



Initial Study - Environmental Checklist

MJG Properties/Sweet Springs Conditional Use Permit DRC2022-00025/ED23-098

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The proposed project could have a "Potentially Significant Impact" for environmental factors checked below. Please refer to the attached pages for discussion on mitigation measures or project revisions to either reduce these impacts to less than significant levels or require further study.

Table with 3 columns of environmental factors and checkboxes. Checked items include: Aesthetics, Air Quality, Biological Resources, Hazards & Hazardous Materials, Hydrology & Water Quality, Land Use & Planning, Noise, Utilities & Service Systems, Wildfire, and Mandatory Findings of Significance.

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation, the Environmental Coordinator finds that:

- Options for determination: 1) The proposed project COULD NOT have a significant effect... 2) Although the proposed project could have a significant effect... 3) The proposed project MAY have a significant effect... 4) The proposed project MAY have a "potentially significant impact"... 5) Although the proposed project could have a significant effect...

SWCA Environmental Consulting

Prepared by (Print) Signature Date

Eric Hughes, Principal Environmental Specialist

Reviewed by (Print) Signature Date

## Initial Study – Environmental Checklist

### Project Environmental Analysis

The County's environmental review process incorporates all of the requirements for completing the Initial Study as required by the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The Initial Study includes staff's on-site inspection of the project site and surroundings and a detailed review of the information in the file for the project. In addition, available background information is reviewed for each project. Relevant information regarding soil types and characteristics, geologic information, significant vegetation and/or wildlife resources, water availability, wastewater disposal services, existing land uses and surrounding land use categories and other information relevant to the environmental review process are evaluated for each project. Exhibit A includes the references used, as well as the agencies or groups that were contacted as a part of the Initial Study. The County Planning Department uses the checklist to summarize the results of the research accomplished during the initial environmental review of the project.

Persons, agencies or organizations interested in obtaining more information regarding the environmental review process for a project should contact the County of San Luis Obispo Planning Department, 976 Osos Street, Rm. 200, San Luis Obispo, CA, 93408-2040 or call (805) 781-5600.

### A. Project

**DESCRIPTION:** A request by MJG Property Holding Partners, LLC for a Conditional Use Permit to allow the expansion of the existing Sweet Springs Mobile Home Park from 17 units to 26 units. The project includes a density bonus for affordable housing increasing the allowable number of units on the site from 19 to 26 based on the State density bonus law. The project would result in 1.30 acres of ground disturbance, including 3,220 cubic yards of earthwork, for road, drainage, and wastewater infrastructure. The project site is located at 311 Sweet Springs Road, approximately 2,500 feet northeast of the Huasna Road and Lopez Drive intersection, northeast of the City of Arroyo Grande. The project is located in the Residential Suburban land use category, within the San Luis Bay (Inland) Sub Area (South) of the South County Inland Planning Area.

The site was previously graded under a grading permit issued by a State Housing and Community Development permit (HCD; Permit #6087760). This permit allowed approximately three acres of grading in order to provide access and utilities to Units 1-6. The applicant has identified designated lease areas ranging in size from 7,000 to 14,000 square feet for the areas previously disturbed by grading activities on Units 1-6.

Five of the twenty-six mobile home units will be designated as affordable housing in order to qualify for the density bonus, with four designated as "low" income, and one as "very low" income.

#### Site Improvements

The project includes driveway improvements to Lopez Drive, as required by the Department of Public Works, sewer line trenching, and sewer leach field improvements. The project would result in the disturbance of approximately 5,000 square feet for off-site improvements to Lopez Drive, approximately 44,000 square feet for grading and drainage improvements to the 24-foot-wide northernmost driveway providing access to Units 1-6, and 1,900 square feet for sewerline trenching. Additionally, a 110,000-gallon water tank would be installed north of Unit 5, north of the driveway, for water storage, with water distribution lines within the driveway. The project will result in the onsite disturbance of 1.15 acres with 3,220 cubic yards of cut and fill, with a total disturbance area of 1.30 acres.

Units 7 and 19-26 would receive new 1,200-gallon individual septic tanks that would flow to communal leach areas located near Units 7 and 13-18. These improvements to the existing wastewater system would require

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an additional approximately 7,900 square feet of site disturbance which would be located within previously graded areas. Units 1-6, 8-11, and 18 have existing individual 1,200-gallon septic tanks and Units 12-17 share an existing 6,000-gallon septic tank which would remain. The new leach lines are located at least 100 feet from the creek and are a minimum of 150 feet from the onsite wells. New leach lines would be dug approximately 36 inches deep.

The site has existing mobile homes on Units 1, 3-9, 11, 14, 15, 17, 18, and 22. Units 10, 13, and 16 previously had mobile homes installed, but were decommissioned and would be reinstalled with project approval. New mobile homes would be placed on Units 2, 12, 19-21, and 23-26. No additional site disturbance is proposed for future residential development (i.e., building pads) because the site was previously graded under a permit issued by the State HCD.

**ASSESSOR PARCEL NUMBER(S):** 047-200-019

**Latitude:** 35° 08' 52.16" N      **Longitude:** 120° 32' 46.78" W      **SUPERVISORIAL DISTRICT #** 3

### B. Existing Setting

**Plan Area:** South County      **Sub:** San Luis Bay (South)      **Comm:**

**Land Use Category:** Residential Suburban

**Combining Designation:** None

**Parcel Size:** 37.67 acres

**Topography:** Nearly level to steeply sloping

**Vegetation:** Grasses, Chaparral, Oak woodland, Eucalyptus trees, Arroyo willow thicket

**Existing Uses:** Sweet Springs Mobile Home Park

**Surrounding Land Use Categories and Uses:**

<b>North:</b> Agriculture; Rural Residential proposed residential	<b>East:</b> Residential Suburban; agricultural uses
<b>South:</b> Residential Suburban; agricultural uses residential nursery and row crops Arroyo Grande Creek	<b>West:</b> Residential Suburban; residential

*Baseline Conditions*

The project site is located at the intersection of Sweet Springs Road and Lopez Drive, approximately 1.25 miles northeast of the City of Arroyo Grande on the north side of Lopez Drive. The project site consists of a single legal parcel, approximately 37.67 acres in size, which consists of the Sweet Springs Mobile Home Park. The project site terrain varies from nearly level in some areas to steeply sloping in others with an average slope of 22%, and is vegetated primarily by annual grasslands, chaparral, Arroyo willow thicket, oak woodland, and eucalyptus. The project site has a land use designation of Residential Suburban and is subject to the regulations of County’s Inland Land Use Ordinance (LUO).

The project is bordered to the north by large Residential Rural parcels, 5-20 acres in size, with very low-density residential development, by smaller Residential Suburban parcels, 1-5 acres in size, with low-density residential development to the south and west, and by Lopez Drive and residential development to the east.

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The adjacent parcel to the west (Assessor Parcel Number 047-182-002; “Mid-State Properties”/“Hondonada”) was recently approved for a 11 unit subdivision for residential single-family lots.

The project site is accessed by Sweet Springs Road, which connects with Lopez Drive.

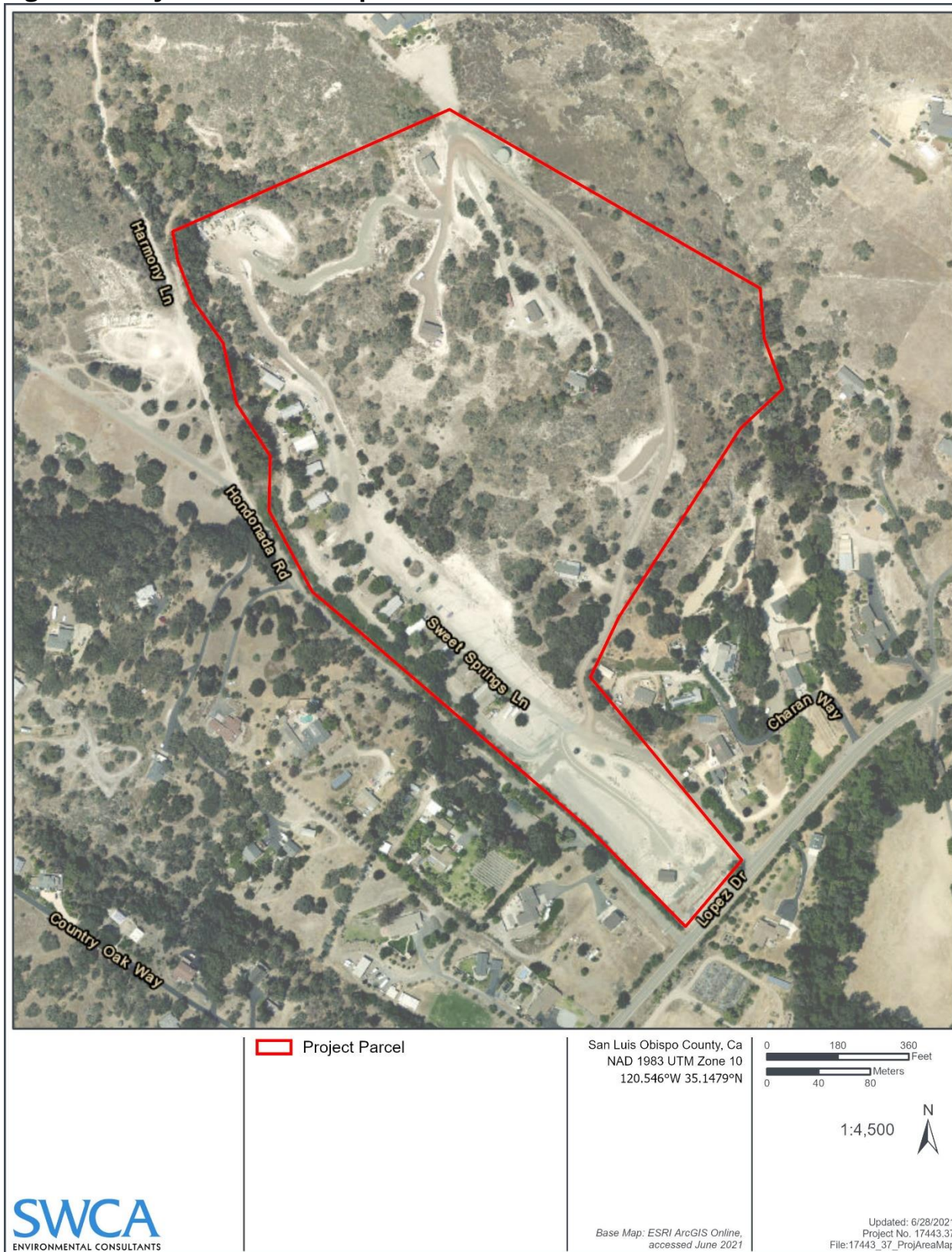
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Figure 1. Project Vicinity Map



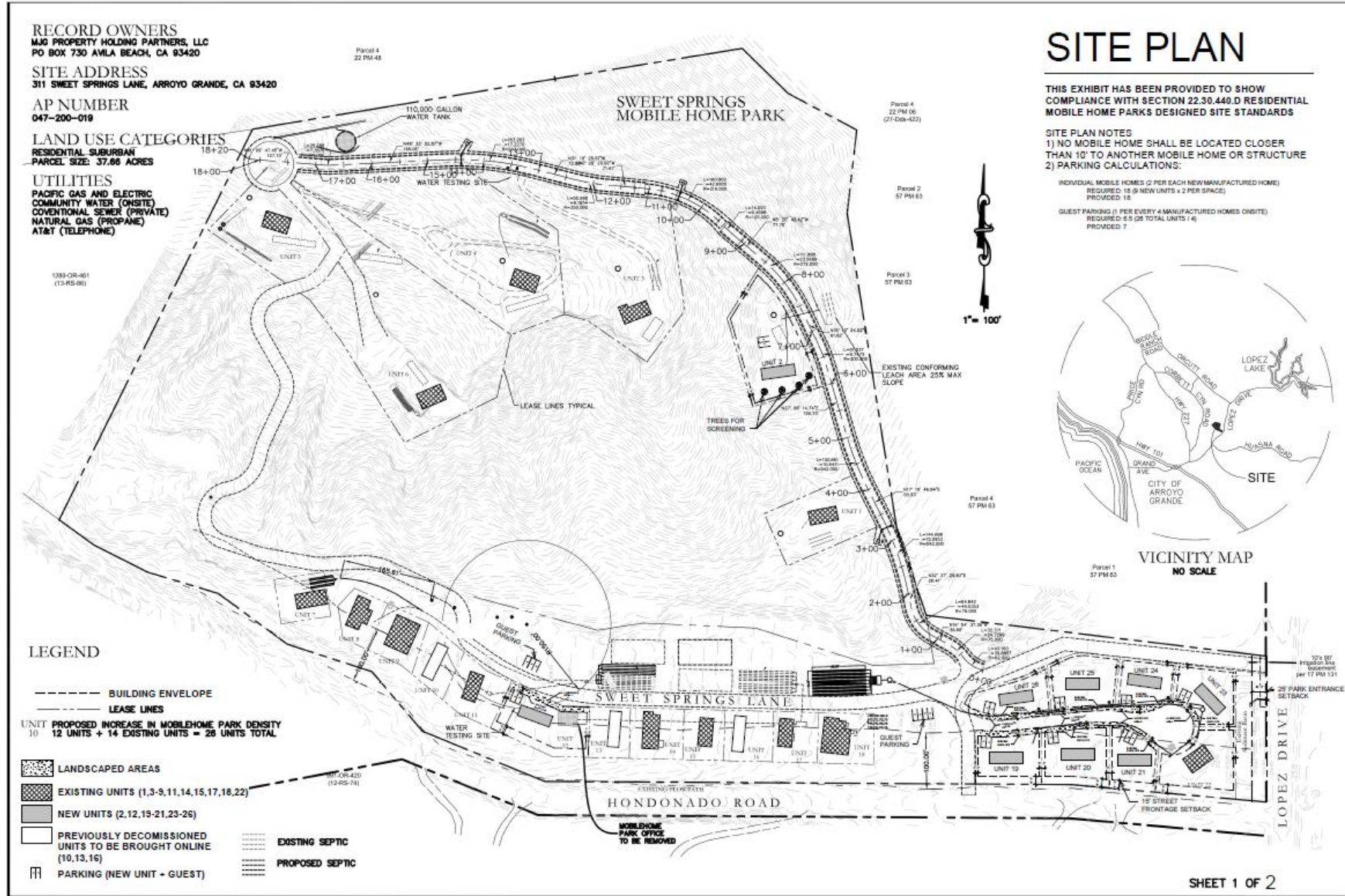
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Figure 2. Project Location Map



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Figure 3. Project Site Plan



## Initial Study – Environmental Checklist

### C. Environmental Analysis

The Initial Study Checklist provides detailed information about the environmental impacts of the proposed project and mitigation measures to lessen the impacts.

#### I. AESTHETICS

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

#### Setting

##### California Scenic Highway Program

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 upon 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 Highway 101 (HWY 101), State Route 46 (SR 46), portions of State Route 41 (SR 41), State Route 1 (SR 1), and Lake Nacimiento Drive. The project site is not located within the viewshed of a state scenic highway.

##### County Conservation and Open Space Element

The Conservation and Open Space Element (COSE) of the County of San Luis Obispo General Plan identifies several goals for visual resources in rural parts of the county, listed below:

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- **Goal VR 1:** The natural and agricultural landscape will continue to be the dominant view in rural parts of the county.
- **Goal VR 2:** The natural and historic character and identity of rural areas will be preserved.
- **Goal VR 3:** The visual identities of communities will be preserved by maintaining rural separation between them.
- **Goal VR 7:** Views of the night sky and its constellation of stars will be maintained.

Some of the strategies identified to accomplish the goals listed above include encouraging project designs that emphasize native vegetation and conforming grading to existing natural forms, as well as ensuring that new development follows the Countywide Design Guidelines to protect rural visual and historical character.

### *County of San Luis Obispo Land Use Ordinance*

The LUO defines a Sensitive Resource Area (SRA) combining designation that applies to areas having high environmental quality and special ecological or educational significance. These designated areas are considered visual resources by the County, and the LUO establishes specific standards for projects located within these areas. These standards include, but are not limited to, setback distances from public viewpoints, prohibition of development that silhouettes against the sky, grading slope limitations, set back distances from significant rock outcrops, design standards including height limitations and color palette, and landscaping plan requirements. The subject property is not located within an SRA designated by the County.

The subject property is mostly level along Sweet Springs Road and slopes steeply to the east. It is visible from Lopez Drive, an arterial road, and Sweet Springs Road, a private road. Existing vegetation consists predominately of chapparal, arroyo willow thickets, eucalyptus, and oak woodland. The surrounding development can be characterized as suburban ranchette development with typical lots of 2.5 to 5 acres each with residences, sometimes including non-commercial farm or livestock activities.

### *Discussion*

(a) *Have a substantial adverse effect on a scenic vista?*

A scenic vista is generally defined as a high-quality view displaying good aesthetic and compositional values that can be seen from public viewpoints. Some scenic vistas are officially or informally designated by public agencies or other organizations. A substantial adverse effect on a scenic vista would occur if the project would significantly degrade the scenic landscape as viewed from public roads or other public areas. A project's potential effect on a scenic vista is largely dependent upon the degree to which it would complement or contrast with the natural setting, the degree to which it would be noticeable in the existing environment, and whether it detracts from or complements the scenic vista. The project is not located in the view of a scenic vista, either formally designated or not. Therefore, there would be *no impact*.

(b) *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

The project site is accessed by Sweet Springs Road, which runs along the western edge of the project site and connects to Lopez Drive. The nearest state scenic highway is U.S. Highway 101 (Highway 101), which is an eligible state scenic highway, located approximately 2.7 miles west of the project site. The subject property is not located within the viewshed of a designated or eligible state scenic highway; therefore, *no impact* would occur.

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- (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?*

The 37.67-acre parcel is located in a rural area approximately 1.25 miles northeast of the city of Arroyo Grande on the north side of Lopez Drive. The parcel is comprised of relatively flat topography along Sweet Springs Road to steeply sloping topography in the eastern portion of the property. The property may be visible from Lopez Drive, which is a suggested scenic corridor under the County's General Plan Conservation and Open Space Element (COSE) (Table VR-2). Implementation of the project would result in construction-related views along Lopez Drive and to surrounding land uses. Construction-related views would be temporary in nature and would not result in long-term adverse views from Lopez Drive or other surrounding land uses; therefore, impacts related to adverse construction-related views would be *less than significant*.

Unit 2 would be located on the hillside of the subject property and may be visible from Lopez Drive. The project does not propose removal of any additional oak woodland beyond what was removed as part of the previously issued grading permit from HCD. The mobile home park has been located on the existing parcel since the 1960s, so the primary visual concern is future residential development on the hillside of the property (Unit 2 and the new 110,000-gallon water tank). The previously graded building pad for Unit 2 is located below the top of the ridge, so silhouetting is not expected. The new 110,000-gallon water tank would be located north of Unit 5 in an area not previously graded. Units 19-26 would be located at the base of the park, between Lopez Drive and Unit 18, where mobile homes have previously been located. As discussed in Section XIII, *Noise*, there is potential for outdoor land uses to be placed within the Lopez Drive noise source, which would require the implementation of a noise wall to protect outdoor uses from exposure to excessive noise. The noise wall may be visible from Lopez Drive. Existing oak trees (averaging about 30 feet in height) would provide some screening for development on this portion of the project site. Although existing oak trees would provide screening of the proposed hillside development, Mitigation Measure AES-1 would be required to ensure future residential development on Unit 2, the new 110,000-gallon water tank, and potential development of a noise wall does not result in adverse views from Lopez Drive. Mitigation Measure AES-1 includes additional screening, the use of muted colors for new structures, minimization of structure massing, and exterior lighting requirements. Therefore, with implementation of Mitigation Measure AES-1, impacts related to adverse effects on a scenic vista would be *less than significant with mitigation*.

- (d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

The property is surrounded by low density rural residential development. Existing sources of nighttime lighting on the subject property include the existing mobile home units located on the project site. The addition of 9 additional mobile home units would result in an increase of nighttime lighting in the area. Installation of exterior lighting onsite would be required to comply with the County's LUO (Section 22.10.060) to avoid creating a substantial new source of light or glare. Further, Mitigation Measure AES-1 requires an exterior lighting plan that identifies low intensity, shielded, and downward directed lighting onsite to ensure compliance with the County's LUO; therefore, impacts would be *less than significant with mitigation*.

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### *Conclusion*

The proposed project would result in new residential development on the hillside of the subject property that may be visible to the public traveling east on Lopez Drive. Mitigation Measure AES-1 has been included to require additional screening, the use of muted colors for new structures, minimization of structure massing, and exterior lighting requirements to reduce potential visual impacts of proposed development along the hillside. New sources of lighting would be subject to the County's LUO (22.10.060) and Mitigation Measure AES-1, which requires implementation of an exterior lighting plan. Therefore, impacts related to visual impacts would be less than significant upon implementation of Mitigation Measure AES-1.

### *Mitigation*

**AES-1** In order to lessen the visual impacts associated with development of the proposed Unit 2 and the 110,000-gallon water tank from the surrounding public roadways, the applicant shall incorporate the following mitigation measures:

1. provide muted, earth-toned, colors for Unit 2 and dark green for the water tank to blend with the surrounding tree canopy;
2. retain existing large shrubs and trees on the hillside (Unit 2);
3. provide for additional landscaping, as needed, to provide for at least a 50% screening of structures as seen from Lopez Drive to be achieved within 5 years of landscape planting;
4. all lighting shall be low intensity, shielded, and directed downward onto the site.

In addition, for the two lease spaces located closest to Lopez Drive, outdoor activity areas for new units shall be located between the noise source (Lopez Drive) and the residence so the residence acts as a sound barrier. If the outdoor activity area cannot be located in this manner, a sound wall or landscaping berm shall be constructed that is of sufficient height that it interrupts the line-of-sight between the noise source and outdoor activity area. The design and materials used for the sound wall or berm shall be reviewed and approved by the Planning and Building Department prior to issuance of construction permits and shall include textures, materials of varied tones and colors. The primary wall shall be of muted earth tones.

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### II. AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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*In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:*

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| (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?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (d) Result in the loss of forest land or conversion of forest land to non-forest use?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

#### Setting

Based on the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) (DOC 2016), the entire project site contains Grazing land, Farmland of Local Potential, and vacant land. The property is located in the Arroyo Grande Valley Agricultural Preserve Area and the property is not subject to a Williamson Act contract.

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The soil type and characteristics of the project area include:

Corralitos sand (0 - 2 % slope). This nearly level sandy bottom soil is considered well drained. The soil has moderate erodibility and low shrink-swell characteristics, as well as having potential septic system constraints due to poor filtering capabilities. The soil is considered Class VI without irrigation and Class IV when irrigated.

Corralitos sand (2 - 15 % slope). This gently to moderately sloping, sandy bottom soil is considered well drained. The soil has low erodibility and low shrink-swell characteristics, as well as having potential septic system constraints due to poor filtering capabilities. The soil is considered Class VI without irrigation and Class IV when irrigated.

Gaviota fine sandy loam (15 - 50 % slope). This moderately to steeply sloping, shallow coarse loamy soil is considered very poorly drained. The soil has high erodibility and low shrink-swell characteristics, as well as having potential septic system constraints due to steep slopes and shallow depth to bedrock. The soil is considered Class VII without irrigation and class is not rated when irrigated.

Forestland is defined in Public Resources Code Section 12220(g) as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

Timberland is defined in Public Resources Code Section 4526 as land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.

### *Discussion*

- (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?*

The proposed project area is not underlain by soils classified as Prime Farmland, Unique Farmland, or as Farmland of Statewide Importance by the FMMP. The project area is however classified as Grazing land, Farmland of Local Potential, and other land (DOC 2016). The project area does not support grazing or other agricultural activities and would not result in disturbance to Prime Farmland, Unique Farmland, or as Farmland of Statewide Importance by the FMMP; therefore, *no impact* would occur.

- (b) *Conflict with existing zoning for agricultural use, or a Williamson Act contract?*

The subject property is located within the Arroyo Grande Valley Agricultural Preserve Area; however, it is not zoned for Agricultural uses and is not subject to a Williamson Act contract. The project site does not support agricultural activities and implementation of the project would not result in disturbance to land subject to a Williamson Act contract or zoned for agricultural uses; therefore, *no impact* would occur.

