agricultural uses to the north. As shown in Table 2-1 (in *Chapter 2, Project Description*), approximately 7%, or about 10.26 acres, of the project site would be used for passive park, pedestrian plaza, and green space uses.

The project site is adjacent to the city boundary to the west and is separated by the city boundary to the north by two intervening parcels. Though the land to the south of the project site is comprised of vineyards, wineries, and the Paso Robles Horse Park, this land is largely designated for business park uses (the Paso Robles Horse Park being designated for agricultural uses). Though the project site is not an infill site as defined by CEQA (surrounded on three sides by urban development), the site is currently developed and would not necessitate the extension of new public infrastructure (i.e., water) to previously unserved areas.

In isolated locations, or locations outside urban boundaries, incompatible land uses, along with speculative land value increases, can result in development pressure of lands adjacent to those proposed for development. Development of the project site could increase the development pressure of the agricultural land to the north of the project site, especially considering the parcel to the north is zoned for manufacturing uses, and airport uses are located to the east. These agricultural lands total approximately 80 acres and given the *City of Paso Robles General Plan Land Use Element* assumption of 0.37 floor-area-ratio, could potentially be developed with 1,289,376 square feet of commercial or industrial uses, if the land use and zoning designations were amended. While this agricultural land may eventually develop, it would not be considered a growth-inducing impact resulting from this project as the surrounding lands are already designated for commercial and industrial development, and the City's General Plan envisions this airport area as a commercial and industrial hub for the City.

Additionally, lands to the west of the project site are largely undeveloped and could be subject to development pressure to amend land use and zoning designations for commercial or industrial development. However, these lands are located within the unincorporated county, are designated for agricultural use, and are subject to the *County of San Luis Obispo General Plan* and *County of San Luis Obispo Land Use Ordinance* for development. The *County of San Luis Obispo General Plan Agriculture Element* discourages the conversion of agricultural land within the county to non-agricultural uses. The City's General Plan also contains policy regarding the establishment of an open space/purple belt around the City's boundaries, which delineates the finite edge of the City and aims to protect agricultural and open space lands in the adjacent unincorporated county. Given these policies, it is unlikely that adjacent undeveloped lands outside the City boundary would experience growth as a result of this project.

5.1.5 Removal of an Impediment to Growth

The project would not result in the removal of an impediment to growth within the city of Paso Robles, as adequate access and services are already available for the adjacent and surrounding areas located within the city boundary. The project would not create new access to any parcel that was previously unavailable and would not extend services, such as water or sewer, to any parcel that was previously unserved.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

State CEQA Guidelines Section 15126.2(d) states that use of nonrenewable resources during the initial and continued phases of a proposed project may be irreversible if a large commitment of these resources makes their removal, indirect removal, or use thereafter unlikely. This chapter of the EIR evaluates whether the project would result in the irretrievable commitment of resources or would cause irreversible changes in the environment.

The project would allow for the development of industrial and commercial uses on the project site, the construction of which would irreversibly commit construction materials and non-renewable energy resources (e.g., fossil fuels, wood, etc.). Nonrenewable resources utilized during construction for the development of The Landing would no longer be utilized for other purposes. Consumption of building materials and energy is associated with all development projects in the region, and these commitments of resources are not unique or unusual to the project. Construction of industrial and commercial structures would be subject to the California Building Code (CBC), which regulates the method of use, properties, performance, and types of building materials used in construction. Construction equipment would be subject to state and local fuel efficiency standards and idling restrictions.

The buildout of the project would also result in an incremental contribution to the long-term consumption of energy resources associated with the establishment of industrial and commercial uses. Future residential development would be serviced by the Pacific Gas and Electric Company (PG&E), which supplies 25% of its energy mix from renewable resources, 45% from nuclear energy, 28% from large hydrological energy sources, and 2% from nuclear gas (PG&E 2020). The Southern California Gas Company (SoCalGas) is the primary provider of natural gas for urban and rural communities within San Luis Obispo county. SoCalGas has committed to replacing 20% of its traditional natural gas supply with renewable natural gas by 2030 (Sempra 2019). The project would meet or exceed the requirements of the CBC and California Title 24 in effect at the time of construction. Compliance with these standards would include implementation of water conservation measures, energy- and water-efficient appliances, and energy-efficient heating and cooling systems. These sustainable building features would reduce new energy demand and the consumption of water and nonrenewable fossil fuels to a level consistent with or better than other development within the project vicinity. Therefore, the commitment of these resources for project development has been planned for and impacts associated with commitment of resources would be *less than significant*.

5.3 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS

State CEQA Guidelines Section 15126.2(c) requires that EIRs provide a discussion of significant impacts that cannot be mitigated to a level of insignificance without imposing an alternative design, their implications, and the reasons why the project is proposed, notwithstanding their effect. The project's potential impacts on the environment were evaluated with respect to specific resource areas in *Chapter 4, Environmental Impacts Analysis*. Based on the analysis provided in Chapter 4, the project would have significant unavoidable residual impacts associated with agricultural resources (*Section 4.2, Agriculture and Forestry Resources*), air quality (*Section 4.3, Air Quality and Greenhouse Gas Emissions*), land use and planning (*Section 4.9, Land Use and Planning*), and transportation (*Section 4.13, Traffic and Transportation*).

In accordance with State CEQA Guidelines Section 15093, if an EIR demonstrates that implementation of a proposed project would cause significant and unavoidable impacts, the lead agency must issue a Statement of Overriding Considerations before approving the project to provide the specific reasons to support its action. Therefore, the City, as the lead agency, will be required to adopt a Statement of Overriding Considerations to address the significant impacts identified above and discussed in detail in *Chapter 4, Environmental Impacts Analysis*, prior to approval of the project. For the purposes of this document, the City may determine the long-term benefits of the project, such as fostering additional regional housing opportunities, including affordable housing, providing substantial overriding considerations for approving the project despite the identified adverse environmental impacts that would result from implementation of the project. To facilitate consideration of this determination, this EIR includes an evaluation of potential impacts and identifies a range of project alternatives that could reduce and/or fully negate adverse environmental effects. In addition, *Section 4.9, Land Use and Planning*, provides a detailed analysis of the project's consistency with applicable local policies and objectives. Each of these resources may be used in consideration of the significant unavoidable effects that would result from the project.

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CHAPTER 6. ALTERNATIVES ANALYSIS

6.1 INTRODUCTION

The California Environmental Quality Act (CEQA), Section 15126.6(a), requires an Environmental Impact Report (EIR) to "describe a reasonable range of alternatives to a project, or to the location of a project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." This chapter discusses a range of alternatives to the proposed project, including alternative locations, alternative designs, and a No Project Alternative. The State CEQA Guidelines provide the following guidance for the discussion of alternatives to the proposed The Landing Paso Robles (project):

- "An EIR shall describe a range of reasonable alternatives to the project, or to the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." (Section 15126.6(a))
- "Because an EIR must identify ways to mitigate or avoid the significant environmental effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (Section 15126.6(b))
- "The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison" (Section 15126.6(d))
- "The specific alternative of 'no project' shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project." (Section 15126.6(e))
- "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." (Section 15126.6(e)(2))
- "The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project." (Section 15126.6(f))
- "Alternative Locations. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR." (Section 15126.6(f)(2)(A))

Given the CEQA mandates listed above, this section: (1) describes the range of reasonable alternatives to the project; (2) examines and evaluates resource issue areas where significant adverse environmental effects have been identified and compares the impacts of the alternatives to those of the proposed project; and (3) identifies the Environmentally Superior Alternative.

6.2 ALTERNATIVES SELECTION

In accordance with the State CEQA Guidelines, appropriate alternatives for EIR analysis are those that meet most of the basic project objectives and avoid or substantially lessen any of the significant environmental effects of the proposed project. Consequently, this section reviews the objectives that were identified for the proposed project and any significant unavoidable environmental effects.

6.2.1 Project Objectives

Pursuant to State CEQA Guidelines Section 15124(b), this statement of objectives sought by the proposed project includes the underlying purpose of the project and will guide the development of reasonable alternatives that will be evaluated in this EIR. The purpose and goal of the proposed project is to accomplish the redevelopment of the former California Department of Corrections and Rehabilitation (CDCR) Estrella Youth Correctional Facility (Paso Robles Boys School) site with employment-generating uses that are compatible with the adjacent airport and will complement the existing development and character of the city of Paso Robles and surrounding areas. This underlying goal aligns with the goals of the City of El Paso de Robles (City) to increase employment opportunities and provide new development that will serve the need of the city and its residents. The following objectives are intended to achieve these underlying purposes:

1. To eliminate deferred maintenance issues on the former Paso Robles Boys School property by reusing the property for a productive, new use.
2. To redevelop the former Paso Robles Boys School property with uses that are compatible with the adjacent Paso Robles Municipal Airport and that maximize the development potential of the property.
3. To expand economic development, facilitate job creation, and increase the tax base for the City by establishing new industrial, retail, and visitor-serving land uses near the Paso Robles Municipal Airport.
4. To attract new employment-generating businesses to the city of Paso Robles, thereby growing the economy and providing a more equal jobs-housing balance.
5. To attract a large warehouse to the city that can expedite the delivery of essential goods to consumers and businesses in the city and in the region beyond the city's boundary.
6. To develop a warehouse facility that is designed to meet contemporary industry standards and be similar to other facilities in the region.
7. To establish visitor-serving uses near the Paso Robles Municipal Airport to help meet the growing demand for lodging, shopping, and leisure activities to support the larger winery and tourist industries.
8. To develop uses along Airport Road that have architectural design characteristics that complement and enhance the city's wine country character and visually express the area's history and culture.

6.2.2 Significant Impacts Resulting from the Proposed Project

Alternatives to be considered under CEQA are those that would avoid or substantially lessen one or more of the significant environmental effects identified during evaluation of the proposed project. As detailed in *Chapter 4, Environmental Impact Analysis*, the project would result in significant and unavoidable

impacts to agricultural resources (*Section 4.2, Agriculture and Forestry Resources*), air quality and greenhouse gas (GHG) emissions (*Section 4.3, Air Quality and Greenhouse Gas Emissions*), land use and planning (*Section 4.9, Land Use and Planning*), and transportation (*Section 4.13, Transportation*).

6.2.2.1 Agriculture and Forestry Resources

- **AG Impact 1: The project may or may not construct an extension of Rollie Gates Drive, which if constructed would convert approximately 2.53 acres of Farmland of Statewide Importance to non-agricultural use, resulting in a significant impact.** The proposed extension of Rollie Gates Drive would result in the conversion of 2.53 acres of Farmland of Statewide Importance to non-agricultural use (see *Section 4.2, Agriculture and Forestry Resources*). Rollie Gates Drive is a local roadway located to the northeast of the project site that primarily provides access to the Paso Robles Municipal Airport. Portions of the proposed extension would occur in designated Farmland of Statewide Importance and would result in the permanent and significant loss of 2.53 acres of designated Farmland. This estimated loss of 2.53 acres is based on an assumed maximum roadway section consisting of a 50-foot right-of-way, which would allow for two 12-foot lanes in each direction and 5-foot bike lanes and sidewalks on each side. Mitigation Measure AG/mm-1.1 has been identified to require conservation of Farmland equal to the amount of existing Farmland to be converted by project development. Because conservation easements would encompass lands that already are suitable for, if not actively being used for, agricultural production, and a conservation easement would not result in the compensation of project impacts to designated Farmland. Therefore, residual impacts would be *significant and unavoidable*.

6.2.2.2 Air Quality

- **AQ Impact 1: The project would conflict with or obstruct implementation of the SLOAPCD 2001 Clean Air Plan San Luis Obispo County and Particulate Matter Report.** As discussed in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, the project would increase the regional vehicle miles traveled (VMT), which would conflict with regional VMT-reduction efforts and associated reductions in mobile-source emissions accounted for in the San Luis Obispo Air Pollution Control District's (SLOAPCD's) *2001 Clean Air Plan San Luis Obispo County* (2001 CAP). The regional average VMT per service population (VMT/SP) would remain the same at 22.56 with project implementation; however, project-generated VMT would exceed the significance threshold of 19.18 VMT/SP (15% below the regional average). Therefore, potential impacts associated with consistency with regional VMT reduction plans (and associated mobile-source emission reduction goals) would be significant. Implementation of Mitigation Measures AQ/mm-1.1 and AQ/mm-1.2 would reduce potential impacts related to VMT, but impacts are not guaranteed to be reduced to less-than-significant levels. No additional mitigation measures have been identified that would reduce this impact to a less-than-significant level. As a result, this impact would be *significant and unavoidable.*
- **AQ Impact 2: The project would result in a cumulatively considerable net increase of criteria pollutants that would exceed applicable SLOAPCD thresholds.** As discussed in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, the project would exceed daily and quarterly Tier 1 significance thresholds during construction for reactive organic gases and nitrogen oxides ($ROG+NO_x$). Maximum daily emissions associated with construction would occur during Phase 1 and would total approximately 218.9 pounds per day of $ROG+NO_x$ and 7.6 pounds per day of exhaust particulate matter 10 microns in diameter or less (PM_{10}). Maximum quarterly construction-generated emissions would total approximately 5.75 tons per quarter of $ROG+NO_x$, 0.48 tons per quarter of fugitive PM_{10}, and 0.16 tons per quarter of exhaust PM_{10}. Mitigation Measure AQ/mm-1.3 would require implementation of fugitive dust control measures and AQ/mm-2.1 has been identified to require the project to implement SLOAPCD-

recommended standard and Best Available Control Technology (BACT) measures to reduce construction-generated and mobile-source emissions associated with construction vehicles and equipment, and evaporative emissions from architectural coasting (e.g., low volatile organic compound (VOC)-emission paint). With mitigation, maximum construction-generated daily emissions of ROG+NO_x would be reduced to approximately 203.4 pounds per day and exhaust PM_{10} would be reduced to approximately 3.8 pounds per day. Maximum quarterly emissions would be reduced to approximately 5.6 tons per quarter of ROG+NO_x and 0.3 tons per quarter of fugitive PM_{10}, and 0.1 tons per quarter of exhaust PM_{10}. Even with Mitigation Measures AQ/mm-2.1 through AQ/mm-2.4, the project would exceed daily and quarterly Tier 1 significance thresholds for ROG+NO_x. No additional mitigation measures have been identified that would reduce this impact to a less-than-significant level. As a result, this impact would be *significant and unavoidable*.

- **AQ Impact 8: The long-term operation of the project would have the potential to expose sensitive receptors to harmful localized concentrations of diesel particulate matter.** As discussed in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, the project would have the potential to expose sensitive receptors to substantial pollutant concentrations associated with long-term operational localized diesel particulate matter (DPM) emissions, resulting in a long-term significant and unavoidable impact. A screening-level Health Risk Assessment (HRA) was conducted for the proposed loading dock operations to evaluate potential health risk impacts associated with DPM at the nearest residential land use, which is located approximately 240 feet west of the loading dock and approximately 120 feet from onsite truck travel areas. Based on the screening-level analysis, predicted health risks at the nearest residential dwelling would exceed the SLOAPCD significance threshold. As a result, this impact would be significant. Implementation of Mitigation Measure AQ/mm-2.3 includes measures that would significantly reduce DPM emissions associated with loading dock operations, including restriction on idling, electrification of the loading dock to power truck refrigeration units (TRUs), and use of model year 2014 or newer trucks (AMBIENT Air Quality & Noise Consulting [AMBIENT] 2022). No additional mitigation measures have been identified that would reduce this impact to a less-than-significant level. As a result, this impact would be *significant and unavoidable.*
- **AQ Cumulative Impacts: The project would result in cumulatively considerable impacts associated with exposure of sensitive receptors to substantial pollutant emissions.** Reasonably foreseeable future projects within the vicinity of the project have the potential to further exceed established VMT-reduction requirements that would conflict with applicable air quality plans and further exceed operational SLOAPCD criteria air pollutant thresholds. Reasonably foreseeable future projects would be subject to separate environmental review to determine potential impacts to air quality. Long-term localized concentrations of DPM would be cumulatively considerable when considered in combination with current and future development projects proximate to the project area. The project would have the potential to expose sensitive receptors to substantial pollutant concentrations associated with long-term operational localized DPM emissions, resulting in a long-term significant and unavoidable impact. This impact, when considered in combination with other existing and future development projects in the area, would be cumulatively considerable. As a result, cumulative air quality impacts would be *significant and unavoidable*.

6.2.2.3 Greenhouse Gas Emissions

- **GHG Impact 1: The project would generate greenhouse gas emissions, directly and indirectly, that would have a significant impact on the environment.** Based on the modeling conducted and assuming a total service population of 1,200 employees for Phase 1 and 3,561 employees for Phase 1 plus 2, the calculated GHG efficiency for the proposed project, with the implementation of waste diversion and water efficiency mitigation measures, would be 16.1

million metric tons of CO_2e per service population per year ($MMTCO_2e$/SP/year) in 2024, 7.1 MTCO2e/SP/year in 2028, and 6.9 MTCO2e/SP/year in 2030. The GHG efficiency for the proposed project would exceed the GHG efficiency significance threshold of 2.0 MTCO2e/SP/year. Implementation of Mitigation Measures AQ/mm-1.1, AQ/mm-1.2, and AQ/mm-2.1 through AQ/mm-2.4 would require implementation of numerous measures that would reduce long-term operational GHG emissions, including implementation of a Traffic Demand Management Plan (TDMP) to reduce project-generated VMT, as well as onsite measures to reduce operational emissions. However, based on the quantity of exceedance of project-generated GHG above the GHG significance threshold of 2.0 $MTCO_2e$/SP/year, implementation of these measures would not reduce project emissions enough to fall below the applicable service population threshold. Mitigation Measure GHG/mm-1.1 has been identified to require the preparation of a GHG Reduction Plan, which would include additional measures to reduce project-generated GHG emissions to below the efficiency threshold for year 2030, in accordance with the GHG-reduction targets identified by Senate Bill (SB) 32. However, the certainty of availability and effectiveness of GHG reduction credits and/or offsets cannot be guaranteed. No additional mitigation measures have been identified that would reduce this impact to a less-than-significant level. As a result, this impact would be *significant and unavoidable*.

- **GHG Impact 2: The project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions.** As discussed in *Section 4.3, Air Quality and Greenhouse Gas Emissions*, the project would increase the regional VMT, which would conflict with regional GHG-reduction efforts accounted for in the SLOAPCD's 2001 CAP and San Luis Obispo Council of Government's (SLOCOG's) *2019 Regional Transportation Plan and Sustainable Communities Strategy* (RTP/SCS). Implementation of Mitigation Measures AQ/mm-1.1, AQ/mm-1.2, and AQ/mm-2.1 through AQ/mm-2.4 would require implementation of numerous measures that would reduce long-term operational GHG emissions, including implementation of a TDMP to reduce project-generated VMT, as well as onsite measures to reduce operational emissions. However, based on the quantity of exceedance of project-generated GHG above the GHG significance threshold of 2.0 $MTCO_2e$/SP/year, implementation of these measures would not reduce project emissions enough to fall below the applicable service population threshold. Mitigation Measure GHG/mm-1.1 has been identified to require the preparation of a GHG Reduction Plan, which would include additional measures to reduce project-generated GHG emissions to below the efficiency threshold for year 2030, in accordance with the GHG-reduction targets identified by SB 32. However, the certainty of availability and effectiveness of GHG reduction credits and/or offsets cannot be guaranteed. No additional mitigation measures have been identified that would reduce this impact to a less-than-significant level. As a result, this impact would be *significant and unavoidable*.
- **GHG Cumulative Impacts: Implementation of mitigation measures identified above would reduce all project-level impacts associated with greenhouse gas emissions to less than cumulatively considerable.** Individual future projects would be subject to separate environmental review to determine potential impacts related to GHG emissions. However, due to project-specific significant impacts, cumulative impacts would be *significant and unavoidable.*

6.2.2.4 Land Use and Planning

- **LUP Impact 1: The project would be inconsistent with land use plans, policies, and regulations related to noise and VMT. The inconsistencies related to VMT policies would result in significant environmental impacts.** As discussed in *Section 4.9, Land Use and Planning*, the project would be inconsistent with land use plans, policies, and regulations related to noise and VMT (LUP Impact 1). Mitigation measures have been included in individual resource sections throughout this EIR to reduce potential impacts that may be inconsistent with applicable local plans, policies, and ordinances. With implementation of mitigation measures

identified throughout this EIR, the project would be mostly consistent with applicable local plans, policies, and ordinances, with the exception of policies related to noise and a regional net increase in VMT. The project's inconsistency with policies related to noise and a regional net increase in VMT would be inconsistent with the *City of El Paso de Robles General Plan 2003 Noise Element*, *City of El Paso de Robles General Plan 2003 Circulation Element*, SLOCOG's 2019 RTP/SCS, and City's Municipal Code. Mitigation measures have been included to reduce operational ambient noise impacts and the increase in VMT generated by the project; however, the identified mitigation measures would not reduce these impacts to less-than-significant levels. Because the project would be inconsistent with the policies included in the City's Noise Element, City's Circulation Element, SLOCOG's 2019 RTP/SCS, and City's Municipal Code related to noise and VMT-reduction strategies, and implementation of mitigation measures would not reduce these impacts to less-than-significant levels, impacts would be considered *significant and unavoidable*.