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(c) *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

The subject property is not currently zoned for forestland, timberland, or Timberland Production; therefore, implementation of the project would not result in disturbance to forest or timber uses and *no impact* would occur.

(d) *Result in the loss of forest land or conversion of forest land to non-forest use?*

The subject property supports oak woodlands, arroyo willow thicket, and eucalyptus trees. The project would require additional vegetation removal or trimming surrounding new structures for fire protection, which may include the removal of trees onsite. However, the project site does not meet the definition of forest land per Public Resource Code section 12220(g). Therefore, *no impact* to forest land would occur.

(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?*

There is land under a Williamson Act contract located approximately 870 feet southeast of the project site. The project would not result in impacts to designated farmland within the vicinity of the project. In addition, surrounding land uses are not zoned for forest or timber use; therefore, the project would not result in the conversion of farmland to non-agricultural uses or forest land to non-forest use and *no impact* would occur.

### Conclusion

The project site does not contain Prime Farmland, land currently zoned for agricultural uses or under a Williamson Act contract, timberland, or forest land. Therefore, implementation of the project would not result in conversion of farmland to non-agricultural uses or conversion of forest land to non-forest use. Therefore, impacts would be less than significant.

### Mitigation

No mitigation necessary.

## III. AIR QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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*Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:*

(a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Setting

#### San Luis Obispo County Clean Air Plan

The San Luis Obispo County Air Pollution Control District (SLOAPCD) San Luis Obispo County 2001 Clean Air Plan (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 ozone and particulate matter 10 micrometers or less in diameter (PM<sub>10</sub>). The 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. In order to be considered consistent with the San Luis Obispo County CAP, a project must be consistent with the land use planning and transportation control measures and strategies outlined in the CAP.

#### SLOAPCD Criteria Pollutant Thresholds

The SLOAPCD has developed and updated their CEQA Air Quality Handbook (most recently updated with a 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 nitrogen oxides (NO<sub>x</sub>), reactive organic gases (ROG), greenhouse gases (GHG), and diesel particulate matter (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 SLOAPCD CEQA

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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 particulate matter (PM<sub>10</sub>). According to the SLOAPCD estimates, an unpaved roadway of one mile in length carrying 6.0 round trips would likely exceed the 25 lbs/day PM<sub>10</sub> threshold.

### *Sensitive Receptors*

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants, such as the elderly, children, people with asthma or other respiratory illnesses, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. Some land uses are considered more sensitive to changes in air quality than others due to the population that occupies the uses and the activities involved. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residences. The nearest off-site sensitive receptor locations to the project site include residential units located to the south, east, and west of the property and future residential development planned on the adjacent northwest parcel. The nearest off-site residential unit is located approximately 160 feet southeast of the property.

### *Naturally Occurring Asbestos*

Naturally Occurring Asbestos (NOA) is identified as a toxic air contaminant by the California Air Resources Board (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 the SLOAPCD (SLOAPCD 2021).

### *Developmental Burning*

As of February 25, 2000, the SLOAPCD prohibits developmental burning of vegetative material within San Luis Obispo County. However, under certain circumstances where no technically feasible alternatives are available, limited developmental burning under restrictions may be allowed. Any such exception must complete the following prior to any burning: SLOAPCD approval, payment of fee to the SLOAPCD based on the size of the project, and issuance of a burn permit by the SLOAPCD and the local fire department authority. As a part of SLOAPCD approval, the applicant shall furnish them with the study of technical feasibility (which includes costs and other constraints) at the time of application.

### *Discussion*

(a) *Conflict with or obstruct implementation of the applicable air quality plan?*

The SLOAPCD establishes thresholds for criteria pollutant release from development and other projects in order to meet the air quality goals and objectives identified in the County's 2001 CAP.

The project site is located in a rural area and would not be applicable to mixed-use development standards. The project would facilitate the construction of 9 additional mobile home units, which is not a significant increase that would significantly affect the local area's jobs/housing balance. Implementation of the proposed project would be consistent with the air quality goals and/or

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objectives of the County's 2001 CAP; therefore, impacts related to consistency with applicable air quality plans would be *less than significant*.

- (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?*

Construction activities for the expansion of the mobile home park would result in the generation of criteria air pollutants including ozone precursors (reactive organic gases and nitrogen oxides) and fugitive dust. Additionally, future construction of residential uses would result in additional emissions of pollutants during construction activity. The county is currently designated as non-attainment for ozone and PM<sub>10</sub> under state ambient air quality standards (CARB 2021). Onsite project grading for future residential development was previously completed under a permit issued by HCD, and remaining work includes access improvements and installation of a new septic system, which would result in approximately 1.30 acres of ground disturbance, including 3,220 cubic yards of earthwork.

The SLOAPCD CEQA Air Quality Handbook provides thresholds of significance for construction related emissions. The SLOAPCD CEQA Air Quality Handbook also provides preliminary screening construction emission rates based on the proposed volume of soil to be moved and the anticipated area of disturbance. The SLOAPCD CEQA Air Quality Handbook clarifies that any project that would require grading of 4.0 acres or more can exceed the 2.5-ton PM<sub>10</sub> quarterly threshold listed above. Site improvement related construction emissions are shown below in Table 1.

**Table 1. Proposed Project Estimate Construction Emissions**

Pollutant	Screening Emission Rate (pounds/cubic yard)	Total Estimated Emissions	Threshold Quarterly	Threshold Exceeded?
ROG + NO <sub>x</sub> (combined)	0.1138	0.18 tons	2.5 tons	No
Diesel Particulate Matter (DPM)	0.0049	0.01 tons	0.13 tons	No

Project construction would not result in substantial pollutant emissions that would conflict with applicable air quality plans. Exact grading volumes for future mobile home unit placement is unknown at this time but would involve less than 4 acres of site disturbance and 1,200 cy of earthwork per day, which would not result in exceedances of the SLOAPCD thresholds.

The SLOAPCD CEQA Air Quality Handbook provides operational screening criteria to identify projects with the potential to exceed SLOAPCD operational significance thresholds (refer to Table 1-1 of the SLOAPCD CEQA Air Quality Handbook). Based on Table 1-1 of the Handbook, the project does not propose a use that would have the potential to result in operational emissions that would exceed SLOAPCD thresholds and operational impacts would be *less than significant*.

Therefore, impacts would be *less than significant*.

- (c) *Expose sensitive receptors to substantial pollutant concentrations?*

Off-site residential units are located to the south, east, and west of the project site and planned on the northwest parcel. The nearest off-site residential unit is located approximately 160 feet

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southeast of the property. Implementation of the project has the potential to result in short-term construction-related emissions and due to the proximity of the nearest sensitive receptor locations, short-term emissions may result in adverse impacts. Implementation of Mitigation Measures AQ-1 and AQ-2 are included to implement equipment and construction regulations to reduce potential emissions near sensitive receptor locations; therefore, impacts would be *less than significant with mitigation*.

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

According to the SLOAPCD Naturally Occurring Asbestos (NOA) Map, the project site is not located in an area with known NOA (SLOAPCD 2021). Future development does not require demolition that could inadvertently release asbestos containing material (ACM), lead paint, or other hazardous materials and contaminants. The project is not anticipated to result in adverse emissions or odors; therefore, impacts would be *less than significant*.

### Conclusion

Implementation of the proposed project would not result in significant construction or operation emissions. The project site is not located in an area that has known NOA and would not result in the demolition of buildings that could inadvertently release ACM. Implementation of Mitigation Measure AQ-1 and AQ-2 would reduce impacts of construction emissions near sensitive receptor locations. Therefore, with implementation of Mitigation Measure AQ-1 and AQ-2, impacts would be less than significant.

### Mitigation

**AQ-1 Idling Control Techniques. Prior to issuance of related permits, such as those from the California Department of Housing and Community Development (HCD), or site disturbance activities, whichever occurs first,** the following measures shall be implemented during all site disturbance activities and shown on all applicable plans:

#### Idling Restrictions Near Sensitive Receptors for Both On- and Off-Road Equipment.

1. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors if feasible;
2. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted;
3. Use of alternative fueled equipment shall be used whenever possible; and
4. Signs that specify the no idling requirements shall be posted and enforced at the construction site.

California Diesel Idling Regulations. On-road diesel vehicles shall comply with 13 CCR 2485. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:

1. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and
2. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.

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3. Signs must be posted in the designated queuing areas and job sites to remind drivers of the 5-minute idling limit. The specific requirements and exceptions in the regulation can be reviewed at the following website: [www.arb.ca.gov/msprog/truck-idling/2485.pdf](http://www.arb.ca.gov/msprog/truck-idling/2485.pdf).

**AQ-2 Fugitive Dust Measures. Prior to issuance of related permits, such as those from the California Department of Housing and Community Development (HCD), or site disturbance activities,** whichever occurs first, the following measures shall be implemented during all site disturbance activities and shown on all applicable plans:

1. Reduce the amount of disturbed area where possible.
2. Use of water trucks 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 (mph). Reclaimed (non-potable) water should be used whenever possible. When drought conditions exist and water use is a concern, the contractor or builder should consider use of a dust suppressant that is effective for the specific site conditions to reduce the amount of water used for dust control. Please refer to the following link from the San Joaquin Valley Air District for a list of potential dust suppressants: [Products Available for Controlling Dust](#)
3. All dirt stockpile areas shall be sprayed daily and 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, and building pads should be laid as soon as possible after grading unless seeding, soil binders or other dust controls are used;
5. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or shall maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) or otherwise comply with California Vehicle Code (CVC) 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 CVC 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. All fugitive dust mitigation measures shall be shown on grading and building plans;
8. The contractor or builder shall designate a person or persons whose responsibility is to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures as necessary to minimize dust complaints and reduce visible emissions below the APCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. Their duties shall include holidays and weekend periods when work may not be in progress (for example, wind-blown dust could be generated on an open dirt lot). The name and telephone number of such persons shall be provided to the APCD Compliance Division prior to the start of any grading, earthwork or demolition (Contact the Compliance Division at 805- 781-5912).

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9. 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;
10. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established;
11. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD;
12. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;
13. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers shall be used with reclaimed water where feasible. Roads shall be pre-wetted prior to sweeping when feasible;
14. Take additional measures as needed to ensure dust from the project site is not impacting areas outside the project boundary.

### IV. BIOLOGICAL RESOURCES

	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<i>Would the project:</i>				
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Setting

#### Federal and State Endangered Species Acts

The Federal Endangered Species Act of 1973 (FESA) provides legislation to protect federally listed plant and animal species. The California Endangered Species Act of 1984 (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 CDFW has the authority to review projects for their potential to impact special-status species and their habitats.

#### Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) protects all migratory birds, including their eggs, nests, and feathers. The MBTA was originally drafted to put an end to the commercial trade in bird feathers, popular in the latter part of the 1800s. The MBTA is enforced by the U.S. Fish and Wildlife Service (USFWS), and potential impacts to species protected under the MBTA are evaluated by the USFWS in consultation with other federal agencies and are required to be evaluated under CEQA.

#### Oak Woodland Ordinance

The County of San Luis Obispo Oak Woodland Ordinance was adopted in April 2017 to regulate the clear-cutting of oak woodlands. This ordinance applies to sites located outside of Urban or Village areas within the inland portions of the county (not within the Coastal Zone). "Clear-cutting" is defined as the removal of one acre or more of contiguous trees within an oak woodland from a site or portion of a site for any reason, including harvesting of wood, or to enable the conversion of land to other land uses. "Oak woodland" includes the following species: Blue oak (*Quercus douglasii*), coast live oak (*Quercus agrifolia*), interior live oak (*Quercus wislizeni*), valley oak (*Quercus labata*), and California black oak (*Quercus kelloggii*). The ordinance

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applies to clear-cutting of oak woodland only and does not apply to the removal of other species of trees, individual oak trees (except for Heritage Oaks), or the thinning, tree trimming, or removal of oak woodland trees that are diseased, dead, or creating a hazardous condition. Heritage oaks are any individual oak species, as defined in the Oak Woodland Ordinance, of 48 inches diameter at breast height (dbh) or greater, separated from all Stands and Oak Woodlands by at least 500 feet.

The following information regarding setting and discussion of impacts to biological resources is based on the Biological Letter Report for Sweet Springs Mobile Home Park by Althouse and Meade, Inc. (Althouse and Meade 2020).

### Existing Conditions

The subject property currently consists of existing development including paved and unpaved roads, mobile home residences, and graded residential pads. Undeveloped areas of the subject property occur on moderate to steep topography of the property and includes oak woodlands, chaparral, eucalyptus groves, and arroyo willow thicket. There is an unnamed ephemeral drainage located along the western edge of the property.

### Special-Status Plants

Based on desktop review of the California Natural Diversity Database (CNDDDB) and California National Plant Society (CNPS) Online Inventory of Rare and Endangered Plants of California, 95 special status plant species are listed as having the potential to occur within a five-mile radius of the project area (Althouse and Meade 2020). The oak woodlands and chaparral vegetation onsite serves as suitable habitat for both special-status plants and wildlife onsite. The July 2020 field survey identified four special-status plant species and identified an additional six species as having the potential to occur onsite (Althouse and Meade 2020). The remaining 85 special-status plant species listed as having the potential to occur within the project area have no potential to occur onsite due to the previously disturbed and built-up nature of the site and the absence of suitable habitat, soils, or other ecological conditions (Althouse and Meade 2020).

#### La Panza Manzanita [Santa Margarita Manzanita] (*Arctostaphylos pilosula*)

La Panza Manzanita is a CRPR 1B.2 species and is endemic to San Luis Obispo County. During the July 2020 field survey of the subject property, four individuals of this species were detected within the eastern portion of the project area within disturbed chaparral on Unit 6 (adjacent to Units 8, 10, and 11), and Unit 2.

#### Pismo Clarkia (*Clarkia speciosa* ssp. *immaculata*)

Pismo clarkia is listed "Endangered" under the Federal Endangered Species Act (FESA), is listed "Rare" by the state of California under the Native Plant Protection Act (NPPA) and is a CRPR 1B. A total of 63 individuals were observed during July 2020 field survey and occur adjacent to a road cut within a small area of highly disturbed chaparral in the central/western portion of the project area adjacent to Units 10 and 11.

#### Paniculate Tarplant (*Deinandra paniculata*)

This species is a CRPR 4.2 species and was observed during the July 2020 field survey in a small area of the chaparral scrub habitat onsite located immediately adjacent to a dirt roadway in the north-central portion of the project site on Unit 5.

#### California Spineflower (*Mucronea californica*)

California spineflower is a CRPR 4.2 species. An estimated 3,650 individuals were encountered within the central portion of the project site (Unit 6) during July 2020 field survey.

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### Mesa Horkelia (*Horkelia cuneata* var. *puberula*)

The Mesa horkelia is a CRPR 1B.1 variety. According to CNDDDB, the nearest record of this species is directly adjacent to the northwestern portion of the project area. This species was not detected during the July 2020 field survey; however, there is suitable habitat for this species within the oak woodlands onsite. Based on the proximity of the nearest known record and presence of suitable habitat onsite, this species has potential to occur onsite. However, the suitable habitat is not located within the footprint of the project.

### Michael's Rein Orchid (*Piperia michaelii*)

This species is a CRPR 4.2 species. According to the CNDDDB, the nearest recorded occurrence of this species is 0.13 mile northwest of the project area. This species was not detected during the July 2020 field survey; however, there is suitable habitat for this species located within the oak woodland and chaparral habitat onsite. Based on the proximity of the nearest known record and presence of suitable habitat onsite, there is potential for this species to occur onsite. However, the suitable habitat is not located within the footprint of the project.

### Hoover's Bent Grass (*Agrostis hooveri*)

Hoover's bent grass is a CRPR 1B.2 species. According to the CNDDDB, the nearest recorded occurrence of this species is 1.3 miles west of the project area. This species was not detected during the July 2020 field survey. There is suitable habitat for this species located within the oak woodland and chaparral habitat onsite; however, the presence of non-native species within the suitable habitat reduces the overall quality of the suitable habitat to marginally suitable. Based on the lack of suitable habitat onsite, this species is not anticipated to occur onsite.

### Straight-awned Spineflower (*Chorizanthe rectispina*)

This species is a CRPR 1B.3 species and according to the CNDDDB, the nearest recorded occurrence of this species is 0.89-mile northwest of the project area. This species was not observed onsite during the July 2020 field survey. There is suitable habitat for this species located within the oak woodland and chaparral habitat onsite; however, the presence of non-native species within the suitable habitat and absence of granite substrate reduces the quality of suitable habitat to marginally suitable. Based on the absence of suitable habitat onsite, this species is not anticipated to occur onsite.

### Southern Curly-leaved Monardella (*Monardella sinuata* ssp. *sinuata*)

This species is listed as a CRPR 1B.2 species. According to the CNDDDB, the nearest recorded occurrence of this species is historic and is 1.5 miles southwest of the project area. This species was not detected during July 2020 field survey. Due to the presence of non-native species within the chaparral, the overall quality of the habitat has been reduced to marginally suitable. Based on the lack of recent records of this species in the vicinity of the project and presence of marginally suitable habitat, this species is not anticipated to occur onsite.

### Brewer's Calandrinia (*Calandrinia breweri*)

This species is a CRPR 4.2 species. According to the CNDDDB, the nearest recorded occurrence of this species is a historic and is located 3.5 miles west of the project area. This species was not detected during the July 2020 field survey and there is only marginally suitable habitat located within the project area. Based on the lack of recent records in the project vicinity and lack of suitable habitat onsite, this species is not anticipated to occur onsite.

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### Special-Status Wildlife

Based on desktop review of the California Natural Diversity Database (CNDDDB), 53 special status wildlife species are listed as having the potential to occur within a five-mile radius of the project area (Althouse and Meade 2020). The oak woodlands and chaparral vegetation onsite serves as suitable habitat for both special-status plants and wildlife onsite. The July 2020 field survey identified two special-status wildlife species and identified an additional four species as having the potential to occur onsite (Althouse and Meade 2020). In addition, the eucalyptus groves between the western property line and Hondonada Road serves as suitable habitat for monarch butterfly. The remaining 47 special-status wildlife species listed as having the potential to occur within the project area have no potential to occur onsite due to the previously disturbed and built-up nature of the site and the absence of suitable habitat, soils, or other ecological conditions (Althouse and Meade 2020).

#### Oak Titmouse (*Baeolophus inornatus*)

There is suitable habitat for the oak titmouse within the oak woodland habitat onsite and this species was observed during the July 2020 field survey. It is expected that the oak titmouse is a year-round resident of the oak woodland habitat within the project area.

#### Nuttall's Woodpecker (*Picoides nuttallii*)

This species was observed onsite during the July 2020 field survey. Nuttall's woodpecker inhabits the oak woodland habitat onsite and likely inhabits the area year-round.

#### Blainville's horned lizard [Coast Horned Lizard] (*Phrynosoma blainvillii*)

The nearest recorded occurrence of this species is located 1.5 miles east of the project area. This species was also observed on the adjacent parcel (Mid-State Properties/Hondonada) during a May 2012 field survey (Padre 2017). The project area provides suitable habitat and food sources favorable to this species. Based on the proximity to the nearest known record and the presence of suitable habitat onsite, there is potential for this species to occur onsite.

#### Northern California Legless Lizard (*Anniella pulchra*)

This species is a California Species of Special Concern (SSC). The closest known record of the northern California legless lizard is a historic record located 3.7 miles southwest of the project area. The project area supports sandy soils and small portions of shaded understory with deep leaf litter, which is suitable habitat for this species. This species was not detected during the July 2020 field survey; however, based on the presence of suitable habitat and proximity of the closest known record, there is potential for this species to occur onsite.

#### Monarch Butterfly (*Danaus plexippus*)

There is potential habitat for this species located within the eucalyptus groves along Hondonada Road near the southern portion of the project site. This species was not detected during the July 2020 field survey; however, based on the presence of potential habitat, there is potential for this species to occur onsite.

#### Pallid Bat (*Antrozous pallidus*)

This species is a California SSC. The closest known record of this species is 7.25 miles south of the project area. Additionally, the project site supports only marginally suitable habitat for this species due to the presence of structures with high disturbance and few tree cavities. This species was not detected during the

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July 2020 field survey. Based on the lack of suitable habitat and distance of the closest known record, this species is not anticipated to occur onsite.

### Western bumble bee (*Bombus occidentalis*)

The closest recorded occurrence of this species is historic and is located 3.7 miles southwest of the project area. The project area supports landscaped ornamental trees, which provides potentially suitable habitat for the western bumble bee; however, the project site is highly disturbed, which reduces the overall quality of the potentially suitable habitat to marginally suitable. Western bumble bee was not observed onsite during the July 2020 field survey. Based on the lack of recent records of this species in the vicinity of the project area and the presence of only marginally suitable habitat, there is low potential for occurrence onsite.

### Critical Habitat

The project site is adjacent to USFWS Critical Habitat for steelhead (*Oncorhynchus mykiss irideus*) that is located within Arroyo Grande Creek approximately 260 feet southeast of the subject property. There is an unnamed ephemeral drainage that runs along the western property line that connects to Arroyo Grande Creek. The onsite drainage is not considered suitable habitat for steelhead due to its cobbled stream bottom, highly dense riparian vegetation, and ephemeral nature (Althouse and Meade 2020).

### Discussion

- (a) *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

The project site has been previously graded under a permit issued by HCD. The project includes on- and off-site improvements that would result in 1.3 acres of ground disturbance and vegetation clearance and trimming within a 100-foot buffer around future structures on Units 2 and 19-26, in accordance with CAL FIRE/County FIRE recommendations for defensible space. Implementation of the project has the potential to disturb sensitive plant species and sensitive wildlife species if located within or utilize the portions of the property within the footprint of the project.

### Special-Status Plants

The plant-species of concern based on known presence within the footprint of the project include La Panza manzanita, Pismo clarkia, Paniculate tarplant, and California spineflower. Based on the proposed site plan, no impacts would occur to Pismo clarkia or California spineflower. Proposed vegetation clearance would remove one La Panza manzanita species located on Unit 2. Additionally, natural areas outside the building envelopes also contain suitable habitat for sensitive plant species that if present, would likely be impacted or removed during vegetation maintenance and normal residential activities. To mitigate for this loss, Mitigation Measure BIO-1 would require a biological monitor to oversee installation of protective fencing around the species not proposed for removal, and Mitigation Measures BIO-2 and BIO-3 would require an open space easement be created for all areas outside the lease envelopes and roadways, with certain allowances. With implementation of these measures, impacts to special-status plant species would be less than significant.

### Special-Status Wildlife

As previously discussed, there is potential for coast horned lizard, Northern California legless lizard, oak titmouse, Nuttall's woodpecker, nesting birds, and monarch butterfly to occur onsite and be impacted by project activities.

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### Sensitive Reptiles

Implementation of the project has the potential to result in habitat loss, accidental take, and other disturbance to sensitive reptile species onsite, including coast horned lizard and Northern California legless lizard. Mitigation Measure BIO-4 requires preconstruction surveys for coast horned lizard and northern California legless lizard prior to the start of grading and/or vegetation removal. This measure identifies the proper protocol if individuals are present onsite, including removal of the species to alternative suitable habitat outside the work area. Mitigation Measure BIO-5 would require worker sensitivity training to educate construction workers on the sensitive reptile species and the applicable policies, regulations, and protocols relating to these species. Implementation of the identified mitigation measures would reduce impacts of project activities to sensitive reptile species to less than significant.

### Oak Titmouse, Nuttall's woodpecker, and Nesting Birds

Oak titmouse, Nuttall's woodpecker, and other nesting bird species were detected onsite, and implementation of the project has the potential to result in habitat loss, accidental take, or other disturbance due to tree removal and construction equipment disturbances (e.g., noise). Mitigation Measure BIO-5 requires pre-construction nesting bird surveys during the appropriate nesting season (February 1 through September 1) and identifies the proper protocol if nesting birds, including oak titmouse, or Nuttall's woodpecker are present onsite. Within implementation of BIO-6, impacts to nesting birds would be less than significant.