- **LUP Cumulative Impacts: The project would result in cumulatively considerable impacts associated with inconsistency with applicable land use and planning policies.** As discussed in LUP Impact 1, the project would be mostly consistent with applicable local plans, policies, and ordinances, with the exception of policies related to noise and a regional net increase in VMT. Reasonably foreseeable future projects would be subject to separate environmental review to determine each project's consistency with applicable local plans, policies, and ordinances. Other reasonably foreseeable future projects within the vicinity of the proposed project have the potential to add to the increase in ambient noise levels and other reasonably foreseeable projects within the city have the potential to contribute to the regional net increase in VMT, which would be inconsistent with the City's Noise Element, City's Circulation Element, SLOCOG's 2019 RTP/SCS, and City's Municipal Code. Therefore, cumulative impacts would be considered *significant and unavoidable.*

6.2.2.5 Noise

- **N Impact 1: Construction activities for the proposed project would generate a substantial temporary increase in ambient noise levels and operation of the project would result in a permanent increase in ambient noise levels from warehouse and loading dock activities and an increase in roadway and vehicle traffic.** As discussed in *Section 4.10, Noise*, the project would generate a total of approximately 676 tractor trailer (truck) trips per day, which would result in an average of approximately 14 trucks trips per hour over a 24-hour period. Predicted operational truck traffic noise levels at the nearest residential sensitive receptor location, located directly west of the western project boundary, could reach levels of approximately 57 A-weighted decibels (dBA) energy-equivalent noise level (Leq), which would exceed the City's applicable daytime and nighttime noise standards. Mitigation Measure N/mm-1.2 has been included to reduce operational noise where feasible. Implementation of Mitigation Measure N/mm-1.2 would reduce operational noise at the nearest sensitive receptor location to approximately 54 dBA Leq, which would still exceed the City's daytime and nighttime noise standards. Therefore, even with implementation of Mitigation Measure N/mm-1.2, operational impacts related to an increase in ambient noise levels near sensitive receptor locations would be *significant and unavoidable*.

  Predicted increases in traffic noise levels at the nearest existing residence located along Airport Road (between Dry Creek Road and State Route 46 East [SR 46E]), would exceed the City's exterior noise standard of 65 dBA community noise equivalent (CNEL); therefore, implementation of the proposed project would result in a significant increase in traffic noise levels at nearby noise-sensitive land uses (AMBIENT 2022). Because the offsite residence located along Airport Road (between Dry Creek Road and SR 46E) is accessed via Airport Road, construction of a sound barrier sufficient to reduce predicted traffic noise levels to within acceptable levels would not be feasible. No other mitigation measures were identified that would

reduce this impact to a less-than-significant level. Therefore, this impact would be *significant and unavoidable*.

- **N Cumulative Impacts: Project impacts associated with increased ambient noise levels would be cumulatively considerable.** Operational noise generated by the proposed project would result in a permanent increase in ambient noise levels within the vicinity of the project. Therefore, other reasonably foreseeable future projects within the vicinity of the proposed project would have the potential to add to this increase in ambient noise levels, which would further exceed the City's established noise standards. Therefore, cumulative impacts associated with increases in ambient noise levels in exceedance of local standards would be *significant and unavoidable*.

6.2.2.6 Traffic and Transportation

- **TR Impact 2: The Phase 2 retail and hotel uses would result in a net increase in regional vehicle miles traveled (VMT) and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b). Additionally, a substantial number of Phase 1 warehouse employees are anticipated to live outside of Paso Robles, which would result in long commute trips.** As discussed in *Section 4.13, Traffic and Transportation*, the Phase 2 retail and hotel uses would result in a net increase in regional VMT and would therefore not be consistent with State CEQA Guidelines Section 15064.3(b). In addition, a substantial number of Phase 1 warehouse employees are anticipated to live outside of Paso Robles, which would result in long commute trips. The SLOCOG Travel Demand Model (TDM) was applied to estimate VMT under multiple land use and horizon year scenarios to evaluate the VMT impact of individual project components (Central Coast Transportation Consulting [CCTC] 2023). The project's Phase 2 hotel and retail components would generate over 40% of the overall project's daily vehicle trips, which would increase the regional work VMT by 53,125 in the near term and by 77,735 by 2045 (CCTC 2023). Additionally, the SLOCOG TDM projected that the Phase 1 warehouse and Phase 2 office and industrial uses would reduce regional work VMT; however, data from the Bureau of Labor Statistics, the U.S. Census Bureau, and BW Research Partnership (see *Section 4.11, Population and Housing*) indicate that a significant number of employees generated by the Phase 1 warehouse would likely commute from outside the city or county from lower average wage-earning communities and lower housing-cost communities, which would result in increased commute lengths and increased regional work VMT and overall VMT. Even with implementation of Mitigation Measures AQ/mm-1.1, this net increase in regional VMT would be *significant and unavoidable*.
- **TR Impact 3: The project would introduce additional unprotected left-turning truck and vehicle traffic onto State Route 46 East (SR 46E), which has high speeds and collision rates greater than the state average.** The project would introduce 676 new truck trips and 15,178 vehicle trips per day to the circulation network. (Note that the 676 truck trips have a passenger vehicle equivalent of 2,028 trips, for a project total of 17,026 trips.) This would include 775 unprotected left-turning movements onto the SR 46E corridor during the weekday AM peak hour, 686 during the weekday PM peak hour, 608 during the Sunday PM peak hour, and 686 during the Friday PM peak hour. These impacts would be mitigated with project truck traffic using the signalized intersection at Golden Hill Road (via the planned Huer Huero Creek Bridge) and via extension of acceleration lanes serving the southbound to eastbound left-turning vehicles at Jardine Road and Airport Road (TR/mm-3.1 and TR/mm-3.2). Due to the uncertainty associated with the timing and implementation of acceleration lane improvements requiring California Department of Transportation (Caltrans) oversight, impacts related to non-truck vehicles making left-turning movements onto SR 46E would remain *significant and unavoidable*.

- **TR Impact 4: The project would exacerbate queuing deficiencies and create new queuing deficiencies at intersections during peak travel hours. The queuing deficiencies would exceed the storage capacity of the intersections and would create safety issues from queuing spillover into through lanes or into deceleration areas.** The project would generate 17,206 daily weekday trips, including 1,318 during the AM peak hour and 1,967 during the PM peak hour, and 11,273 trips on Sundays, including 1,566 during the Sunday PM peak hour. These trips would result in queuing deficiencies at seven intersections, which would result in new or increased backup onto the SR 46E mainline, U.S. Highway 101 mainline, or onto City streets. Mitigation to address this congestion and capacity issue involves construction of an overcrossing at the Union Road and SR 46E intersection, a project currently being studied by the City and Caltrans. By constructing an overcrossing at SR 46E and Union Road, queues resulting from Phase 2 of the project would be accommodated by the circulation network. Due to the uncertainty associated with the timing and implementation of this improvement requiring Caltrans oversight, impacts related to non-truck vehicles making left-turning movements onto SR 46E would remain *significant and unavoidable.*
- **TR Cumulative Impacts: Project impacts associated with the increase of vehicle miles traveled (VMT) and safety impacts associated with queuing deficiencies would be cumulatively considerable.** Despite implementation of mitigation to reduce VMT impacts to the greatest extent feasible, Phase 2 retail and hotel uses associated with the project would result in an increase in the regional VMT. Therefore, the project would result in a cumulatively considerable contribution to VMT increase within the city and county, and potential cumulative impacts would be *significant and unavoidable*. Additionally, under cumulative conditions, the project would contribute to queuing deficiencies at seven intersections, even with the Union Road and SR 46E intersection overcrossing in place. The *Traffic Operations Analysis Report* prepared for the SR 46E at Union Road Improvement identifies that by 2045 (cumulative conditions/general plan buildout), additional capacity (widening) improvements will be needed for the Alternative 1 overcrossing to increase the overcrossing from three lanes to five lanes (Mott MacDonald 2019). Due to the uncertainty associated with additional improvements to these intersections, project impacts would be cumulatively considerable and *significant and unavoidable.*

6.2.3 Alternatives Development and Analysis Process

In defining the feasibility of alternatives, the State CEQA Guidelines state: "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site." If an alternative was found to be infeasible, as defined above, then it was dropped from further consideration in this analysis.

In addition, State CEQA Guidelines Section 15126.6 states that alternatives should " . . . attain most of the basic objectives of the project . . . " As further explained by the California Supreme Court:

> [A]n EIR should not exclude an alternative from detailed consideration merely because it "would impede to some degree the attainment of the project objectives." But an EIR need not study in detail an alternative that is infeasible or that the lead agency has reasonably determined cannot achieve the project's underlying fundamental purpose . . .
>
> Although a lead agency may not give a project's purpose an artificially narrow definition, a lead agency may structure its EIR alternative analysis around a reasonable definition of

> underlying purpose and need not study alternatives that cannot achieve that basic goal. (In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings, 43 Cal.4th 1143, 1165-1166 [2008]).

The alternatives selected for further analysis have been evaluated against the proposed project to provide a comparison of environmental effects and to identify the Environmentally Superior Alternative. Note that the significance of impacts associated with the proposed project, and the determination of impacts presented in this section for comparative purposes, are based on the respective identified changes in conditions relative to the environmental baseline (as described in *Chapter 4, Environmental Impact Analysis*).

The City has the discretion to approve (or disapprove) whatever alternative or combination of alternatives it deems most appropriate, provided that the environmental impacts of the proposed project can be mitigated, or to the extent that they cannot, provided that the County adopts a Statement of Overriding Considerations, per Section 15093 of the State CEQA Guidelines.

This alternatives analysis includes a preliminary alternatives screening process and alternative project evaluation process, as described below.

6.2.4 Preliminary Alternatives Screening Process

The alternatives analysis begins with a screening and evaluation of a list of preliminary alternatives to determine which alternatives will be selected for further analysis in the EIR. In order to maximize the range of alternatives considered and provide flexibility during project approval, the EIR evaluated a total of five variations of the proposed project aimed at reducing the significant and unavoidable impacts to agriculture and forestry resources, air quality, land use, and transportation associated with the proposed project.

Each of the identified alternatives was preliminarily assessed to determine which of the alternatives met the requirements of a viable alternative under CEQA by considering whether the alternative: (1) would be generally feasible; (2) would avoid or substantially lessen any of the significant effects of the project; and (3) could feasibly attain most of the basic objectives of the project. Those alternatives that met these three criteria were carried forward for more detailed review in the EIR.

6.2.5 Alternative Project Evaluation Process

The environmental impacts of the alternatives carried forward for review in the EIR, including the No Project Alternative, were then compared against the impacts of the proposed project for each environmental issue area discussed in Chapter 4 of the EIR. A significance determination was made about each alternative for each issue area, and a basis for that determination has been provided. The determination of comparative impacts utilizes the following criteria:

- **No Impact:** The significance criteria do not apply or no impact would result.
- **Similar:** Impacts would be identical or would be of the same general extent and severity as the impacts associated with the proposed project; therefore, the significance determination would be the same.
- **Increased:** New potentially significant impacts or a substantial increase in the severity of the impacts associated with the proposed project would occur; therefore, the significance determination would be greater.

- **Decreased:** Potentially significant impacts would be avoided or a substantial reduction in the severity of the impacts associated with the proposed project would occur; therefore, the significance determination would be reduced.

As a result of this evaluation and comparison of potentially significant environmental impacts, an Environmentally Superior Alternative has been identified.

6.3 ALTERNATIVES CONSIDERED BUT DISCARDED

State CEQA Guidelines Section 15126.6(c) requires that an EIR disclose potential alternatives that were considered and eliminated along with a brief explanation of the reason for elimination. Factors used to eliminate alternatives from detailed consideration include: (1) failure to meet most of the basic project objectives; (2) infeasibility; and/or (3) inability to avoid significant environmental impacts.

6.3.1 Alternative Location

Under this potential alternative, proposed development would be located on an alternative project site within the city. An alternative location would need to be large enough to accommodate 76.87 acres of warehouse facilities, 6.91 acres of industrial flex uses, 13.5 acres of office uses, 16.99 acres of maker spaces, 2.58 acres of market hall uses, 3.32 acres of retail (food and beverage) uses, 4.41 acres of restaurant and winery uses, 4.3 acres of hotel uses, and 10.26 acres of passive park/pedestrian plaza/green spaces. There is potential that alternative locations would include similar physical and environmental constraints as the proposed project site (i.e., conversion of farmland, near noise-sensitive land uses) as well as other constraints not presented at the proposed project site (i.e., wetlands, surface water features). Development at another location would likely result in similar impacts related to air pollutant emissions and VMT. Further, the Applicant does not own alternative sites that could accommodate the proposed development, making this alternative likely infeasible even if alternative locations did exist in the Paso Robles area that could accommodate the proposed development. In addition, Objectives 1 and 2 pertain specifically to the remediation and redevelopment of the former Paso Robles Boys School property. Development of the project at an alternative location would fail to meet these objectives. Objectives 3, 7, and 8 also pertain specifically to providing visitor-serving land uses near the Paso Robles Regional Airport and development of uses with specific architectural design characteristics along Airport Road. Development of the project at an alternative location within the city would potentially not be located near the Paso Robles Regional Airport or Airport Road; therefore, the alternative location would likely fail to meet these objectives as well.

Based on the above considerations, the alternative location alternative would not be feasible, would not reduce the project's significant impacts, and would not meet the basic project objectives. Therefore, this alternative was eliminated from further discussion in accordance with State CEQA Guidelines Section 15126.6(c).

6.3.2 Reuse of Existing Facilities for Phase 2

Under this potential alternative, proposed Phase 2 uses would be accommodated by existing structures onsite and the Phase 1 warehouse would be constructed on the western 76.87 acres of the project site. The existing buildings total approximately 279,706 square feet, which is less than half of the 630,900 square feet proposed for Phase 2. These buildings have significant structural, mechanical, and electrical deficiencies and were estimated in 2007 to cost upwards of $70.4 million to rehabilitate to current health and safety standards (Kitchell 2007). Based on inflation, this cost is likely closer to $100.5 million in today's dollar. Objectives 1 and 2 pertain specifically to the redevelopment of the site to eliminate the issues resulting from deferred maintenance of the existing structures. Additionally, Objective 8 pertains to

development with architectural design characteristics that complement and enhance the city's wine country character and visually express the area's history and culture. The existing architectural design of the facility is institutional in nature, and demolition and redevelopment of the facility would visually unify and complement the nearby airport development. Therefore, reuse of the existing facilities would likely fail to meet these objectives. This alternative would include similar physical and environmental constraints as the proposed project site (i.e., conversion of farmland, near noise-sensitive land uses). Air quality impacts related to demolition and grading on the eastern portion of the property would likely be reduced, but new impacts resulting from extensive rehabilitation efforts may be created. VMT and noise impacts would be similar as reuse of the existing buildings would not significantly change operational characteristics of the uses.

Based on the above considerations, the reuse alternative would not be feasible, would not reduce the project's significant impacts, and would not meet the basic project objectives. Therefore, this alternative was eliminated from further discussion in accordance with State CEQA Guidelines Section 15126.6(c).

6.4 ALTERNATIVES IMPACT ANALYSIS

This section discusses alternatives to the proposed project, including alternatives that were considered and discarded. Each of these considers the ability of a particular alternative to comply with the *City of El Paso de Robles General Plan 2003* or substantially reduce or eliminate the project's significant environmental impacts, while still meeting basic project objectives. The EIR also includes a No Project Alternative and an analysis of possible alternative sites that may not have the same environmental resource sensitivity as the selected project site. Those alternatives carried forward for consideration and analysis include:

- CEQA "No Project" Alternative;
- Alternative 1: No Extension of Rollie Gates Drive;
- Alternative 2: Elimination of Retail and Hotel Uses;
- Alternative 3: Reduced Warehouse Size;
- Alternative 4: Alternative Warehouse Location; and
- Alternative 5: Alternative Configuration of Warehouse Uses.

6.4.1 No Project Alternative

Under the No Project Alternative, no demolition of onsite facilities or development of the site would occur, and the site would remain vacant. All structures associated with the existing Paso Robles Boys School would remain in place and would not be rebuilt or restored, and no active uses would occur onsite. No vegetation removal or offsite roadway improvements would occur, and the City would not reuse the maintenance facility.

6.4.1.1 Analysis of the No Project Alternative

As no physical changes to the environment would occur, potentially significant and other identified impacts would be reduced in comparison to the proposed project. However, this alternative would not meet any of the project objectives, and remediation of onsite hazardous materials, contaminated soils, and contaminated groundwater would also not occur. Impacts associated with aesthetics; air quality and GHG emissions; biological resources; cultural and tribal cultural resources; geology and soils; hazards, hazardous materials, and wildfire; hydrology and water quality; noise; and traffic and transportation would be reduced or eliminated when compared to the project, due to the absence of demolition and

construction activities and operation of the proposed project. Mitigation measures would not be necessary for these resource areas to avoid significant impacts under this alternative and no secondary impacts would be anticipated to occur.

6.4.1.1.1 AGRICULTURE AND FORESTRY RESOURCES

No improvements or extension of Rollie Gates Drive would occur under this alternative. No demolition of existing uses onsite, development of new uses onsite, or construction of offsite roadway or drainage infrastructure would occur. Therefore, there would be no project-level impacts to Farmland in comparison to the proposed project. In addition, no cumulatively considerable impacts to agriculture or forestry resources would occur.

6.4.1.1.2 AIR QUALITY AND GREENHOUSE GAS EMISSIONS

This alternative would not result in long-term air pollutant emissions or GHG emissions being generated from the project site or project truck or vehicle traffic. No project-level or cumulatively considerable impacts associated with air quality would occur; therefore, impacts would be decreased in comparison to the proposed project.

6.4.1.1.3 LAND USE AND PLANNING

This alternative would not establish any new land uses on the project site and therefore would not result in a conflict with the City's Noise Element, City's Circulation Element, SLOCOG's 2019 RTP/SCS, or the City's Municipal Code. Therefore, project-level and cumulatively considerable impacts associated with land use and planning would be decreased in comparison to the proposed project.

6.4.1.1.4 NOISE

The project site is currently vacant, and this alternative would not establish any new land uses on the project site. Under this alternative, no construction or operational noise would be generated. Noise levels at the site would remain similar to the existing setting at the project site. Project-level and cumulatively considerable impacts associated with project operational noise and project truck and vehicle noise would be decreased in comparison to the proposed project.

6.4.1.1.5 TRAFFIC AND TRANSPORTATION

No roadway improvements would be constructed along the project site frontage streets and Rollie Gates Drive would remain in its current state and would not be extended or improved. The Huer Huero Creek Bridge crossing would eventually be constructed by the City, though an interim bridge crossing would not be constructed. No vehicle trips would be generated by uses on the project site. Project-level and cumulatively considerable impacts associated with transportation would be decreased in comparison to the proposed project.

6.4.1.1.6 OTHER ENVIRONMENTAL IMPACT ISSUE AREAS

Under this alternative, impacts to aesthetics or visual resources would be decreased, as there would be no new development of the site that would result in nighttime lighting or glare, and no oak tree removal, demolition, construction, or other site disturbance activities would occur onsite. However, over time, the structures onsite would become dilapidated and could become visually unaesthetic. Ground disturbance at the project site and offsite improvement areas would not occur and there would be no potential to disturb known or unknown historic, archaeological, or tribal cultural resources, including unidentified human remains, within the project area.

No remediation of onsite hazardous materials, contaminated soil, or contaminated groundwater, as described in *Section 4.7, Hazards, Hazardous Materials, and Wildfire*, would be conducted. No oak tree removal or site disturbance activities would occur onsite. Under the No Project Alternative, construction of new uses of the project site would not occur, which would preclude the need for the construction of new and expanded utility infrastructure to serve the project site. The No Project Alternative would not introduce new occupiable buildings and structures to the project site that would be susceptible to risk involving geologic hazards or development within a High Fire Hazard Severity Zone (FHSZ). Therefore, impacts associated with biological resources; cultural and tribal cultural resources; geology and soils; hazards, hazardous materials, and wildfire; and utilities/service systems and energy would be decreased in comparison to the proposed project.

6.4.2 Alternative 1: No Extension of Rollie Gates Drive

Alternative 1 would include demolition of existing Paso Robles Boys School facilities onsite and construction and operation of the proposed project, with the exception of the extension of Rollie Gates Drive. Rollie Gates Drive is a local roadway located to the northeast of the project site that primarily provides access to the Paso Robles Municipal Airport. Under this alternative, no truck or vehicle access would be provided to the project site from Rollie Gates Drive and project truck and vehicle traffic would be limited to the other proposed site access driveways located off Airport Road and Dry Creek Road.

6.4.2.1 Analysis of the No Extension to Rollie Gates Drive Alternative

Based on a preliminary evaluation of the project alternative and project objectives, development of this alternative would be able to meet all project objectives. Under this alternative, environmental impacts associated with agricultural resources would be decreased, while all other environmental impacts would be similar to the proposed project, as detailed below.

6.4.2.1.1 AGRICULTURE AND FORESTRY RESOURCES

Alternative 1 would not result in the direct conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Consistent with the proposed project, the entire eastern portion of the project site is designated as Urban and Built-Up land and the western portion is designated Farmland of Local Potential. Because the project site is not located on designated Prime Farmland, Farmland of Statewide Importance, or Unique Farmland by the FMMP, project-related development on the project site would not result in the conversion of Farmland to non-agricultural use.

Alternative 1 would also include offsite improvements, including installation of a storm drain and outfall, a sewer line extension, realignment of Dry Creek Road, and construction of an interim bridge over Huer Huero Creek and temporary connecting roadways. Installation of the storm drain and outfall would occur in land designated as Prime Farmland, Farmland of Local Potential, and Grazing Land. While short-term work would occur within the Prime Farmland and Farmland of Statewide Importance, installation of these infrastructure lines would not result in the permanent conversion of Farmland because both lines would be buried, surface soils would be restored to preconstruction conditions to the extent feasible upon the completion of construction, and existing and/or future agricultural operations could persist following installation. The Rollie Gates Drive extension, which would occur in designated Farmland of Statewide Importance, would not be constructed and therefore this conversion would be eliminated. Therefore, potential impacts associated with conversion of Farmland to non-agricultural uses would be decreased under Alternative 1.

6.4.2.1.2 AIR QUALITY AND GREENHOUSE GAS EMISSIONS

Alternative 1 would result in potential impacts associated with inconsistency with the applicable clean air plan and cumulatively considerable net increases in criteria pollutants. These impacts would be similar to the proposed project.

Alternative 1 would have the potential to expose sensitive receptors to substantial pollutant concentrations associated with long-term operational localized diesel particulate matter emissions. Potential impacts associated with exposure of sensitive receptors to harmful levels of air pollutant emissions would be similar to the proposed project.

6.4.2.1.3 LAND USE AND PLANNING

Alternative 1 would result in inconsistencies with land use plans, policies, and regulations related to noise and VMT. Because the project would be potentially inconsistent with the policies included in the City's Noise Element, City's Circulation Element, SLOCOG's 2019 RTP/SCS, and City's Municipal Code related to noise and VMT-reduction strategies, and implementation of mitigation would not reduce these impacts to less-than-significant levels, impacts would be similar to the proposed project. Cumulative land use and planning impacts would also be similar to the proposed project.

6.4.2.1.4 NOISE

Alternative 1 would exceed the City's applicable daytime and nighttime noise standards due to warehouse operations and proximity of noise-sensitive land uses. Mitigation has been identified to reduce operational noise where feasible. Implementation of identified mitigation measures would reduce operational noise at the nearest sensitive receptor location to approximately 54 dBA Leq, which would still exceed the City's daytime and nighttime noise standards. Therefore, even with implementation of identified mitigation measures, operational impacts related to an increase in ambient noise-levels near sensitive receptor locations would be similar to the proposed project.

Alternative 1 would result in a significant increase in traffic noise levels at nearby noise-sensitive land uses, and this impact would be similar to the proposed project. Cumulative noise impacts resulting from Alternative 1 would be similar to the proposed project as well.

6.4.2.1.5 TRAFFIC AND TRANSPORTATION

Alternative 1 would result in a minor change in onsite circulation patterns to limit site ingress and egress to the access driveways along the eastern and southern boundaries of the project site. The Applicant has indicated that the extension of Rollie Gates Drive is an optional consideration for the project design and elimination of that component would not significantly alter the safety, capacity, or efficiency of onsite circulation patterns.

Consistent with the proposed project, Alternative 1 would result in a net increase in regional VMT and would therefore not be consistent with State CEQA Guidelines Section 15064.3(b). Despite implementation of mitigation to reduce VMT impacts to the greatest extent feasible, Phase 2 retail and hotel uses associated with the project would result in an increase in the regional VMT. Even with implementation of identified mitigation measures, this net increase in regional VMT would be similar to the proposed project. Additionally, Alternative 1 would not change offsite circulation patterns, and project truck and vehicle traffic would still create safety issues resulting from unprotected left turns onto the SR 46E corridor and from queue lengths at intersections beyond the storage capacity of the intersection. Even with implementation of the identified mitigation, these safety impacts would be *significant and unavoidable* due to the uncertainty regarding timing and implementation and collaboration with Caltrans.

Alternative 1 would result in a cumulatively considerable contribution to VMT increase within the city and county; therefore, potential cumulative transportation impacts would be similar to the proposed project.

6.4.2.1.6 OTHER ENVIRONMENTAL IMPACT ISSUE AREAS

While the elimination of the Rollie Gates Drive extension would reduce headlight lighting impacts on surrounding properties located along the proposed extension alignment, Alternative 1 would result in similar impacts to aesthetic resources as the proposed project.

Alternative 1 would result in similar impacts associated with other issue areas when compared to the proposed project. Secondary impacts would include a minor increase in vehicle traffic on internal roadways from project trucks utilizing the other access driveways. No potentially significant secondary impacts would be anticipated.

6.4.3 Alternative 2: Elimination of Retail and Hotel Uses

Alternative 2 would include a design of the project site to eliminate proposed Phase 2 retail and hotel uses. This alternative would include demolition of existing Paso Robles Boys School facilities onsite located within the building footprint of the proposed warehouse facility and associated parking areas and drainage basin, site preparation activities, grading, underground offsite utility construction and installation, and construction and operation of the proposed warehouse building and associated road improvements. Existing Paso Robles Boys School facilities located within the eastern 63.88 acre of the site would remain as-is.

6.4.3.1 Analysis of Elimination of Retail and Hotel Uses Alternative

Based on a preliminary review of project objectives, Alternative 2 would be potentially consistent with Objectives 1, 4, 5, 6, and 8. The project would be potentially inconsistent with Objective 2, which identifies the objective to redevelop the former Paso Robles Boys School property with uses that are compatible with the adjacent Paso Robles Municipal Airport and that maximize the development potential of the property. This alternative would result in the development of a portion of the property, and the eastern 63.88 acres of the site would remain vacant. Therefore, this alternative would not maximize the development potential of the property. This alternative would also be inconsistent with Objectives 3 and 7, which pertain to the establishment of new retail and visitor-serving land uses near the Paso Robles Municipal Airport. This alternative would not include the future development of commercial retail uses onsite and therefore would not meet Objectives 3 and 7. Under Alternative 2, some impacts associated with air quality and GHG emissions, noise, land use policy consistency, and transportation would be reduced, while all other environmental impacts would be similar to the proposed project, as detailed below.

6.4.3.1.1 AGRICULTURE AND FORESTRY RESOURCES

Under Alternative 2, the entire eastern portion of the project site is designated as Urban and Built-Up land and the western portion is designated Farmland of Local Potential. Because the project site is not located on designated Prime Farmland, Farmland of Statewide Importance, or Unique Farmland by the FMMP, development under Alternative 2 on the project site would not result in the conversion of Farmland to non-agricultural use, similar to the proposed project.

Alternative 2 would also include offsite improvements, including installation of a storm drain and outfall, a sewer line extension, realignment of Dry Creek Road, construction of an interim bridge over Huer Huero Creek and temporary connecting roadways, and the extension of Rollie Gates Drive. Development

of this alternative would result in the direct conversion of 2.53 acres of Farmland of Statewide Importance to non-agricultural use associated with the proposed extension of Rollie Gates Drive. Even with implementation of identified mitigation measures, this impact would be similar to the proposed project.

6.4.3.1.2 AIR QUALITY AND GREENHOUSE GAS EMISSIONS

Alternative 2 would eliminate the Phase 2 retail and hotel uses, which contribute to over 40% of the project's regional VMT. By removing these uses, the project's regional VMT per capita would be reduced.

Alternative 2 would result in decreased air pollutant emissions generated during construction activities in comparison to the proposed project, due to the reduced amount of proposed demolition activities, reduced scope of proposed development, and smaller area of disturbance.

Operational air pollutant emissions would also be decreased as a result of the elimination of air pollutant emissions generated by employee, visitor, and delivery vehicle trips associated with retail and commercial land uses. However, long-term air pollutant emissions produced by the operation of the proposed warehouse facility would have the potential to expose sensitive receptors to substantial pollutant concentrations associated with long-term operational localized DPM emissions. Operational impacts associated with exposure of sensitive receptors to substantial pollutant concentrations would be similar to the proposed project.

Based on the reduction of mobile-source air pollutant emissions associated with Alternative 2, overall cumulative impacts associated with air quality and GHG emissions would be decreased in comparison to the proposed project but may still be significant.

6.4.3.1.3 LAND USE AND PLANNING

Under Alternative 2, noise emissions produced by the operation of the proposed warehouse facility under this alternative would have the potential to expose sensitive receptors to noise levels in exceedance of the City's Noise Element thresholds. Therefore, impacts associated with inconsistency with Policies 7, 8, and 11 of the City's Noise Element would be similar to the proposed project.

Alternative 2 would result in an overall reduction of project-generated VMT based on the elimination of retail and commercial uses. Therefore, this alternative would result in decreased impacts associated with inconsistency with Policy CE-1B of the City's Circulation Element.

Cumulative land use and planning impacts under Alternative 2 would be similar to the proposed project.

6.4.3.1.4 NOISE

Similar to the proposed project, implementation of Alternative 2 would exceed the City's applicable daytime and nighttime noise standards due to warehouse operations and proximity of noise-sensitive land uses. Mitigation Measure N/mm-1.2 has been included to reduce operational noise where feasible. Implementation of Mitigation Measure N/mm-1.2 would reduce operational noise at the nearest sensitive receptor location to approximately 54 dBA Leq, which would still exceed the City's daytime and nighttime noise standards. Therefore, even with implementation of Mitigation Measure N/mm-1.2, operational impacts related to an increase in ambient noise levels near sensitive receptor locations would be similar to the proposed project.

Alternative 2 would result in a decrease in delivery truck, visitor, and employee vehicle trips to and from the project site in comparison to the proposed project. Therefore, noise impacts associated with transportation would be decreased.

Based on the analysis provided above, implementation of Alternative 2 would result in decreased cumulative noise impacts.

6.4.3.1.5 TRAFFIC AND TRANSPORTATION

As described in *Section 4.13, Traffic and Transportation*, VMT refers to "the amount and distance of automobile travel attributable to a project." Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks and does not include heavy duty trucks. Implementation of this alternative would include development of the proposed warehouse facility. Although the SLOCOG TDM projected that the proposed Phase 1 office and industrial uses would reduce regional work VMT, data from the Bureau of Labor Statistics, the U.S. Census Bureau, and BW Research Partnership (see *Section 4.11, Population and Housing*) indicate that a significant number of employees generated by the Phase 1 warehouse would likely commute from outside the city or county from lower housing-cost communities, which would result in increased commute lengths and increased regional work VMT and overall VMT. Therefore, VMT impacts associated with the proposed warehouse facility would be similar to the proposed project. Additionally, Alternative 2 would not change offsite circulation patterns for the Phase 1 use, and project truck and vehicle traffic would still create safety issues resulting from unprotected left turns onto the SR 46E corridor and from queue lengths at intersections beyond the storage capacity of the intersection. Some queuing deficiencies would be decreased or eliminated without the Phase 2 retail and hotel component.

Based on the analysis provided above, implementation of Alternative 2 would result in decreased cumulative transportation impacts.

6.4.3.1.6 OTHER ENVIRONMENTAL IMPACT ISSUE AREAS

Alternative 2 would result in decreased potential impacts to vernal pool fairy shrimp habitat, onsite sensitive and special-status species, onsite non-wetland waters of the United States, federally or state-protected wetlands, movement of native fish or wildlife species, and native oak trees. Therefore, this alternative would have the potential to result in decreased impacts associated with biological resources.

Alternative 2 would have the potential to result in adverse impacts to previously undiscovered subsurface archaeological resources. Impacts would be similar to the proposed project.

Alternative 2 would result in a smaller area of site disturbance, which would reduce potential impacts associated with soil erosion and loss of topsoil. Consistent with the proposed project, this alternative would have the potential to disturb native geological formations that are known to have high paleontological sensitivity and could therefore destroy paleontological resources. Potential impacts would be similar to the proposed project.

Consistent with the proposed project, Alternative 2 would have the potential to create a significant hazard to workers and the public and/or the environment through the accidental release of asbestos-containing materials, lead-based paint, and/or contaminated soils. This impact would be similar to the proposed project.

Alternative 2 may result in a reduction in the size of the required stormwater detention basin to be constructed onsite. This would result in a reduced wildlife attractant that would be hazardous to safe airport operations. However, consistent with the proposed project, Alternative 2 would be potentially significant regardless of the relative size of the basin and would be similar to the proposed project.

Alternative 2 would have the potential to result in new sources of pollutants that may lead to degradation of water quality within the project area, alter existing drainage patterns in a manner that may result in

erosion or siltation on- or offsite, and conflict with or obstruct implementation of a water quality control plan. While this alternative would generally result in less new impervious surfaces, potential impacts associated with hydrology and water quality would be anticipated to be similar with the proposed project.

Alternative 2 would result in impacts similar to the proposed project associated with population and housing, public services and recreation, and utilities/service systems and energy. No potentially significant secondary impacts would be anticipated from the implementation of this alternative.

6.4.4 Alternative 3: Reduced Warehouse Size

Alternative 3 would include the construction and operation of a substantially smaller warehouse on the project site, with development of all other components of the proposed project. This alternative would include demolition of existing Paso Robles Boys School facilities onsite, site preparation activities, grading, underground offsite utility construction and installation, construction and operation of a warehouse substantially reduced in size, and construction and operation of a variety of commercial, office, and visitor-serving uses in a business park setting. It is assumed that the substantial reduction in warehouse size would result in a reduction in the number of operational truck trips and a reduction in project employees when compared to the proposed project.

6.4.4.1 Analysis of Reduced Warehouse Size Alternative

Based on the reduced size of the warehouse, the facility would not be able to meet the same performance standards, the overall type of warehouse facility may be different, and the warehouse would likely serve a smaller customer base. Under Alternative 3, project Objectives 5 and 6 would likely not be met. Environmental impacts associated with air quality, noise, and transportation would be reduced under this alternative, as described below.

6.4.4.1.1 AGRICULTURE AND FORESTRY RESOURCES

Similar to the proposed project, development of Alternative 3 would result in the direct conversion of 2.53 acres of Farmland of Statewide Importance to non-agricultural use associated with the proposed extension of Rollie Gates Drive. However, the reduced size of the warehouse and associated reduction in number of daily truck trips needed to serve the warehouse may have the potential to eliminate the need for the extension of Rollie Gates Drive, which is intended to facilitate warehouse truck circulation. Therefore, impacts associated with conversion of Farmland may be reduced under this alternative.

6.4.4.1.2 AIR QUALITY AND GREENHOUSE GAS EMISSIONS

Alternative 3 would result in a reduction in air pollutant emissions generated during construction activities, due to the reduced amount of proposed development and smaller area of disturbance. Further analysis would need to be conducted to determine whether this alternative would result in construction emissions below applicable local thresholds.

Under Alternative 3, operational air pollutant emissions would be reduced when compared to the proposed project due to a reduction in daily truck trips serving the warehouse facility. Further analysis would need to be conducted to determine whether this alternative would result in less-than-significant impacts associated with adverse effects on proximate sensitive receptors from warehouse operations.

6.4.4.1.3 LAND USE AND PLANNING

Similar to the proposed project, Alternative 3 may still result in an inconsistency with land use plans, policies, and regulations related to noise and VMT. Because this alternative would be potentially

inconsistent with the policies included in the City's Circulation Element, SLOCOG's 2019 RTP/SCS, and City's Municipal Code related to VMT-reduction strategies, and implementation of mitigation would not reduce these impacts to less-than-significant levels, impacts would be *significant and unavoidable*. Similar to the proposed project, cumulative land use and planning impacts would also be *significant and unavoidable*.

6.4.4.1.4 NOISE

Construction noise levels under Alternative 3 would be similar to the proposed project but overall may be shorter in duration. Operational noise resulting from implementation of this alternative would be reduced as a result of fewer daily truck trips serving the warehouse facility. Vehicle traffic-generated noise emissions would also be reduced during operation of this alternative as a result of requiring fewer warehouse employees. Further analysis would need to be conducted to determine whether this alternative would result in construction emissions below applicable local thresholds.

6.4.4.1.5 TRAFFIC AND TRANSPORTATION

Under Alternative 3, transportation impacts associated with warehouse employee VMT would be reduced as a result of requiring fewer warehouse employees. Impacts associated with VMT generated from proposed hotel and retail uses would be similar to the proposed project and would result in a *significant and unavoidable impact*. Additionally, Alternative 3 would not change offsite circulation patterns, and project truck and vehicle traffic would still create safety issues resulting from unprotected left turns onto the SR 46E corridor. Additional analysis would be required to determine what size warehouse reduction would result in acceptable queuing at intersections. Cumulative effects associated with regional VMT would be similar to the proposed project and would result in a *significant and unavoidable impact*.

6.4.4.1.6 OTHER ENVIRONMENTAL IMPACT ISSUE AREAS

Alternative 3 would result in similar impacts to aesthetics; biological resources; cultural and tribal cultural resources; geology and soils; hazards, hazardous materials, and wildfire; hydrology and water quality; mineral resources; public services and recreation; and utilities/service systems and energy as the proposed project.

6.4.5 Alternative 4: Alternative Warehouse Location

Under Alternative 4, the proposed warehouse facility would be located on the eastern portion of the project site, and proposed commercial retail uses would be located on the western portion of the project site, with the proposed stormwater basin remaining in the same location. This alternative would include demolition of existing Paso Robles Boys School facilities onsite, site preparation activities, grading, underground offsite utility construction and installation, construction and operation of the proposed warehouse building, and construction and operation of the proposed commercial retail facilities. Onsite circulation patterns would be modified to accommodate warehouse access and loading on the eastern portion of the project site.

6.4.5.1 Analysis of Alternative Warehouse Location

Based on a preliminary review of project objectives, Alternative 4 would be potentially consistent with all project objectives. Location of the proposed warehouse facility on the eastern portion of the project site would increase the distance between warehouse operations and proximate sensitive receptor locations. Overall, environmental impacts associated with air quality, land use and planning, and noise would be reduced in comparison with the proposed project, as described below.

6.4.5.1.1 AGRICULTURE AND FORESTRY RESOURCES

Similar to the proposed project, development of Alternative 4 would result in the direct conversion of 2.53 acres of Farmland of Statewide Importance to non-agricultural use associated with the proposed extension of Rollie Gates Drive. Even with implementation of identified mitigation measures, this impact would be *significant and unavoidable*.

6.4.5.1.2 AIR QUALITY AND GREENHOUSE GAS EMISSIONS

The nearest sensitive receptor location includes a residential dwelling, located directly adjacent to the western project boundary. Other nearby sensitive receptor locations include a residential dwelling located approximately 1,100 feet west of the western project boundary and four residential dwellings located approximately 730 to 1,100 feet north of the northern project site boundary. Under Alternative 4, location of the proposed warehouse facility on the eastern portion of the project site would increase the distance between warehouse operations and proximate sensitive receptor locations. Therefore, potential impacts associated with exposure of sensitive receptors to long-term operational localized DPM emissions would be reduced compared to the proposed project. In addition, cumulative impacts associated with long-term localized concentrations of DPM would be reduced when compared to the proposed project.

Alternative 4 would result in impacts associated with consistency with the applicable air quality plan, a cumulatively considerable net increase in criteria pollutants, and other emissions adversely affecting a substantial number of people. These impact levels are anticipated to be similar to the proposed project.

6.4.5.1.3 LAND USE AND PLANNING

Alternative 4 would reduce potential impacts associated with inconsistency with the City's Noise Element. Location of the proposed warehouse facility on the eastern portion of the project site would increase the distance between warehouse operations and proximate sensitive receptor locations, reducing operational noise impacts.

Similar to the proposed project, Alternative 4 would result in *significant and unavoidable impacts* associated with inconsistency with regional and local policies associated with VMT.