### Monarch Butterfly

Construction activities conducted in close proximity to the eucalyptus groves have the potential to disturb monarch butterflies if present within the habitat. Mitigation Measure BIO-7 has been included to require preconstruction surveys and identifies the proper protocol if species are determined to occur onsite. Implementation of the identified mitigation measure would ensure project activities do not result in disturbance to monarch butterflies.

In addition, Mitigation Measure BIO-1 requires the use of construction vehicles and equipment to be limited to the project limits to avoid disturbance to relocated or other animal species outside of the identified project areas. The identified mitigation measures would ensure project activities do not result in disturbance to sensitive animal species onsite; therefore, impacts would be *less than significant with mitigation*.

- (b) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?*

The project site is located adjacent to USFWS Critical Habitat for steelhead associated with Arroyo Grande Creek. There is an onsite drainage that runs along the western property line, approximately 30 feet from Units 7 through 22. The onsite drainage does not support steelhead based on its cobbled stream bottom, highly dense riparian vegetation, and ephemeral nature (Althouse and Meade 2020). Project activities would not result in modification of or work within Arroyo Grande Creek or the ephemeral drainage onsite. The project would be required to prepare an Erosion and Sedimentation Control Plan (LUO 22.52.120) in order to protect steelhead habitat from habitat degradation through polluted runoff. Based on proposed project activities and required compliance

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with the County's LUO, the project would not result in adverse effects to USFWS Critical Habitat; therefore, impacts would be *less than significant*.

- (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?*

According to the Biological Letter Report prepared for the project, the unnamed ephemeral drainage located along the western property boundary is not considered a jurisdictional wetland due to the presence of dense vegetation located within the channel and the lack of regular significant flows (Althouse and Meade 2020). Further, the project site does not support marsh, vernal pool, or coastal habitat that could be disturbed as a result of project implementation. Arroyo Grande Creek is located 260 feet southeast of the project site; however, the project does not include direct modification to the creek and would implement sedimentation and erosion control measures (LUO 22.52.120) to ensure there is no direct or indirect disturbance to the creek. The majority of project grading has already been conducted for the project; therefore, construction activity is not anticipated to result in large quantities of earthwork that could lead to erosion and sedimentation to the off-site creek. Therefore, the project would not have an adverse effect on wetland resources and impacts would be *less than significant*.

- (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?*

According to CNDDDB, the project site is not located within an identified wildlife corridor (CDFW 2021). There is an unnamed ephemeral drainage located along the western property line, approximately 30-feet from the existing mobile home units, and Arroyo Grande Creek is located approximately 260 feet southwest of the project site. The onsite drainage does not support steelhead based on its cobbled stream bottom, highly dense riparian vegetation, and ephemeral nature (Althouse and Meade 2020). Arroyo Grande Creek supports USFWS Critical Habitat for steelhead associated with Arroyo Grande Creek. The majority of project grading has already been conducted for the project; therefore, construction activity is not anticipated to result in large quantities of earthwork that could lead to erosion and sedimentation to the off-site creek. Further, the project would include sedimentation and erosion control measures to reduce the potential for surface runoff. In addition, the project does not require work within or adjacent to Arroyo Grande Creek that could result in direct or indirect impacts to the movement of migratory fish.

The project site supports eucalyptus trees, arroyo willow thicket, and oak woodlands that could support nesting or other migratory bird species onsite. Mitigation Measure BIO-6 requires nesting bird surveys prior to the start of work during nesting bird season (February 1 to September 1) and identifies the proper protocol if nesting birds are present onsite. Therefore, impacts would be *less than significant with mitigation*.

- (e) *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

According to the Biological Letter Report, the project area supports 8.7 acres of oak woodlands throughout the subject property (Althouse and Meade 2020). The County's Inland LUO Chapter 22.58 establishes regulations for clear-cutting oak woodlands occupying one or more contiguous acres on slopes greater than 30%. Grading operations for future residential development has been

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previously completed under a permit issued by the state. Additional vegetation clearing and trimming is required within 100-feet around structures in accordance with CAL FIRE/County Fire recommendations. Therefore, the project proposes to remove individual oak trees within 100-feet of the proposed lease envelope of Unit 2. Although the project would be consistent with the County's LUO for tree removal, Mitigation Measures BIO-8 and BIO-9 have been included to ensure revegetation of any trees that are removed and protection of trees to be retained during future residential development. Therefore, impacts would be *less than significant with mitigation*.

- (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?*

A Habitat Conservation Plan (HCP) was prepared for Arroyo Grande Creek in 2004 regarding incidental take of steelhead and California red-legged frog. The HCP extends approximately 10 miles, and its boundaries include Arroyo Grande Creek downstream from Lopez Dam to the flood control channel (Fair Oaks Boulevard). The project does not require work within Arroyo Grande Creek that could directly affect steelhead populations. In addition, the project would be required to prepare and implement an Erosion and Sedimentation Control Plan to address short- and long-term erosion and sedimentation from the project. Therefore, project activities would not result in direct or indirect impacts to Arroyo Grande Creek and impacts would be *less than significant*.

### Conclusion

Future construction activities have the potential to adversely affect biological resources located within the footprint of the proposed project. Mitigation Measures BIO-1 through BIO-12 have been included to reduce potential impacts to biological resources. Therefore, upon implementation of the identified mitigation measures, impacts would be less than significant.

### Mitigation

**BIO-1 Biological Monitor. Prior to issuance of grading permits, related permits, such as those from the California Department of Housing and Community Development (HCD), or site disturbance activities,** the applicant shall retain a County-approved biological monitor. The biological monitor shall prepare and submit a biological monitoring plan for review and approval by the San Luis Obispo County Department of Planning and Building. The monitoring plan shall detail the responsibilities of the monitor, including, but not limited to: oversee the installation of protective fencing around all areas identified by Althouse and Meade (2020) containing California spineflower and Pismo clarkia and the three species of La Panza manzanita that are not proposed to be removed by the project; ensuring the use of heavy equipment and vehicles are limited to the proposed project work area, existing roadways, and defined staging areas/access points and that the boundaries of each work area are clearly defined and marked with visible flagging prior to project initiation; conducting regular inspections/site visits to verify construction activity location, managing the replacement plantings required by BIO-2 and preconstruction wildlife surveys required by BIO-5 and BIO-7; conducting the worker awareness training required by BIO-6; and verifying best management practices required by BIO-11 are adhered to.

The use of heavy equipment and vehicles shall be limited to the proposed project work area, existing roadways, and defined staging areas/access points. The boundaries of each work area shall be clearly defined and marked with visible flagging prior to Project initiation.

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- BIO-2**      **Special Status Plants Replacement. Prior to grading permits, related permits, such as those from the California Department of Housing and Community Development (HCD), or site disturbance activities,** the applicant shall submit a restoration plan prepared by a qualified biologist for special status plant species (not including oaks, oaks are instead subject to BIO-9 and 10) to the County for review and approval, in consultation with the United States Fish and Wildlife Service (USFWS), and California Department of Fish and Wildlife (CDFW), if necessary. If any Incidental Take Permits are required, the restoration plan shall be consistent with them. At a minimum, the plan shall include:
1. Identification of locations, amounts, size and types of plants to be replanted, as well as any other necessary components (e.g., temporary irrigation, amendments, etc.) to ensure successful reestablishment. Restoration areas shall be located within open space and conservation easements onsite.
  2. Provide for a native plant salvage and seed collection effort prior to ground disturbing activities. Salvaged plants shall include, but not be limited to, special status plant species that may be affected.
  3. Updated quantification of impact based on finalized tract improvement plans and quantification of mitigation areas such that the replacement criteria are met.
  4. A program schedule and success criteria for a minimum five-year monitoring and reporting program that is structured to ensure the success of the restoration plan.
  5. For in-kind replacement of Pismo clarkia (*Clarkia speciosa* ssp. *immaculata*), individuals that are removed or damaged shall be replaced in-kind at a 2:1 ratio (based on square feet cover) within the designated restoration area with 100% success in five years (inclusive of replacement plantings for unsuccessful individuals). **Prior to any removal or impacts (take) to Pismo clarkia,** the applicant shall provide evidence that an Incidental Take Permit (ITP) has been obtained and shall also provide a copy of the Habitat Conservation Plan that accompanies the ITP.
  6. For in-kind replacement of Santa Margarita (La Panza) manzanita, individuals that are removed or impacted shall be replaced in-kind at a 2:1 ratio (based on square feet cover) within the designated restoration area with 100% success in 5 years (inclusive of replacement plantings for unsuccessful individuals). The restoration shall also provide in-kind 2:1 replacement of tarplant.
  7. For in-kind replacement of tarplant, individuals that are removed or impacted shall be replaced in-kind at a 2:1 ratio (based on square feet cover) within the designated restoration area with 100% success in 5 years (inclusive of replacement plantings for unsuccessful individuals).
  8. Identification of access and methods of materials transport to the restoration area, including personnel, vehicles, tools, plants, irrigation equipment, water, and all other similar supplies. Access shall not result in new or additional impacts to habitat and special-status species.
  9. Incorporation of an invasive species control program, which would include the following at a minimum:
    - a. To avoid the spread of invasive species, the contractor will stockpile topsoil

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and redeposit the stockpiled soil on the slopes after construction is complete, or if heavily infested with invasive species, transport the topsoil to a certified landfill for disposal.

- b. During construction, the project will make all reasonable efforts to limit the use of imported soils for fill. Soils currently existing on-site should be used for fill material. If the use of imported fill material is necessary, the imported material must be obtained from a source that is known to be free of invasive plant species; or the material must consist of purchased clean material such as crushed aggregate, sorted rock, or similar.
- c. The restoration planting plans must emphasize the use of native species expected to occur in the area. Project plans must avoid the use of plant species that the Cal-IPC, Cal-EPPC, CDFW, or other resource organizations considers to be invasive or potentially invasive. Prior to issuance of County grading permits, the County shall verify that restoration plans do not include the use of any species considered invasive by the Cal-IPC, Cal-EPPC, or CDFW.
- d. If performance standards detailed in the final restoration plan are not achieved in any restoration area, the applicant shall submit and implement an alternative or adaptive mitigation strategy during the restoration and monitoring phase for approval to the San Luis Obispo County Planning and Building Department, in consultation with other appropriate resource agencies including the United States Fish and Wildlife Service and/or the California Department of Fish and Wildlife.

The replacement species may either be planted onsite, in a location determined by the biological monitor, outside of the 100-foot vegetation clearance zone, OR may be arranged to be included in an offsite replanting effort with similar species (e.g., with the Mid-State Properties/Hondonada restoration). If planting onsite, the biological monitor shall provide for a native plant salvage and seed collection effort prior to ground disturbing activities. The biological monitor shall monitor the replacement plantings annually and submit a report to the County regarding the success of the species. Should any of the species not meet 100% success within 5 years, the applicant shall submit and implement an alternative or adaptive mitigation strategy. The applicant shall submit a copy of the approved contract with the biological monitor for the project to include the scope of work that includes the requirements above. **The biological monitor shall provide reports every two weeks to the Department of Planning and Building**, which shall include verification that the measures above have been implemented.

- BIO-3. Open Space Easement. Prior to grading permits, related permits, such as those from the California Department of Housing and Community Development (HCD), or site disturbance activities**, the applicant shall enter into an agreement with the County, in a form acceptable to County Counsel, to create an open space easement(s) on all areas outside of the identified lease envelopes, roadways, and vegetation clearance areas. The terms of the open space easement will allow only activities that help the long-term protection of native plant species and oak woodlands. No structures, grading, site disturbance, native vegetation removal, mowing, disking, off-road vehicle use, crop production, equestrian uses, or other animal raising or keeping activities (unless specifically

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proposed for long term protection of native species) are allowed in the open space easement area with the exception of infrastructure such as septic tanks and leach lines, which may be located outside the envelopes. Any infrastructure located outside building envelopes shall be located so as to not impact sensitive plant species or oak trees, to the extent practicable. The following shall apply to the areas within the open space: no oak trees, or other visually significant vegetation, shall be impacted or removed; no activities (including grazing or the keeping of animals) shall be allowed that could adversely impact the open space area. Grazing for weed and invasive plant control may be allowed with an Open Space Management Plan prepared by a qualified biologist and approved by the County of San Luis Obispo Department of Planning and Building. Any removal of non-sensitive vegetation shall be done by hand, and by a qualified individual that can identify and avoid those sensitive species.

Fencing may be allowed along the individual lease areas within the open space provided the fencing does not impact oak trees or visually significant vegetation. Fencing shall be limited to six feet in height and shall be horizontally open to allow for wildlife passage (e.g., five strand wire fencing, post and rail, not woven wire or panel fencing). Barbed wire and electric fencing shall not be used.

For the life of the project, the Developer agrees to allow the County, a land conservancy, resource agency, or other appropriate entity, the right to enter the open space area as shown on the final exhibit to the open space agreement, to ensure compliance with the restrictions and to access the oak woodland population. However, prior to entering the open space area, the County, land conservancy, resource agency, or other appropriate entity shall give a 72-hour notice of intent to enter the site.

### BIO-4.

**Open Space Maintenance. Prior to grading permits, related permits, such as those from the California Department of Housing and Community Development (HCD), or site disturbance activities,** the following shall apply to the areas within the open space: no oak trees outside a 30-foot buffer from structures, or other native vegetation outside a 100-foot buffer from structures, shall be impacted or removed unless prescribed by CAL FIRE/County Fire to promote defensible space; no activities (including grazing or the keeping of animals) shall be allowed that could adversely impact the open space area. Grazing for weed and invasive plant control may be allowed with an Open Space Management Plan prepared by a qualified biologist and approved by the County of San Luis Obispo Department of Planning and Building. Any removal of non-sensitive vegetation shall be done by hand, and by a qualified individual that can identify and avoid those sensitive species. All applicable plans shall show open space areas and lease envelopes, where all trees outside of the lease envelopes shall be protected during all construction activities. Plans shall show how these trees will be protected from any disturbance/ compaction at 1-1/2 times the distance between the trunk and dripline edge (e.g., install sturdy fencing, install retaining walls, etc.).

**Prior to grading permits, related permits, such as those from the California Department of Housing and Community Development (HCD), or site disturbance activities,** applicant shall submit a statement from the biological monitor that tree protection measures have been installed. Prior to occupancy of any new unit, the applicant

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shall submit report prepared by the Biological Monitor verifying that tree protection measures remained effective during the entire construction phase.

**For the life of the project**, the Applicant shall be responsible for regular maintenance and reporting to the County of San Luis Obispo Department of Planning and Building. Reporting shall be **annually for the first 5 years after construction**, and the frequency of reporting shall be determined by the County based on the history of compliance with the Open Space restrictions.

**BIO-5 Preconstruction Wildlife Surveys.** The County-approved qualified biologist shall be retained to conduct pre-activity surveys of the project site, **immediately prior to the initiation of grading or vegetation removal.**

As part of the pre-activity surveys, in order to avoid potential impacts to sensitive reptiles, leaf litter and sandy areas under shrubs within suitable habitat shall be raked in the areas to be disturbed to a minimum depth of eight inches. In addition to raking, coverboards or other suitable methods identified in the Biological Monitoring Plan (BIO-1) shall be used to capture reptiles. If using coverboards, they shall consist of untreated lumber, sheet metal, corrugated steel, or other flat material, at a minimum size of 4 foot by 4 foot. Coverboards shall be placed in suitable habitat areas at minimum 7 days prior to ground disturbing activities and shall be inspected daily unless otherwise outlined in the Biological Monitoring Plan (BIO-1). Captured lizards shall be placed in buckets and relocated to a pre-determined location within the area that will not be disturbed by Project activities. As necessary, appropriate regulatory agency permits and/or approvals shall be obtained to allow relocation of special-status species (i.e., coast horned lizard, etc.) from the project area.

Erosion control materials shall be utilized as needed to minimize potential storm runoff associated with construction and operation activities from entering Project Site waterways.

**The biological monitor shall provide weekly reports** to the Department of Planning and Building, which shall include verification that the measures above have been implemented. The biological monitor shall have the authority to stop any Project activities to relocate an animal outside of Project limits to a pre-designated relocation area with suitable habitat conditions essential for the animal's survival.

**BIO-6 Worker Awareness Training. Prior to mobilization of any equipment on the project site** and installation of project limit fencing/flagging, a qualified Biologist shall conduct an environmental sensitivity training for all Project personnel during the Project kick-off meeting. The purpose of the training is to educate the personnel on identification of special-status wildlife species that may occur within the Project area and to provide an overview of the avoidance and minimization measures to be adhered to during the Project. Specifically, the training will emphasize on all special-status wildlife species that would be expected to occur within the Project limits, applicable regulatory policies and provisions regarding their protection, and a review of measures being implemented to avoid and/or minimize impacts to the species and their associated habitat. Furthermore, crew members will be briefed on the reporting process in the event that an inadvertent injury should occur to a special-status species during construction.

**BIO-7. Nesting Birds. Prior to any site disturbance (i.e., mobilization, staging, grading or construction, tree and vegetation removal or trimming)** the County-approved biologist

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shall conduct preconstruction surveys for potential nesting birds within the recognized breeding season (February 1 to September 1) in all areas within 500 feet of proposed disturbance areas, or a lesser distance if dense vegetation renders a 500-foot survey radius infeasible. The required survey dates may be modified based on local conditions, as determined by the County-qualified biologist based on observations in the field, with the approval of the County of San Luis Obispo.

If breeding birds with active nests are found prior to or during construction, a biological monitor shall establish an avoidance buffer around the nest for ground-based construction activities and no activities will be allowed within the buffer(s) until the young have fledged from the nest or the nest fails. Buffers shall be 500 feet for raptors and 100 feet for non-raptor species. Buffers may be adjusted to reflect existing conditions including ambient noise, topography, and disturbance with the approval of the County of San Luis Obispo, and must be based on evidence that a reduced buffer will not pose a threat to the success of the nest.

For active nests identified within the survey area, the biological monitor(s) shall conduct regular monitoring of the nest to determine success/failure and to ensure that project activities are not conducted within the buffer(s) until the nesting cycle is complete or the nest fails. The biological monitor(s) shall be responsible for documenting the results of the surveys and ongoing monitoring and will provide a copy of the monitoring reports to the County.

All trees to be removed as part of project-related construction activities will be removed outside of the nesting season to avoid additional impacts to nesting birds. If removal during the nesting season can't be avoided, trees (tree to be removed/impacted and any surrounding trees that are within 100 feet of the tree canopy to be removed/impacted) will be thoroughly surveyed by a County-qualified biologist to ensure that no nests are present. If nests are found within these trees and contain eggs or young, the biological monitor shall establish avoidance buffers as described above until the young have fledged the nest or the nest fails.

**BIO-8. Monarch Butterfly. For the life of the project,** tree removal and/or noise-generating construction activities (including but not limited to use of large equipment, gas-powered tools, and/or pneumatic equipment) within 100 feet of the eucalyptus groves within the project area shall be avoided during the fall and winter migration of the monarch butterflies (October 15 through the end of February) to the extent feasible. If tree removal or site disturbance within 100-feet of eucalyptus groves are necessary **during the fall and winter migration**, a qualified County-biologist shall conduct a preconstruction survey for monarch butterflies that could utilize trees onsite for overwintering. If monarch butterflies are identified to be roosting/overwintering in the work area or within 100 feet of the work area, activities will be postponed until after the overwintering period or until the biologist determines monarch butterflies are no longer utilizing the trees.

**BIO-9. Oak Woodland Mitigation and Protection Plan. Prior to grading permits, related permits, such as those from the California Department of Housing and Community Development (HCD), or site disturbance activities,** the applicant shall prepare an Oak Tree Replacement and Protection Plan (OTRPP) outlining the proposed mitigation efforts for the permanent loss of oak woodland habitat and individual oaks. Mitigation shall be accomplished through on-site conservation, on-site replanting, or payment of an in-lieu fee.

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Conservation easements shall be delineated to encompass existing oak woodland canopy that is equal to or greater than 4:1 conservation of oak woodland based on as-built conditions. If the quantity of existing oak woodland is not sufficient to fulfil 4:1 conservation, the remaining mitigation shall be accomplished through payment of an in-lieu fee and/or on-site replanting. Any fee payments shall be coordinated with the County of San Luis Obispo Department of Planning and Building to determine the appropriate fee amount and shall be submitted to the California Wildlife Conservation Board's Oak Woodlands Conservation Program to mitigate for up to 50 percent of oak trees impacted by the project that have not mitigated through on-site conservation easements or replacement plantings. Any contribution to the Oak Woodlands Conservation Fund shall be paid in full prior to issuance of grading or construction permits.

If on-site planting is required, any on-site planting shall be done **within 90 days of completion of tract improvements or at the beginning of the rainy season as determined appropriate by the County**. The OTRPP shall include the following the following:

1. Replanting onsite of individual oak trees through replanting, maintaining and monitoring replacement plantings for at least seven years. Seedling planting will be based on a minimum replacement ratio of 4:1 for oak trees removed and a minimum replacement ratio of 2:1 ratio for oak trees impacted (i.e., disturbance within the root zone area) for the mitigation not fulfilled by conservation easements. At a minimum, the following shall also be included within the OTRPP:
2. Replacement oak trees shall be from regionally or locally collected seed stock grown in vertical tubes or deep one-gallon tree pots. Four-foot diameter shelters shall be placed over each oak tree to protect it from deer and other herbivores and shall consist of 54-inch tall, welded wire cattle panels (or equivalent material) and be staked using T-posts. Wire mesh baskets, at least two feet in diameter and two feet deep, shall be use below ground. Planting during the warmest, driest months (June through September) shall be avoided. The Plan shall provide a species-specific planting schedule. If planting occurs outside this time period, a landscape and irrigation plan shall be submitted prior to permit issuance and implemented upon approval by the San Luis Obispo County Planning and Building Department.
3. Replacement oak trees shall be planted no closer than 20 feet on center on average and shall average no more than four planted per 2,000 square feet. Trees shall be planted in random and clustered patterns to create a natural appearance. As feasible, replacement trees shall be planted in a natural setting on the north side of and at the canopy/dripline edge of existing mature native oak trees; on north-facing slopes; within drainage swales (except when riparian habitat present); where topsoil is present; and away from continuously wet areas (e.g., lawns, irrigated areas, etc). Replanting areas shall be either in native topsoil or areas where native topsoil has been reapplied. Planting locations shall not result in a displacement of existing sensitive plants or habitats. A seasonally timed maintenance program, which includes regular weeding (hand removal at a minimum of once early fall and once early spring within at least a three-foot radius from the tree or installation of a staked "weed mat" or weed-free mulch) and a temporary watering program, shall be

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developed for all oak tree planting areas. A qualified arborist/botanist shall be retained to monitor the acquisition, installation, and maintenance of all oak trees to be replaced. Replacement trees shall be monitored and maintained by a qualified arborist/botanist for at least seven years or until the trees have successfully established as determined by the County Environmental Coordinator. **Annual monitoring reports shall be prepared by a qualified arborist/botanist and submitted to the County by October 15 each year for 7 years.**

4. The OTRPP shall include a process to follow for the following aspects: 1) the process to follow to account for all trees removed and impacted; 2) the process to follow to protect trees proposed to remain; 3) the process to follow for all tree trimming efforts; 4) the process to follow should any additional trees be inadvertently impacted or removed that were not originally considered in this MND (this shall not exceed 10% above these original numbers).