6.4.5.1.4 NOISE

Location of the proposed warehouse facility on the eastern portion of the project site would increase the distance between warehouse operations and proximate sensitive receptor locations. Therefore, Alternative 4 would reduce noise impacts associated with exposure of noise-sensitive receptors to operational noise levels in exceedance of the City's applicable daytime and nighttime noise standards. Operational noise levels associated with commercial/industrial, office, retail, hotel uses, and parking lots would be anticipated to be similar to the proposed project.

Alternative 4 would result in similar noise impacts associated with roadway traffic noise as the proposed project. Potential impacts associated with groundborne vibration, groundborne noise, and exposure to excessive noise due to proximity to an airport facility would also be similar to the proposed project.

6.4.5.1.5 TRAFFIC AND TRANSPORTATION

Alternative 4 would result in similar impacts associated with potential conflicts with an adopted plan, ordinance, or policy addressing the circulation system. While internal circulation patterns would be modified to accommodate the proposed warehouse facility on the eastern side of the project site and commercial retail uses on the western side of the site, overall trip generation and impacts to traffic

operations of the surrounding area would be similar to the proposed project. No major changes to planned offsite roadway and transportation system improvements would be anticipated compared to the proposed project.

Similar to the proposed project, Alternative 4 would result in a net increase in regional VMT and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b). Similar to the proposed project, development of this alternative would result in a cumulatively considerable significant impact associated with VMT. Additionally, a substantial number of warehouse employees are anticipated to live outside of the city of Paso Robles, which would result in long commute trips. Additionally, this alternative would not change offsite circulation patterns, and project truck and vehicle traffic would still create safety issues resulting from unprotected left turns onto the SR 46E corridor and from queue lengths at intersections beyond the storage capacity of the intersection. Even with implementation of the identified mitigation, these safety impacts would be *significant and unavoidable* due to the uncertainty regarding timing and implementation and collaboration with Caltrans.

6.4.5.1.6 OTHER ENVIRONMENTAL IMPACT ISSUE AREAS

Alternative 4 would result in similar impacts to aesthetics; biological resources; cultural and tribal cultural resources; geology and soils; hazards, hazardous materials, and wildfire; hydrology and water quality; mineral resources; public services and recreation; and utilities/service systems and energy as the proposed project.

6.4.6 Alternative 5: Alternative Configuration of Warehouse Uses

Under Alternative 5, the proposed warehouse uses would be located in six separate warehouse buildings, with the truck loading docks located to face east (i.e., away from the western property line). The total square footage of warehouse uses would remain generally consistent with the current project design, with a maximum of 1,330,556 square feet of total floor space. It is also assumed that the number of loading docks would remain approximately equivalent to the current project design, with a total of 98 loading docks. The total number of daily truck trips and daily passenger vehicle trips would remain unchanged from the current project design. The warehouse uses would also be located within the 76.87-acre area located on the western side of the project site, consistent with the current project design. Onsite circulation patterns would be modified to accommodate the alternative warehouse access and loading locations. All components associated with Phase 2 of the proposed project (Business Park) would be unchanged from the current project design under Alternative 5.

6.4.6.1 Analysis of Alternative Configuration of Warehouse Uses

Based on a preliminary review of project objectives, Alternative 5 would be potentially consistent with all project objectives. Reconfiguration of the proposed warehouse facility uses to be located within six separate buildings with the loading docks facing away from the western property line would increase the total distance between warehouse loading operations and proximate sensitive receptor locations. Overall, environmental impacts associated with air quality, land use and planning, and noise would be reduced in comparison with the proposed project, as described below.

6.4.6.1.1 AGRICULTURE AND FORESTRY RESOURCES

Similar to the proposed project, development of Alternative 5 may result in the direct conversion of 2.53 acres of Farmland of Statewide Importance to non-agricultural use associated with the proposed extension

of Rollie Gates Drive. Even with implementation of identified mitigation measures, this impact would be *significant and unavoidable*.

6.4.6.1.2 AIR QUALITY AND GREENHOUSE GAS EMISSIONS

The nearest sensitive receptor location in relation to the project site includes a residential dwelling, located directly adjacent to the western project boundary. Other nearby sensitive receptor locations include a residential dwelling located approximately 1,100 feet west of the western project boundary and four residential dwellings located approximately 730 to 1,100 feet north of the northern project site boundary. Under Alternative 5, location of the proposed warehouse uses in six individual warehouse buildings with the loading docks facing east would increase the distance between warehouse loading operations and proximate sensitive receptor locations. Therefore, potential impacts associated with exposure of sensitive receptors to long-term operational localized DPM emissions from warehouse loading activities would be reduced compared to the proposed project. In addition, cumulative impacts associated with long-term localized concentrations of DPM would be reduced when compared to the proposed project.

Alternative 5 would result in impacts associated with consistency with the applicable air quality plan, a cumulatively considerable net increase in criteria pollutants, and other emissions adversely affecting a substantial number of people. These impact levels are anticipated to be similar to the proposed project.

6.4.6.1.3 LAND USE AND PLANNING

Alternative 5 would reduce potential impacts associated with inconsistency with the City's Noise Element. Location of the proposed warehouse uses within six individual warehouse buildings with the loading docks facing east would increase the distance between warehouse loading operations and proximate noise-sensitive receptor locations, reducing operational noise impacts.

Similar to the proposed project, Alternative 5 would result in *significant and unavoidable impacts* associated with inconsistency with regional and local policies associated with VMT, as the total number of daily truck trips and daily passenger vehicle trips would remain unchanged from the current project design.

6.4.6.1.4 NOISE

Location of the proposed warehouse uses within six individual warehouse buildings with the loading docks facing east would increase the distance between warehouse loading operations and proximate noise-sensitive receptor locations. Therefore, Alternative 5 would reduce noise impacts associated with exposure of noise-sensitive receptors to operational noise levels in exceedance of the City's applicable daytime and nighttime noise standards. Operational noise levels associated with commercial/industrial, office, retail, hotel uses, and parking lots would be anticipated to be similar to the proposed project.

Alternative 5 would result in similar noise impacts associated with roadway traffic noise as the proposed project, as the total number of daily truck trips and daily passenger vehicle trips would remain unchanged from the current project design. Potential impacts associated with groundborne vibration, groundborne noise, and exposure to excessive noise due to proximity to an airport facility would also be similar to the proposed project.

6.4.6.1.5 TRAFFIC AND TRANSPORTATION

Alternative 5 would result in similar impacts associated with potential conflicts with an adopted plan, ordinance, or policy addressing the circulation system. While internal circulation patterns would be

modified to accommodate the locations of the six separate warehouse buildings and their loading docks, overall trip generation and impacts to traffic operations of the surrounding area would be consistent with the current project design. No major changes to planned offsite roadway and transportation system improvements would be anticipated compared to the proposed project.

Similar to the proposed project, Alternative 5 would result in a net increase in regional VMT and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b) and development of this alternative would result in a cumulatively considerable significant impact associated with VMT. In addition, a substantial number of warehouse employees are anticipated to live outside of the city of Paso Robles, which would result in long commute trips. This alternative would not change offsite circulation patterns when compared to the current project design, and project truck and vehicle traffic would still create safety issues resulting from unprotected left turns onto the SR 46E corridor and from queue lengths at intersections beyond the storage capacity of the intersection. Even with implementation of the identified mitigation, these safety impacts would be *significant and unavoidable* due to the uncertainty regarding timing and implementation and collaboration with Caltrans.

6.4.6.1.6 OTHER ENVIRONMENTAL IMPACT ISSUES

Alternative 5 would result in similar impacts to aesthetics; biological resources; cultural and tribal cultural resources; geology and soils; hazards, hazardous materials, and wildfire; hydrology and water quality; mineral resources; public services and recreation; and utilities/service systems and energy as the proposed project.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The State CEQA Guidelines require an analysis of alternatives to identify an Environmentally Superior Alternative among the alternatives evaluated in the EIR. The Environmentally Superior Alternative is the alternative that would minimize adverse impacts to the environment.

Based on the evaluation of alternatives above, the No Project Alternative would be the Environmentally Superior Alternative because it would minimize the project's adverse impacts to the environment. However, State CEQA Guidelines Section 15126.6(e)(2) states that if the No Project Alternative is also the Environmentally Superior Alternative, the EIR should then identify an Environmentally Superior Alternative among the other alternatives.

As summarized in Table 6-1, below, Alternative 1 (No Extension of Rollie Gates Drive) would only reduce the project's significant environmental impacts related to agricultural impacts. Alternative 2 (Elimination of Retail and Hotel Uses) would decrease the project's significant environmental impacts related to transportation (VMT) but not agricultural resources, GHG emissions, land use and planning, or noise. Alternative 3 (Reduced Warehouse Size) would potentially decrease all of the project's significant environmental impacts but it is unknown what size reduction would be required. Both Alternative 4 (Alternative Warehouse Location) and Alternative 5 (Alternative Configuration of Warehouse Uses) would decrease the project's significant environmental impacts to land use and planning and noise and would potentially decrease significant environmental impacts related to air quality and nearby sensitive receptors. However, Alternative 4 would be anticipated to result in a larger decrease in impacts to these resource areas due to the larger distance increase between warehouse loading uses and offsite sensitive receptor locations.

Alternatives 1, 4, and 5 would fully meet the project objectives, while Alternatives 2 and 3 would only partially meet the project objectives. Alternative 3 would have the potential to reduce most of the project's significant environmental impacts while still meeting most of the project objectives. Under

Alternative 3, project Objectives 5 and 6 would likely not be fully achieved. However, it is unknown how large of a reduction would be needed to achieve these reductions and it is possible further analysis could determine whether a 100% reduction would be necessary. Alternatives 2, 4, and 5 would result in a similar number of decreased impacts, but Alternatives 4 and 5 would meet all of the project's objectives. Because both Alternatives 4 and 5 would continue to meet all project objectives and Alternative 4 would be anticipated to result in a larger decrease in impacts associated with air quality, land use and planning, and noise, Alternative 4 would be considered the Environmentally Superior Alternative.

Table 6-1. Comparison of Significant Impacts Among Alternatives

Issue Area	No Project Alternative	Alternative 1: No Extension of Rollie Gates Drive	Alternative 2: Elimination of Retail and Hotel Uses	Alternative 3: Reduced Warehouse Size[1]	Alternative 4: Alternative Warehouse Location	Alternative 5: Alternative Configuration of Warehouse Uses
AG Impact 1	No Impact	No Impact	Similar	Potentially Decreased	Similar	Similar
AG Cumulative Impacts	No Impact	No Impact	Similar	Potentially Decreased	Similar	Similar
AQ Impact 1	No Impact	Similar	Decreased	Potentially Decreased	Similar	Similar
AQ Impact 2	No Impact	Similar	Similar		Similar	Similar
AQ Impact 8	No Impact	Similar	Similar	Potentially Decreased	Potentially Decreased[1]	Potentially Decreased[1]
AQ Cumulative Impacts	No Impact	Similar	Decreased[2]	Potentially Decreased	Potentially Decreased[1]	Potentially Decreased[1]
GHG Impact 1	No Impact	Similar	Similar	Potentially Decreased	Similar	Similar
GHG Impact 2	No Impact	Similar	Similar	Potentially Decreased	Similar	Similar
GHG Cumulative Impacts	No Impact	Similar	Similar	Potentially Decreased	Similar	Similar
LUE Impact 1	No Impact	Similar	Decreased[3]	Potentially Decreased	Decreased[5]	Decreased[5]
LUE Cumulative Impacts	No Impact	Similar	Decreased[3]	Potentially Decreased	Decreased[5]	Decreased[5]
N Impact 1	No Impact	Similar	Similar	Potentially Decreased	Decreased	Decreased
N Cumulative Impacts	No Impact	Similar	Similar	Potentially Decreased	Decreased	Decreased
TR Impact 2	No Impact	Similar	Decreased	Potentially Decreased	Similar	Similar
TR Impact 3	No Impact	Similar	Similar	Potentially Decreased	Similar	Similar
TR Impact 4	No Impact	Similar	Potentially Decreased[1]	Potentially Decreased	Similar	Similar
TR Cumulative Impacts	No Impact	Similar	Decreased[4]	Potentially Decreased	Similar	Similar
Non-significant Impacts	No Impact	Similar	Similar	Similar	Similar	Similar
Meets Project Objectives?	No	Yes	Partially	Partially	Yes	Yes

[1] Potentially decreased impacts would be dependent on further analysis to determine what size reduction would result in a decreased level of significance for Alternative 3, and whether relocation of the warehouse to the eastern portion of the property would reduce DPM to a level to decrease the level of significance for Alternative 4.

[2] Impacts related to VMT inconsistencies would be decreased, but the project would still result in a considerable increase in criteria pollutants, including DPM near sensitive receptors.

[3] Impacts related to inconsistencies with policies for VMT would be decreased, but the project would still result in inconsistencies with noise policies.

[4] Cumulative impacts related to VMT would be decreased, but other transportation impacts related to safety would remain.

[5] Impacts related to inconsistencies with policies for noise would be decreased, but the project would still result in inconsistencies with VMT policies.

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CHAPTER 7. MITIGATION MONITORING AND REPORTING PROGRAM

7.1 STATUTORY REQUIREMENTS

When a Lead Agency makes findings on significant environmental effects identified in an Environmental Impact Report (EIR), the agency must also adopt a "reporting or monitoring program for the changes to the project which it has adopted or made a condition of approval in order to mitigate or avoid significant effects on the environment" (Public Resources Code [PRC] Section 21081.6(a) and State California Environmental Quality Act (CEQA) Guidelines Sections 15091(d) and 15097). The Mitigation Monitoring and Reporting Program (MMRP) is implemented to ensure that the mitigation measures and project revisions identified in the EIR are implemented. Therefore, the MMRP must include all changes in the proposed project either adopted by the project proponent or made conditions of approval by the Lead or Responsible Agency.

7.2 ADMINISTRATION OF THE MITIGATION MONITORING AND REPORTING PROGRAM

The City of Paso Robles (City) is the Lead Agency responsible for the adoption of the MMRP. As the project applicant, the City is also responsible for implementation of the MMRP, in coordination with the County of San Luis Obispo and other government agencies. According to State CEQA Guidelines Section 15097(a), a public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation. However, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that the implementation of the measure occurs in accordance with the program.

7.3 MITIGATION MEASURES AND MONITORING PROGRAM

Table 6-1 is structured to enable quick reference to mitigation measures and the associated monitoring program based on the environmental resource. The numbering of mitigation measures correlates with numbering of measures found in Chapter 4, Environmental Impact Analysis.

Table 7-1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
Aesthetics				
AES/mm-4.1	Prior to issuance of building permits in either phase, the Applicant shall provide a lighting plan for the lot affected by the building permit and any areas outside of the lot that are subject to associated offsite improvements that demonstrates that the selected light fixtures, locations, and optical distribution patterns comply with the California Green Building Code standards. Specifically, the plan shall evaluate the light fixture selection against the lighting zone that is appropriate. Backlight, uplight, and glare (BUG) ratings provided by the manufacturer of the proposed fixtures shall be provided for each fixture type proposed. The lighting plans shall be prepared by a qualified engineer who is an active member of the Illuminating Engineering Society of North America (IESNA) using guidance and best practices endorsed by the International Dark Sky Association. All fixtures shall meet or exceed the standards of the California Green Building Code Maximum Allowable BUG Rating (Table 5.106.8 in the 2019 version). The plan shall also include the following to meet this requirement: 1. In order to prevent "hot spots" onto the structures, wall-mounted fixtures shall be positioned for lighting at the ground level and around the building for safety using appropriate IESNA uniformity ratings and shall not shed light back onto the building. To achieve this, the plan shall consider use of house side shields to minimize glare that may be observed from the vertical surface of the building walls. Wall-mounted light fixtures shall use nonreflective materials, including nonreflective glass. 2. The project shall include lighting controls and dimming capabilities for both building-related lighting and pedestrian/parking-related lighting, based on the IESNA, California Green Building Code, and California Energy Code minimums. Occupancy sensors shall be utilized so that lighting is dimmed or turned off when an area is unoccupied. 3. Lighting in parking areas and along drive aisles shall be the minimum level necessary to provide appropriate visibility of pedestrians and vehicles. 4. Lighting fixtures located in parking areas or drive aisles shall not be located adjacent to or above trees that will obscure lighting beyond safe levels as the trees mature. 5. Any exterior lighting, including lighting for signs, shall be "warm-white" or filtered (correlated color temperature of < 3,000 Kelvin; scotopic/photopic ratio of < 1.2) to minimize blue emissions. 6. All exterior lighting fixtures shall be International Dark Sky Association approved (Fixture Seal of Approval program) and shall be installed so that they are shielded and directed downwards.	Prepare a lighting plan	Prior to issuance of building permits	City of Paso Robles Community Development Department

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
Agriculture and Forestry Resources				
AG/mm-1.1	If the street improvement plans for an extension of Rollie Gates Drive are submitted for City of Paso Robles (City) approval, the Applicant shall provide a calculation of the acreage of Farmland Mapping and Monitoring Program designated Farmland that would be converted to non-agricultural use as a result of the roadway extension, based on detailed design plans for the roadway extension, including road shoulders and right-of-way areas that could not be used for agricultural uses in the future. Upon City verification of the acreage calculation and prior to City of approval of roadway construction, the Applicant shall contribute monetarily at a 1:1 ratio to the California Farmland Trust, or a similar established conservation program in the State of California as accepted by the City, for the conservation of Farmland. The Trust or other conservation program would be responsible for maintaining conserved Farmland in perpetuity. The Applicant shall provide satisfactory evidence to the City that the mitigation has been satisfied.	Offset impacts to farmland through conservation	If the Rollie Gates Drive extension is constructed, prior issuance or approval of street improvements plans related to the extension	City of Paso Robles Community Development Department
Air Quality and Greenhouse Gas Emissions				
AQ/mm-1.1	The Applicant shall prepare and implement a Traffic Demand Management Plan (TDMP), which shall be reviewed and approved by the City Engineer prior to implementation. The plan shall identify the strategies to be implemented and methods for monitoring the effectiveness of the strategies and include strategies and/or payment of traffic mitigation fees sufficient to achieve the City of Paso Robles's significance threshold of 15% below the existing County of San Luis Obispo average vehicle miles traveled per service population (VMT/SP) of 19.18. At a minimum, based on the Transportation Impact Study prepared for this project, the following strategies shall be implemented (Central Coast Transportation Consulting 2023): 1. Implement a Commute Trip Reduction program through SLO Regional Rideshare and become a Gold Employer in the Back 'N' Forth Club program. This program, operated by the San Luis Obispo Council of Governments (SLOCOG), helps employers develop and implement transportation demand management measures for employees. 2. Offer financial incentives to employees who carpool, take transit, walk, or bike. 3. Implement a shuttle system from centralized locations, including transit centers, mobility hubs, and park-and-ride lots. 4. Provide a fair-share contribution towards the City of Paso Robles's Theater Drive Mobility Hub project. 5. Implement a vanpool program and subsidize a portion of the vanpool expenses to increase adoption.	Prepare a Transportation Demand Management Plan	Prior to occupancy of the Phase 1 warehouse. If the TDMP only applies to the Phase 1 warehouse, an updated or separate TDMP will be required prior to occupancy of any Phase 2 uses	City of Paso Robles Community Development Department. May require coordination with SLOCOG and SLO Regional Rideshare

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	6. Modify shift change schedules and restrict truck trips to avoid peak period congestion on nearby roadways. Restricting truck trips between 10:00 a.m. and 2:00 p.m. on Sundays and 2:00 p.m. and 6:00 p.m. on Fridays would limit exposure during the busiest times on State Route 46 East (SR 46E). Modifying shift changes to occur at or after 7:00 p.m. would also reduce congestion and conflicts on SR 46E. 7. Construct onsite bicycle and pedestrian facilities connecting to the project entry points or comparable routes. Provide onsite bicycle amenities including bicycle lockers, secure bicycle parking, showers, and bicycle repair stations. 8. Coordinate with San Luis Obispo Regional Transit Authority to accommodate future transit service to the project site. 9. Modify shift change schedules and restrict truck trips to avoid peak period congestion on nearby roadways. Shift changes shall occur after 7:00 p.m. and before 10:00 a.m. Truck trips shall be restricted between 10:00 a.m. and 2:00 p.m. on Sundays and 2:00 p.m. and 6:00 p.m. on Fridays. 10. All outbound and inbound truck traffic from the west shall use the Huer Huero Creek bridge to/from Golden Hill Road. (See Mitigation Measure TR/mm-3.1.) Separate TDMPs may be prepared for Phase 1 and Phase 2 (or partial subphases thereof). The Applicant shall monitor the TDMP(s) on an annual basis to determine its effectiveness at reducing project VMT. If the TDMP(s) does not achieve a 14.98% reduction in VMT (19.18 VMT/SP), the Applicant shall work with the City of Paso Robles to update the TDMP(s) to achieve VMT reduction.			
AQ/mm-1.2	The following San Luis Obispo County Air Pollution Control District (SLOAPCD) recommended measures shall be implemented to reduce the operational emissions generated by the project. City of Paso Robles (City) staff shall evaluate each application submitted for implementing development and determine from the following list of measures which are applicable: 1. Provide a pedestrian-friendly and interconnected streetscape with good access to/from the development for pedestrians, bicyclists, and transit users to make alternative transportation more convenient, comfortable, and safe. 2. Incorporate traffic calming modifications to project roads to reduce vehicle speeds and increase pedestrian and bicycle usage and safety. 3. Meet or exceed 2022 California Green Building Standards Code (CALGreen) nonresidential voluntary measures for the provision of changing/shower facilities for building tenants.	Measures shall be printed on all grading and building plans. Measures shall be adhered to during construction	Measures shall be printed on plans prior to issuance of grading and building permits. Compliance to be verified during construction activities and prior to occupancy	City Community Development Department and SLOAPCD. May require coordination with SLOCOG and SLO Regional Rideshare

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	4. Provide employee lockers and showers to promote bicycle and pedestrian use. One shower and five lockers for every 25 new employees is recommended. 5. Increase bicycle accessibility and safety in the vicinity of the project; for example, provide interconnected bicycle routes/lanes or construction of bikeways. 6. Meet or exceed CALGreen standards for providing onsite bicycle parking—both short-term racks and long-term lockers, or a locked room with standard racks and access limited to bicyclists only. 7. Provide shade over parking spaces to the extent feasible and allowable per building code requirements to reduce evaporative emissions from parked vehicles and reduce heat-island effect. 8. Reduce fugitive dust from roads and parking areas with the use of paving or other materials. 9. Install legible, durable, weather-proof signs at truck access gates, loading dock areas, and truck parking areas that identify anti-idling regulations and state that diesel engine idling shall be limited to 3 minutes or less. 10. Meet or exceed CALGreen Tier 2 standards for providing electric vehicle charging infrastructure. 11. Meet or exceed CALGreen Tier 2 standards for building energy efficiency. 12. Meet or exceed CALGreen Tier 2 standards for utilizing recycled content materials. 13. Meet or exceed CALGreen building standards at the time of development for water conservation (e.g., use of low flow water fixtures, water efficient water irrigation systems, and drought tolerant landscaping). 14. All built-in appliances shall be Energy Star certified or equivalent. 15. Utilize onsite renewable energy systems (e.g., solar, wind, geothermal, biomass, and/or bio-gas) to offset at least 10% of the project's energy use. 16. Meet or exceed 2022 CALGreen standards for the use of greywater, rainwater, or recycled water where applicable/available. 17. Meet or exceed 2022 CALGreen standards for using shading, trees, plants, cool roofs, etc. to reduce "heat island" effect. 18. Design roof trusses to handle dead weight loads of standard solar-heated water systems and/or photovoltaic panels.			