**BIO-10. Oak Tree Protection. Prior to and during ground disturbing activities,** the following tree protection guidelines and root protection zone shall be implemented for each tree to be retained that occurs within 50 feet of impact areas:

1. All trees to remain within 50 feet of construction or grading activities shall be marked for protection with protective fencing and their root zone fenced prior to any grading. The root zone will be defined at 1.5 times the diameter of the canopy dripline. All activities within the root zone shall be avoided to the extent feasible. If activities within the root zone cannot be avoided, the activity within this area will be considered an impact and shall be mitigated according to the OTRPP. Substantial impacts such as grading, trenching where roots are damaged or exposed would be considered a permanent impact and shall be mitigated according to the OTRPP. The applicant shall consider the use of retaining walls where appropriate to minimize cut and fill impacts. Care shall be taken to avoid surface roots within the top 18 inches of soil. If any roots must be removed or exposed, they shall be cleanly cut by a certified arborist and not left exposed above the ground surface.
2. Unless previously approved by the county, the following activities are not allowed within the root zone of existing oak trees: year-round irrigation (no summer watering, unless “establishing” new tree or native compatible plants for up to three years); grading (includes cutting and filling of material); compaction (e.g., regular use of vehicles); placement of impermeable surfaces (e.g., pavement); disturbance of soil that impacts roots (e.g., tilling).
3. The applicant shall minimize trimming of oak trees to remain onsite. Removal of larger lower branches should be minimized to 1) avoid making tree top heavy and more susceptible to “blow-overs”, 2) reduce having larger limb cuts that take longer to heal and are much more susceptible to disease and infestation, 3) retain wildlife habitat values associated with the lower branches, 4) retain shade to keep summer temperatures cooler (retains higher soil moisture, greater passive solar potential, provides better conditions for oak seedling volunteers) and 5) retain the natural shape of the tree. The amount of trimming (roots or canopy) done in any one season shall be limited as much as possible to reduce

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tree stress/shock (ten percent or less is best, 25 percent maximum). If trimming is necessary, the applicant shall use a certified arborist when removing limbs. Unless a hazardous or unsafe situation exists, major trimming shall be done only during the summer months. Trimming greater than 25% of the canopy or roots would be considered an 'impacted tree' and shall be mitigated per the OTRPP measures described above.

### BIO-11

**Erosion and Sediment BMPs.** The following erosion and sedimentation control BMPs are required to be implemented during vegetation removal, tract improvements, during individual lot construction, and after the construction phases of the project. BMPs shall be listed on all tract improvement plans:

1. If possible, the potential for erosion and sedimentation shall be minimized by scheduling construction to occur outside of the rainy season, which is typically defined as October 15 through April 15.
2. To minimize site disturbance, all construction related equipment shall be restricted to established roads, construction areas, and other designated staging areas.
3. **Prior to any site disturbance, a Sediment and Erosion Control Plan shall be prepared by a qualified engineer.** The use of silt fence, straw wattles, erosion control blankets, straw bales, sandbags, fiber rolls, and other appropriate techniques should be employed to protect the drainage features on and off the property. Biotechnical approaches using native vegetation shall be used as feasible. All areas with soil disturbance shall have appropriate erosion controls and other stormwater protection BMPs installed to prevent erosion potential. All sediment and erosion control measures shall be installed per the engineer's requirements prior to the initiation of site grading if planned to occur within the rainy season.
4. Spill kits shall be maintained on the site, and a Spill Response Plan shall be in place.
5. No vehicles or equipment shall be refueled within 100 feet of wetland areas, riparian habitat and/or drainage features, and refueling areas shall have a spill containment system installed. No vehicles or construction equipment shall be stored overnight within 100 feet of these areas unless drip pans or ground covers are used. All equipment and vehicles shall be checked and maintained on a daily basis to ensure proper operation and to avoid potential leaks or spills. Construction staging areas shall be located in a location where spills would not drain into aquatic habitats.
6. No concrete washout shall be conducted on the site outside of an appropriate containment system. Washing of equipment, tools, etc. should not be allowed in any location where the tainted water could enter onsite drainages.
7. The use of chemicals, fuels, lubricants, or biocides shall be in compliance with all local, state, and federal regulations. All uses of such compounds shall observe label and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other state and federal legislation.
8. All project-related spills of hazardous materials within or adjacent to the project site should be cleaned up immediately.
9. All areas with soil disturbance shall have appropriate erosion controls and other stormwater protection BMPs installed to prevent erosion potential. Silt fencing, erosion

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control blankets, straw bales, sandbags, fiber rolls, and/or other types of materials prescribed on the plan shall be implemented to prevent erosion and sedimentation. Biotechnical approaches using native vegetation shall be used as feasible.

- Areas with disturbed soils shall be restored under the direction of the project engineer in consultation with a qualified restoration ecologist as detailed above. Methods may include recontouring graded areas to blend in with existing natural contours, covering the areas with salvaged topsoil containing native seedbank from the site, and/or applying the native seed mix as described in the table below. Native seed mix shall be applied to the graded areas in the creek setback area through either direct hand seeding or hydroseeding methods. Seeding with the native erosion control seed mix should be provided on all disturbed soil areas prior to the onset of the rainy season (by October 15).

**Native Erosion Control Seed Mix**

Species	Application Rate (lbs/acre)
California Brome ( <i>Bromus carinatus</i> )	10
purple needlegrass ( <i>Stipa pulchra</i> )	5
tomcat clover ( <i>Trifolium wildenovii</i> )	5
six weeks fescue ( <i>Festuca microstachys</i> , formerly <i>Vulpia microstachys</i> )	5
<b>Total</b>	<b>25</b>

- BIO-12 Other Agency Permits.** Prior to implementing project activities that would divert, obstruct, alter, or discharge any material into Hondonada Creek or Arroyo Grande Creek, the applicant shall demonstrate to the County that all necessary approvals from the U.S. Army Corps of Engineers, the California Department of Fish and Wildlife, and the Central Coast Water Quality Control Board have been secured, or shall provide the County with documentation that such approvals are not required. In the event that these approvals require the applicant to provide compensatory mitigation for impacts to aquatic resources, the applicant shall comply with all conditions and requirements.

## V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Setting

The project is located in an area historically occupied by two Native American tribes, the northernmost subdivision of the Chumash, the Obispeño (after Mission San Luis Obispo de Tolosa), and the Salinan. However, the precise location of the boundary between the Chumashan-speaking Obispeño Chumash and their northern neighbors, the Hokaan-speaking Playanos Salinan, is currently the subject of debate, as those boundaries may have changed over time.

San Luis Obispo county possesses a rich and diverse cultural heritage and therefore has a wealth of historic and prehistoric resources, including sites and buildings associated with Native American habitation, Spanish missionaries, immigrant settlers, and military branches of the United States.

As defined by CEQA, a historical resource includes:

1. A resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR).
2. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant. The architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural records of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence.

Pursuant to CEQA, a resource included in a local register of historic resources or identified as significant in an historical resource survey shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

An Archaeological Inventory Study was conducted by Cultural Resource Management Services (CRMS; CRMS 2020) for the project in September 2020. A background search was conducted at the Central Coastal Information Center (CCIC) at the University of California, Santa Barbara and included a search of the State Historic Property Data Files, National Register of Historic Places, National Register of Determined Eligible Properties, California Historical Landmarks, California Points of Historical Interest, California Office of Historic Preservation (OHP) Archaeological Determinations of Eligibility, and Caltrans State and Local Bridge Surveys. The search revealed that there are no previously recorded resources within a 0.5-mile radius of the project area. In addition, background research included coordination with the Native American Heritage Commission (NAHC), which revealed that there are no previously recorded resources within a 0.5-mile radius of the project area. A field survey was conducted for the project on August 17, 2020. The field survey did not identify any prehistoric or historic archaeological features onsite.

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### Discussion

- (a) *Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?*

The project does not include the removal or demolition of existing structures that could be eligible for listing as a Historical Resource on local, state, and/or federal registers. Therefore, implementation of the proposed project is not anticipated to result in disturbance to historical resources and *no impact* would occur.

- (b) *Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?*

The project property consists of a 37.67-acre property in a region with high archaeological sensitivity. The project does not require onsite grading because grading operations have been previously conducted under a permit issued by HCD. Site and access improvements would result in 1.30 acres of ground disturbance. According to the Cultural Resources Report prepared for the project, although the project region is considered an area with high archaeological sensitivity, background research and intensive archaeological field surveys did not reveal any previous resource sites within the project site. Further archaeological studies are not necessary for the proposed project; however, in the event an unknown cultural resource is discovered during project activities, all work within the vicinity of the find must be halted until a qualified archaeologist is retained to evaluate the nature, integrity, and significance of the find in accordance with the County's LUO (22.10.040). Based on the limited earthwork required for the project and compliance with the County's LUO, potential impacts related to disturbance of archaeological resources would be *less than significant*.

- (c) *Disturb any human remains, including those interred outside of dedicated cemeteries?*

In the unlikely event that unknown human remains are uncovered during construction activities, the project would be required to comply with State of California Health and Safety Code Section 7050.5 and the County's LUO (22.10.040), which identifies the proper protocol for the inadvertent discovery of human remains. Based on the limited earthwork required for the project and required compliance with California Health and Safety Code and the County's LUO, impacts would be *less than significant*.

### Conclusion

According to the Cultural Resources Report prepared for the project, there are no known cultural resources located within the project area. The project would be required to comply with the County's LUO and the California Health and Safety Code in the unlikely event unknown cultural resources or human remains are discovered during project activities. Therefore, impacts would be less than significant, and no mitigation is required.

### Mitigation

No mitigation is necessary.

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### VI. ENERGY

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

#### Setting

##### Local Utilities

The Pacific Gas & Electric Company (PG&E) is the primary electricity provider for urban and rural communities within San Luis Obispo County. Approximately 50% of electricity provided by PG&E is sourced from renewable resources and an additional 43% is sourced from non-renewable GHG-free resources (PG&E 2021).

PG&E offers two programs through which consumers may purchase electricity from renewable sources: the Solar Choice program and the Regional Renewable Choice program. Under the Solar Choice program, a customer remains on their existing electric rate plan and pays a modest additional fee on a per kilowatt-hour (kWh) basis for clean solar power. The fee depends on the type of service, rate plan, and enrollment level. Customers may choose to have 50% or 100% of their monthly electricity usage to be generated via solar projects. The Regional Renewable Choice program enables customers to subscribe to renewable energy from a specific community-based project within PG&E's service territory. The Regional Renewable Choice program allows a customer to purchase between 25% and 100% of their annual usage from renewable sources.

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).

##### Local Energy Plans and Policies

The COSE establishes goals and policies that aim to reduce vehicle miles traveled (VMT), conserve water, increase energy efficiency and the use of renewable energy, and reduce GHG emissions. This element provides the basis and direction for the development of the County's EnergyWise Plan (EWP), which outlines in greater detail the County's strategy to reduce government and community-wide GHG emissions through a number of goals, measures, and actions, including energy efficiency and development and use of renewable energy resources.

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### *U.S. Department of Housing and Urban Development (HUD) Manufactured Home Construction and Safety Standards*

The U.S. Department of Housing and Urban Development (HUD) Manufactured Home Construction and Safety Standards sets standards for the design, construction, transportation, fire safety, heat-producing, and electrical systems of manufactured homes to be used as residential units. These include energy conservation standards based on the most recent version of the International Energy Conservation Code. The standards take into consideration the design and factory construction techniques of manufactured homes, are based on the climate zones established by HUD (rather than those established under the International Energy Conservation Code), and provide alternative practices that result in net estimated energy consumption equal to or less than the specified standards.

### *Vehicle Fuel Economy Standards*

In October 2012, the U.S. Environmental Protection Agency (USEPA) and the National Highway Traffic Safety Administration (NHTSA), on behalf of the U.S. Department of Transportation (USDOT), issued final rules to further reduce GHG emissions and improve corporate average fuel economy (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 (mpg) limiting vehicle emissions to 163 grams of carbon dioxide (CO<sub>2</sub>) 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 USEPA's final agency action, and the USEPA intends to initiate rulemaking to adopt new standards. Until that rulemaking has been completed, the current standards remain in effect.

As part California's overall approach to reducing pollution from all vehicles, the CARB has established standards for clean gasoline and diesel fuels and fuel economies of new vehicles. CARB has also put in place innovative programs to drive the development of low-carbon, renewable, and alternative fuels, such as their Low Carbon Fuel Standard (LCFS) Program pursuant to California Assembly Bill (AB) 32 and the Governor's Executive Order S-01-07.

In January 2012, the 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

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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).

All self-propelled off-road diesel vehicles 25 horsepower (hp) or greater used in California and most two-engine vehicles (except on-road two-engine sweepers) are subject to the CARB's Regulation for In-Use Off-Road Diesel Fueled Fleets (Off-Road regulation). This includes vehicles that are rented or leased (rental or leased fleets). The overall purpose of the Off-Road regulation is to reduce emissions of NO<sub>x</sub> and particulate matter from off-road diesel vehicles operating within California through the implementation of standards including, but not limited to, limits on idling, reporting and labeling of off-road vehicles, limitations on use of old engines, and performance requirements.

### *Discussion*

- (a) *Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Future construction activities would require the use of energy in the form of electricity, diesel fuel and gasoline for worker and construction vehicles and equipment. Future construction activities would be subject to State and local diesel idling restrictions and other equipment standards. Therefore, construction activity is not anticipated to result in wasteful, inefficient, or unnecessary consumption of energy resources.

Future buildout of the proposed project would result in nine new mobile home units, (total of 26 residential units onsite), and potential accessory structures that would be regulated by the HUD Manufactured Home Construction and Safety Standards. The project would source energy from PG&E, which sources 50% of electricity from renewable resources, 4% is sourced from hydroelectric power, and an additional 39% is sourced from nuclear resources (PG&E 2021). Operation of the project is not anticipated to result in environmental impacts due to wasteful or otherwise inefficient use of energy during project construction or operation; therefore, impacts would be *less than significant*.

- (b) *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Proposed construction activities would require the use of energy in the form of diesel fuel and gasoline for worker and construction vehicles and equipment. Future construction activities would be subject to State and local diesel idling restrictions and other equipment standards. Therefore, future construction activity is not anticipated to result in wasteful or inefficient energy use, which would be consistent with applicable renewable energy plans.

In order to be compliant with the County's COSE and EWP, the project would be required to reduce GHG emissions where feasible in energy consumption. The project would source energy from PG&E, which sources 50% of electricity from renewable resources, 4% is sourced from hydroelectric power, and an additional 39% is sourced from nuclear resources (PG&E 2021). By utilizing PG&E for electricity, 100% of the project's electricity demand would be sourced from GHG-free energy sources. The project would also comply with the HUD Manufactured Home Construction and Safety Standards Act, including energy conservation measures and is not anticipated to result in wasteful use of energy. Therefore, the project would be compliant with applicable energy efficiency plans and impacts would be *less than significant*.

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### Conclusion

The project would not result in a wasteful, inefficient, or unnecessary consumption of energy resources during short-term construction or long-term operation and would not conflict with state or local renewable energy or energy efficiency plans. Therefore, potential impacts related to energy would be less than significant and mitigation measures are not necessary.

### Mitigation

No mitigation is necessary.

## VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) Landslides?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(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 off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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 swater?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Setting

The Alquist-Priolo Earthquake Fault Zoning Act is a California state law that was developed to regulate development near active faults and mitigate the surface fault rupture potential and other hazards. The act identifies active earthquake fault zones and restricts building habitable structures over known active or potentially active faults. San Luis Obispo County is located in a geologically complex and seismically active region. The *County of San Luis Obispo General Plan Safety Element* identifies three active faults that traverse through the county and that are currently zoned under the act: the San Andreas, the Hosgri-San Simeon, and the Los Osos. The San Andreas Fault zone is located along the eastern border of San Luis Obispo County and has a length of over 600 miles. The Hosgri-San Simeon fault system generally consists of two fault zones: the Hosgri fault zone that is mapped off of the San Luis Obispo County coast; and the San Simeon fault zone, which appears to be associated with the Hosgri, and comes onshore near the pier at San Simeon Point. Lastly, the Los Osos Fault zone has been mapped generally in an east/west orientation along the northern flank of the Irish Hills. The project site is located 1.56 miles southwest of the Los Osos fault zone, 2.87 miles southwest of the West Huasna fault zone, and 2.57 miles northeast of the Wilmar Avenue fault (DOC 2015).

The County Safety Element also identifies 17 other faults that are considered potentially active or have uncertain fault activity in the County. The County Safety Element establishes policies that require new development to be located away from active and potentially active faults, that the County enforce applicable building codes relating to seismic design of structures, and that the County require design professionals to evaluate the potential for liquefaction or seismic settlement to impact structures in accordance with the Uniform Building Code.

Ground shaking refers to the motion that occurs in response to local and regional earthquakes. Seismic ground shaking is influenced by the proximity of the site to an earthquake fault, the intensity of the seismic event, and the underlying soil composition. Ground shaking can endanger life and safety due to damage or collapse of structures or lifeline facilities. The HUD Manufactured Home Construction and Safety Standards and California Code of Regulations Title 25 includes requirements that units be designed to resist a certain minimum seismic force resulting from ground motion.

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The County LUO identifies a Geologic Study Area (GSA) combining designation for areas where geologic and soil conditions could present new developments and/or their occupants with potential hazards to life and property. The project site is not located within the LUO Geologic Study Area (GSA) combining designation. Landslides and slope instability can occur as a result of wet weather, weak soils, improper grading, improper drainage, steep slopes, adverse geologic structure, earthquakes, or a combination of these factors. Liquefaction is the sudden loss of soil strength due to a rapid increase in soil pore water pressures resulting from ground shaking during an earthquake. The project site is located in an area with moderate to high landslide potential and low liquefaction potential (County of San Luis Obispo 2016).

Shrink/swell potential is the extent to which the soil shrinks as it dries out or swells when it gets wet. Extent of shrinking and swelling is influenced by the amount and kind of clay in the soil. Shrinking and swelling of soils can cause damage to building foundations, roads, and other structures. A high shrink/swell potential indicates a hazard to maintenance of structures built in, on, or with material having this rating. Moderate and low ratings lessen the hazard accordingly. Based on the NRCS Soil Survey of the project site, the project is in an area with soils with a low potential for shrink swell (DOC 2016).

The County COSE identifies a policy for the protection of paleontological resources from the effects of development by avoiding disturbance where feasible. Where substantial subsurface disturbance is proposed in paleontologically sensitive units, Implementation Strategy CR 4.5.1 (Paleontological Studies) requires a paleontological resource assessment and mitigation plan be prepared, to identify the extent and potential significance of resources that may exist within the proposed development and provide mitigation measures to reduce potential impacts to paleontological resources.

A Geotechnical Engineering Report (2013) and a Percolation Data Report (2010) were prepared by Mid-Coast Geotechnical, Inc. (MCG) for the project. The reports include recommendations for development of future residential buildings and installation of septic infrastructure.

### *Discussion*

(a) *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*

(a-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.*

The project site is located approximately 1.66 miles west of the Los Osos fault zone, which is an Alquist-Priolo Earthquake Fault. Although the project site is located near the Los Osos fault zone, there are no fault lines that directly underlay the project site. Therefore, rupture of a known earthquake fault would not occur under the project site and impacts would be *less than significant*.

(a-ii) *Strong seismic ground shaking?*

The central coast is a seismically active region and there is always potential for seismic activity. The project site is located 1.66 miles west of the Los Osos fault zone, 2.87 miles southwest of the West Huasna fault zone, and 2.57 miles northeast of the Wilmar Avenue fault (DOC 2015). The project would be required to comply with HUD Manufactured Home Construction and Safety Standards and California Code of Regulations Title 25 and other engineering practices and standards to adequately withstand and minimize the risk associated with the level of seismic ground shaking expected to

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occur in the project region; therefore, impacts associated with strong seismic ground shaking would be *less than significant*.

(a-iii) *Seismic-related ground failure, including liquefaction?*

According to the Geotechnical Engineering Report by MCG, based on the presence of shallow sandstone and lack of groundwater, the project site has low potential for liquefaction (MCG 2013). Based on existing site conditions, risk of loss death and injury due to liquefaction is not anticipated. The project would be required to comply with HUD Manufactured Home Construction and Safety Standards and California Code of Regulations Title 25 to address the site's potential for seismic-related ground failure, including liquefaction. Therefore, impacts would be *less than significant*.

(a-iv) *Landslides?*

According to the County's Safety Element Maps, the project site has a moderate to high potential for landslides. Geotechnical reports identified necessary building design features to be incorporated based on existing site conditions including landslide risk. The project would be required to comply with applicable sections of the HUD Manufactured Home Construction and Safety Standards and California Code of Regulations Title 25 to minimize the risk associated with landslide. However, in order mitigate risk from landslide, Mitigation Measures GEO-1 through GEO-5, which specify drainage requirements and site-specific geology reports, are required. With implementation of these measures, impacts would be *less than significant with mitigation*.

(b) *Result in substantial soil erosion or the loss of topsoil?*

Onsite grading operations for six mobile home units were previously conducted under a permit issued by the State HCD. Remaining site improvements would result in 1.30 acres of ground disturbance. Implementation and buildout of off-site improvements would result in a slight increase of soil erosion and loss of topsoil during construction activity. The project would disturb more than one acre of soil and would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) with best management practices (BMPs) under the National Pollution Discharge Elimination System (NPDES). Mitigation Measure BIO-11 identifies BMPs to be included to reduce the potential for increased erosion and sediment during project activities. Preparation and approval of an Erosion and Sedimentation Control Plan is required for all construction and grading projects (LUO 22.52.120) to minimize potential impacts related to erosion, sedimentation, and siltation. The plan would be prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. Therefore, impacts would be *less than significant with mitigation*.

(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 off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

According to the USGS Areas of Land Subsidence in California Map, the project site is not located in an area with known subsidence (USGS 2021). The project site is located in an area with moderate to high landslide potential and low liquefaction potential (County of San Luis Obispo 2016). The Geotechnical Engineering Report by MCG has identified building design features that should be incorporated during construction of building pads and other future development activities to reduce risk associated with development on existing site conditions. Mitigation Measure GEO-6 requires the project to implement the building design recommendations from the Geotechnical Engineering

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Report (MCG 2013). Further, the project would be required to comply with Mitigation Measures GEO-1 through GEO-5 to adequately withstand and minimize risk associated with potential ground-failure events; therefore, impacts would be *less than significant with mitigation*.

- (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?*

Typically, expansive soils are comprised of clay or clay materials. The project site is underlain by sandy soil with a low shrink-swell potential (MCG 2013). Therefore, future development would not be located on expansive soil and *no impact* would occur.

- (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?*

The project includes the installation of individual septic tanks and new leach fields. According to the Percolation Data Report by Mid-Coast Geotechnical, Inc. (MCG 2010), soils at the project site are capable of supporting the proposed leach line method for wastewater disposal in accordance with County standards (MCG 2010). In addition, wastewater infrastructure would be required to comply with County and applicable sections of the HUD Manufactured Home Construction and Safety Standards and California Code of Regulations Title 25 to minimize the risk associated with landslide and design standards. Based on existing soil conditions and required compliance, impacts would be *less than significant*.

- (f) *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

The project site is underlain by the Monterey formation, which has a high paleontological sensitivity (SWCA 2003). The project does not require substantial grading or excavation because grading operations for residential development was completed under a permit issued by HCD. Limited quantities of ground disturbance are required for the expansion and installation of the septic leach field, wastewater lines, and development of the proposed private driveway within the previously graded area. Wastewater line trenches would be 36 inches deep and due to the previously graded conditions, are not anticipated to uncover any paleontological resources. Other improvements would not require deep cuts that could result in disturbance to unknown paleontological resources onsite. Therefore, impacts would be *less than significant*.

### Conclusion

The project would be required to comply with HUD Manufactured Home Construction and Safety Standards and California Code of Regulations Title 25 requirements which have been developed to properly safeguard against seismic hazards. The project would be required to implement Mitigation Measure GEO-1 through GEO-6 to adequately withstand and minimize potential risks related to existing site conditions, landslides, and other potential ground failure events. Additionally, the project would be required to comply with the County's LUO and prepare a SWPPP with BMPs and an Erosion and Sedimentation Control Plan to account for short- and long-term erosion from the project. The project site would be capable of supporting the proposed septic system. Additionally, the project is not anticipated to encounter paleontological resources. Therefore, upon implementation of the identified mitigation measures, impacts would be less than significant.

### Mitigation

Implement Mitigation Measure BIO-11.