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
AQ/mm-1.3	The following mitigation measures shall be implemented to reduce construction-generated fugitive dust and shall be shown on grading and building plans: 1. Reduce the amount of disturbed area where possible. 2. Use water trucks, San Luis Obispo County Air Pollution Control District (SLOAPCD)-approved dust suppressants (see Section 4.3 in the *CEQA Air Quality Handbook*), or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the SLOAPCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency would be required whenever wind speeds exceed 15 miles per hour. Reclaimed (non-potable) water should be used whenever possible. Please note that since water use is a concern due to drought conditions, the contractor or builder shall consider the use of a SLOAPCD-approved dust suppressant where possible to reduce the amount of water used for dust control. For a list of suppressants, see Section 4.3 of the *CEQA Air Quality Handbook*. 3. All dirt stockpile areas should be sprayed daily or covered with tarps or other dust barriers as needed. 4. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used. 5. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard (minimum vertical distance between the top of load and top of trailer) in accordance with California Vehicle Code Section 23114. 6. "Track-Out" is defined as sand or soil that adheres to and/or agglomerates on the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto any highway or street as described in California Vehicle Code Section 23113 and California Water Code 13304. To prevent track-out, designate access points and require all employees, subcontractors, and others to use them. Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can be any device or combination of devices that are effective at preventing track out, located at the point of intersection of an unpaved area and a paved road. Rumble strips or steel plate devices need periodic cleaning to be effective. If paved roadways accumulate tracked out soils, the track-out prevention device may need to be modified. 7. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil-disturbing activities.	Measures shall be printed on all grading and building plans. Measures shall be adhered to during construction	Measures shall be printed on plans prior to issuance of grading and building permits. Compliance to be verified during construction activities	City of Paso Robles Community Development Department and SLOAPCD

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	8. Exposed ground areas that are planned to be reworked at dates greater than 1 month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established. 9. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD. 10. Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site. 11. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where possible. Roads shall be pre-wetted prior to sweeping when possible. 12. The burning of vegetative material shall be prohibited. Effective February 25, 2000, the SLOAPCD prohibited developmental burning of vegetative material within San Luis Obispo County. If you have any questions regarding these requirements, contact the SLOAPCD Engineering and Compliance Division at (805) 781-5912. 13. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20% opacity, and to prevent the transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Engineering and Compliance Division prior to the start of any grading, earthwork, or demolition.			
AQ/mm-2.1	The following measures shall be implemented to reduce construction emissions from on and off-road construction equipment (nitrogen oxides, reactive organic gases, and diesel particulate matter) and area sources and shown on grading and building plans. Construction contracts shall be obligated to comply with these measures and permit inspection of the construction site by the City of Paso Robles or its designee and San Luis Obispo County Air Pollution Control District (SLOAPCD) to confirm compliance: 1. Maintain all construction equipment in proper tune according to manufacturer's specifications. 2. Fuel all off-road and portable diesel-powered equipment with California Air Resources Board (CARB)-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road). 3. Heavy-duty (50 horsepower or greater) diesel-fueled construction equipment shall meet, at a minimum, the CARB's Tier 3 certified engines, or cleaner, off-road heavy-duty diesel engines; be fitted with diesel exhaust particulate filters in accordance with manufacturer recommendations; and comply with the State Off-Road Regulation.	Measures shall be printed on all grading and building plans and included as a requirement of construction contracts. Measures shall be adhered to during construction	Measures shall be printed on plans prior to issuance of grading and building permits. Compliance to be verified during construction activities	City of Paso Robles Community Development Department and SLOAPCD

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	Heavy-duty equipment with Tier 4 engines shall be used to the extent locally available (within 50 miles). Where Tier 3, or cleaner, equipment is not available, incorporate diesel emission control strategies/retrofits, such that emission reductions achieved equal or exceed that of a Tier 3 engine. Installing California Verified Diesel Emission Control Strategies. Verified diesel emissions control strategies can be found at: https://ww2.arb.ca.gov/diesel/verdev/vt/cvt.htm.			
	4. When applicable, portable equipment, 50 horsepower or greater, used during construction activities shall be registered with the California statewide portable equipment registration program (issued by the CARB) or be permitted by the San Luis Obispo Air Pollution Control District (SLOAPCD). Such equipment may include power screens, conveyors, internal combustion engines, crushers, portable generators, tub grinders, trammel screens, and portable plants (e.g., aggregate plant, asphalt plant, concrete plant). For more information, contact the SLOAPCD Engineering and Compliance Division at (805) 781-5912.			
	5. Use on-road heavy-duty trucks that meet the CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines and comply with the State On-Road Regulation.			
	6. All on- and off-road diesel equipment shall not idle when not in use. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5-minute idling limit.			
	7. Construction equipment staging areas shall be located at the farthest reasonable distance possible from nearby sensitive land uses, or at a minimum distance of 300 feet.			
	8. Stationary noise sources such as generators, pumps, and pavement crushers shall be located at the farthest distance possible from noise-sensitive uses, or at a minimum distance of 300 feet.			
	9. To the extent locally available, electrified or alternatively powered construction equipment shall be used.			
	10. Substitute gasoline-powered in place of diesel-powered equipment, where possible.			
	11. Use alternative-fueled construction equipment onsite where possible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.			
	12. Construction of the proposed project shall use low volatile organic compound content paints not exceeding 50 grams per liter.			
	13. To the extent locally available, use prefinished building materials or materials that do not require the application of architectural coatings.			
	14. The proposed screening wall to be located along the western boundary of the project site shall be constructed after the completion of onsite demolition, site preparation, and site grading activities for			

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	the Phase 1 Warehouse (Lot 32) and prior to the issuance of construction permits for the Phase 1 Warehouse building (Lot 32).			
AQ/mm-2.2	Prior to installation of stationary emission sources (e.g., emergency back-up power generators), the San Luis Obispo County Air Pollution Control District (SLOAPCD) shall be consulted to identify applicable permitting limitations and requirements. A Permit to Operate (PTO) shall be obtained from the SLOAPCD prior to installation. At a minimum, emergency back-up power generators shall meet U.S. Environmental Protection Agency (USEPA) Tier 4 emission standards. Additional limitations, such as hourly operational limitations and/or alternative fuel sources, may also be required as part of the PTO.	Obtain a Permit to Operate from SLOAPCD	Prior to installation of stationary emission sources	City of Paso Robles Community Development Department and SLOAPCD
AQ/mm-2.3	The following additional mitigation measures shall apply specific to the proposed warehouse: 1. Loading docks that service chilled, refrigerated, or freezer warehouse space shall be equipped with electrical hookups for trucks with transport refrigeration units or auxiliary power units to minimize truck idling. 2. Electrical service conduit shall be designed to accommodate future electric charging stations for haul trucks. 3. Service equipment (e.g., yard hostlers, yard equipment, forklifts, pallet jacks) shall be zero emission or natural gas if zero emission is not available.	Implement GHG-reducing measures	During operation of the Phase 1 warehouse	City of Paso Robles Community Development Department
AQ/mm-2.4	The project shall develop an Operational Activity Management Plan (OAMP) for proposed warehouse operations. The plan shall be developed in coordination with the San Luis Obispo County Air Pollution Control District (SLOAPCD) and shall identify mitigation measures and, if necessary, offsets to be implemented to reduce reactive organic gases and nitrogen oxides (ROG+NO_x) operational emissions in comparison to SLOAPCD's annual significance threshold of 25 tons per year for ROG+NO_x. Such measures may include, but are not limited to, those identified in Mitigation Measures AQ/mm-1.1, AQ/mm-1.2, and AQ/mm-2.2.	Develop an Operational Activity Management Plan	Prior to occupancy of Phase 1 warehouse	City of Paso Robles Community Development Department and SLOAPCD
AQ/mm-4.1	The following mitigation measures shall be implemented to reduce the disturbance of asbestos and lead. Strategies include but are not limited to the following: 1. Demolition of onsite structures shall comply with the National Emission Standards for Hazardous Air Emissions requirements (Title 40, Code of Federal Regulations, Part 61, Subpart M) for the demolition of existing structures. The San Luis Obispo Air Pollution Control District (SLOAPCD) is delegated authority by the U.S. Environmental Protection Agency to implement the Federal Asbestos National Emission Standards for Hazardous Air Pollutants. Prior to demolition of onsite structures, the SLOAPCD shall be notified, per National Emission Standards for Hazardous Air Pollutants requirements. SLOAPCD notification form and reporting	Comply with lead and asbestos removal requirements	During demolition	City of Paso Robles Community Development Department and SLOAPCD

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	requirements are included in Appendix C of the project environmental impact report. Additional information may be obtained at: http://slocleanair.org/business/asbestos.php. 2. If during the demolition of existing structures, paint is separated from the construction materials (e.g., chemically or physically), the paint waste will be evaluated independently from the building material by a qualified hazardous materials inspector to determine its proper management. All hazardous materials shall be handled and disposed of in accordance with federal, state, and local regulations. According to the California Department of Toxic Substances Control (DTSC), if the paint is not removed from the building material during demolition (and is not chipping or peeling), the material can be disposed of as construction debris (a non-hazardous waste). The landfill operator will be contacted prior to disposal of building material debris to determine any specific requirements the landfill may have regarding the disposal of lead-based paint materials. The disposal of demolition debris shall comply with any such requirements. Contact the SLOAPCD Enforcement Division at (805) 781-5912 for more information. Approval of a lead work plan and permit may be required. Lead work plans, if required, will need to be submitted to SLOAPCD 10 days prior to the start of demolition. 3. Prior to any grading activities, a geologic evaluation shall be conducted to determine if naturally occurring asbestos (NOA) is present within the area that will be disturbed. If NOA is not present, an exemption request must be filed with the SLOAPCD. If NOA is found at the site, the Applicant must comply with all requirements outlined in the Asbestos Airborne Toxic Control Measure. These requirements may include but are not limited to: a. Development of an Asbestos Dust Mitigation Plan which must be approved by the SLOAPCD before operations begin, and b. Development and approval of an Asbestos Health and Safety Program (required for some projects).			
AQ/mm-6.1	The Applicant and contractor(s) shall implement the following measures during construction activities to reduce potential impacts associated with valley fever: 1. If peak daily wind speeds exceed 15 miles per hour (mph) or peak daily temperatures exceed 95 degrees Fahrenheit (ºF) for 3 consecutive days, additional dust suppression measures shall be implemented prior to and immediately following ground-disturbing activities. These measures shall include, at a minimum, use of additional water or the application of additional soil stabilizer on areas of disturbance and stockpiles. The additional dust suppression measures shall continue to be implemented until peak daily wind speeds are 10 mph or less and outdoor air temperatures are below a peak daily temperature of 90ºF for at least 2 consecutive days.	Comply with valley fever requirements. Prepare educational handout for nearby residents and onsite workers	During ground-disturbing activities The educational handout shall be prepared and distributed prior to issuance of any grading permits	City of Paso Robles Community Development Department and SLOAPCD

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	2. Heavy construction equipment traveling on unpaved roads within the project site shall be preceded by a water truck to dampen roadways and reduce dust from transportation along such roads. 3. The Applicant or contractor(s) shall notify the City of Paso Robles no more than 60 nor less than 30 days before initiation of site-disturbing construction activities to allow the City of Paso Robles the opportunity to provide education outreach to community members and medical providers, as well as enhanced disease surveillance in the area both during and after construction activities involving grading. 4. Prior to any project grading activity, the project construction contractor(s) shall prepare and implement a worker training program that describes potential health hazards associated with valley fever, common symptoms, proper safety procedures to minimize health hazards, and notification procedures if suspected work-related symptoms are identified during construction, including the fact that certain ethnic groups and immune-compromised persons are at greater risk of becoming ill with valley fever. The objective of the training shall be to ensure the workers are aware of the danger associated with valley fever. The worker training program shall be included in the standard in-person training for project workers and shall identify safety measures to be implemented by construction contractors during construction. Prior to initiating any grading, the Applicant shall provide the City of Paso Robles with copies of all educational training material for review and approval. No later than 30 days after any new employee or employees begin work, the Applicant shall submit evidence to the City of Paso Robles that each employee has acknowledged receipt of the training (e.g., sign-in sheets with a statement verifying receipt and understanding of the training). 5. The Applicant shall work with a medical professional, in consultation with the City of Paso Robles and the County of San Luis Obispo Public Health Department, to develop an educational handout for onsite workers and surrounding residents within 3 miles of the project site that includes the following information on valley fever: a. Potential sources/causes; b. Common symptoms; c. Options or remedies available should someone be experiencing these symptoms; and d. The location of available testing for infection. Prior to grading permit issuance, this handout shall have been created by the Applicant and reviewed by the City of Paso Robles. No less than 30 days prior to any surface disturbance (e.g., grading, filling, trenching) work commencing, this handout shall be mailed to all existing residences within three miles of the project site.			

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	The Applicant or developer(s) shall submit proof that the County of San Luis Obispo Public Health Department has been consulted prior to commencement of construction activities, a worker training program has been conducted, and the educational handout has been mailed to existing residences within 3 miles of the project area to the City of Paso Robles.			
GHG/mm-1.1	A Greenhouse Gas (GHG) Reduction Plan shall be prepared for the proposed project. The GHG Reduction Plan shall include a menu of possible onsite GHG reduction measures sufficient to reduce operational emissions to below the GHG efficiency significance threshold identified in *The Land Paso Robles Final Environmental Impact Report* of 2.0 metric tons of carbon dioxide equivalents ($MTCO_2e$) per service population per year (SP/year). In the event that the City of Paso Robles (City) adopts an updated Climate Action Plan or the San Luis Obispo Air Pollution Control District (SLOAPCD) releases updated recommended GHG significance thresholds that addresses future-year 2030 GHG emissions reductions, the GHG-Reduction Plan shall be evaluated in comparison to the GHG thresholds and reduction measures identified in the Climate Action Plan and adjusted if an efficiency threshold of 2.0 $MTCO_2e$/SP/year is no longer necessary in order for the project to be in compliance with the Climate Action Plan or those identified by the SLOAPCD. The GHG Reduction plan shall be approved by the City prior to issuance of building construction permits. The list of GHG-reduction measures to be included in the GHG Reduction Plan shall include, but not be limited to, those identified in Mitigation Measures AQ/mm-1.1, AQ/mm-1.2, and AQ/mm-2.1 through AQ/mm-2.4, as well as the following: 1. Up to the extent allowed by the building code at the time of development, incorporate natural lighting in buildings to minimize daytime lighting demand. 2. Design outdoor lighting shall be designed to minimize electrical demand, such as the use of solar-powered lighting and lighting controlled by motion sensors. 3. Meet or exceed building code requirements for solar installation. 4. Elect to receive electricity from Central Coast Community Energy (3CE). 5. To the extent possible, install electrically powered appliances and building mechanical equipment in place of natural-gas fueled equipment. 6. Provide organic waste pick up and the appropriate onsite enclosures consistent with the provisions of the City of Paso Robles Development Standards for Solid Waste Services. A GHG emissions calculation per SP shall be submitted by the Applicant with each building permit application. If the emissions exceed the efficiency threshold identified in the GHG Reduction Plan, under California Environmental Quality Act Guidelines Section 15126.4(c)(3) and (c)(4), respectively, a project's GHG emissions can be reduced by offsite measures, including offsets	Prepare a GHG-Reduction Plan, implement measures in the GHG-Reduction plan, and implement off-site reduction measures or purchase carbon offset credits	Prior to issuance of construction permits	City of Paso Robles Community Development Department and SLOAPCD

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	that are not otherwise required and measures that sequester GHGs. In the event that feasible onsite GHG-reduction measures are insufficient to reduce operational GHG emissions to below the City of Paso Robles's threshold of significance, offsite mitigation measures may be included. Offsite mitigation measures may include "Direct Reduction Activities" or the purchase of "Carbon Offset Credits" and discussed further, as follows: 1. **Direct Reduction Activities.** Directly undertake or fund activities that will reduce or sequester GHG emissions. GHG reduction credits shall achieve GHG emission reductions that are real, permanent, quantifiable, verifiable, enforceable, in accordance with the criteria set forth in the most recent California Air Resources Board (CARB) Process for the Review and Approval of Compliance Offset Protocols in Support of the Cap-and-Trade Regulation (2013). GHG reduction credits shall be undertaken for the specific purpose of reduction project-generated GHG emissions and shall not include reductions that would otherwise be required by law. All Direct Reduction Activities and associated reduction credits shall be confirmed by an independent, qualified third party. The "Direct Reduction Activity" shall be registered with a CARB-approved registry and in compliance with CARB-approved protocols. In accordance with the applicable Registry requirements, the Applicant (or its designee) will retain an independent, qualified third-party to confirm the GHG emissions reduction or sequestration achieved by the Direct GHG Reduction Activities against the applicable Registry protocol or methodology. The Applicant (or its designee) will then apply for issuance of carbon credits in accordance with the applicable registry rules. 2. **Carbon Offsets.** Obtain and retire "Carbon Offsets." Carbon offsets shall achieve GHG reductions that are real, permanent, quantifiable, verifiable, and enforceable. Carbon offsets shall be purchased from CARB-approved registries and shall comply with CARB-approved protocols to ensure that offset credits accurately and reliably represent actual emissions reductions. If the purchase of carbon offsets is selected, offsets shall be purchased according to the following preference: (1) within the City of Paso Robles; (2) within the SLOAPCD jurisdictional area; (3) within the State of California; (4) elsewhere in the United States; and then (5) through a United Nations approved offset program. In the event that a project or program providing offsets to the Applicant loses its accreditation, the Applicant shall comply with the rules and procedures of retiring offsets specific to the registry involved and shall purchase an equivalent number of credits to recoup the loss.			