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- GEO-1 At the time of application for grading permits or prior to installation of new units**, the applicant shall provide a drainage plan to the County that directs surface water not be concentrated on unprotected surface deposits at any unit or lease area. Concentrated surface water shall be directed to protected areas and allowed to infiltrate where surface water has been concentrated from upslope sources. No discharge across steep slopes of ravines, swales, and erodible alluvial soils is allowed.
- GEO-2 Prior to installation of new units**, unless required otherwise by the California Department of Housing and Community Development (HCD) individual engineering geology and geotechnical engineering shall be prepared. Borings and geologic cross sections shall be prepared for each unit. Recommendations in the reports shall be implemented as requirements.
- GEO-3 Prior to occupancy of new units**, flow from downspouts be conveyed in pipes that discharge in areas a safe distance away from structures (distance shall be specified in the lot-specific reports required by GEO-2).
- GEO-4 During project construction**, unless required otherwise by the California Department of Housing and Community Development (HCD), excavations and other earthwork involved in initial and subsequent phases of construction shall be monitored by a registered Geotechnical Engineer or Engineering Geologist and documentation of work shall be provided to County bimonthly. Leach field design and location, roadway alignment, cut and fill slopes, final grading plans, and drainage plans, shall be reviewed by Geotechnical Engineer or Engineering Geologist. The Geotechnical Engineer or Engineering Geologist shall check with conformance of the Engineering Geology Report and modify recommendations where necessary to address unforeseen geologic conditions.
- GEO-5 During project construction**, all slope surfaces shall be hydroseeded or revegetated, erosion control blankets shall be installed on slopes, and lined V-ditches shall be constructed above all cut and fill slopes. The Geotechnical Engineer or Engineering Geologist shall provide documentation of completion to County.
- GEO-6 Geotechnical Engineering Report. During project construction**, unless otherwise required by the California Department of Housing and Community Development (HCD), all design measures and recommendations included in the Geotechnical Engineering Report (MCG 2013) shall be implemented into the final project design. A qualified professional shall verify via signature or stamp that the plans incorporate the recommendations from the Geotechnical Engineering Report (MCG 2013).

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### VIII. GREENHOUSE GAS EMISSIONS

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

#### Setting

Greenhouse gasses (GHGs) are any gases that absorb infrared radiation in the atmosphere. The primary GHGs that are emitted into the atmosphere as a result of human activities are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrogen oxides (NO<sub>x</sub>), and fluorinated gases. These are most commonly emitted through the burning of fossil fuels (oil, natural gas, and coal), agricultural practices, decay of organic waste in landfills, and a variety of other chemical reactions and industrial processes (e.g., the manufacturing of cement). Carbon dioxide (CO<sub>2</sub>) is the most abundant GHG and is estimated to represent approximately 80–90% of the principal GHGs that are currently affecting the earth’s climate. According to the California Air Resources Board (CARB), transportation (vehicle exhaust) and electricity generation are the main sources of GHGs in the state.

In October 2008, the CARB published the *Climate Change Proposed Scoping Plan*, which is the state’s plan to achieve GHG reductions in California required by Assembly Bill (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.

Senate Bill (SB) 32 and Executive Order (EO) S-3-05 extended the state’s GHG reduction goals and require CARB to regulate sources of GHGs to meet the following goals:

- Reduce GHG emissions to 1990 levels by 2020;
- Reduce GHG emissions to 40% below 1990 levels by 2030;
- Reduce GHG emissions to 80% below 1990 levels by 2050.

The initial Scoping Plan was first approved by CARB on December 11, 2008, and is updated every 5 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) toward reaching the 2050 goals. The most recent update released by CARB is the 2017 Climate Change Scoping Plan, which was released in November 2017. The 2017 Climate Change

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Scoping Plan incorporates strategies for achieving the 2030 GHG-reduction target established in SB 32 and EO S-3-05.

When assessing the significance of potential impacts for CEQA compliance, an individual project's GHG emissions will generally not result in direct significant impacts because the climate change issue is global in nature. However, an individual project could be found to contribute to a potentially significant cumulative impact. Projects that have GHG emissions above the noted thresholds may be considered cumulatively considerable and require mitigation. Accordingly, in March 2012, the SLOAPCD approved thresholds for GHG impacts which were incorporated into their 2012 CEQA Air Quality Handbook. The Handbook recommended applying a 1,150 MTCO<sub>2e</sub> per year Bright Line Threshold for commercial and residential projects and included a list of general land uses and estimated sizes or capacities of uses expected to exceed this threshold. According to the SLOAPCD, this threshold was based on a 'gap analysis' and was used for CEQA compliance evaluations to demonstrate consistency with the state's GHG emission reduction goals associated with AB32 and the 2008 Climate Change Scoping Plan which have a target year of 2020. However, in 2015, the California Supreme Court issued an opinion in the case of *Center for Biological Diversity vs California Department of Fish and Wildlife* ("Newhall Ranch") that determined that AB 32 based thresholds derived from a gap analysis are invalid for projects with a planning horizon beyond 2020. Since the bright-line and service population GHG thresholds in the Handbook are AB 32 based, and project horizons are now beyond 2020, the SLOAPCD no longer recommends the use of these thresholds in CEQA evaluations. Instead, the following threshold options are recommended for consideration by the lead agency:

- Consistency with a Qualified Climate Action Plan: CAPs conforming to CEQA Guidelines § 15183 and 15183.5 would be qualified and eligible for project streamlining under CEQA.

The County of San Luis Obispo EnergyWise (EWP), adopted in 2011, serves as the County's GHG reduction strategy. The GHG-reducing policy provisions contained in the EWP were prepared for the purpose of complying with the requirements of AB 32 and achieving the goals of the AB 32 Scoping Plan, which have a horizon year of 2020. Therefore, the EWP is not considered a qualified GHG reduction strategy for assessing the significance of GHG emissions generated by projects with a horizon year beyond 2020.

- No-net Increase: The 2017 Scoping Plan states that no-net increase in GHG emissions relative to baseline conditions "*is an appropriate overall objective for new development*" consistent with the Court's direction provided by the Newhall Ranch case. Although a desirable goal, the application of this threshold may not be appropriate for a small project where it can be clearly shown that it will not generate significant GHG emissions (i.e., *de minimis*: too trivial or minor to merit consideration).
- Lead Agency Adopted Defensible GHG CEQA Thresholds: Under this approach, a lead agency may establish SB 32-based local operational thresholds. As discussed above, SB 32 requires the state to reduce GHG levels by 40 percent below 1990 levels by the year 2030. According to the *California Greenhouse Gas Emissions for 2000 to 2017, Trends of Emissions and Other Indicators* published by the California Air Resources Board, emissions of GHG statewide in 2017 were 424 million MMTCO<sub>2e</sub>, which was 7 million MTCO<sub>2e</sub> below the 2020 GHG target of 431 MMTCO<sub>2e</sub> established by AB 32. Therefore, application of the 1,150 MTCO<sub>2e</sub> Bright Line Threshold in San Luis Obispo County, together with other local and State-wide efforts to reduce GHG emissions, proved to be an effective approach for achieving the reduction targets set forth by AB32 for the year 2020. It should be noted that the 1,150 MTCO<sub>2e</sub> per year Bright Line Threshold was based on the assumption that a project with the potential to emit less than 1,150 MTCO<sub>2e</sub> per year would result in impacts that are less than significant and less than cumulatively considerable impact and would be consistent with state and local GHG reduction goals.

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Since SB 32 requires the state to reduce GHG levels by 40 percent below 1990 levels by the year 2030, the application of an interim “bright line” SB32-based working threshold that is 40 percent below the 1,150 MMTCO<sub>2e</sub> Bright Line threshold ( $1,150 \times 0.6 = 690$  MMTCO<sub>2e</sub>) would be expected to produce comparable GHG reductions “in the spirit of” the targets established by SB32. Therefore, for the purpose of evaluating the significance of GHG emissions for a project after 2020, emissions estimated to be less than 690 MMTCO<sub>2e</sub> per year GHG are considered *de minimus* (too trivial or minor to merit consideration) and will have a less than significant impact that is less than cumulatively considerable and consistent with state and local GHG reduction goals.

### Discussion

- (a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

During construction, fossil fuels and natural gas would be used by construction vehicles and equipment. Federal and state regulations in place require fuel-efficient equipment and vehicles and prohibit wasteful activities, such as diesel idling. Construction contractors, in an effort to ensure cost efficiency, would not be expected to engage in wasteful or unnecessary energy and fuel practices.

Operational emissions would come from vehicle trips to and from the project site and residential energy use. Implementation of the project would result in nine new mobile home units. Energy for the project would be supplied by PG&E which sources approximately 50% of electricity from renewable resources and an additional 43% is sourced from non-renewable GHG-free resources (PG&E 2021).

GHG emissions were estimated using CalEEMod version 2020.4.0, which estimates emissions based on land use information input by the user. Per SLOAPCD guidance, the construction related GHG emissions are amortized over a 25-year period. Based on the CalEEMod reporting, the project is expected to generate 168.03 MTCO<sub>2e</sub>, which is less than the reduced Bright Line threshold identified above of 690 MTCO<sub>2e</sub>. The project is not anticipated to result in GHG-emissions that would exceed existing thresholds during construction activities; however, Mitigation Measure AQ-1 identifies diesel idling restrictions during construction activities that would further reduce potential GHG emissions during construction activities.

The project is not expected to generate construction-related GHGs and operational GHGs would not exceed existing interim thresholds and Mitigation Measure AQ-1 would further reduce construction-related GHG emissions; therefore, impacts would be *less than significant*.

- (b) *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Implementation of the project would result in nine new mobile home units within the Residential Suburban (RS) land use designation. Energy inefficiency contributes to higher GHG emissions and would which in turn may conflict with state and local plans for energy efficiency.

As discussed above, the EWP, adopted in 2011, serves as the County’s GHG reduction strategy. The GHG-reducing policy provisions contained in the EWP were prepared for the purpose of complying with the requirements of AB 32 and achieving the goals of the AB 32 Scoping Plan, which have a horizon year of 2020. The policy provisions are divided into community-wide measures and measures aimed at reducing GHG emissions associated with County operations. The GHG reduction measures contained in the EWP are generally programmatic and intended to be implemented at the

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community level. Measure No. 7 encourages energy efficient new development and provides incentives for new development to exceed CALGreen energy efficiency standards.

The 2019 RTP, which was adopted by the SLOCOG Board in June 2019, includes the region's Sustainable Communities' Strategy and outlines how the region will meet or exceed its GHG reduction targets by creating more compact, walkable, bike-friendly, transit-oriented communities, preserving important habitat and agricultural areas, and promoting a variety of transportation demand management and system management tools and techniques to maximize the efficiency of the transportation network. The RTP and SCS provide guidance for the development and management of transportation systems county-wide to help achieve, among other objectives, GHG reduction goals. The RTP/SCS recommend strategies for community planning such as encouraging mixed-use, infill development that facilitate the use of modes of travel other than motor vehicles.

The project consists of the development of rural residential mobile home units within the Residential Suburban land use designation. As discussed in Section III, Air Quality, the project does not include development of retail, business, or commercial uses that would be open to the public, therefore, land use planning strategies such as mixed-use development and planning compact communities are generally not applicable. The project would result in the establishment of activities that are residential in nature and would not result in employment opportunities or a substantial population increase in the project area.

Pursuant to AB 32, the California Air Resources Board (CARB or Board) prepared and adopted the initial Scoping Plan to *"identify and make recommendations on direct emissions reductions measures, alternative compliance mechanisms, market-based compliance mechanisms, and potential monetary and non-monetary incentives"* in order to achieve the 2020 goal, and to achieve *"the maximum technologically feasible and cost-effective GHG emissions reductions"* by 2020 and maintain and continue reductions beyond 2020. AB 32 requires CARB to update the Scoping Plan at least every five years.

The 2017 Climate Change Scoping Plan recommends strategies for achieving the 2030 GHG-reduction target established in SB 32 and EO S-3-05. These strategies include the following:

- Implement SB350 which is aimed at Reduce GHG emissions in the electricity sector;
- 2030 Low Carbon Fuel Standard (LCFS) -- Transition to cleaner/less-polluting fuels that have a lower carbon footprint.
- 2030 Mobile Source Strategy (Cleaner Technology and Fuels [CTF] Scenario) -- Reduce GHGs and other pollutants from the transportation sector through transition to zero-emission and low-emission vehicles, cleaner transit systems and reduction of vehicle miles traveled.
- Implement SB 1383 which is aimed at reducing Short-Lived Climate Pollutants to reduce highly potent GHGs.
- Implement the 2030 California Sustainable Freight Action Plan aimed at improving freight efficiency, transition to zero emission technologies, and increase competitiveness of California's freight system.
- Implement the 2030 Post-2020 Cap-and-Trade Program which is aimed at reducing GHGs across the largest GHG emissions sources.

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The strategies described in the 2017 Scoping Plan are programmatic and intended to be implemented state-wide and industry wide. They are therefore not applicable at the level of an individual project. However, as discussed in Section XVII, Transportation, the project is not expected to generate a significant increase in construction-related or operational traffic trips or Vehicle Miles Traveled (VMT) which is consistent with Scoping Plan strategies for reducing vehicle miles traveled and transportation-related GHG emissions. Overall, the project is consistent with adopted plans and policies aimed at reducing GHG emissions and impacts would be *less than significant*.

### Conclusion

Implementation and buildout of the proposed project would result in additional residential and mobile home units on the project site. The project would be compliant with GHG reduction standards during construction and operation through compliance with diesel idling restrictions, green building standards, and applicable GHG-reduction strategies. Mitigation Measure AQ-1 would further reduce construction-related GHG emissions through specific diesel idling restrictions. Therefore, impacts would be less than significant.

### Mitigation

No mitigation is necessary. Implementation of Mitigation Measure AQ-1 would further reduce GHG emissions.

## IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Setting

The Hazardous Waste and Substances Site List (Cortese List), which is a list of hazardous materials sites compiled pursuant to California Government Code (CGC) Section 65962.5, is a planning document used by the state, local agencies, and developers to comply with CEQA requirements related to the disclosure of information about the location of hazardous materials release sites. The project would not be in an area of known hazardous material contamination and is not on a site listed on the Cortese List (SWRCB 2015; California Department of Toxic Substance Control [DTSC] 2021).

Based on the SLOAPCD NOA screening map, the project is not located in an area with potential for soils containing naturally occurring asbestos (SLOAPCD 2021).

The County has adopted general emergency plans for multiple potential natural disasters, including the Local Hazard Mitigation Plan, County Emergency Operations Plan, Earthquake Plan, Dam and Levee Failure Plan, Hazardous Materials Response Plan, County Recovery Plan, and Tsunami Response Plan.

The California Health and Safety Code provides regulations pertaining to the abatement of fire-related hazards and requires that local jurisdictions enforce the California Building Code, which provides standards for fire resistive building and roofing materials, and other fire-related construction methods. The Safety Element of the County of San Luis Obispo General Plan provides a Fire Hazard Zones Map that indicates unincorporated areas in the county within a high and very high Fire Hazard Severity Zones (FHSZs). The project would be located within the State Responsibility Area in a high FHSZ. Emergency response time to

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the project site is less than 10-18 minutes. For more information about fire-related hazards and risk assessment, see Section XX, Wildfire.

### Discussion

- (a) *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Project construction would require the use of limited quantities of hazardous substances (e.g., gasoline, diesel fuel, hydraulic fluid, solvents, oils, paints, etc.). Construction contractors would be required to comply with applicable federal and state environmental and workplace safety laws for the handling of hazardous materials, including response and clean-up requirements for any minor spills. Therefore, proposed construction activity is not anticipated to result in hazard to the public due to routine transport, use, or disposal of hazardous materials.

Operation of the project is not expected to require routine transport, use, or disposal of hazardous materials that would lead to significant upset in the event of an accidental spill. The project would result in the operation of 26 mobile home units that would generate common household waste. Household waste would be stored and hauled in accordance with County regulations; therefore, impacts would be *less than significant*.

- (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?*

As described above, future construction of the proposed project is anticipated to require use of limited quantities of hazardous substances, including gasoline, diesel fuel, hydraulic fluid, solvents, oils, paints, etc. Construction contractors would be required to comply with applicable federal and state environmental and workplace safety laws for the handling of hazardous materials, including response and clean-up requirements for any minor spills. The project does not require demolition that could release asbestos containing material (ACM) or other potential hazards. Due to the proximity of the ephemeral drainage, Mitigation Measure BIO-11 has been included to identify construction BMPs to reduce the potential for project activities to result in increased pollution or an accidental spill during any construction-related activities. Operation of the project does not require the use of hazardous materials or volatile substances that would result in a significant risk of upset or accidental release conditions. Project construction and operation are not anticipated to result in hazard caused by hazardous materials spill; therefore, impacts would be *less than significant with mitigation*.

- (c) *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

The nearest school is Branch Elementary School, located 1.2 miles southeast of the project site. Branch Elementary School is not located within one-quarter mile of the project site; therefore, *no impact* would occur.

- (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?*

According to the SWRCB GeoTracker database and DTSC EnviroStor database, the project is not located in an area of known hazardous material contamination and is not on a site listed on the

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“Cortese List” pursuant to Government Code Section 65962.5 (SWRCB 2015; DTSC 2021). Therefore, the project would not be located on a known hazardous materials site and *no impact* would occur.

- (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?*

The project is not located within an airport land use plan and is not located within two miles of an airport. Therefore, there would be no risk of exposing persons to a safety hazard or excessive noise from the operation of the airport and *no impact* would occur.

- (f) *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Future construction activities may include temporary traffic controls along nearby roadways; however, the project does not require road closures and emergency access would be available during construction activities. Additionally, the project would be required to comply with CAL FIRE/County Fire recommendations for site access and building design; therefore, impacts would be *less than significant*.

- (g) *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

According to Cal Fire, the project site is located in a high and very high fire hazard severity zone (FHSZ) within a State Responsibility Area (SRA) (CAL FIRE 2021). According to the CAL FIRE/County Fire referral response letter, emergency response time to the project site is 10 to 18 minutes. Implementation of the proposed project would result in the development of nine new mobile home units within a high and very high fire hazard severity zone. Future development would be required to comply with CAL FIRE/County Fire recommendations for roads, access roads, driveways, building design, and creation of defensible space; therefore, impacts would be *less than significant*.

### Conclusion

Future construction and operational activities would require the use of acutely hazardous substances and are not anticipated to result in hazardous spill that would cause significant hazard or risk to the public. Mitigation Measure BIO-11 has been included to avoid or minimize potential for accidental hazardous materials spill during project construction. There are no known hazardous materials sites on the project property. The project site is not located within one-quarter mile of a school and is located more than 2-miles away from the nearest airport. The project would result in future development within a high and very high FHSZ and would be subject to CAL FIRE/County Fire, County, and HUD Manufactured Home Construction and Safety Standards and California Code of Regulations Title 25 standards for development within a high and very high FHSZ. Therefore, impacts would be less than significant with mitigation.

### Mitigation

Implement Mitigation Measure BIO-11.

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### X. HYDROLOGY AND WATER QUALITY

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

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### *Setting*

The RWQCB Water Quality Control Plan for the Central Coast Basin (Basin Plan; RWQCB 2019) describes how the quality of surface water and groundwater in the Central Coast Region should be managed to provide the highest water quality reasonably possible. The Basin Plan outlines the beneficial uses of streams, lakes, and other water bodies for humans and other life. There are 24 categories of beneficial uses, including, but not limited to, municipal water supply, water contact recreation, non-water contact recreation, and cold freshwater habitat. Water quality objectives are then established to protect the beneficial uses of those water resources. The RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements to individuals, communities, or businesses whose discharges can affect water quality.

The LUO dictates which projects are required to prepare a drainage plan, including any project that would, for example, change the runoff volume or velocity leaving any point of the site, result in an impervious surface of more than 20,000 square feet, or involve hillside development on slopes steeper than 10 percent. Preparation of a drainage plan is not required where grading is exclusively for an exempt agricultural structure, crop production, or grazing. The LUO also dictates that an erosion and sedimentation control plan is required year-round for all construction and grading permit projects and site disturbance activities of 0.5 acre or more in geologically unstable areas, on slopes steeper than 30 percent, on highly erodible soils, or within 100 feet of any watercourse.

Per the County's Stormwater Program, the County Department of Public Works is responsible for ensuring that new construction sites implement Best Management Practices (BMPs) during construction, and that site plans incorporate appropriate post-construction stormwater runoff controls. Construction sites that disturb 1 acre or more must obtain coverage under the SWRCB Construction General Permit. The Construction General Permit requires the preparation of a SWPPP to minimize on-site sedimentation and erosion. There are several types of projects that are exempt from preparing a SWPPP, including routine maintenance to existing developments, emergency construction activities, and projects exempted by the SWRCB or RWQCB. Projects that disturb less than 1 acre must implement all required elements within the site's erosion and sediment control plan as required by the LUO.

For planning purposes, the flood event most often used to delineate areas subject to flooding is the 100-year flood. The Safety Element of the County of San Luis Obispo General Plan establishes policies to reduce flood hazards and reduce flood damage, including, but not limited to, prohibition of development in areas of high flood hazard potential, discouragement of single-road access into remote areas that could be closed during floods, and review of plans for construction in low-lying areas. The project site is not located 120-feet northwest of the 100-year flood zone associated with Arroyo Grande Creek.

There are no surface water features located within the property; however, there is an unnamed drainage located along the western property boundary and Arroyo Grande Creek is located 260 feet southeast of the project site.

Two water supply assessments (Cleath-Harris Geologists, Inc., January 2015, Cleath-Harris Geologists, Inc., November 2015) were prepared for this project and included the subject project and cumulative proposed and potential development within the aquifer. This report was peer-reviewed by GSI Water Solutions, Inc. (May 2018). A response to the peer review was also provided (Cleath-Harris Geologists, Inc., July 2018).

### *Hydrogeography*

The project area is located within the South Coast water planning area, within the Guaya Canyon subwatershed of the Arroyo Grande Creek watershed. The southern-most portion of the project site (access road) is located within a non-adjudicated portion of the Santa Maria Groundwater Basin, as defined by the

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California Department of Water Resources (CA DWR). The remainder of the project site is not located within a CA DWR defined groundwater basin, and instead sits atop a fractured rock aquifer that is approximately 876 acres in size. The project's well field is located outside the Santa Maria Groundwater Basin boundary.

The important geologic formations that underlie the project vicinity include the Corbett Canyon Alluvium, fine to coarse sandstone of Pismo Formation Squire member, and fine-grained silty sandstone of the Pismo Formation Edna member. Pismo Formation outcrops are visible at the surface in many of the hills between Arroyo Grande Creek Valley and Price Canyon and contain the layers that serve as an aquifer for local domestic wells. Field observations by Cleath-Harris Geologists, Inc. confirmed Pismo Formation sandstones are present on the property site. (Cleath-Harris Geologists, Inc., 2016)

The local structure indicates the aquifer beneath the property deepens from north to south. The groundwater bearing sands and gravels tapped by the Sweet Springs MHP wells crop out on the edges of the Hondonada Road valley and at the sand and gravel quarry at the end of the road. The aquifer appears to subcrop beneath the Arroyo Grande Creek alluvium (Cleath-Harris Geologists, Inc., 2015). Based on the Water Supply Assessments prepared for this project, the extent of the aquifer appears to be limited by a fault boundary to the south, which could restrict the flow of groundwater from the vicinity of Hondonada Road area, and by the Corbett Canyon subwatershed to the west (Cleath-Harris Geologists, Inc., 2015). The limit of local groundwater to the north of Sweet Springs MHP is created by the aquifer becoming unsaturated because of the formations becoming shallower in the north due to dips in the Pismo formation (Cleath-Harris Geologists, Inc., 2015).

### *Discussion*

- (a) *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

The project area consists of relatively flat to steeply sloping topography on a 37.67-acre parcel. There is an unnamed drainage along the western property boundary and Arroyo Grande Creek is located approximately 260 feet southeast of the site. Future buildout of the project area would result in the development of nine new mobile home units (26 units total) and necessary site improvements. Onsite grading operations were previously conducted under a permit issued by the State HCD. Additional improvements for the proposed driveway and installation of septic infrastructure would result in 1.30 acres of ground disturbance, including 3,220 cubic yards of earthwork.

Future construction activity would require limited grading that has the potential to increase erosion and sedimentation onsite and the use of construction vehicles and equipment has the potential to increase pollution onsite that could runoff and result in degradation to nearby water features. The project would disturb 1.30 acres of soils and would be required to prepare a SWPPP which includes BMPs during project construction. Construction BMPs are identified in Mitigation Measure BIO-11 to reduce potential erosive and other polluted runoff. Preparation and approval of an Erosion and Sedimentation Control Plan is required for all construction and grading projects (LUO 22.52.120) to minimize potential impacts related to erosion, sedimentation, and siltation. The plan would be prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. Therefore, impacts would be *less than significant with mitigation*.