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
Biological Resources				
BIO/mm-3.1	Prior to issuance of grading, demolition, or tract improvement permits, or prior to any vegetation removal or ground disturbance activities in or within 100 feet of Huer Huero Creek or oak woodland habitat, the Applicant shall retain a City of Paso Robles (City)-approved biologist to monitor grading/ground-disturbing activities located within and directly adjacent to Huer Huero Creek and oak woodlands to ensure the avoidance of significant indirect impacts, such as sedimentation and invasive plant material introduction. The requirement for biological monitoring and the implementation of best management practices (BMPs) to avoid significant indirect impacts shall be noted on all grading, demolition, tract improvement, and other permits that authorize construction activities in or within 100 feet of Huer Huero Creek or oak woodlands. The biological monitor will verify that mitigation measures and construction BMPs are properly implemented. The biological monitor shall actively communicate observations and information with the construction supervisor as necessary for maintenance of mitigation and BMPs. The construction supervisor shall keep the biological monitor apprised of the project schedule. The biological monitor shall prepare a post-construction report that documents completion of ground-disturbing activities adjacent to natural resources that are to be retained onsite, and progress of mitigation measures implemented. Reports shall be furnished to the construction supervisor and the City of Paso Robles Community Development Department. Within 30 days of initiating ground-disturbing construction activities, the biological monitor retained by the Applicant shall provide a Worker Education Training Program to all personnel associated with vegetation removal and ground-disturbing construction activities, with instructions on BMPs, to avoid or reduce impacts to biological resources. At a minimum, the training shall include information on the protection of riparian and oak woodland habitats, Huer Huero Creek, special-status wildlife with potential to occur, and all mitigation measures specified by the City of Paso Robles, as well as any related biological report(s) prepared for the project. The Applicant shall notify the City of Paso Robles Community Development Department 1 week prior to this meeting. A fact sheet shall also be developed prior to the training program, and distributed at the training program to all contractors, employers, and other personnel involved with the construction of the project.	Retain a biologist for mitigation compliance monitoring and to administer a Worker Education Training Program	Prior to issuance of grading, demolition, or tract improvement permits, or prior to any vegetation removal or ground disturbance Worker Education Training Program shall be completed within 30 days prior to initial site disturbance and to all new workers.	City of Paso Robles Community Development Department
BIO/mm-3.2	Immediately prior to vegetation removal, ground-disturbing activities, and/or grading, a focused preconstruction survey for coast horned lizards shall be conducted by a City of Paso Robles (City)-approved qualified biologist with a valid scientific collecting permit from the California Department of Fish and Wildlife (CDFW) in proposed work areas that would affect potentially suitable habitat; these areas include sandy loamy substrate in annual grassland habitat or within the sandy wash of Huer Huero Creek, as determined by the City-approved project biologist. The scope of the survey shall be determined by the qualified biologist and shall be sufficient to determine presence or absence of	Conduct preconstruction coast horned lizard surveys	Immediately prior to any grading, trenching, or ground-disturbing activities	City of Paso Robles Community Development Department and CDFW

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	the species in the project areas proposed for ground disturbance. If the focused survey results are negative, a letter report shall be submitted to the City Community Development Department, and no further action shall be required. If coast horned lizards are found to be present in the proposed work areas the following steps shall be taken: 1. Coast horned lizards shall be captured by hand by the City-approved qualified biologist with a valid CDFW scientific collecting permit and relocated to an appropriate offsite location an appropriate distance away from the project area to prevent the species from repopulating the site during construction activity, as determined by the City-approved project biologist. 2. Construction monitoring by the City-approved qualified biologist shall be required for all new ground-breaking activities located within coast horned lizard habitat. Construction monitors shall capture and relocate lizards as specified above. 3. A letter report shall be submitted to the City Department of Community Development within 30 days of coast horned lizard relocation. 4. A final letter report shall be submitted to the City Department of Community Development within 30 days of completion of construction activities in coast horned lizard habitat and shall document the project's compliance with this measure.			
BIO/mm-3.3	Prior to commencement of ground-disturbing construction activities during the breeding season of western spadefoot toad (February–May), a seasonally appropriate survey (per California Department of Fish and Wildlife [CDFW] guidelines) shall be conducted within 3 weeks of saturating winter rainfall to determine the presence or absence of spadefoot toads in the project area. If spadefoot toads are detected in the project area, a mitigation plan shall be developed to ensure direct impacts are minimized. The mitigation plan shall address the potential for impacts to aquatic breeding habitat and upland non-breeding habitat and include recommendations to minimize direct mortality of individuals by implementation of avoidance and/or relocation measures. For ground-disturbing construction activities outside of the breeding season, a City of Paso Robles (City)-approved qualified biologist with a valid scientific collecting permit from CDFW shall capture by hand and relocate any uncovered spadefoot toads an appropriate distance away from the project area to prevent the species from repopulating the site during construction activity, as determined by the City-approved project biologist.	Conduct preconstruction surveys for and relocate spadefoot toad	Prior to any ground-disturbing construction activities between February and May, and during construction activities from May through February	City of Paso Robles Community Development Department and CDFW
BIO/mm-3.4	Prior to commencement of any vegetation removal or construction activities, the project biologist shall survey trees within 1 mile of the project site, including offsite improvement areas, for eagle nests, including the known nesting site in the Huer Huero Creek where golden eagles and two large stick nests were detected during 2020 and 2021 biological surveys for the Huer Huero Bridge and Roundabout Project. If the project biologist identifies a nest that is in use,	Conduct preconstruction nesting eagle surveys	Prior to any vegetation removal, site disturbance, grading, trenching, or construction activities	City of Paso Robles Community Development Department and USFWS

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	meaning it has eggs, dependent young, or adult eagles, then the Applicant shall consult with the U.S. Fish and Wildlife Service (USFWS) regarding the necessity for a take permit under the Bald and Golden Eagle Protection Act. Should a take permit be required, the Applicant shall obtain the permit and implement all requirements and recommendations of the USFWS prior to any vegetation removal or construction activities and shall provide written evidence to the City of Paso Robles Community Development Department that such actions have been completed.			
BIO/mm-3.5	Within 1 week of vegetation removal or any construction activities other than demolition activities located entirely within a building, that commence between February 1 and August 15, nesting bird surveys shall be conducted in the area proposed for disturbance and a 500-foot buffer. If surveys do not locate nesting birds, construction activities may be conducted with no further action needed. If work lapses for more than 2 weeks, new surveys shall be conducted. If nesting birds are located, no construction activities shall occur within 100 feet of nests (or other setback distance determined by a qualified biologist). Occupied nests of special-status bird species within project work areas shall be mapped using the Global Positioning System (GPS) or survey equipment. Work shall not be allowed within a 300-foot buffer (for special-status non-raptors) or 500-foot buffer (for raptors) while the nest is in use. The buffer zone shall be delineated on the ground with highly visible fencing or rope barriers where it overlaps work areas. The project biologist conducting the nesting survey shall have the authority to reduce or increase the recommended buffer depending upon site conditions and the species. Occupied nests of special-status bird species shall be monitored at least every 2 weeks through the nesting season to document nest success and check for project compliance with buffer zones. Once nests are deemed inactive and/or chicks have fledged and are no longer dependent on the nest, work may commence in these areas. A preconstruction survey report shall be submitted to the City of Paso Robles Community Development Department immediately upon completion of the survey. The report shall detail appropriate fencing or flagging of the buffer zone and make recommendations on additional monitoring requirements, where applicable. A map of the project site and nest locations shall be included with the report.	Conduct preconstruction nesting bird surveys	Between February 1 and August 15, within 1 week prior to vegetation removal or commencement of construction	City of Paso Robles Community Development Department
BIO/mm-3.6	Within 30 days of commencement of interior or exterior building demolition or tree removal activities, a focused survey shall be conducted by a qualified biologist to determine if roosting bats are present in and near construction, vegetation removal, and demolition areas. The survey shall include complete visual inspection of buildings and structures to be demolished and evaluation of large trees for potential roosts. An acoustic survey combined with a visual bat emergence survey shall be conducted. If a bat roost is located in the planned disturbance area and cannot be avoided, a Bat Habitat Mitigation and Monitoring Plan (BHMMP) shall be prepared, specific to the observed conditions. The BHMMP shall contain specific details regarding exclusion efforts for the existing roosting habitat to be removed, details on the type and placement of alternative roosting habitat, and protection measures for roost habitat to remain if feasible. If a maternity colony is identified during the	Conduct preconstruction roosting bat surveys If roosting bats are encountered and cannot be avoided, prepare a BHMMP	Within 30 days prior to demolition or tree removal.	City of Paso Robles Community Development Department and CDFW

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	breeding season (generally April–October) and it cannot be avoided, the Applicant's qualified biologist shall consult with the California Department of Fish and Wildlife (CDFW) for guidance and shall implement all requirements and recommendations provided by the CDFW.			
BIO/mm-3.7	Prior to commencement of vegetation removal or grading, a City of Paso Robles (City)-approved qualified biologist with a valid scientific collecting permit from California Department of Fish and Wildlife (CDFW) for Salinas pocket mouse shall be retained by the Applicant. The qualified biologist shall be present during all ground-disturbing construction activities associated with developing the project, including, but not limited to, grading, excavations, and tilling. The biologist shall conduct a morning clearance survey of the project area each day that ground-disturbing activities are proposed. Salinas pocket mouse captured during surveys or during construction monitoring shall be relocated to the nearest suitable habitat outside of the project area. A letter report shall be submitted to the City Department of Community Development within 30 days of Salinas pocket mouse relocation.	Relocate Salinas pocket mouse	Prior to daily ground-disturbing activities	City of Paso Robles Community Development Department
BIO/mm-3.8	American badger preconstruction surveys shall be conducted within 30 days of any ground-disturbing construction activity on the project site to identify if badgers are present. The results of the survey shall be sent to the City of Paso Robles Community Development Department. If the preconstruction survey finds potential badger dens, they shall be inspected to determine whether they are occupied. The survey shall cover the entire impact area and examine both old and new dens. If potential badger dens are too long to completely inspect from the entrance, a fiber optic scope shall be used to examine the den to the end. Inactive dens may be excavated by hand with a shovel to prevent reuse of dens during construction. If badgers are found in dens on the property between February and July, nursing young may be present. To avoid disturbance and the possibility of direct take of adults and nursing young, and to prevent badgers from becoming trapped in burrows during construction activity, no grading shall occur within 100 feet of active badger dens between February and July. Between July 1 and February 1 all potential badger dens shall be inspected to determine if badgers are present. During the winter, badgers do not truly hibernate but are inactive and asleep in their dens for several days at a time. Because they can be torpid during the winter, they are vulnerable to disturbances that may collapse their dens before they rouse and emerge. Therefore, surveys shall be conducted for badger dens throughout the year. Exclusion of badgers from dens may only be done during the non-breeding season by a qualified biologist experienced in den exclusions. Dens shall be fully excavated and backfilled after eviction is complete.	Conduct preconstruction badger surveys and weekly site visits to monitor compliance with active den grading buffers	Badger preconstruction surveys shall occur within 30 days prior to site disturbance, grading, or trenching activities Weekly site visits during construction for active badger den monitoring	City of Paso Robles Community Development Department
BIO/mm-3.9	The proposed project occurs within a 3:1 San Joaquin kit fox mitigation zone. Prior to issuance of grading and/or construction permits that authorize ground disturbance, the Applicant shall submit evidence to the City of Paso Robles (City) Community Development Department and California Department of Fish and Wildlife (CDFW) that satisfactorily demonstrates one or a combination of the following three San Joaquin kit fox mitigation measures has been	Payment of the in-lieu fee, purchase of conservation credits, or creation of a conservation area.	Prior to issuance of any grading or construction permits	City of Paso Robles Community Development Department and CDFW

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	implemented to offset the project's calculated compensatory impacts at 3:1 ratio: 1. **Habitat Set Aside:** Provide for the protection in perpetuity, through acquisition of fee or a conservation easement, the number of acres of required mitigation of suitable habitat in the kit fox corridor area, as determined by the CDFW (e.g., within the San Luis Obispo County kit fox habitat area), either onsite or offsite, and provide for a non-wasting endowment to provide for management and monitoring of the property in perpetuity. Lands conserved shall be subject to the review and approval of the CDFW and the County of San Luis Obispo (County). Mitigation alternative 1 requires that all aspects if this program must be in place before City permit issuance or initiation of any ground-disturbing activities. 2. **In-Lieu Fee:** Deposit funds into an approved in-lieu fee program, which would provide for the protection in perpetuity of suitable habitat in the kit fox corridor area within San Luis Obispo County and provide for a non-wasting endowment for management and monitoring of the property in perpetuity. Mitigation alternative 2 can be completed by providing funds to The Nature Conservancy (TNC) pursuant to the Voluntary Fee-Based Compensatory Mitigation Program (Program). The Program was established in agreement between the CFDW and TNC to preserve San Joaquin kit fox habitat, and to provide a voluntary mitigation alternative to project proponents who must mitigate the impacts of projects in accordance with the California Environmental Quality Act (CEQA). This fee is calculated based on the current cost-per-unit of $2,500 per acre of mitigation, which is scheduled to be adjusted to address the increasing cost of property in San Luis Obispo County; the actual cost may increase depending on the timing of payment. This fee shall be paid after the CDFW provides written notification about mitigation options but prior to City permit issuance and initiation of any ground-disturbing activities. 3. **Conservation Bank Credit:** Purchase the number of credits required by the CDFW in a CDFW-approved conservation bank, which would provide for the protection in perpetuity of suitable habitat within the kit fox corridor area and provide for a non-wasting endowment for management and monitoring of the property in perpetuity. Mitigation alternative 3 can be completed by purchasing credits from the Palo Prieto Conservation Bank. The Palo Prieto Conservation Bank was established to preserve San Joaquin kit fox habitat, and to provide a voluntary mitigation alternative to project proponents who must mitigate the impacts of projects in accordance with CEQA. This fee is calculated based on the current cost-per-credit of $2,500 per			

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	acre of mitigation. The fee is established by the conservation bank owner and may change at any time. The actual cost may increase depending on the timing of payment. Purchase of credits must be completed prior to County permit issuance and initiation of any ground-disturbing activities.			
BIO/mm-3.10	Prior to issuance of grading and/or construction permits that authorize ground disturbance, the project biologist (BIO-mm/3.1) shall perform the following monitoring activities: 1. Prior to issuance of grading and/or construction permits that authorize ground disturbance and within 30 days prior to initiation of site disturbance and/or construction, the project biologist shall conduct a pre-activity (i.e. preconstruction) survey for known or potential kit fox dens and submit a letter to the City of Paso Robles (City) Community Development Department reporting the date the survey was conducted, the survey protocol, survey results, and what measures were necessary (and completed), as applicable, to address any kit fox activity within the project limits. 2. The project biologist shall conduct weekly site visits during site-disturbance activities (e.g., grading, disking, excavation, stock piling of dirt or gravel, etc.) that proceed longer than 14 days, for the purpose of monitoring compliance. Site disturbance activities lasting up to 14 days do not require weekly monitoring by the biologist unless observations of kit fox or their dens are made onsite, or the qualified biologist recommends monitoring for some other reason. When weekly monitoring is required, the biologist shall submit weekly monitoring reports to the City Community Development Department. 3. Prior to or during project construction activities, if any observations are made of San Joaquin Kit fox, or any known or potential San Joaquin kit fox dens are discovered within the project limits, the project biologist shall re-assess the probability of incidental take (e.g., harm or death) to kit fox. At the time a den is discovered, the project biologist shall contact the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) for guidance on possible additional kit fox protection measures to implement and whether or not a federal and/or state incidental take permit is needed. If a potential den is encountered during construction, work shall stop until such time the USFWS determines it is appropriate to resume work. If incidental take of kit fox during project activities is possible, before project activities commence, the Applicant must consult with the USFWS. The results of this consultation may require the Applicant to obtain a federal and/or state permit for incidental take during project activities. The Applicant should be aware that the presence of kit foxes or known or potential kit fox dens at the project site could result in further delays of project activities.	Conduct preconstruction kit fox surveys, weekly site visits to monitor compliance with mitigation, and install exclusionary fencing around den sites	Kit fox preconstruction surveys and exclusionary fencing installation shall occur within 30 days prior to site disturbance, grading, trenching, or construction Weekly site visits during construction	City of Paso Robles Community Development Department

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	4. In addition, the project biologist shall implement the following measures: a. Within 30 days prior to initiation of site disturbance and/or construction, fenced exclusion zones shall be established around all known and potential kit fox dens. Exclusion zone fencing shall consist of either large, flagged stakes connected by rope or cord, or survey laths or wooden stakes prominently flagged with survey ribbon. Each exclusion zone shall be roughly circular in configuration with a radius of the following distance measured outward from the den or burrow entrances: i. Potential kit fox den: 50 feet ii. Known or active kit fox den: 100 feet iii. Kit fox pupping den: 150 feet b. All foot and vehicle traffic, as well as all construction activities, including storage of supplies and equipment, shall remain outside of exclusion zones. Exclusion zones shall be maintained until all project-related disturbances have been terminated, and then shall be removed. If kit foxes or known or potential kit fox dens are found onsite, daily monitoring by the project biologist shall be required during ground-disturbing activities.			
BIO/mm-3.11	The following measures shall be implemented during all construction activities other than interior building demolition: 1. Grading and construction activities after dusk shall be prohibited unless coordinated through the City of Paso Robles. 2. To prevent entrapment of the San Joaquin kit fox, all excavations, steep-walled holes and trenches in excess of two feet in depth shall be covered at the close of each working day by plywood or similar materials or provided with one or more escape ramps constructed of earth fill or wooden planks. Trenches shall also be inspected for entrapped kit fox each morning prior to onset of field activities and immediately prior to covering with plywood at the end of each working day. Before such holes or trenches are filled, they shall be thoroughly inspected for entrapped kit fox. Any kit fox so discovered shall be allowed to escape before field activities resume or removed from the trench or hole by the project biologist and allowed to escape unimpeded. In addition, any pipes, culverts, or similar structures with a diameter of 4 inches or greater, stored overnight at the project site shall be thoroughly inspected for trapped San Joaquin kit foxes before the subject pipe is subsequently buried, capped, or otherwise used or moved in any way. If during the construction phase a kit fox is discovered inside a pipe, that section of pipe will not be moved. If	Implement kit fox best management practices	During construction other than demolition	City of Paso Robles Community Development Department

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	necessary, the pipe may be moved only once to remove it from the path of activity, until the kit fox has escaped. 3. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of only in closed containers. These containers shall be regularly removed from the site. Food items may attract San Joaquin kit fox onto the project site, consequently exposing such animals to increased risk of injury or mortality. No deliberate feeding of wildlife shall be allowed. 4. Prior to, during, and after the site-disturbance and/or construction phase, use of pesticides or herbicides shall be in compliance with all federal, state, and local regulations. This is necessary to minimize the probability of primary or secondary poisoning of endangered species utilizing adjacent habitats, and the depletion of prey upon which San Joaquin kit fox depends.			
BIO/mm-3.12	During all construction activities, any contractor or employee that inadvertently kills or injures a San Joaquin kit fox or who finds any such animal either dead, injured, or entrapped shall be required to report the incident immediately to the City of Paso Robles Community Development Department. In the event that any observations are made of injured or dead kit fox, the Applicant shall immediately notify the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) by telephone. In addition, formal notification shall be provided in writing within 3 working days of the finding of any such animal(s). Notification shall include the date, time, location, and circumstances of the incident. Any threatened or endangered species found dead or injured shall be turned over immediately to the CDFW for care, analysis, or disposition.	Notification of any entrapped, injured, or dead kit fox	During construction	City of Paso Robles Community Development Department, CDFW, USFWS
BIO/mm-3.13	Prior to issuance of a building permit or other permit that authorizes the installation of fencing, all proposed fencing shall be installed to provide for kit fox passage and 8- by 12-inch openings near the ground shall be provided every 100 yards. Upon fence installation, the Applicant shall notify the City of Paso Robles (City) Community Development Department to verify proper installation. Any fencing constructed after issuance of a final permit shall follow the above guidelines and shall be inspected during quarterly monitoring by the City.	Install kit fox passage fencing	Prior to issuance of permits authorizing the installation of fencing	City of Paso Robles Community Development Department
BIO/mm-4.1	Prior to construction activities for the stormwater outfall in Huer Huero Creek or construction of the modified Class I Multiuse Trail low water crossing for temporary vehicular use, the Applicant shall comply with all state and federal permitting requirements, including those of the U.S. Army Corps of Engineers and Central Coast Regional Water Quality Control Board, including requirements for riverine habitat creation and/or enhancement specified in BIO/mm-4.2. The Applicant shall provide the City of Paso Robles Community Development Department copies of the federal and state permits and with written evidence of compliance with the jurisdictional agencies' requirements.	Obtain federal and state permits, if required, and if required comply with permit requirements	Prior to construction activities for the stormwater outfall in Huer Huero Creek	City of Paso Robles Community Development Department, U.S. Army Corps of Engineers, and Central Coast Regional Water Quality Control Board, if permits are required