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- (b) *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Water for the project site would be supplied by two existing wells. Details regarding water quantity and water quality of the existing well are further discussed in Section XIX, Utilities and Service Systems, threshold (b).

A study of existing cumulative water supply conditions in the project vicinity found there is currently a water deficit of approximately 41-acre-feet-per-year (AFY) in the aquifer during drought conditions and a surplus of potential recharge during average precipitation years of 137 AFY (Cleath-Harris Geologists 2016). At the end of a drought period, the surplus water from average precipitation is available to replenish the decline from drought years, though the amount of recharge is dependent on how full the aquifer is. The total calculated existing outflow in the study area, which includes water use from existing developed parcels, agricultural activities, and uptake from deep-rooted plants (e.g. willows), was calculated to be 172 AFY. Recharge (inflow) into the aquifer is primarily from deep percolation of rainwater and from stormwater runoff, though domestic wastewater return (septic tanks and irrigation) also contributes to existing inflow (Cleath-Harris Geologists 2016). Based on well information from the Hondonada and Sweet Springs property wells, the groundwater levels within the region are declining at approximately one-foot-per-year during drought conditions, as measured between 2014 and 2016.

As discussed above, the property lies within the Pismo Formation, an area that is bounded by Price Canyon Road to the north and the Arroyo Grande Creek Valley to the south. The water balance study prepared for the project evaluates the effects of future development within the limits of the saturated Pismo Formation aquifer underlying the property. Cumulative foreseeable proposed development within the aquifer includes: the proposed project (anticipated in the water balance study as 6 single-family dwellings and 6 mobile homes [since revised to 9 mobile homes]), the proposed Mid-State Properties subdivision (anticipated in the water balance study as 12 single-family dwellings [since approved as 11 single-family dwellings]), the proposed Greenview Estates subdivision (anticipated in the water balance study as 21 single-family dwellings [since approved as 7 single-family dwellings]), and development of currently undeveloped lots in the area (anticipated as 12 single-family dwellings). The cumulative development scenario analyzed 50 new single-family dwellings and 11 new mobile homes within the aquifer. It should be noted that this project has since reduced their project to nine mobile homes units, Mid State Properties has since reduced their project to 11 single-family dwellings, and Greenview Estates has reduced their project to 7 single-family dwellings. While the actual projects are less than anticipated in the cumulative water assessment, the conclusions of the report are not significantly altered.

As discussed above, the existing outflow of the aquifer has been calculated at 172 AFY, and the existing inflow varies from 131 AFY and 309 AFY, depending on the amount of precipitation received each year. During drought years, the existing water deficit is 41 AFY. Development of the proposed project would result in an additional 4.5 AFY of water use, and full cumulative buildout of the aquifer as described above would result in an additional increase of approximately 33 AFY of water use. During drought years, the project would result in a water deficit of 45.8 AFY (a 4.8 AFY increase over existing conditions). Full cumulative buildout of the aquifer would result in a water deficit of 56 AFY (an additional 15 AFY deficit increase) and potential recharge would decrease by 15 AFY to 122 AFY due to increased domestic pumping. Table 2 below shows the water balance summary.

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**Table 2: Water Balance**

	Current Conditions (AF)		Buildout Conditions – This Project Only (AF)*		Buildout Conditions - Full Cumulative Development (AF)	
	Drought Year	Average Year	Drought Year	Average Year	Drought Year	Average Year
Outflow	172	172	176.5	176.5	205	205
Inflow	131	309	136.8	314.8	149	327
Water Balance with Recharge	-41	137	-45.8	132.2	-56	122

\* The Buildout Conditions for the Project Only were extrapolated from the Full Buildout data and were not calculated individually as part of the water studies prepared for this project.

Note: Data from Cleath-Harris Geologists 2016 (Table 2).

The results of this analysis imply that in a given drought year, or series of drought years, the groundwater system in the study area may have a deficit in which outflows exceed inflows. However, a water balance may be achieved over a longer time period, as groundwater surpluses from the average years equal or exceed the deficits from the drought years. Under the proposed buildout scenario, the amount of the average year surplus is about two times the amount of the drought year deficit, implying that the impacts of two years of drought in the study area would be offset by a single average year. Implications of the study are that during individual or successive drought years, a reduction of storage may occur, which may be observed in individual wells as a decline in water levels; however, over a multi-year time frame, conditions in the average years would replenish the depleted storage and water levels would likely recover (GSI 2018).

Based on the information available, there does not appear to be a long-term issue regarding water quality; during drought years some users may experience more problems than others given site specifics, but average years would be able to offset this. Implementation of drought-management plans would help balance the potential problems during drought years. Given the uncertainties with small water systems and the cumulative effectiveness of differing drought-management efforts, a broader water agency would be better able to balance the regional needs of the aquifer area.

Mitigation Measures USS-1 through USS-4 include drought reduction measures in order to preserve water quantity in the existing well. With implementation of drought reduction measures, the project is not anticipated to interfere with a sustainable groundwater management plan; therefore, impacts would be *less than significant with mitigation*.

(c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

(c-i) *Result in substantial erosion or siltation on- or off-site?*

Project construction would result in 1.30 acres of disturbance for implementation of the proposed driveway, sewer lines, and septic leach field onsite. Onsite grading has been previously completed under a permit issued by HCD. Construction activities have the potential to temporarily alter off-site drainage patterns. The project would disturb 1.30 acres of soil and would be required to prepare a

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SWPPP in accordance with the RWQCB. Mitigation Measure BIO-11 identifies erosion and sediment BMPs to be included to reduce potential erosive or other polluted runoff during project activities. The project would be required to comply with the County's LUO and prepare and implement an Erosion and Sedimentation Control Plan, which is required for all construction and grading projects (LUO 22.52.120) to minimize potential impacts related to erosion, sedimentation, and siltation. The plan would be prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. The project would be compliant with the County's LUO to further reduce erosive and polluted runoff that may result from limited quantities of earthwork required for the project. Therefore, impacts would be *less than significant with mitigation*.

(c-ii) *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

The project does not require work within or alteration of the existing drainage onsite that could result in on- or off-site flooding. Development of the 37.67-acre parcel would result in increased impervious surface area that could result in an increase in surface runoff from the site. The project would be required to prepare and implement an erosion and Sedimentation Control Plan in accordance with the County's LUO (22.52.120). The plan would be prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. Implementation of an Erosion and Sedimentation Control Plan would reduce short- and long-term pollutant that could runoff from the project site. The project site is not located within an MS4 stormwater coverage area and would disturb less than one-acre of soil. Therefore, impacts related to an increase in surface water would be *less than significant*.

(c-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?*

The project would result in the future development of nine new mobile home units, and expanded utility infrastructure and road improvements. Development of the 37.67-acre parcel would result in increased impervious surface area that could result in an increase in surface runoff. The project site is not located within the MS4 stormwater area; however, the project would be required to prepare and implement an Erosion and Sedimentation Control Plan, which is required for all construction and grading projects (LUO 22.52.120) to minimize potential impacts related to erosion, sedimentation, and siltation. The plan would be prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. The Erosion and Sedimentation Control Plan would account for long-term runoff from the project area in order to reduce potential pollutants from increased surface runoff; therefore, impacts would be *less than significant*.

(c-iv) *Impede or redirect flood flows?*

The southeastern portion of the project site is located approximately 155-feet from an identified flood zone associated with Arroyo Grande Creek; however, the project site is not located within an identified flood zone. Implementation of the proposed project does not require work within or alteration of the existing drainage or Arroyo Grande Creek that could increase the amount of runoff and result in flooding. Existing facilities and drainages would be able to adequately support potential flood flows; therefore, impacts would be *less than significant*.

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(d) *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

The project site is not located in a 100- or 500-year flood zone and is not at risk for tsunami or seiche. The nearest 100-year flood zone is associated with Arroyo Grande Creek and is located approximately 155 feet southeast of the site (San Luis Obispo County 2016). Due to the project’s location and existing conditions, there is low potential for pollutant release due to project inundation; therefore, impacts would be *less than significant*.

(e) *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

As discussed above, implementation of the project would be required to comply with the County’s LUO and prepare an Erosion and Sedimentation Control Plan. In addition, implementation of Mitigation Measures USS-1 through USS-4 would ensure that the project would not interfere with a basin management plan. Therefore, based on compliance with existing regulations and implementation of the identified mitigation measures, impacts would be *less than significant with mitigation*.

### Conclusion

Future construction activities are not anticipated to increase erosion, sedimentation, and pollution based on implementation of an Erosion and Sedimentation Control Plan in accordance with the County’s LUO (22.52.120). The project site is not located in an area with risk of flooding, tsunami, or seiche. Implementation of Mitigation Measures USS-1 through USS-4 would ensure the project does not interfere with groundwater management of the existing well. Therefore, impacts related to hydrology and water quality would be less than significant with mitigation.

### Mitigation

Implement Mitigation Measure USS-1 through USS-4.

## XI. LAND USE AND PLANNING

	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<i>Would the project:</i>				
(a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(f) 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Setting

The County LUE provides policies and standards for the management of growth and development in each unincorporated community and rural areas of the county and serves as a reference point and guide for future land use planning studies throughout the county. The LUE identifies strategic growth principles to define and focus the county’s pro-active planning approach and balance environmental, economic, and social equity concerns. Each strategic growth principle correlates with a set of policies and implementation strategies that define how land will be used and resources protected. The LUE also defines each of the 14 land use designations and identifies standards for land uses based on the designation they are located within. The project area is designated for Rural Suburban land uses.

### Discussion

(a) Physically divide an established community?

The project would not result in the removal or blockage of existing public roadways or other circulation paths and would not otherwise include any features that would physically divide an established community; therefore, impacts would be *less than significant*.

(b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The project would be consistent with the property’s land use designation and the guidelines and policies for development within the applicable area plan, inland LUO, and COSE. The project was found to be consistent with standards and policies set forth in the County of San Luis Obispo General Plan, the South County Area Plan, the SLOAPCD CAP, and other land use policies for this area. The project would be required to be consistent with standards set forth by County Fire/CAL FIRE and the County Department of Public Works.

The project would be required to implement measures to mitigate potential impacts associated with Aesthetics, Air Quality, Biological Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, and Utilities and Service Systems; therefore, with mitigation, the project would not conflict with policies or regulations adopted for the purpose of avoiding or mitigating environmental effects and impacts would be *less than significant with mitigation*.

## Initial Study – Environmental Checklist

### Conclusion

Implementation of the proposed project would not physically divide an established community. Upon implementation of the mitigation measures identified throughout this document, the project would be consistent with the County’s LUO, COSE, General Plan, South County Area Plan, SLOAPCD CAP, and other applicable documents. Therefore, impacts would be less than significant upon implementation of the identified mitigation measures.

### Mitigation

Implement the mitigation measures identified throughout this document.

## XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Setting

The California Surface Mining and Reclamation Act of 1975 (SMARA) requires that the State Geologist classify land into mineral resource zones (MRZs) according to the known or inferred mineral potential of the land (California PRC Sections 2710–2796).

The three MRZs used in the SMARA classification designation process in the San Luis Obispo-Santa Barbara Production-Consumption Region are defined below (California Geological Survey [CGS] 2015):

- **MRZ-1:** Areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources.
- **MRZ-2:** Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists. This zone shall be applied to known mineral deposits or where well-developed lines of reasoning, based upon economic-geologic principles and adequate data, demonstrate that the likelihood for occurrence of significant mineral deposits is high.
- **MRZ-3:** Areas containing known or inferred aggregate resources of undetermined significance.

The LUO provides regulations for development in delineated Energy and Extractive Resource Areas (EX) and Extractive Resource Areas (EX1). The EX combining designation is used to identify areas of the county where:

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1. Mineral or petroleum extraction occurs or is proposed to occur;
2. The state geologist has designated a mineral resource area of statewide or regional significance pursuant to California PRC Sections 2710 et seq. (SMARA); and
3. Major public utility electric generation facilities exist or are proposed.

The purpose of this combining designation is to protect significant resource extraction and energy production areas identified by the LUE from encroachment by incompatible land uses that could hinder resource extraction or energy production operations, or land uses that would be adversely affected by extraction or energy production. The project area is not located within an EX or EX1 combining designation.

### *Discussion*

*(a-b) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

*Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

According to the California Department of Conservation CGS Information Warehouse: Mineral Land Classification map, the project site is not in close proximity to an active mine (DOC 2021). The county does not identify the property as an EX or EX1 zone (County of San Luis Obispo 2016). The project is not located within a designated mineral resource zone or within an Extractive Resource Area combining designation. The project is not expected to result in adverse impacts to mineral resources because there are no known mineral resources in the project area; therefore, *no impacts* would occur.

### *Conclusion*

Project activities would not disturb mineral resources because the project is not located within a designated mineral resource zone or within an Extractive Resource Area combining designation and there are no known mineral resources in the project area. Therefore, impacts would be less than significant, and no mitigation is necessary.

### *Mitigation*

No mitigation is necessary.

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### XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project result in:</i>				
(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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d) <i>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?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Setting

The Noise Element of the County of San Luis Obispo General Plan provides a policy framework for addressing potential noise impacts in the planning process. The purpose of the Noise Element is to minimize future noise conflicts. The Noise Element identifies the major noise sources in the county (highways and freeways, primary arterial roadways and major local streets, railroad operations, aircraft and airport operations, local industrial facilities, and other stationary sources) and includes goals, policies, and implementation programs to reduce future noise impacts. Among the most significant policies of the Noise Element are numerical noise standards that limit noise exposure within noise-sensitive land uses and performance standards for new commercial and industrial uses that might adversely impact noise-sensitive land uses.

Noise sensitive uses that have been identified by the County include the following:

- Residential development, except temporary dwellings
- Schools (preschool to secondary, college and university, and specialized education and training)
- Health care services (e.g., hospitals, clinics, etc.)
- Nursing and personal care
- Churches

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- Public assembly and entertainment
- Libraries and museums
- Hotels and motels
- Bed and breakfast facilities
- Outdoor sports and recreation
- Offices

All sound levels referred to in the Noise Element are expressed in A-weighted decibels (dBA). A-weighting deemphasizes the very low and very high frequencies of sound in a manner similar to the human ear.

The LUO establishes acceptable standards for exterior and interior noise levels and describe how noise shall be measured. Exterior noise level standards are applicable when a land use affected by noise is one of the sensitive uses listed in the Noise Element. Exterior noise levels are measured from the property line of the affected noise-sensitive land use.

**Table 3. Maximum Allowable Exterior Noise Level Standards<sup>1</sup>**

Sound Levels	Daytime 7 a.m. to 10 p.m.	Nighttime <sup>2</sup>
Hourly Equivalent Sound Level (L <sub>eq</sub> , dB)	50	45
Maximum level (dB)	70	65

<sup>1</sup> When the receiving noise-sensitive land use is outdoor sports and recreation, the noise level standards are increased by 10 db.

<sup>2</sup> Applies only to uses that operate or are occupied during nighttime hours.

The County has established acceptable noise exposure levels for new development through the Noise Element. A portion of the project is within a transportation noise source (Lopez Drive) and development within the following distances from the noise source will exceed the County’s acceptable exterior noise threshold of 60 dBs for sensitive uses as follows:

- Areas within the 60 dB to 65 dB range - 145 feet from road centerline, and closer;
- Areas within the 65 dB to 70 dB range – approximately 72 feet from road centerline, and closer;
- Areas above the 70 dB level – approximately 35 feet from road centerline, and closer.

### Discussion

(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?*

The subject property is located in a rural area and is surrounded by low-density rural residential development in all directions. The nearest off-site residential unit is located approximately 160-feet from the southeastern property boundary. Implementation of the proposed project would result in the

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construction of new mobile home and residential units on the 37.67-acre property and construction-related noise would result in a temporary increase in ambient noise levels in the project vicinity. Construction-related noise would be short-term, intermittent, and would only occur during daytime hours in accordance with the County's LUO. Construction-related noise would not result in a permanent increase in ambient noise within the project area; however, based on the proximity of the nearest sensitive receptor location, Mitigation Measures N-1 and N-2 have been included to require construction noise BMPs during construction activities within close proximity to sensitive receptor locations. The proposed project would be consistent with the land use designation of the site and would not result in a significant new source of long-term ambient noise that would conflict with surrounding land uses.

Existing ambient noise of the subject property consists of a transportation noise from Lopez Drive and Sweet Springs Mobile Home Park which includes 17 operational mobile home units. Lopez Drive is considered a transportation noise source by the County's Noise Element. In order to be consistent with the County's acceptable exterior noise threshold of 60 dBs for sensitive noise uses, outdoor uses must be sited at least 145 feet from the centerline of Lopez Drive. Units 22 and 23 are located within the 145 feet from the Lopez Drive centerline; however, there is adequate area to site outdoor areas away from the noise source area. If outdoor areas must be placed within 145 feet of the Lopez Drive centerline, Mitigation Measure N-3 has been included to require noise reduction design features. In the event outdoor areas must be sited within the noise area, Mitigation Measures N-3 would reduce noise to acceptable levels as to not expose nearby persons to excessive noise from the Lopez Drive noise source; therefore, impacts would be *less than significant with mitigation*.

(b) *Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?*

The project site does not require demolition, pile driving, or other construction activities that could significantly increase groundborne noise levels within the project vicinity. In addition, onsite grading for future residential development has been completed under a permit issued by the State HCD. Additional earthwork for the proposed driveway and installation of septic infrastructure may generate groundborne noise; however, any groundborne noise generated during road improvements is anticipated to be minimal and would be short-term, intermittent, and occur during daylight hours in accordance with the County's LUO. Operational uses include residential uses and would not result in an increase in long-term groundborne noise. The project is not anticipated to generate excessive groundborne noise; therefore, impacts would be *less than significant*.

(c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

The project property is not located within an ALUP or within the vicinity of a public or private airstrip; therefore, *no impact* would occur.

### *Conclusion*

Construction activities would increase ambient and groundborne noise levels near sensitive receptors; therefore, Mitigation Measures N-1 and N-2 have been included to reduce construction-related noise near sensitive receptor locations. Mitigation Measure N-3 has been included in the event outdoor land uses are placed within the Lopez Driver noise source. The project is not expected to generate groundborne noise during construction or operation. The project property is not located within an ALUP or public or private airstrip and future development of the project would not result in exposure of airport noise to proposed

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residential land uses. Therefore, upon implementation of the identified mitigation measures, impacts would be *less than significant*.

### *Mitigation*

**N-1** For the entire duration of the construction phase of the project, the following BMPs shall be adhered to:

1. Stationary construction equipment that generates noise that exceeds 60 dBA at the project boundaries shall be shielded with the most modern noise control devices (i.e., mufflers, lagging, and/or motor enclosures).
2. Impact tools (e.g., jack hammers, pavement breakers, rock drills, etc.) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed-air exhaust from pneumatically powered tools.
3. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used.
4. All construction equipment shall have the manufacturers' recommended noise abatement methods installed, such as mufflers, engine enclosures, and engine vibration insulators, intact and operational.
5. All construction equipment shall undergo inspection at periodic intervals to ensure proper maintenance and presence of noise control devices (e.g., mufflers, shrouding, etc.).

**N-2** **Prior to installation of Units 22 and 23** located within 145 feet of the centerline of Lopez Drive, the following measures shall be included in the project to achieve acceptable noise levels:

1. Mobile home shall be located between the noise source (Lopez Drive) and the outdoor activity areas for the unit (e.g., yards, patios, etc.) so the mobile home acts as a sound barrier.
2. If the outdoor activity area cannot be located in this manner, a sound wall or landscaping berm shall be constructed that is of sufficient height that it interrupts the line-of-sight between the noise source and outdoor activity area.
3. The design and materials used for the sound wall or berm shall be reviewed and approved by the County Planning and Building Department prior to issuance of construction permits and shall include textures, materials of varied tones and colors.
4. The primary wall shall be of muted earth tones.

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### XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Setting

The County of San Luis Obispo General Plan Housing Element recognizes the difficulty for residents to find suitable and affordable housing within San Luis Obispo County. The County Housing Element includes an analysis of vacant and underutilized land located in urban areas that are suitable for residential development and considers zoning provisions and development standards to encourage development of these parcels. These parcels are categorized into potential sites for very low and low-income households, moderate income households, and above moderate income households.

In its efforts to provide for affordable housing, the county currently administers the Home Investment Partnerships (HOME) Program and the Community Development Block Grant (CDBG) program, which provide limited financing to projects relating to affordable housing throughout the county. The County's Inclusionary Housing Ordinance requires provision of new affordable housing in conjunction with both residential and nonresidential development and subdivisions.

#### Discussion

- (a) *Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

The project includes an existing 37.67-acre mobile home park and adding nine new mobile home units for a total of 26 mobile home units onsite. Implementation of the project would result in marginal population growth as a result of 9 new units. Marginal population growth is accounted for in the County's General Plan and would not result in substantial unplanned population growth; therefore, impacts would be *less than significant*.

- (b) *Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The project does not include the removal or demolition of existing house and would not require the construction of replacement housing elsewhere. *No impact* would occur.

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### Conclusion

Implementation of the project would not displace substantial numbers of people or housing and future development of residential units would not result in unplanned population growth. Therefore, impacts related to population growth are less than significant, and no mitigation is necessary.

### Mitigation

No mitigation is necessary.

## XV. PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Setting

Fire protection services in unincorporated San Luis Obispo County are provided by CAL FIRE, which has been under contract with the County to provide full-service fire protection since 1930. Approximately 180 full-time state employees operate the County Fire Department, supplemented by as many as 100 state seasonal fire fighters, 300 County paid-call and reserve fire fighters, and 120 state inmate fire fighters. CAL FIRE responds to emergencies and other requests for assistance, plans for and takes action to prevent emergencies and reduce their impact, coordinates regional emergency response efforts, and provides public education and training in local communities. CAL FIRE has 24 fire stations located throughout the county, and the nearest station to the project site would be CAL FIRE / Pismo Beach Fire Department (Station #64), located approximately 7 miles west of the project site. The project may also be serviced by CAL FIRE Station #21

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located 12 miles northwest. According to the referral response letter from CAL FIRE/County Fire, emergency response times to the project range from 10 to 18 minutes.

Police protection and emergency services in the unincorporated portions of the county are provided by the San Luis Obispo County Sheriff's Office. The Sheriff's Office Patrol Division responds to calls for service, conducts proactive law enforcement activities, and performs initial investigations of crimes. Patrol personnel are deployed from three stations throughout the county: Coast Station in Los Osos, North Station in Templeton, and South Station in Oceano. The project would be served by the South Station in Oceano, located approximately 6.7 miles southwest of the project site.

San Luis Obispo County has a total of 12 school districts that currently enroll approximately 34,000 students in over 75 schools. The project site is located within the Lucia Mar Unified School District (LMUSD).

Within the County's unincorporated areas, there are currently 23 parks, three golf courses, four trails/staging areas, and eight Special Areas that include natural areas, coastal access, and historic facilities currently operated and maintained by the County.

Public facilities fees, Quimby fees, and developer conditions are several ways the County currently funds public services. A public facility fee program (i.e., development impact fee program) has been adopted to address impacts related to public facilities (county) and schools (CGC Section 65995 et seq.). The fee amounts are assessed annually by the County based on the type of proposed development and the development's proportional impact and are collected at the time of building permit issuance. Public facility fees are used as needed to finance the construction of and/or improvements to public facilities required to serve new development, including fire protection, law enforcement, schools, parks, and roads.

### *Discussion*

- (a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

#### *Fire protection?*

Implementation of the proposed project would result in a marginal increase in population and new residential units that would result in an increased demand on fire protection services. The project would be served by existing fire protection services and would not require new or expanded facilities in order to serve the project. The project would be required to pay public facility fees to account for the increased demand on existing fire protection services and facilities; therefore, impacts would be less than significant.

#### *Police protection?*

Implementation of the proposed project would result in a marginal increase in population and new residential units that may increase demand on police protection services. The project would be served by existing police protection services and would not require new or expanded facilities in order to serve the project. The project would be required to pay public facility fees to account for the increased demand on existing police protection services and facilities; therefore, impacts would be less than significant.

#### *Schools?*

Implementation of the proposed project would result in new residential units that may marginally increase the number of school aged children in the area that would result in an increased demand on the LMUSD. The project would be required to pay public facility fees to account for the potential increased demand on the LMUSD; therefore, impacts would be less than significant.

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*Parks?*

Implementation of the proposed project would result in a marginal increase in population and new residential units that may increase demand on public recreation facilities. The project would be required to pay public facility fees to account for the potential increased demand on public recreation facilities; therefore, impacts would be less than significant.

*Other public facilities?*

Implementation of the proposed project would marginally induce population growth through the development of new mobile home and residential units. The project would be required to pay public facility fees to account for an increased demand on public services. Therefore, potential impacts related to the increased demand of public facilities would be *less than significant*.

*Conclusion*

The project would be required to pay public facility fees to account for an increased demand on public services. Therefore, potential impacts associated with physical impacts associated with provision of public services would be less than significant, and no mitigation is necessary.

*Mitigation*

No mitigation is necessary.

### XVI. RECREATION

	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
(a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) <i>Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Setting*

The Parks and Recreation Element of the County of San Luis Obispo General Plan establishes goals, policies, and implementation measures for the management, renovation, and expansion of existing parks and recreation facilities and the development of new parks and recreation facilities in order to meet existing and projected needs and to assure an equitable distribution of parks throughout the county.

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Public facilities fees, Quimby fees, and developer conditions are several ways the County currently funds public parks and recreational facilities. Public facility fees are collected upon construction of new residential units and currently provide funding for new community-serving recreation facilities. Quimby Fees are collected when new residential lots are created and can be used to expand, acquire, rehabilitate, or develop community-serving parks. Finally, a discretionary permit issued by the County may condition a project to provide land, amenities, or facilities consistent with the Parks and Recreation Element.

The County Bikeways Plan identifies and prioritizes bikeway facilities throughout the unincorporated area of the county, including bikeways, parking, connections with public transportation, educational programs, and funding. The Bikeways Plan is updated every 5 years and was last updated in 2016. The plan identifies goals, policies, and procedures geared towards realizing significant bicycle use as a key component of the transportation options for San Luis Obispo County residents. The plan also includes descriptions of bikeway design and improvement standards, an inventory of the current bicycle circulation network, and a list of current and future bikeway projects within the county.

### *Discussion*

- (a) *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

Implementation of the proposed project would result in the development of nine new mobile home units that would result in a marginal increase in population. The marginal increase in population may result in a slight increase of demand on local and regional recreational facilities; however, future development would be required to pay development impact fees for maintenance of public recreation facilities. Therefore, impacts would be *less than significant*.

- (b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

The project does not include the construction or expansion of recreation facilities and implementation of the project would not require the construction or expansion of recreation facilities elsewhere; therefore, *no impact* would occur.

### *Conclusion*

The project would be required to pay public facility fees to account for an increased demand on public recreation facilities. The project does not include the expansion or development of recreation facilities. Therefore, potential impacts associated with recreation facilities would be less than significant, and no mitigation is necessary.

### *Mitigation*

No mitigation is necessary.

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### XVII. TRANSPORTATION

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

#### Setting

The San Luis Obispo Council of Governments (SLOCOG) holds several key roles in transportation planning within the county. As the Regional Transportation Planning Agency (RTPA), SLOCOG is responsible for conducting a comprehensive, coordinated transportation program; preparing a Regional Transportation Plan (RTP); programming state funds for transportation projects; and administering and allocating transportation development act funds required by state statutes. The 2019 RTP, adopted June 5, 2019, is a long-term blueprint of San Luis Obispo County’s transportation system. The plan identifies and analyzes transportation needs of the region and creates a framework for project priorities. SLOCOG represents and works with the County as well as the Cities within the county in facilitating the development of the RTP.

In 2013 SB 743 was signed into law with the intent to “more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions” and required the Governor’s Office of Planning and Research (OPR) to identify new metrics for identifying and mitigating transportation impacts within CEQA. As a result, in December 2018, the California Natural Resources Agency certified and adopted updates to the State CEQA Guidelines. The revisions included new requirements related to the implementation of SB 743 and identified VMT per capita, VMT per employee, and net VMT as new metrics for transportation analysis under CEQA (as detailed in Section 15064.3[b]). The County of San Luis Obispo has developed a Vehicle Miles Traveled (VMT) Program (Transportation Impact Analysis Guidelines; Rincon, October 2020 & VMT Thresholds Study; GHD, March 2021). The program provides interim operating thresholds and includes a screening tool for evaluating VMT impacts.

The County’s Framework for Planning (Inland), includes the Land Use and Circulation Elements of the County of San Luis Obispo General Plan. The framework establishes goals and strategies to meet pedestrian

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circulation needs by providing usable and attractive sidewalks, pathways, and trails to establish maximum access and connectivity between land use designations. Due to the remote location of the project site, there are no pedestrian, bicycle, or public transit facilities within 5 miles of the project site.

The County Department of Public Works maintains updated traffic count data for all County-maintained roadways. In addition, Traffic Circulation Studies have been conducted within several community areas using traffic models to reasonably simulate current traffic flow patterns and forecast future travel demands and traffic flow patterns. These community Traffic Circulation Studies include the South County Circulation Study, Los Osos Circulation Study, Templeton Circulation Study, San Miguel Circulation Study, Avila Circulation Study, and North Coast Circulation Study. The California Department of Transportation (Caltrans) maintains annual traffic data on state highways and interchanges within the county.

### *Discussion*

- (a) *Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

The subject property is located in a rural area and would not be applicable to existing mixed-land use development or pedestrian accessibility standards of the 2019 RTP and the County's Circulation Element. The project would result in nine new mobile home units (26 units total) in the Rural Suburban land use designation. Implementation of the project would result in additional vehicle trips to and from the project site during construction and operation of the project. The project would be subject to road improvement fees for maintenance of nearby county roads. In addition, in accordance with the County Bikeways Plan, the project would be required to widen Lopez Drive to Class II Bike Lane. The project would be consistent with applicable circulation system plans; therefore, impacts would be *less than significant*.

- (b) *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

As described above, the project includes a 37-acre mobile home park with additional nine units located in a rural area along Sweet Springs Drive. In 2021, the County released draft guidelines for evaluating transportation impacts using VMT consistent with recently mandated changes to the California Environmental Quality Act (CEQA). The guidelines describe screening criteria for projects presumed to have a less than significant impact. Residential projects consistent with the General Plan and generating fewer than 27.2 daily trips are presumed to have a less than significant impact. Central Coast Transportation Consulting (CCTC 2021) prepared a VMT evaluation for the project using the County's SB743 Sketch VMT tool. According to the evaluation, buildout of the project would not result in additional trips that would exceed the County's daily trip threshold for residential projects. Therefore, the project would generate fewer than 27.2 daily trips and impacts would be *less than significant*.

- (c) *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

The project includes the development of new internal driveways and private access. Access points and driveway design would be required to comply with CAL FIRE/County Fire and county engineering and design standards for proper development; therefore, impacts would be *less than significant*.

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(d) *Result in inadequate emergency access?*

Future construction activities may include temporary traffic controls along nearby roadways; however, the project does not require road closures and emergency access would be available during construction activities. Additionally, the project would include CAL FIRE/County Fire recommendations for site access and other building design features; therefore, impacts would be *less than significant*.

*Conclusion*

The project would be consistent with the 2019 RTP, 2016 Bikeways Plan, and the County’s Circulation Element. In addition, the project would be consistent with CAL FIRE/County Fire and county standards for site access and driveway design; therefore, impacts related to transportation would be less than significant, and no mitigation is required.

*Mitigation*

No mitigation is necessary.

### XVIII. TRIBAL CULTURAL RESOURCES

	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
(a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, 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 California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Setting

Approved in 2014, AB 52 added tribal cultural resources to the categories of resources that must be evaluated under CEQA. Tribal cultural resources are defined as either of the following:

1. Sites, features, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
  - a. Included or determined to be eligible for inclusion in the CRHR; or
  - b. Included in a local register of historical resources as defined in California PRC Section 5020.1(k).
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth California PRC Section 5024.1(c).

In applying these criteria for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Recognizing that tribes have expertise with regard to their tribal history and practices, AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if they have requested notice of projects proposed within that area. If the tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe regarding the potential for adverse impacts on tribal cultural resources as a result of a project. Consultation may include discussing the type of environmental review necessary, the presence and/or significance of tribal cultural resources, the level of significance of a project’s impacts on the tribal cultural resources, and available project alternatives and mitigation measures recommended by the tribe to avoid or lessen potential impacts on tribal cultural resources.

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### Discussion

(a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, 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:*

*(a-i-a-ii) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*

*A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

The 37.67-acre parcel has been previously disturbed during development of the Sweet Springs Mobile Home Park. As described in Section V, *Cultural Resources*, the project site does not support any known cultural resources. Pursuant to AB 52, tribal consultation opportunity was provided. Referral letters were sent to tribal representatives on June 24, 2021. No tribes requested consultation or provided information regarding significant tribal cultural resources; therefore, impacts would be *less than significant*.

### Conclusion

The project site does not contain any known tribal or cultural resources. In the unlikely event unknown tribal resources are encountered during project implementation, the project would be required to comply with the County’s LUO for inadvertent discoveries and the California Health and Safety Code. Implementation of the proposed project is not anticipated to disturb any unknown cultural tribal resources. Therefore, impacts would be less than significant, and no mitigation is necessary.

### Sources

No mitigation is necessary.

## XIX. UTILITIES AND SERVICE SYSTEMS

	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<i>Would the project:</i>				
(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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Setting

The County Department of Public Works provides water and wastewater services for specific County Service Areas (CSAs) that are managed through issuance of water/wastewater “will serve” letters. The County Department of Public Works currently maintains CSAs for the communities of Nipomo, Oak Shores, Cayucos, Avila Beach, Shandon, the San Luis Obispo County Club, and Santa Margarita. Other unincorporated areas in the county rely on on-site wells and individual wastewater systems. Regulatory standards and design criteria for on-site wastewater treatment systems are provided by the Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems (California OWTS Policy).

The 2016 *Cumulative Projects Water Level Impact and Water Supply Assessment at the Sweet Springs Mobile Home Park, Arroyo Grande, California* study prepared by Cleath-Harris Geologists, Inc. found there is a water deficit of approximately 41-acre-feet-per-year (AFY) in the aquifer during drought conditions and a surplus of potential recharge during average precipitation years of 137 AFY (Cleath-Harris Geologists 2016). At the end of a drought period, the surplus water from average precipitation is available to replenish the decline from drought years, though the amount of recharge is dependent on how full the aquifer is. The total calculated existing outflow in the study area, which includes water use from existing developed parcels, agricultural activities, and uptake from deep-rooted plants (e.g. willows), was calculated to be 172 AFY. Recharge (inflow) into the aquifer is primarily from deep percolation of rainwater and from stormwater runoff, though domestic wastewater return (septic tanks and irrigation) also contributes to existing inflow (Cleath-Harris Geologists 2016). Based on well information from the Hondonada and Sweet Springs wells, the groundwater levels within the region are declining at approximately one-foot-per-year during drought conditions, as measured between 2014 and 2016.

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Per the County's Stormwater Program, the County Department of Public Works is responsible for ensuring that new construction sites implement BMPs during construction and that site plans incorporate appropriate post-construction stormwater runoff controls. Construction sites that disturb 1 acre or more must obtain coverage under the SWRCB's Construction General Permit. PG&E is the primary electricity provider and both PG&E and SoCalGas provide natural gas services for urban and rural communities within the county.

There are three landfills in San Luis Obispo County: Cold Canyon Landfill, located near the city of San Luis Obispo; Chicago Grade Landfill, located near the community of Templeton; and Paso Robles Landfill, located east of the city of Paso Robles.

### *Discussion*

- (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?*

The project is currently developed with the Sweet Springs Mobile Home Park. The project would require wastewater connections including replacement septic tanks and leach fields. The project would be required to implement Mitigation Measures AQ-1 and AQ-2, BIO-1 through BIO-12, GEO-1 through GEO-6, and N-1 and N-2 to reduce potential environmental impacts during the expansion and installation of utility infrastructure to serve the project. Upon implementation of the identified mitigation measures, impacts would be *less than significant with mitigation*.

- (b) *Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

### Water Quantity

The water balance study prepared for the project evaluates the effects of future development within the limits of the saturated Pismo Formation aquifer underlying the property. As shown in **Table 4** cumulative proposed development within the aquifer includes: the proposed project<sup>1</sup>, the recently approved Mid-State Properties (Hondonada) subdivision (12 single-family dwellings), the recently approved Greenview Estates subdivision (21 single-family dwellings), and development of currently undeveloped lots in the area (12 single-family dwellings). The cumulative development scenario analyzed 50 new single-family dwellings and 11 new mobile homes within the aquifer. It should be noted that Hondonada has since reduced their project to 11 single-family dwellings, and Greenview Estates has reduced their project to 7 single-family dwellings. While the actual projects are less than anticipated in the cumulative water assessment, the conclusions of the report are not significantly altered.

As discussed above, the existing outflow of the aquifer has been calculated at 172 AFY, and the existing inflow varies from 131 AFY and 309 AFY, depending on the amount of precipitation received each year. During drought years, the existing water deficit is 41 AFY. Development of the proposed project would result in an additional 7.5 AFY of water use, and full cumulative buildout of the aquifer as described above would result in an additional increase of approximately 33 AFY of water use. During drought years, the project would result in a water deficit of 47.2 AFY (a 6.2 AFY increase over

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<sup>1</sup> At the time of the cumulative water study, the project was proposing 6 single family homes and 9 mobile homes. The project has since been reduced to 6 single family homes and 6 mobile homes.

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existing conditions). Full cumulative buildout of the aquifer would result in a water deficit of 56 AFY (an additional 15 AFY deficit increase) and potential recharge would decrease by 15 AFY to 122 AFY due to increased domestic pumping. Table 2 below shows the water balance summary.

**Table 4: Water Balance**

	Current Conditions (AF)		Buildout Conditions - Hondonada Only (AF)*		Buildout Conditions - Full Cumulative Development (AF)	
	Drought Year	Average Year	Drought Year	Average Year	Drought Year	Average Year
<b>Outflow</b>	172	172	182.5	182.5	205	205
<b>Inflow</b>	131	309	135.5	313.3	149	327
<b>Water Balance with Recharge</b>	-41	137	-47.2	130.8	-56	122

\* The Buildout Conditions for the Hondonada Only were extrapolated from the Full Buildout data and were not calculated individually as part of the water studies prepared for this project.

Note: Data from Cleath-Harris Geologists 2016 (Table 2).

The results of this analysis imply that in a given drought year, or series of drought years, the groundwater system in the study area may have a deficit in which outflows exceed inflows. However, a water balance may be achieved over a longer time period, as groundwater surpluses from the average years equal or exceed the deficits from the drought years. Under the proposed buildout scenario, the amount of the average year surplus is about two times the amount of the drought year deficit, implying that the impacts of two years of drought in the study area would be offset by a single average year. Implications of the study are that during individual or successive drought years, a reduction of storage may occur, which may be observed in individual wells as a decline in water levels; however, over a multi-year time frame, conditions in the average years would replenish the depleted storage and water levels would likely recover (GSI 2018).

Based on the information available, there does not appear to be a long-term issue regarding water quality; during drought years some users may experience more problems than others given site specifics, but average years would be able to offset this. Implementation of drought-management plans would help balance the potential problems during drought years. Given the uncertainties with small water systems and the cumulative effectiveness of differing drought-management efforts, a broader water agency would be better able to balance the regional needs of the aquifer area.

Based on the water budget analysis provided in the Water Supply Assessment (Cleath-Harris Geologists 2016) and the peer review (GSI 2018), the groundwater system in the study area has enough long-term availability to supply the proposed cumulative project pumping, based on the per capita pumping factors used in the analysis. However, during drought years some users may experience more problems than others given site specifics, but average years would be able to offset this. Implementation of drought-management plans would help balance the potential problems during drought years, though these would be more effective on a regional scale.

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Additionally, a broader water agency would be better able to balance the regional needs of the aquifer area and overcome the technical, managerial, and fiscal problems of a smaller water system. It would also be better able to support users who experience problems during drought by balancing water across the users. Mitigation measures are proposed to increase water conservation awareness and implementation, reduce turf planting, and to regulate water use during drought years. As noted above, the applicant is also required to coordinate, in a good faith effort, with other community water systems in the area regarding consolidation.

### Well Interference

Well interference occurs when a pumping well causes water level drawdown at an adjacent well (Cleath-Harris Geologists 2016). The cumulative water supply assessment (Cleath-Harris Geologists 2016) evaluated the cumulative water level drawdown on the nearest wells to the three subdivision properties, listed above. The well interference analysis compares three scenarios of pumping: aggressive pumping (full buildout of all three subdivisions), lower-density pumping (reduction in density of Greenview Estates from 1.7 acres/dwelling to 3-4 acres/dwelling, consistent with the other two subdivisions), and reduced pumping (elimination of the Greenview Estate project). **Table 5** below shows the well interference levels based on these three scenarios.

**Table 5: Estimated Cumulative Projects – 1 year Well Interference at Nearest Known Wells to the Proposed Development**

Proposed Development	Scenario 1* (feet of interference)	Scenario 2** (feet of interference)	Scenario 3*** (feet of interference)
Sweet Springs MHP Well	3	2.5	1.7
Hondonada Well	3.9	3.1	2.1
Greenview Estates Well	4.8	3.7	--

\*Anticipated Interference at proposed buildout for all developments

\*\*Anticipated Interference if study area housing density is maintained at 3-4 acres/dwelling

\*\*\*Anticipated Interference if only Sweet Springs MHP and Mid-State Properties (Hondonada) are completed

Note: Reprinted from Cleath, 2016 (Table 6).

Under the full buildout scenario in Scenario 1, drawdown at wells nearest to the three subdivisions one-year post buildout would range from 3-5 feet, which is unlikely to cause significant impacts to the wells (GSI 2018).

The well interference analysis indicates that the maximum cumulative one-year drawdown at nearby wells attributable to the combined project pumping will be less than five feet. This amount of drawdown is not considered significant enough to pose any risk to operations of nearby wells (GSI 2018).

Based on the limited information about the Corbett Canyon Watershed, the Pismo Formation, proposed amount of water to be used and the water source, there is concern about the long-term sustainability of the aquifer due to the potential number of parcels that could be created and

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evolving trend that seems to show that more dry years than wet years can be expected in the future. Water conservation measures and a drought management plan are included as Mitigation Measures USS-1 through USS-4 for the project. With implementation of these mitigation measures, impacts to well interference is expected to be less than significant.

### Water Quality

Based on historical information and recent water quality data, it is expected that the water pumped for the project will be highly mineralized and will require advanced treatment. Mitigation Measures USS-5 through USS-7 require disclosure to leasers about the funding requirements of the community water system, including treatment costs. With implementation of these mitigation measures, and standard requirements by Environmental Health and Safety Department (EHSD) and the California State Water Resources Control Board, coordinate, in a good faith effort, with other community water systems in the area regarding consolidation; therefore, impacts related to water quality are expected to be *less than significant with mitigation*.

- (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?*

Wastewater services would be supplied by a private onsite sewer system and would not require connections to a wastewater treatment provider; therefore, *no impact* would occur.

- (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?*

Solid waste, recycling, and green waste would be serviced by South County Sanitary Services and would be disposed of at Cold Canyon Landfill. Cold Canyon Landfill has an expected close date of 2040 (CalRecycle 2015). Implementation of the proposed project would result in an increase in solid waste during construction and operation. Construction waste would be similar to other development projects within the county and would result in a temporary increase in solid waste. Cold Canyon landfill has enough permitted capacity to accommodate the temporary increase in construction-related waste. According to the Estimated Solid Waste Generation Rates by the California Department of Resources Recycling and Recovery (CalRecycle; CalRecycle 2019), the project may generate approximately 117.6 pounds (lbs) of waste per day, as shown in **Table 6** below.

**Table 6.** Estimated Solid Waste Generation Rates for the DRSP Project

Waste Generation Source	Generation Rate	Unit of Measure	Proposed Development	Total
Single-family	9.8	lb/dwelling unit/day	12 <sup>1</sup> units	117.6 lbs
<b>Total</b>				<b>117.6 lbs</b>

Source: CalRecycle Estimated Solid Waste Generation Rates, 2019

<sup>1</sup>Accounts for proposed development which includes six additional mobile home units and six residential single-family units.

Implementation of the proposed project would result in a long-term increase in solid waste generation. Implementation of the project would result in a long-term increase in operational solid

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waste generation; however, Cold Canyon Landfill has adequate available capacity to support the increase of solid waste; therefore, impacts would be *less than significant*.

- (e) *Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The project would be services by South County Sanitary Services and Cold Canyon Landfill, which are fully compliant with existing local and state regulations related to disposal of solid waste. The project is not expected to generate solid waste in excess of state or county regulations for solid waste; therefore, impacts would be *less than significant*.

### Conclusion

The project would require the expansion and installation of utility infrastructure to support proposed development. The project would be required to implement Mitigation Measures AQ-1 and AQ-2, BIO-1 through BIO-12, GEO-1 through GEO-6 and N-1 and N-2 to reduce potential environmental impacts during expansion and installation of utility infrastructure for the proposed projects. Upon Implementation of Mitigation Measures USS-1 through USS-7, impacts to water quantity and quality would be less than significant. The project would use a private sewer system and would not need to connect to a wastewater treatment provider. The project would not generate solid waste in exceedance of state or county regulations. Therefore, upon implementation of the identified mitigation measures, impacts would be less than significant.

### Mitigation

Implement Mitigation Measures AQ-1 and AQ-2, BIO-1 through BIO-12, GEO-1 through GEO-6 and N-1 and N-2.

**USS-1**      **Water Conservation – Education Program.** To reduce water usage, prior to issuance of related permits, such as those from the California Department of Housing and Community Development (HCD), or site disturbance activities, whichever occurs first, the Applicant shall develop and implement a Water Conservation Education Program (WCEP) for all project-related personnel, including residents and commercial operators/employees. The WCEP shall be prepared by an individual knowledgeable on current conservation methods for interior and exterior water usage as it relates all project development, as well as any applicable County regulations and existing building codes on conserving water. The Program shall focus on a) all consumer-controlled water uses (e.g. landscaping, washing {e.g. dishes, clothes}, showers, etc.); b) project design elements that would make water conservation easier to implement; and c) the creation of ‘good practices’ user documents for daily use and during drought conditions; furthermore the WCEP shall describe the most effective means to best disseminate this information to target audience(s) on an ongoing basis.

**Prior to issuance of related permits, such as those from the California Department of Housing and Community Development (HCD), or site disturbance activities, whichever occurs first,** the Applicant shall submit for County review and approval the Water Conservation Education Program (WCEP), which will include ‘good practices’ user documents for each project element. Once approved by the County, any recommendations for project design changes shall be incorporated into all applicable construction drawings. **Prior to and/or during construction/ improvements,** as applicable, all program-approved water conservation construction practices shall be administered. **Prior to final inspection/ occupancy of individual units,** the County will verify installation of any WCEP-approved

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design features. Furthermore, the Applicant shall verify that the ‘good practices’ user documents are complete and are made available to the end users.

### USS-2

**Water Conservation – Limit Turf Planting.** To limit water usage, the Applicant shall limit the use of turf for landscaping and maximize turf maintenance elements that reduce water consumption. Turf shall be limited to no more than 100 square-feet per single-family residence, and no more than 500 square-feet total in common areas. The following measures shall be shown on applicable construction drawings and applied to the proposed turf areas:

- a. To maximize drought-tolerance and minimize water usage, warm season grasses (excludes Bermuda grass) such as buffalo grass, shall be used;
- b. To minimize establishment of shallow roots, the following shall be avoided on turf areas, and provided in all applicable documents (e.g., educational brochure, CC&Rs, landscape plans): close mowing, overwatering, excessive fertilization, soil compaction, and accumulation of thatch;
- c. Watering times shall be programmed for longer and less frequently rather than for short periods and more frequently; length of time and delivery rate shall be monitored to avoid runoff to surrounding areas.