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
BIO/mm-4.2	To minimize impacts to riverine habitat and non-wetland jurisdictional waters, prior to commencement of construction activities for the stormwater outfall in Huer Huero Creek or construction of the modified Class I Multiuse Trail low water crossing for temporary vehicular use, the project biologist (BIO/mm-3.1) shall prepare and implement a Riverine Habitat Mitigation and Monitoring Plan (HMMP). Impacted areas shall be restored at a 1:1 ratio (habitat restored to habitat impacted) according to the plan immediately following disturbance. Appropriate restoration and enhancement activities shall include planting native species, correcting bank stabilization issues, and providing habitat enhancements by reducing non-native invasive species. Success criteria shall include, at a minimum, at least 80% survival of container plants and 80% relative cover by vegetation type.	Demonstrate compliance with U.S. Army Corps of Engineers and Central Coast Regional Water Quality Control Board (including permitting requirements) and prepare a Riverine HMMP	Compliance and the HMMP shall be prepared prior to any site disturbance that impacts the non-wetland jurisdictional waters Restoration shall be completed prior to occupancy of Phase 1.	City of Paso Robles Community Development Department, U.S. Army Corps of Engineers, and Central Coast Regional Water Quality Control Board
BIO/mm-5.1	Prior to construction activities that would impact the emergent wetlands identified as HBC 20 and HBC 2 in *Delineation of Potentially Jurisdictional Wetlands and Waters for The Landing Paso Robles* prepared by Althouse and Meade for the project, the Applicant shall comply with all federal permitting requirements, including those of the U.S. Army Corps of Engineers, including requirements for wetland creation and/or habitat enhancement specified in BIO/mm-5.2. The Applicant shall provide the City of Paso Robles Community Development Department copies of the state and federal permits and written evidence of compliance with the jurisdictional agencies' requirements.	Demonstrate compliance with U.S. Army Corps of Engineers (including permitting requirements)	Prior to construction activities that would impact the wetlands identified at HBC 20 and HBC 2	City of Paso Robles Community Development Department and U.S. Army Corps of Engineers, if permits are required
BIO/mm-5.2	Prior to grading or site disturbance of the two identified freshwater emergent wetlands, the Applicant shall prepare and implement a Wetland Habitat Mitigation and Monitoring Plan (HMMP) for review and approval by the City of Paso Robles Community Development Department. Because wetlands in the project area are manmade and low quality, mitigation for temporary and permanent impacts shall be at a 1:1 ratio (wetlands impacted to wetlands restored), unless a greater ratio is required by the U.S. Army Corps of Engineers and shall consist of onsite enhancement of existing wetlands or creation of replacement wetlands. Appropriate restoration and enhancement activities include planting native species, correcting bank stabilization issues, and providing habitat enhancements by reducing non-native invasive species.	Demonstrate compliance with U.S. Army Corps of Engineers (including permitting requirements) and prepare a Wetland HMMP	Compliance and the HMMP shall be prepared prior to any site disturbance that impacts the wetlands	City of Paso Robles Community Development Department and U.S. Army Corps of Engineers.
BIO/mm-7.1	An Oak Tree Mitigation and Protection Plan shall be prepared and approved by the City of Paso Robles (City) Community Development Department prior to the issuance of a grading permit, at a construction level of detail. 1. Tree canopies and trunks within 50 feet of proposed disturbance zones have been mapped and numbered by a qualified biologist and a licensed land surveyor. Data for each tree includes date, species, number of stems, diameter at breast height (dbh) of each stem, critical root zone (CRZ) diameter, canopy diameter, tree height, health, habitat notes, and nests observed. This information shall be indicated on the grading plan prior to the issuance of a grading permit.	Prepare an Oak Tree Mitigation and Protection Plan	Prior to the issuance of grading permits, the removal of any trees, or any ground disturbance within the critical root zone of onsite oak trees	City of Paso Robles Community Development Department.

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	2. Impacts to the oak canopy or CRZ should be avoided where practicable. Impacts include pruning, any ground disturbance within the dripline or CRZ of the tree (whichever distance is greater), and trunk damage. 3. Replacement oaks for impacted trees would be at a 1:1 ratio for impacts less than 50 percent and 2:1 ratio for impacts to more than 50% of the CRZ. Replacement trees shall be indicated on a landscaping plan subject to City approval. 4. Replacement oaks for removed trees must be equivalent to 25% of the diameter of the removed tree(s). For example, if a 16-inch dbh tree is removed, 4 inches total caliper of replacement trees is required. A 1-inch caliper tree is generally in a 15-gallon container, and approximately 8 to 10 feet tall—four of these would be required. Smaller caliper trees may be planted at a ratio of 5:1 for each tree removed. Replacement trees shall be indicated on a landscaping plan subject to City approval. 5. Replacement trees should be seasonally maintained (browse protection, weed reduction, and irrigation, as needed) and monitored annually for at least 7 years after initial planting by an arborist retained by the Applicant. 6. Upon issuance of the Oak Tree Removal permit, it is the responsibility of the owner or project manager to provide a copy of the Oak Tree Mitigation and Protection Plan to any and all contractors and subcontractors that work within the CRZ of any native tree and confirm they are trained in maintaining fencing, protecting root zones, and conforming to all tree protection goals. It is highly recommended that each contractor sign and acknowledge the Oak Tree Mitigation and Protection Plan. Any future changes (within the CRZ) will need an arborist review and implementation of potential mitigation measures before proceeding. 7. Any future changes (within the CRZ) in the project will need an arborist review and implementation of potential mitigation measures before any said changes can proceed. 8. The proposed fencing around existing oak trees to be protected shall be shown on the grading plan. It must be a minimum of 4-foot-high chain link, snow, or safety fence staked (with t-posts 8 feet on center) at the edge of the CRZ or line of encroachment for each tree or group of trees. The fence shall be up before any construction or earth moving begins. The owner shall be responsible for maintaining an erect fence throughout the construction period. The arborist(s), upon notification, will inspect the fence placement once it is erected. After this time, fencing shall not be moved without arborist inspection/approval. If the orange plastic fencing is used, a minimum of four zip ties shall be used on each stake to secure the fence. All efforts shall be made to maximize the distance from each saved tree.			

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	Weatherproof signs shall be permanently posted on the fences every 50 feet, with the following information: "Tree Protection Zone: No personnel, equipment, materials, or vehicles allowed."			
	9. Soils within the CRZ that have been compacted by heavy equipment and/or construction activities must be returned to their original state before all grading work is completed. Methods include water jetting, adding organic matter, and boring small holes with an auger (18 inches deep, 2–3 feet apart with a 2–4-inch auger) and the application of moderate amounts of nitrogen fertilizer. The arborist(s) shall advise.			
	10. All areas within the CRZ of the trees that can be fenced shall receive a 4- to 6-inch layer of chip mulch to retain moisture, preserve soil structure, and reduce the effects of soil compaction.			
	11. All trenching within the CRZ of native trees shall be hand dug. All major roots shall be avoided whenever possible. All exposed roots larger than 1 inch in diameter shall be clean cut with sharp pruning tools and not left ragged. A mandatory meeting between the arborists and grading contractor(s) must take place prior to work start.			
	12. Grading shall not encroach within the CRZ unless authorized. Grading shall not disrupt the normal drainage pattern around the trees. Fills shall not create a ponding condition and excavations shall not leave the tree on a rapidly draining mound. Any exposed roots shall be covered the same day they were exposed if possible. If they cannot, they must be covered with burlap or another suitable material and wetted down two times per day until reburied.			
	13. Vehicles and all heavy equipment shall not be driven under the trees, as this will contribute to soil compaction. Also, there is to be no parking of equipment or personal vehicles in these areas. All areas behind fencing are off limits unless pre-approved by the arborist.			
	14. The existing ground surface within the CRZ of all oak trees shall not be cut, filled, compacted, or pared unless shown on the grading plans and approved by the arborist.			
	15. No liquid or solid construction waste shall be dumped on the ground within the CRZ of any native tree. The CRZ areas are not for storage of materials.			
	16. An arborist shall be present for soil disturbance work within the CRZ of oak trees. Monitoring does not necessarily have to be continuous but observational at times during these activities. All monitoring will be documented on the field report form which will be forwarded to the project manager and the City Community Development Department.			
	17. Roots impacted during construction (e.g., trenching or grading operations) shall be treated by the arborist on a case-by-case basis using best practices such as clean cuts accompanied by application			

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	of appropriate fungicides and insecticides by a licensed pest control applicator. 18. An onsite preconstruction meeting with the arborist(s), the owner(s), Planning Staff, and the earth-moving team shall be required for this project. Prior to final occupancy, a letter from the arborist(s) shall be required verifying the health/condition of all impacted trees and providing any recommendations for any additional mitigation. The letter shall verify that the arborist(s) were onsite for all grading and/or trenching activity that encroached into the CRZ of the selected native trees, and that all work done in these areas was completed to the standards set forth above. 19. Class 1 pruning has emphasis on aesthetics, removal of dead, dying, decaying weak branches and selective thinning to lesson wind resistance. Class 2 pruning is recommended where aesthetic conditions are secondary to structural integrity and tree health concerns. It shall consist of removal of dead, dying, decaying, interfering, obstructing and weak branches as well as selective thinning to lesson wind resistance. Class 3 pruning includes removal of dead, diseased, decayed, and weak branches where safety considerations and hazardous conditions are the highest priority. Class 4 pruning, including crown reduction pruning, shall consist of reduction of tops, sides or individual limbs. A certified arborist shall direct all pruning. No pruning shall take more than 25% of the live crown of any native tree. Any trees that may need pruning for road/home clearance shall be pruned prior to any grading activities to avoid any branch tearing. 20. All landscape within the CRZ shall consist of drought-tolerant or native varieties. Lawns shall be avoided. All irrigation trenching shall be routed around CRZs; otherwise, aboveground drip irrigation shall be used. It is the owner's responsibility to notify the landscape contractor regarding this mitigation. For this site, it is strongly recommended that drought-tolerant native landscape is used with the approval of the arborist. This includes all City sidewalk/greenbelt areas. 21. All utilities, sewer, and storm drains shall be placed down the roads and driveways and when possible, outside of the CRZ. The arborist shall supervise trenching within the CRZ. All trenches in these areas shall be exposed by air spade or hand dug with utilities routed under/over roots larger than 3 inches in diameter. 22. As the project moves toward completion, the arborist(s) may suggest either fertilization and/or mycorrhizal inoculation applications that will benefit tree health. Application of mycorrhizal inoculum offers several benefits to the host plant, including faster growth, improved nutrition, greater drought resistance, and protection from pathogens.			

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
Cultural Resources				
CUL/mm-2.1	Prior to any subsurface ground-disturbing activities, a City of Paso Robles (City)-approved archaeologist shall be retained by the Applicant to conduct a Workers Environmental Awareness Program training for all project personnel involved in ground-disturbing activities, such as grading, excavation, trenching, and other earthwork. The training shall describe applicable laws and regulations regarding archaeological and tribal cultural resources, types of resources that may be found in the project impact area, and the required procedures in the event of an inadvertent discovery. All ground-disturbing activities, including equipment staging, within 100 feet of the recorded site boundaries of CA-SLO-2826 and CA-SLO-2827 shall be monitored by the City-approved archaeologist. The monitoring shall be guided by a Cultural Resource Monitoring Plan written by the archaeologist and approved by the City. The Cultural Resource Monitoring Plan shall include, but not be limited to, the following: 1. A list of personnel involved in the monitoring activities; 2. Description of Native American involvement, including a requirement that a tribal representative from the yak titᵛu titᵛu yak tiłhini Northern Chumash Tribe be present for all monitoring; 3. Description of how the monitoring shall occur; 4. Description of frequency of monitoring (e.g., full time, part time, spot checking); 5. Description of what resources are expected to be encountered; 6. Description of circumstances that would result in the halting of work at the project site; 7. Description of procedures for halting work on the site and notification procedures; 8. Description of monitoring reporting procedures; and 9. Provide specific, detailed protocols for what to do in the event of the discovery of human remains.	Retention of a City-approved archaeologist and preparation of a Cultural Resources Monitoring Plan for work within 100 feet of CA-SLO-2826 and CA-SLO-2827	Prior to any site disturbance, grading, or trenching activities	City of Paso Robles Community Development Department
CUL/mm-2.2	During construction, in the event of any inadvertent discovery of archaeological or tribal cultural resources, all work within 100 feet of the discovery shall immediately cease. The Applicant and/or contractor shall immediately contact a City of Paso Robles (City)-approved archaeologist and notify the City Community Development Department. The City-approved archaeologist shall evaluate the significance of the discovery pursuant to California Environmental Quality Act Guidelines Section 15064.5 and Public Resources Code Section 21083.2. Should the discovery be determined to not be significant, the City-approved archaeologist, in consultation with the City, shall determine what, if any, measures are appropriate. Work may resume in the area upon approval of the City-approved archaeologist. Should the City-approved archaeologist determine the discovery to be significant, CUL/mm-2.3 shall apply.	Cease work and contact the City-approved archaeologist	During construction, prior to any additional work in the area of an archaeological discovery	City of Paso Robles Community Development Department

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
CUL/mm-2.3	Pursuant to CUL/mm-2.2, should the City of Paso Robles (City)-approved archaeologist determine an inadvertent discovery is significant, the Applicant, in discussion with the City and the City-approved archeologist, shall determine if avoidance of the discovery is feasible through site design measures or alternative construction techniques. If avoidance is not feasible, a Data Recovery Plan shall be prepared by the City-approved archaeologist and submitted to the City for review. The Data Recovery Plan shall include, at a minimum: 1. Mapping of the resource boundary; 2. Quantification of the volume of impact to the resource; 3. Excavation of a sample of the resource to characterize the nature of the site and retrieve a representative sample of artifacts within the impacted area; 4. Monitoring of excavations by a tribal representative; 5. Technical analysis of the recovered samples, including radiocarbon dating, typological and technical analysis of tools and debris, identification and analysis of preserved faunal and floral remains, and other studied appropriate to research questions outlined in the research design; 6. Cataloguing and curation of all artifacts and records detailing the results of the investigations at a City-approved curation facility or to a Native American Tribe; and 7. Submission of a final technical report detailing the results of the investigations.	Project design changes to avoid the discovery or preparation of a Data Recovery Plan	During construction, prior to any additional work in the area of a significant archaeological discovery	City of Paso Robles Community Development Department
Geology and Soils				
GEO/mm-2.1	The final modified Class I Multiuse Trail low water crossing design for vehicular use shall include armoring or protection of the driven piles to prevent scouring during periods of surface flow. Armoring or protection shall include riprap, tetraprons, grout filled bags, concrete blocks, grouted rock slope protection, or functional equivalent as determined by civil engineer responsible for the design of the low water crossing and the City of Paso Robles Engineer. These specifications shall be noted on all applicable construction documents and shall be inspected by the City of Paso Robles Engineer to confirm appropriate installation during the construction process.	Measures shall be printed on all grading and building plans Measures shall be adhered to during construction	Prior to issuance of construction permits for the modified Class 1 Multiuse Trail low water crossing	City of Paso Robles Community Development Department
GEO/mm-5.1	A City of Paso Robles (City)-approved paleontologist shall be retained by the Applicant that meets the qualifications of a Qualified Professional Paleontologist as defined by the Society of Vertebrate Paleontology to develop and conduct a Workers Environmental Awareness Program training for project personnel involved in ground-disturbing activities, such as grading, excavation, trenching, and other earthwork. The training shall describe applicable laws and regulations regarding paleontological resources, types of resources that may	Retention of a City-approved paleontologist	Prior to any site disturbance, grading, or trenching activities.	City of Paso Robles Community Development Department

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	be found in the project area, and the required procedures in the event of an inadvertent discovery.			
GEO/mm-5.2	The City of Paso Robles (City)-approved paleontologist shall develop and submit a Paleontological Resources Management Plan (PRMP) to the City for review and approval. The approved PRMP shall be implemented during all construction activities. The PRMP shall include provisions for documenting the site according to the standards developed by the National Research Council (1987) and shall include, at a minimum: 1. All ground disturbances greater than or equal to 5 feet below ground surface, or that impact older alluvium or Paso Robles Formation regardless of depth, shall be monitored by the City-approved paleontologist; 2. A map, based on final grading plans, showing the areas where monitoring shall occur; 3. Processes and procedures for paleontological monitoring, fossil salvaging, reporting, and curation; 4. In the event paleontological resources are identified during construction, all work within 50 feet of the discovery shall immediately cease so that the City-approved paleontologist can evaluate the significance of the discovery; 5. Preservation of significant fossils found during construction by prompt removal and/or stabilization whenever feasible; and 6. Cataloguing and curation of all artifacts and records detailing the results of the investigations at a recognized, nonprofit paleontological specimen repository with permanent curator, such as a museum or university, or at the discretion of the paleontologist, at a City-approved facility. At the conclusion of paleontological monitoring, the City-approved paleontologist shall prepare a final Paleontological Resources Monitoring Report that documents the implementation of the PRMP, as well as any paleontological resources discoveries, and submit the final report to the City.	Preparation of a Paleontological Resources Management Plan	Prior to any site disturbance, grading, or trenching activities. Monitoring shall take place throughout construction per the PRMP	City of Paso Robles Community Development Department
Hazards, Hazardous Materials, and Wildfire				
HAZ/nmm-2.1	Prior to demolition and removal of the existing boiler plant facility, the Applicant shall prepare and submit a contaminated soil removal and disposal plan to be reviewed and approved by the City of Paso Robles and the County of San Luis Obispo Environmental Health Services (SLOEHS) and/or State Water Resources Control Board (SWRCB) or California Department of Toxic Substance Control (DTSC), as directed by the SLOEHS. The plan shall describe the volume and extent of all diesel-impacted soils with contamination levels exceeding Department of Toxic Substances Control Screening Levels to be fully excavated and disposed of at a solid waste facility approved to accept it. Should the regulatory agency(ies) require additional soil vapor testing before	Prepare a contaminated soils removal and disposal plan Determine indoor soil vapor concentrations	Prior to demolition Contaminated soils removal and disposal plan may be completed in conjunction with HAZ/mm-2.1	City of Paso Robles Community Development Department, County of San Luis Obispo Environmental Health Department

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	or after removal of contaminated soils, the Applicant shall use the 2020 Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion prepared by DTSC and the SWRCB, unless directed otherwise by the regulatory agency(ies), and if warranted address vapor conditions to the satisfaction of regulatory agencies prior to the issuance of a building permit in affected areas.			
HAZ/mm-2.2	Prior to use of the maintenance building, the City of Paso Robles shall evaluate the indoor soil vapor concentrations using the 2020 Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion prepared by California Department of Toxic Substance Control (DTSC) and the State Water Resources Control Board (SWRCB). Specifically, the evaluation shall use an attenuation factor of 0.03 and shall include soil sample location within the area of the spray booth, and if warranted address vapor conditions to the satisfaction of regulatory agencies prior to the issuance of a building permit in affected areas.	Prepare a contaminated soils removal and disposal plan Determine indoor soil vapor concentrations	Prior to reuse of the maintenance building Contaminated soils removal and disposal plan may be completed in conjunction with HAZ/mm-2.1	City of Paso Robles Community Development Department, County of San Luis Obispo Environmental Health Department
HAZ/mm-2.3	Prior to demolition of any structure, the Applicant shall retain a qualified contractor to survey all electrical transformers onsite either in use or in storage. The contractor shall determine the polychlorinated biphenyl (PCB) content using name plate information, or through sampling if name-plate data does not provide adequate information regarding the PCB content of the dielectric equipment. The Applicant shall retain a qualified contractor to remove and dispose of all transformers in accordance with the requirements of Title 40 of the Code Federal of Regulations, Section 761.60 and the Title 22 of the California Code of Regulations, Section 66261.24 or related regulations in effect at the time of demolition. The removal shall be completed in advance of any building demolition.	Survey all electrical transformers for PCB content For leaking transformers, sample and clean building materials, soils, and surrounding surfaces Contaminated soils require a contaminated soils and removal plan and shall be excavated and disposed of	Prior to demolition Contaminated soils removal and disposal plan may be completed in conjunction with HAZ/mm-2.1	City of Paso Robles Community Development Department, County of San Luis Obispo Environmental Health Department
HAZ/mm-2.4	In the event that leakage is observed in the vicinity of a transformer containing greater than 50 parts per million polychlorinated biphenyls (PCBs) (determined in accordance with Title 40 of the Code of Federal Regulations [CFR], Section 761.61(a)), or the leakage has resulted in visible staining of the building materials or surrounding surface areas, the Applicant shall retain a qualified professional to obtain samples of the building materials for the analysis of PCBs in accordance with 40 CFR Part 761. If PCBs are identified at a concentration of 1 part per million, then the Applicant shall retain a contractor to clean the surface to a concentration of 1 part per million or less in accordance with 40 CFR Section 761.61(a) or related regulations in effect at the time of demolition. The sampling and cleaning shall be completed in advance of any building demolition activities in areas containing electrical transformers.	Survey all electrical transformers for PCB content For leaking transformers, sample and clean building materials, soils, and surrounding surfaces Contaminated soils require a contaminated soils and removal plan and shall be excavated and disposed of	Prior to demolition in areas containing electrical transformers Contaminated soils removal and disposal plan may be completed in conjunction with HAZ/mm-2.1	City of Paso Robles Community Development Department, County of San Luis Obispo Environmental Health Department

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
HAZ/mm-2.5	In the event that leakage is observed in the vicinity of a polychlorinated biphenyl (PCB)-containing transformer that has resulted in visible staining of the surrounding soil (determined in accordance with Title 40 of the Code of Federal Regulations [CFR], Section 761.61(a)), the Applicant shall retain a qualified professional to obtain soil samples for the analysis of PCBs in accordance with 40 CFR Part 761. If PCBs are identified at a concentration less than the commercial/industrial Environmental Screening Level of 0.94 milligrams per kilogram, then no further action shall be required. If PCBs are identified at a concentration greater than or equal to the commercial/industrial Environmental Screening Level of 0.94 milligrams per kilogram, then the Applicant shall prepare and submit a contaminated soil removal and disposal plan to be reviewed and approved by the City of Paso Robles and County of San Luis Obispo Environmental Health Services (SLOEHS). The plan shall describe the volume and extent of all PCB-impacted soils to be fully excavated and disposed of at a solid waste facility approved to accept it.	Survey all electrical transformers for PCB content For leaking transformers, sample and clean building materials, soils, and surrounding surfaces Contaminated soils require a contaminated soils and removal plan and shall be excavated and disposed of.	Prior to demolition in areas containing electrical transformers Contaminated soils removal and disposal plan may be completed in conjunction with HAZ/mm-2.1	City of Paso Robles Community Development Department, County of San Luis Obispo Environmental Health Department
HAZ/mm-2.6	Prior to grading or trenching activities in areas of potentially contaminated groundwater, the Applicant shall obtain current shallow-zone groundwater monitoring readings from the onsite groundwater monitoring wells. The readings shall be provided to the City of Paso Robles (City) and the County of San Luis Obispo Environmental Health Services (SLOEHS) and/or State Water Resources Control Board (SWRCB) or California Department of Toxic Substance Control (DTSC), as directed by the SLOEHS for evaluation. The readings shall include concentration numbers for both TPH compounds and total dissolved solids, including concentrations of calcium, magnesium, sodium, chloride. The Applicant shall implement all requirements and recommendations of the regulatory agency(ies), if any, related to remediation of contaminated groundwater. Remediation, if required by the regulatory agency(ies) shall occur prior to grading or trenching activities, unless an alternative timeframe is specified by the regulatory agency(ies). The Applicant shall provide written documentation to the City showing that either no remediation is needed as confirmed by the regulatory agency(ies) or the site cleanup has been approved by the regulatory agency(ies).	Provide shallow-zone groundwater monitoring readings Remediate contaminated groundwater per the directions of the agencies	Prior to any site disturbance, grading, or trenching activities in areas of potentially contaminated groundwater	City of Paso Robles Community Development Department, County of San Luis Obispo Department of Environmental Health, State Water Resources Control Board, California Department of Toxic Substances Control
HAZ/mm-2.7	Prior to grading, trenching, or excavation of soils within 10 feet of Airport Road, Dry Creek Road, or Landing Lane, the City of Paso Robles (City) shall retain a qualified consultant to determine the lead concentrations of soil that would be disturbed. Soils with lead concentrations less than 80 mg/kg may be excavated and/or reused without restrictions. If soils are encountered with lead concentrations greater than or equal to 80 mg/kg, the Applicant shall request written approval from California Department of Toxic Substance Control (DTSC) prior to reuse of the soils and shall comply with all requirements requested from DTSC. Alternatively, if soils are encountered with lead concentrations greater than or equal to 80 mg/kg, the Applicant may elect to excavate and dispose of such soils at a waste facility approved to accept it. The Applicant shall prepare and submit a contaminated soil removal and disposal plan to be reviewed and approved by the City and the County of San Luis	Soils testing shall be conducted to identify lead concentrations If concentrations exceed 80 mg/kg, approval to reuse or dispose of the contaminated soils prior to soil disturbance	Testing shall be completed prior to any site disturbance, grading, or trenching activities that occur within 10 feet of Airport Road, Dry Creek Road, or Landing Lane	City of Paso Robles Community Development Department, County of San Luis Obispo Department of Environmental Health, California Department of Toxic Substances Control

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	Obispo Environmental Health Services (SLOEHS). The plan shall describe the volume and extent of all lead-impacted soils with contamination levels exceeding Department of Toxic Substances Control Screening Levels to be fully excavated and disposed of at a solid waste facility approved to accept it.			
HAZ/mm-5.1	The proposed detention basin shall be designed, engineered, constructed, and maintained for a maximum 48-hour detention period after the design storm and to remain completely dry between storms. To reduce wildlife attraction to the basin, the basin shall be steep sided, concrete (or rip rap) lined, and linear shaped. The City of Paso Robles Engineer shall review and approve the basin design prior to issuance of a permit to construct the basin. The Applicant or its successor in interest shall be required to maintain the detention basin so that it is free of standing water, emergent vegetation, and submergent vegetation.	Grading plans shall show the detention basin designed for a maximum 48-hour detention period and to be dry between storms	Design shall be reviewed and approved prior to issuance of grading permits that authorize construction of the basin	City of Paso Robles Public Works Department
Hydrology and Water Quality				
HYD/mm-1.1	Prior to the issuance of tract improvement plans, grading permits, or building permits, the Applicant shall prepare and submit a Stormwater Pollution Prevention Plan (SWPPP) according to General Permit Order 2009-0009 for approval by the City of Paso Robles (City) Public Works Department and the Central Coast Regional Water Quality Control Board (RWQCB). The SWPPP shall include best management practices (BMPs) to reduce erosive and polluted runoff during all phases of project construction. BMPs shall be approved by the City and Central Coast RWQCB along with the SWPPP. BMPs may include, but are not limited to, erosion and sediment controls and vehicle and equipment monitoring and maintenance, as identified below: 1. Erosion and sediment controls, including silt fences, straw wattles, berms, sediment basins, runoff diversions, or other erosion control measures approved by the Central Coast RWQCB shall be installed properly to increase effectiveness of the SWPPP and shall be maintained regularly during the project's construction. 2. Construction equipment and vehicles shall be checked and maintained daily by the construction contractors to prevent spills of fuel, oil, and other hazardous materials. A designated staging area shall be established on the project site for construction vehicle and equipment parking and storage of fuel, lubricants, and solvents. Any staging areas for the offsite improvements that cannot be accommodated onsite shall be located a minimum of 50-feet from Huer Huero Creek. All fueling and maintenance activities shall take place in the designated staging area(s). Compliance with the SWPPP during project construction shall be monitored by the City's Public Works Department during all construction phases.	Prepare a SWPPP and comply with the SWPPP during construction	SWPPP shall be prepared and approved prior to any site disturbance or issuance of demolition, grading, or construction permits SWPPP shall be adhered to during the entirety of construction	City of Paso Robles Public Works Department, Central Coast Regional Water Quality Control Board

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
Noise				
N/mm-1.1	The following measures shall be implemented to reduce short-term construction noise impacts: 1. The proposed screening wall to be located along the western boundary of the project site shall be constructed after the completion of onsite demolition, site preparation, and site grading activities for the Phase 1 Warehouse (Lot 32) and prior to the issuance of building permits for the Phase 1 Warehouse (Lot 32). (Note: per N/mm-1.2(3), if the loading docks are adjacent to the western property line, the wall shall be constructed to a minimum height of 12 feet above ground level as measured from the inside face of the wall and shall be constructed of concrete, masonry block, or material of similar density and usage.) 2. Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday, where possible. Construction activities are prohibited on Sundays and legal holidays. In the event concrete pouring is necessitated during nighttime hours due to ambient air temperatures that are too hot to cure the concrete during daytime hours, the Applicant shall inform the occupants of the nearest offsite residence to the west a minimum of 30 days before nighttime construction commences and shall provide for alternative overnight accommodations (e.g., hotel room) for the occupants of the offsite residence to the west over the course of the nighttime work. Whether the occupants choose to accept the alternative overnight accommodations or not is beyond the control of the Applicant. 3. Construction equipment shall be properly maintained and equipped with exhaust mufflers and engine shrouds in accordance with manufacturers' recommendations. 4. To the extent locally available, electrified or alternatively powered construction equipment shall be used. 5. Construction equipment staging areas shall be located at the furthest distance possible on the construction site from nearby noise-sensitive land uses. 6. Stationary construction noise sources such as generators, pumps, and pavement crushers, shall be located at the furthest distance possible from noise sensitive uses.	Construct a screening wall, limit construction hours, inform and offer alternative overnight accommodations to the occupants of the nearest offsite residence to the west, and maintain construction equipment	Screening wall shall be constructed prior to issuance of building permits for the warehouse Offsite residence to the west shall be informed and offered accommodations 30 days before nighttime construction commences Equipment shall be maintained during construction	City of Paso Robles Community Development Department

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
N/mm-1.2	The following measures shall be implemented to reduce long-term exposure of sensitive receptors to stationary-source noise levels associated with the Phase 1 Warehouse: 1. Warehouse loading docks shall be fitted with door seals and bumpers, which the City of Paso Robles (City) shall verify are included as part of the building permits issues for the warehouse. When loading docks are not in use, loading dock doors shall remain closed, which shall be made a requirement of the warehouse operator(s) lease agreement. 2. Loading docks that service refrigerated warehouse space shall be equipped with electrical hookups for trailers equipped with transport refrigeration units (TRU) or auxiliary power units to minimize truck idling, which the City shall verify will be included as part of the building permit issuance process. 3. If loading docks are located adjacent to the western property line, or face the western property line without intervening development, the proposed screening wall shall be constructed to a minimum height of 12 feet above ground level. The proposed screening wall shall be constructed of concrete, masonry block, or material of similar density and usage. 4. The proposed trash compactors and diesel pump motor shall be enclosed. 5. The City shall require the preparation of acoustical assessments for the installation of major stationary noise sources (e.g., back-up power generators, air conditioning condensers) to be located within exterior areas and within 600 feet of a sensitive receptor. The acoustical assessments shall evaluate potential noise impacts to nearby noise-sensitive land uses. Where the acoustical analysis determines that stationary-source noise levels would exceed applicable noise standards of 50 A weighted decibel (dBA) energy-equivalent noise level (Leq) during the daytime and 45-dBA Leq during the nighttime at the project site property line, site-design features/noise-reduction measures shall be incorporated sufficient to reduce operational noise levels to below these applicable noise standards. Such measures may include, but are not limited to, the incorporation of setbacks of from the property line to the stationary noise source, installation of sound barriers, the imposition of operation limitations on equipment producing stationary source noise during nighttime hours, or the provisions of equipment enclosures.	Comply with the stationary source noise measures	During operation of the warehouse	City of Paso Robles Community Development Department

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
N/mm-1.3	The following measures shall be implemented to reduce long-term exposure to stationary-source noise levels associated with the Phase 2 Commercial Office, Hotel, and Retail Uses: 1. For development proposed within 150 feet of the hotel planned in the Phase 2 area, the City of Paso Robles (City) shall require acoustical assessments to be prepared and submitted for City review and approval as part of the land use or building permit approval process. The acoustical assessments shall evaluate potential noise impacts to the hotel if it exists or the planned hotel site if the hotel has not yet been constructed. Where the acoustical analysis determines that stationary source noise levels would exceed applicable noise standards, site-design features/noise-reduction measures shall be incorporated sufficient to reduce operational noise levels to below applicable noise standards. Such measures may include but are not limited to, the incorporation of setbacks from the hotel to the stationary noise source, the installation of sound barriers, the imposition of operational limitations on equipment producing stationary source noise during nighttime hours, or the provision of equipment enclosures. The emphasis of such measures shall be placed upon site planning and project design.	Prepare an acoustical assessment	During land use or building permit approval for development proposed within 150 feet of the hotel	City of Paso Robles Community Development Department
Traffic and Transportation				
TR/mm-1.1	Prior to the issuance of any permit or approval that authorizes road construction in the project site, the following design features shall be indicated on the plans and shall be installed as part of road construction. 1. Internal intersections shall be designed to reduce skew angles and provide adequate sight distance consistent with the California Department of Transportation (Caltrans) Highway Design Manual. Roads shall intersect as close to 90 degrees as possible and shall not be less than 75 degrees. 2. Direct sidewalk connections shall be accommodated between all buildings and along the internal roadway network. Crosswalks at roadway intersections internal to the project site shall be required to be marked at delineated crosswalks. The marking type (by paint or other material) shall be approved by the City of Paso Robles (City). 3. The City shall review and approve turning templates at intersections to confirm that two-way truck traffic with the largest anticipated truck size can be accommodated without overlapping turning movements. 4. A north–south roadway shall be installed at the border of Phase 1 and 2 to connect to Landing Lane to provide an improved connection to Hughes Parkway to the south. 5. A connection to the Winery Row/Hughes Parkway intersection shall be provided for.	Shown on design features on plans	Prior to approval of Street or Tract Improvement Plans	City of Paso Robles Community Development Department

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	6. Outbound left turns shall be restricted at project driveways except the northernmost driveway and Dry Creek Road (Landing Lane). 7. Two outbound lanes shall be provided at the northernmost east/west driveway. 8. A traffic signal or roundabout shall be installed at the intersection of Airport Road/Dry Creek Road (Landing Lane) that will accommodate cumulative traffic volumes with project traffic. The Applicant shall be responsible for the installation of the signal or roundabout prior to the issuance of an occupancy permit for the Phase 1 warehouse or for any other building that would take driveway access from Dry Creek Road.			
TR/mm-3.1	Prior to occupancy of any use on the project site, except the existing maintenance building, that would cause more than 30 PM weekday peak hour outbound trips to be generated by uses on the project site, the parallel route north of State Route 46 East (SR 46E) (Huer Huero Creek Bridge and New Airport Road) or functional equivalent shall be constructed. Southbound left turns at the Airport Road and SR 46E intersection shall be restricted.	Construction of the Huer Huero Creek Bridge (or interim bridge) as part of the SR 46E Parallel Route	Prior to occupancy of any use generating more than 30 PM peak hour weekday trips (outbound), except for the existing maintenance building	City of Paso Robles Community Development Department
TR/mm-3.2	The Applicant shall install improvements at the Airport Road intersection restricting southbound left turns onto State Route 46 East (SR 46E). The southbound left turn restrictions shall be operational prior to issuance of occupancy for any building except the existing maintenance building. The Applicant is responsible for design, permitting, and construction of the improvements. An encroachment permit shall be obtained from the California Department of Transportation (Caltrans) prior to construction. The Applicant may submit a request to the City of Paso Robles (City) City Council to approve a reimbursement agreement for the installation of the left turn restriction improvements, which the City Council may approve or deny at their sole discretion. The reimbursement agreement will apply to other development projects benefiting from the improvements. The reimbursement agreement cost allocation shall be based on total building square footage, or another appropriate cost allocation method, as determined by the City Engineer. The City Engineer has evaluated the proposed and pending projects in the area and building square footage is a reasonable means of determining traffic payments as the square footage correlates reasonably to those project's trip generation derived from the Institute of Transportation Engineers (ITE) trip estimates for similar sizes and uses. The Applicant is responsible for all costs associated design and construction of the identified and constructed improvement. If the intersection improvements are constructed by others, the Applicant shall be responsible for payment of any reimbursement agreement cost allocation in place, prior to occupancy for any building except the existing maintenance building.	Restrict southbound left turns onto SR 46E if approved by California Department of Transportation Participate in one of the improvements to serve truck traffic	Prior to occupancy of any building except the existing maintenance building	City of Paso Robles Community Development Department, California Department of Transportation

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
TR/mm-4.1	The Applicant shall prepare a focused traffic evaluation that evaluates the State Route 46 East (SR 46E) corridor between Golden Hill Road and Jardine Road, the Golden Hill Road corridor from Wisteria Lane to Union Road, and the Airport Road corridor between the project site and SR 46E. The Applicant shall prepare the focused traffic evaluation once any of the following occur: 1. After construction and completion of the modified Class I Multiuse Trail low water crossing or Huer Huero Creek Bridge (TR/mm-3.1), whichever occurs first, and occupancy of the Phase 1 Warehouse. 2. After construction and completion of the modified Class I Multiuse Trail low water crossing for vehicular use or the Huer Huero Creek Bridge (TR/mm-3.1) and issuance of any building permit(s) that would cumulatively exceed 965 weekday PM peak hour trips based on the Transportation Impact Study prepared by Central Coast Transportation Consulting and used for evaluation in the Environmental Impact Report for the project. For purposes of the focused traffic evaluation, PM peak hour trips shall include PM peak hour trips from truck traffic, which shall be converted to passenger car equivalents. The focused traffic evaluation shall collect, at a minimum, 24-hour driveway counts to determine trip generation numbers for the uses already constructed and in operation. The evaluation shall identify whether any additional development may be constructed and operated, based upon the above noted threshold levels and pursuant to City of Paso Robles (City) and California Department of Transportation (Caltrans) standards. The focused traffic evaluation shall also evaluate: 1. SR 46E/Union Road: evaluate operations and implement left turn lane restrictions if storage capacity is exceeded. 2. SR 46E/Golden Hill Road: evaluate signal timing, reflective backplates, additional dynamic signage, overlap phases, turn lane extensions, and additional lanes. The analysis shall include added traffic from SR 46E/Union Road turn restrictions (see 1., above). 3. SR 46E/Airport Road: evaluate intersection operations and implement left turn lane restrictions if storage capacity is exceeded. 4. SR 46E/Jardine Road: evaluate intersection operations and implement intersection control changes or turn restrictions if storage capacity is exceeded. 5. Golden Hill Road/Golden Hill Plaza: evaluate signal timing and phasing and consider turn restrictions. 6. Golden Hill Road/Tractor Street: evaluate operations and traffic signal warrants. 7. Golden Hill Road/Tractor Street and Golden Hill Road/Wisteria: evaluate operations and all-way stop control and traffic signal warrants.	Construct TOAR Alternative 1 or functional equivalent OR prepare a focused traffic evaluation and implement the recommendations of the evaluation if approved by California Department of Transportation	After construction of the Huer Huero Creek Bridge (or functional equivalent) and occupancy of the Phase 1 warehouse, or prior to any combination of building permits for uses that would exceed 965 PM peak hour weekday trips	City of Paso Robles Community Development Department, California Department of Transportation

Mitigation Measure	Applicant's Requirements of Measure	Compliance Method	Verification Timing	Party Responsible for Verification
	8. Golden Hill Road/Union Road: evaluate operations and determine if a dual lane roundabout is needed with future project traffic. 9. Airport Road/Dry Creek Road (Landing Lane): evaluate intersection operations and restrict eastbound left turns on Winery Road if needed. Determine if intersection improvements will accommodate future project traffic. 10. SR 46E Overcrossing (Traffic Operations Analysis Report [TOAR] Alternative 1 or functional equivalent as determined by Caltrans and the City Engineer): evaluate if queuing on SR 46 E, Golden Hill Road, and/or Airport Road can be accommodated with intersection improvements. If queuing cannot be accommodated with intersection improvement, construct TOAR Alternative 1 or a functional equivalent. If the City Engineer finds that the focused traffic evaluation determines that additional uses may be constructed and operational without additional circulation system improvements, the occupancy permit may be issued. If additional circulation system improvements are needed, the occupancy permit shall not be issued until subsequent additional focused traffic evaluations are prepared for each successive use and the Applicant either contributes fair share funding for the needed improvements or constructs the improvements. The City Engineer shall be responsible for determining which improvements are subject to fair share payments or construction.			

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CHAPTER 8. REFERENCES AND REPORT PREPARATION

8.1 GENERAL REFERENCES

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8.2 RESOURCE AREA REFERENCES

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8.3 REPORT PREPARATION

This Environmental Impact report (EIR) has been prepared by SWCA Environmental Consultants (SWCA), in association with the City of Paso Robles Community Development Department (California Environmental Quality Act [CEQA] Lead Agency), Althouse and Meade, Inc., AMBIENT Air Quality & Noise Consulting (AMBIENT), Central Coast Transportation Consulting (CCTC), Haro Environmental, and Robert Carr, Visual Resource Specialist.

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