### USS-3

**Water Conservation – Landscaping.** To reduce water use, the Applicant shall install landscaping that will have low-water requirements and be drought-tolerant. **Prior to issuance of related permits, such as those from the California Department of Housing and Community Development (HCD), or site disturbance activities, whichever occurs first,** the applicant shall provide to the County Department of Planning and Building, at a minimum, a landscape plan that includes the following:

- a. all common area and individual unit irrigation shall employ low water use techniques (e.g., drip irrigation);
- b. individual unit turf shall not exceed 20 percent of landscaped area, or 100-square-feet, whichever is less, with remaining landscaping being drought-tolerant and having low water requirements (e.g. use of native vegetation, etc.).
- c. Prior to final inspection, the County will verify installation of any approved irrigation design features. Furthermore, the Applicant shall verify that the approved irrigation system parameters meet the intent of this measure and have been tested by a qualified expert. The Applicant understands that the approved irrigation system and water scheduling will be kept in good working as long as the turf remains.

### USS-4

**Water Conservation – Drought Water Management Program.** To reduce water consumption during droughts, a master “Drought Water Management Program” (Program) shall be prepared and implemented by the Applicant, prior to issuance of related permits, such as those from the California Department of Housing and Community Development (HCD), or site disturbance activities, whichever occurs first. The Program shall provide guidelines on how all future uses will be managed during “severe” drought (including landscaping and indoor uses). These measures would go into effect during periods of

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“severe” drought, as defined in the Program. This Program shall include, but is not necessarily limited to the following, or other similar measures as approved by the County:

- a. the definition of a “severe” drought year (as defined by NOAA’s Palmer Drought Severity method or other similarly recognized methodology);
- b. identification of general measures available to reduce indoor water usage for future development (to be refined as needed for each use approved);
- c. identification of specific measures to be applied for landscape watering;
- d. determination of appropriate early triggers to determine when “severe” drought conditions exist and process for initiating additional water conservation measures.

Once it is determined that a “severe” drought condition exists, the Program’s approved restricted (drought) water usage measures shall remain in effect until it is shown satisfactorily to the County that the “severe” drought condition no longer exists.

Prior to issuance of related permits, such as those from the California Department of Housing and Community Development (HCD), or site disturbance activities, whichever occurs first, the Applicant shall submit for County review and approval the Drought Water Management Program (DWMP), which will include water reduction guidelines for each project element. **Prior to and/or during construction**, as applicable, all Program-approved water reducing construction practices shall be administered. **Prior to final inspection/occupancy of individual units**, the County will verify installation of any DWMP-approved design features. Furthermore, the Applicant shall verify that the ‘water reduction guidelines during drought conditions are complete and are made available to the end users. Furthermore, the Applicant understands that the approved Program will be administered for the life of the project.

**USS-5 Water Supply – Community Water System. At time of occupancy of individual units**, the applicant shall disclose to occupants the costs associated with a public water system, including potential costs that may be passed on to consumers in the event upgrades to the system, or advanced treatment is needed. Items to be disclosed in the Buyer Information Guide shall include, but are not limited to, the items listed on California Water Boards handout – What is a Public Water System, and potential costs associated with increased treatment and disposal of arsenic.

**USS-6 Water Supply – Water System Upgrade. Prior to issuance of related permits, such as those from the California Department of Housing and Community Development (HCD), or site disturbance activities, whichever occurs first**, the existing Sweet Springs Water System shall upgrade from a State Small Water System to a Community Water System. A “will serve” letter shall be obtained and provided to Environmental Health Services Division from the newly created water company, stating there are operable water facilities immediately available for connection to the new units. Water main extensions and related facilities (except wells) may be bonded for, subject to the discretion and approval of the Department of Public Works and Environmental Health Services Division.

**USS-7 Water Supply - Water System Consolidation.** As an ongoing condition valid for the life of the project, the applicant shall explore consolidation or regionalization of the Sweet Springs

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Mobile Home Park community water system with other water systems in the area to help reduce expenses and provide a regional approach to water management. Coordination and consolidation discussions shall include the Mid-State Properties (Hondonada) and Greenview Estates subdivisions, if and when those developments are approved. **Prior to occupancy of the first unit**, the applicant shall provide evidence that consolidation has been explored in a good faith effort.

### XX. WILDFIRE

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

#### Setting

In central California, the fire season usually extends from roughly May through October; however, recent events indicate that wildfire behavior, frequency, and duration of the fire season are changing in California. FHSZs are defined by CAL FIRE based on the presence of fire-prone vegetation, climate, topography, assets at risk (e.g., high population centers), and a fire protection agency's ability to provide service to the area (CAL FIRE 2007). FHSZs throughout the county have been designated as "Very High," "High," or "Moderate." In San Luis Obispo County, most of the area that has been designated as a "Very High Fire Hazard Severity Zone" and is located in the Santa Lucia Mountains, which extend parallel to the coast along the entire length of San

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Luis Obispo County. The project would be located within the State Responsibility Area in a high and very high FHSZ (CAL FIRE 2021). Emergency response to the project site is less than 5-10 minutes.

The County Emergency Operations Plan (EOP) addresses several overall policy and coordination functions related to emergency management. The EOP includes the following components:

- Identifies the departments and agencies designated to perform response and recovery activities and specifies tasks they must accomplish;
- Outlines the integration of assistance that is available to local jurisdictions during disaster situations that generate emergency response and recovery needs beyond what the local jurisdiction can satisfy;
- Specifies the direction, control, and communications procedures and systems that will be relied upon to alert, notify, recall, and dispatch emergency response personnel; alert the public; protect residents and property; and request aid/support from other jurisdictions and/or the federal government;
- Identifies key continuity of government operations; and
- Describes the overall logistical support process for planned operations.

Topography influences wildland fire to such an extent that slope conditions can often become a critical wildland fire factor. Conditions such as speed and direction of dominant wind patterns, the length and steepness of slopes, direction of exposure, and/or overall ruggedness of terrain influence the potential intensity and behavior of wildland fires and/or the rates at which they may spread (Barros et al. 2013).

The Safety Element of the County of San Luis Obispo General Plan establishes goals, policies, and programs to reduce the threat to life, structures, and the environment caused by fire. Policy S-13 identifies that new development should be carefully located, with special attention given to fuel management in higher fire risk areas, and that new development in fire hazard areas should be configured to minimize the potential for added danger. Implementation strategies for this policy include identifying high risk areas, developing and implementing mitigation efforts to reduce the threat of fire, requiring fire resistant material be used for building construction in fire hazard areas, and encouraging applicants applying for subdivisions in fire hazard areas to cluster development to allow for a wildfire protection zone.

The California Fire Code provides minimum standards for many aspects of fire prevention and suppression activities. These standards include provisions for emergency vehicle access, water supply, fire protection systems, and the use of fire-resistant building materials.

The County EOP outlines the emergency measures that are essential for protecting public health and safety. These measures include, but are not limited to, public alert and notifications, emergency public information, and protective actions. The EOP also addresses policy and coordination related to emergency management.

### *Discussion*

(a) *Substantially impair an adopted emergency response plan or emergency evacuation plan?*

Future construction activities may include temporary traffic controls along nearby roadways; however, the project does not require road closures and emergency access would be available during construction activities. Additionally, the project would be required to comply with CAL FIRE/County Fire recommendations for site access and building design; therefore, impacts would be *less than significant*.

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- (b) *Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

The subject property is located in a high and very high FHSZ and supports relatively flat to steeply sloping topography and the project vicinity has an average wind speed of 7.1 to 9.5 miles per hour (mph) annually (WeatherSpark 2021). Implementation of the project has the potential to place buildings in an area with increased risk for wildfire. The project would be required to comply with CAL FIRE/County Fire recommendations for roads, access roads, driveways, gates, addressing, landscaping, and adherence to the California Fire Code. Implementation of the CAL FIRE/County Fire recommendations would ensure future development would not expose people or structures to unnecessary risk due to wildfire; therefore, impacts would be *less than significant*.

- (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?*

The project requires improvements to onsite roads to conform to CAL FIRE/County Fire standards for width and geometry and for ease of emergency access. The project would be required to implement Mitigation Measures AQ-1 and AQ-2, BIO-1 through BIO-12, GEO-1 through GEO-6, and N-1 and N-2 to reduce potential environmental impacts during the expansion and installation of utility infrastructure to serve the project. Upon implementation of the identified mitigation measures, impacts would be *less than significant with mitigation*.

- (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 has a moderate to high potential for landslide and low potential for flooding. The project site is located within a high and very high fire hazard severity zone that would increase risk for potential post-fire landslide risks. Future development would be required to comply with HUD Manufactured Home Construction and Safety Standards and California Code of Regulations Title 25, the California Fire Code, and other CAL FIRE/County Fire recommendations to reduce potential risks associated with post-fire hazards; therefore, impacts would be *less than significant*.

### *Conclusion*

Implementation of the proposed project would result in new development within a high and very high FHSZ. The project would be required to comply with CAL FIRE recommendations and county and HUD Manufactured Home Construction and Safety Standards and California Code of Regulations Title 25 regulations for development within a high and very high FHSZ. Based on required compliance with existing regulations, impacts would be less than significant, and no mitigation is necessary.

### *Mitigation*

No mitigation is necessary.

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### XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Discussion

- (a) *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

As discussed in each resource section above, upon implementation of identified mitigation measures, the proposed project would not result in significant impacts to biological or cultural resources and would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Therefore, impacts would be *less than significant with mitigation incorporated*.

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- (b) *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

### *Aesthetics*

The discussion of cumulative impacts in Section I, Aesthetics, 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 as well as proposed development.

As described in the resource section, the proposed project may be viewed from Lopez Drive; however, upon implementation of Mitigation Measure AES-1, impacts related to development of the parcel would be less than significant. Therefore, the contribution of the subject project to potential impacts to aesthetics are considered less than cumulatively considerable.

### *Agricultural Resources*

The analysis conducted in Section II, Agriculture and Forestry Resources, determines that the project does not have the potential to convert agricultural land to non-agricultural use. Therefore, impacts would be less than cumulatively considerable.

### *Air Quality*

The analysis provided in Section III, Air Quality, concludes that the project’s potential construction-related and operational emissions will fall below SLOAPCD thresholds of significance for both project-related and cumulative impacts, except for ROG+NO<sub>x</sub> and DPM, which can be less than significant with implementation of Mitigation Measures AQ-1 and AQ-2. Therefore, when considered with the potential impacts of other reasonably foreseeable projects in the unincorporated county, the contribution of the subject project to potential impacts to air quality are considered less than cumulatively considerable.

### *Biological Resources*

The analysis provided in Section IV, Biological Resources, concludes that the project would have a less-than-significant impact with implementation of the identified mitigation measures for special-status wildlife species and their habitats, and avoidance and replacement of potentially impacted native trees. With implementation of Mitigation Measures BIO-1 through BIO-12, potential impacts to biological resources would be less than significant. All surrounding proposed development projects would undergo evaluation for potential to impact biological resources. Based on the mitigation measures identified to reduce potential project impacts and discretionary review of surrounding projects, when considered with the potential impacts of other reasonably foreseeable development in the area, project impacts associated with biological resources would be less than cumulatively considerable.

### *Cultural Resources*

The analysis provided in Section V, Cultural Resources, concludes that the project site is located within an Archaeologically Sensitive Area; however, the project would have a less-than-significant impact based on the limited amount of required earthwork. All surrounding proposed development projects would undergo evaluation for potential to impact cultural resources. Based on the mitigation measures identified to reduce potential project impacts and discretionary review of surrounding projects, when considered with the potential impacts of other reasonably foreseeable

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development in the area, project impacts associated with cultural resources would be less than cumulatively considerable.

### *Energy Use*

The analysis provided in Section VI, Energy, concludes that the projects energy use would not result in unnecessary or wasteful energy use and would not conflict with applicable energy efficiency standards. Therefore, when considered with the potential impacts of other reasonably foreseeable projects in the unincorporated county, the contribution of the subject project to potential impacts to energy are considered less than cumulatively considerable.

### *Greenhouse Gas Emission.*

The analysis provided in Section VIII, Greenhouse Gas Emissions, concludes that the project's potential construction-related and operational emissions will fall below SLOAPCD thresholds of significance for both project-related and cumulative impacts upon implementation of Mitigation Measure AQ-1 to reduce diesel idling during project construction. Therefore, when considered with the potential impacts of other reasonably foreseeable projects in the unincorporated county, the contribution of the subject project to potential impacts to GHG emissions are considered less than cumulatively considerable.

### *Hydrology/Water Demand*

As discussed in Section X, Hydrology and Water Quality, upon implementation of Mitigation Measures USS-1 through USS-7, there is sufficient water supply in the existing well to support the project. Additionally, compliance with Mitigation Measure BIO-11 and existing regulations and/or required plans would adequately reduce potential impacts associated with hydrology and water quality to be less than significant. All surrounding proposed development projects would undergo evaluation for potential to impact hydrological resources. Based on the mitigation measures identified to reduce potential project impacts and discretionary review of surrounding projects, when considered with the potential impacts of other reasonably foreseeable development in the area, project impacts associated with hydrology and water quality resources would be less than cumulatively considerable.

### *Noise*

As discussed in Section XIII, Noise, noise associated project construction would be mitigated through Mitigation Measure N-1 through N-2. Potential operational noise impacts caused by surrounding land uses would be mitigated through Mitigation Measure N-3. Future projects with potential to generate noise above County standards or noise that would adversely affect surrounding sensitive receptors would be required to implement measures to reduce associated impacts. Therefore, when considered with the potential impacts of other reasonably foreseeable development projects in the unincorporated county, the contribution of the subject project to potential noise impacts is considered less than cumulatively considerable.

### *Population and Housing*

Based on the discussion in Section XIV, Population and Housing, the most recent projection of regional growth for San Luis Obispo County is the 2050 Regional Growth Forecast (RGF) for San Luis Obispo County prepared and adopted by SLOCOG in 2017. Using the Medium Scenario, the total county population, housing and employment for both incorporated and unincorporated areas is projected to increase at an average annual rate of 0.50% per year. Between 2015 and 2050, the

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County's population is projected to increase by 44,000, or about 1,260 residents per year. Within the unincorporated area, the population is expected to increase by about 19,500 residents, or about 557 per year. Employment is expected to increase by about 6,441, or about 184 per year.

The proposed project is not expected to induce substantial population growth. The project would be limited to six new mobile home units and six new residential units. Therefore, when considered with the potential impacts of other reasonably foreseeable projects in the unincorporated county, the contribution of the subject project to impacts related to housing and population is considered less than cumulatively considerable.

### *Public Services*

Based on the discussion in Section XV, Public Services, the project and surrounding reasonably foreseeable future development would be subject to adopted public facility (County) and school (California Government Code Section 65995 et seq.) fee programs to offset impacts to public services. Therefore, when considered with the potential impacts of other reasonably foreseeable development projects in the unincorporated county, the contribution of the subject project to potential public services impacts would be less than cumulatively considerable.

### *Recreation*

Based on the discussion in Section XVI, Recreation, the project would not substantially induce population growth that could result in the need for new or expanded recreational facilities or cause deterioration of existing ones. The project would be subject to adopted public facility fee programs to offset impacts on public recreational facilities. Therefore, when considered with the potential impacts of other reasonably foreseeable development projects in the unincorporated county, the contribution of the subject project to potential recreation impacts would be less than cumulatively considerable.

### *Transportation*

Based on the analysis in Section XVII, Transportation, the project is not expected to significantly increase peak hour trips to and from the project site. According to the VMT evaluation, buildout of the project would not result in additional trips that would exceed the County's daily trip threshold for residential projects. Therefore, the project would generate fewer than 27.2 daily trips. Additionally, the project and any other reasonably foreseeable development projects in the area would be subject to Road Improvement fees. Therefore, when considered with the potential impacts of other reasonably foreseeable development projects in the unincorporated county, the contribution of the subject project to potential transportation impacts would be less than cumulatively considerable.

- (c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Environmental impacts that may have an adverse effect on human beings, either directly or indirectly, are analyzed in each environmental resource section above. In addition, implementation of Mitigation Measures AQ-1 and AQ-2, BIO-1 through BIO-12, and N-1 and N-2 identified in the resource sections above would reduce potential adverse effects on human beings to less than significant; therefore, impacts would be less than significant with mitigation.

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### *Conclusion*

Potential impacts would be less than significant upon implementation of mitigation measures identified in the resource sections above.

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### Exhibit A - Initial Study References and Agency Contacts

The County Planning Department has contacted various agencies for their comments on the proposed project. With respect to the subject application, the following have been contacted (marked with an ☒) and when a response was made, it is either attached or in the application file:

Contacted	Agency	Response
<input checked="" type="checkbox"/>	County Public Works Department	In File**
<input checked="" type="checkbox"/>	County Environmental Health Services	In File**
<input type="checkbox"/>	County Agricultural Commissioner's Office	In File**
<input type="checkbox"/>	County Airport Manager	Not Applicable
<input type="checkbox"/>	Airport Land Use Commission	Not Applicable
<input checked="" type="checkbox"/>	Air Pollution Control District	None
<input type="checkbox"/>	County Sheriff's Department	Not Applicable
<input type="checkbox"/>	Regional Water Quality Control Board	Not Applicable
<input type="checkbox"/>	CA Coastal Commission	Not Applicable
<input type="checkbox"/>	CA Department of Fish and Wildlife	Not Applicable
<input type="checkbox"/>	CA Department of Forestry (Cal Fire)	Not Applicable
<input type="checkbox"/>	CA Department of Transportation	Not Applicable
<input type="checkbox"/>	Community Services District	Not Applicable
<input type="checkbox"/>	Other	Not Applicable
<input type="checkbox"/>	Other _____	Not Applicable

\*\* "No comment" or "No concerns"-type responses are usually not attached

The following checked ("☒") reference materials have been used in the environmental review for the proposed project and are hereby incorporated by reference into the Initial Study. The following information is available at the County Planning and Building Department.

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Project File for the Subject Application  | <input type="checkbox"/> Design Plan  |
| <input checked="" type="checkbox"/> <b>County Documents</b>   | <input type="checkbox"/> Specific Plan  |
| <input type="checkbox"/> Coastal Plan Policies  | <input type="checkbox"/> Annual Resource Summary Report   |
| <input checked="" type="checkbox"/> Framework for Planning (Coastal/Inland)   | <input type="checkbox"/> Circulation Study  |
| <input checked="" type="checkbox"/> General Plan (Inland/Coastal), includes all maps/elements; more pertinent elements: | <input checked="" type="checkbox"/> <b>Other Documents</b>  |
| <input checked="" type="checkbox"/> Agriculture Element   | <input checked="" type="checkbox"/> Clean Air Plan/APCD Handbook                                      |
| <input checked="" type="checkbox"/> Conservation & Open Space Element   | <input type="checkbox"/> Regional Transportation Plan   |
| <input type="checkbox"/> Economic Element   | <input type="checkbox"/> Uniform Fire Code  |
| <input checked="" type="checkbox"/> Housing Element   | <input type="checkbox"/> Water Quality Control Plan (Central Coast Basin – Region 3)                  |
| <input checked="" type="checkbox"/> Noise Element   | <input type="checkbox"/> Archaeological Resources Map   |
| <input checked="" type="checkbox"/> Parks & Recreation Element/Project List   | <input type="checkbox"/> Area of Critical Concerns Map  |
| <input checked="" type="checkbox"/> Safety Element  | <input type="checkbox"/> Special Biological Importance Map  |
| <input checked="" type="checkbox"/> Land Use Ordinance (Inland/Coastal)   | <input checked="" type="checkbox"/> CA Natural Species Diversity Database                             |
| <input type="checkbox"/> Building and Construction Ordinance  | <input checked="" type="checkbox"/> Fire Hazard Severity Map  |
| <input type="checkbox"/> Public Facilities Fee Ordinance  | <input checked="" type="checkbox"/> Flood Hazard Maps   |
| <input type="checkbox"/> Real Property Division Ordinance   | <input checked="" type="checkbox"/> Natural Resources Conservation Service Soil Survey for SLO County |
| <input type="checkbox"/> Affordable Housing Fund  | <input checked="" type="checkbox"/> GIS mapping layers (e.g., habitat, streams, contours, etc.)       |
| <input type="checkbox"/> Airport Land Use Plan  | <input type="checkbox"/> Other  |
| <input checked="" type="checkbox"/> Energy Wise Plan  |   |
| <input checked="" type="checkbox"/> South County Area Plan/South County sub area  |   |

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In addition, the following project-specific information and/or reference materials have been considered as a part of the Initial Study:

- Althouse and Meade, Inc. (Althouse and Meade). 2020. *Biological Letter Report for Sweet Springs Mobile Home Park Tract 3027/SUB2014-00023, APN 047-200-019, 311 Sweet Springs Lane Unincorporated Arroyo Grande, San Luis Obispo County, California*. December 9, 2020.
- California Air Resources Board (CARB). 2021. Maps of State and Federal Area Designations. Available at: <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>. Accessed on May 21, 2021.
- California Department of Conservation (DOC). 2015. Fault Activity Map of California. Available at: <https://maps.conservation.ca.gov/cgs/fam/>. Accessed on May 3, 2021.
- . 2016. Farmland Mapping and Monitoring Program – California Important Farmland Finder. Available at: <https://www.conservation.ca.gov/dlrp/fmmp/>. Accessed on May 3, 2021.
- . 2021. California Geological Survey Information Warehouse for Mineral Land Classification. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/mlc/>. Accessed on May 4, 2021.
- California Department of Forestry and Fire Protection (CAL FIRE). 2021. FHSZ Viewer. Available at: <https://egis.fire.ca.gov/FHSZ/>. Accessed on May 3, 2021.
- California Department of Fish and Wildlife (CDFW). 2021. California Natural Diversity Database (CNDDDB). Available at: <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data#43018408-cnddb-in-bios>. Accessed on May 3, 2021.
- California Department of Resources Recycling and Recovery (CalRecycle). 2015. Public Notice: Cold Canyon Landfill, Inc. – San Luis Obispo County. Available at: <https://www2.calrecycle.ca.gov/PublicNotices/Details/1548>. Accessed on May 3, 2021.
- . 2019. Estimated Solid Waste Generation Rates. Available at: <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates#:~:text=Residential%20Sector%20Generation%20Rates%20%20%20Waste,%20Cor%20...%20%208%20more%20rows%20>. Accessed on May 26, 2021.
- California Geologic Survey (CGS). 2015. *San Luis Obispo-Santa Barbara Production-Consumption Region*. 2015.
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- California Department of Toxic Substances Control (DTSC). 2021. EnviroStor. Available at: <https://www.envirostor.dtsc.ca.gov/public/>. Accessed on May 3, 2021.
- California Department of Transportation (Caltrans). 2021. California State Scenic Highway System Map. Available at: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf700dfc19983>. Accessed on May 3, 2021.
- California Office of Planning and Research (OPR). 2018. Technical Advisory on Evaluating Transportation

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Cleath Harris Geologists, Inc. 2015a. *Water Supply Assessment*. January 12, 2015.

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County of San Luis Obispo. 2011. EnergyWise Plan. Available at: <https://www.slocounty.ca.gov/Departments/Planning-Building/Energy-and-Climate/Energy-Climate-Reports/EnergyWise-Plan.aspx>. Accessed on May 4, 2021.

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Cultural Resource Management Service (CRMS). 2020. *Archaeological Inventory Survey at the View Park, 311 Sweet Spring Lane, Arroyo Grande, San Luis Obispo County, California*. September 2020.

GSI Water Solutions Inc. (GSI). 2018. *Review of Cumulative Project Water Level Impact and Water Supply Assessment*. May 4, 2018.

Mid-Coast Geotechnical, Inc. (MCG). 2010. *Percolation Data Report*. July 13, 2010.

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Pacific Gas and Electric (PG&E). 2021. Delivering Low-Emission Energy. Available at: [https://www.pge.com/en\\_US/about-pge/environment/what-we-are-doing/clean-energy-solutions/clean-energy-solutions.page](https://www.pge.com/en_US/about-pge/environment/what-we-are-doing/clean-energy-solutions/clean-energy-solutions.page). Accessed on May 5, 2021.

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