COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING & BUILDING

PLN-1123
3/22/2018

Notice of Exemption/General Rule Exemption

Project Title and No.: Callender Commercial, LLC for a Development Plan/Coastal Development Permit/ DRC2017-00016/ED23-173

Project Location: 1291 Mesa View Drive (APN 091-152-004,-006)	**Project Applicant/Phone No./Email:** Callender Commercial, LLC (805-544-3030) cliff@cliff-branch.com
	Applicant Address (Street, City, State, Zip): 755 Santa Rosa Street, Suite 310, San Luis Obispo, CA 93401

Description of Nature, Purpose, and Beneficiaries of Project:

DRC2017-00016 Callender Commercial, LLC. has applied for a Coastal Development Permit ("CDP") to allow the construction of a two-story 9,240 square foot industrial building with a 1,089 square foot caretaker residence, 15 off-street parking spaces, a trash enclosure, landscaping and utilities on a portion of Lot 2 of the Callender Commercial Park located at 1291 Mesa View Drive approximately two miles south of the community of Oceano in the Callender-Garrett Village Area.

The project also includes the abandonment of an existing 2,077 square foot wastewater septic system serving lots 2 and 4, and the installation of a new 10,280 square foot disposal area and 3,000 gallon septic tank to serve these two lots, only. The new septic system will occupy a 7,780 square foot portion of Lot 2 and a 2,500 square foot portion of Lot 4.

The total area of disturbance on both parcels is estimated to be about 36,934 square feet and will include an estimated 813 cubic yards of excavation to replace the existing septic system and construct the new collection system and leach field.

The project site is within the Industrial land use category and within the South County Coastal Planning Area, Callender-Garrett Sub-Area.

No tenants have been identified for the existing 4,480 square foot building or the proposed 9,240 square foot shell building. However, the application materials identify a range of potential occupants as allowed within the Industrial land use category including warehousing, storage, vehicle storage, and agricultural processing.

The County has determined that the project qualifies for the "common sense" exemption (formerly the general rule exemption) as provided in CEQA Guidelines Section 15061 (b) (3) which states:

> "*… a project is exempt because CEQA applies only to projects which have the potential for causing a significant effect on the environment and it can be seen with certainty that there is no possibility that the activity in question may have a significant effect.* "

A finding that the project is exempt from CEQA must be supported by factual evidence in the record which is provided below. The discussion is organized by topical sections based on the nature and scope of the project and is informed by technical studies prepared for the project site.

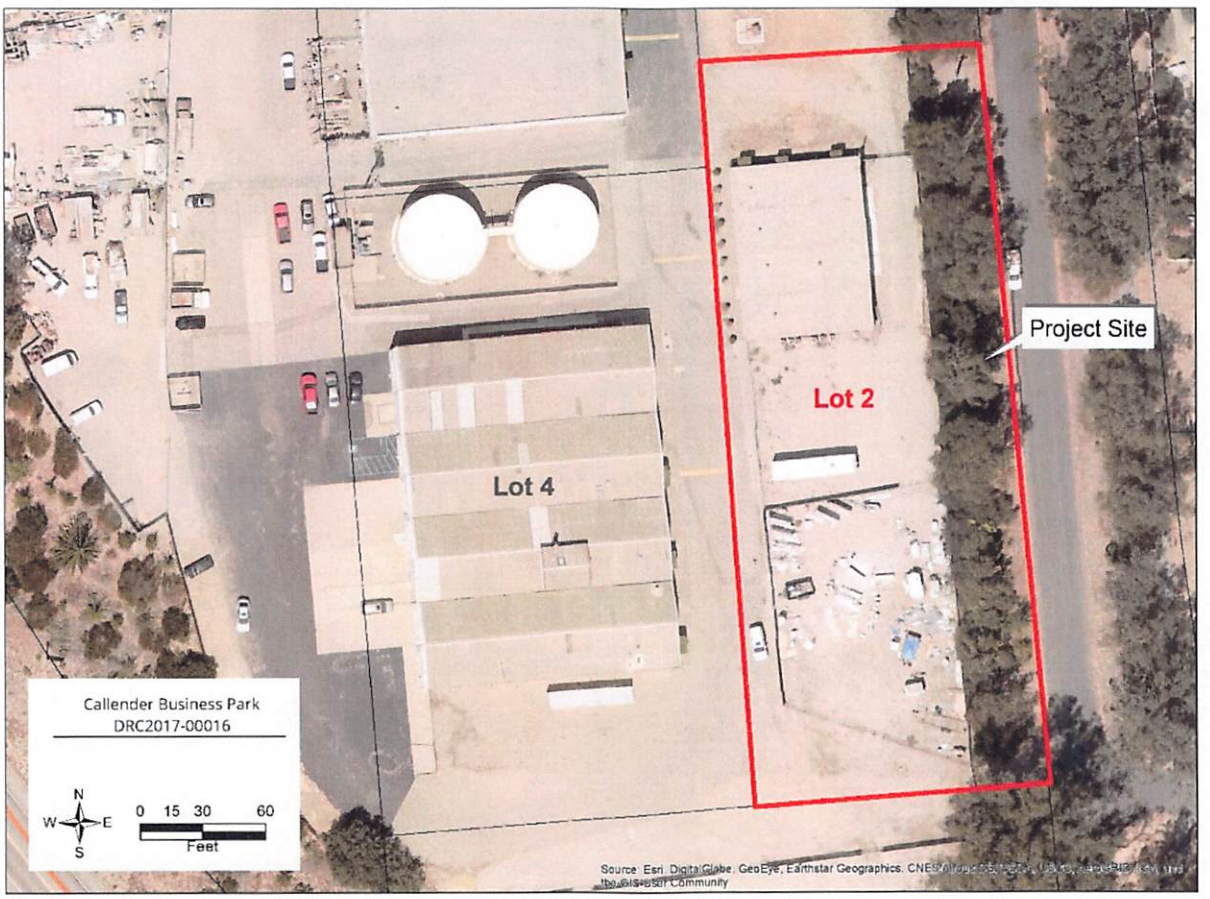
Baseline Conditions

The project site consists of a 1.2 acre rectangular parcel within the Callender Business Park that consists of nine lots with a combined area of 14.7 acres located adjacent to State Route 1 at Callender Road. The Business Park is completely fenced and has been partially developed with a paved access driveway, water storage and distribution lines, a septic system and leach field, and electricity. Water is supplied by the Callender Grove Mutual Water Company. There are currently three vacant industrial buildings located on lots 2, 4 and 5 all of which have paved access and decomposed granite areas surrounding each building. All remaining lots are vacant.

The project site is flat and partially developed with an existing 4,480 square foot industrial building/warehouse that is currently vacant. The remainder of the site is currently used for parking and a fenced vehicle storage area (Figure 1) with a decomposed granite surface. The project site is adjacent to Manadella Street which has been planted with a dense row of eucalyptus trees; there is no other significant vegetation or other improvements.

Surrounding land uses include single family residences to the east, State Route 1 (a State scenic Highway) and the Callender dunes to the west. To the north is a parcel owned by the Land Conservancy at the corner of Callender Road and State Route 1 known as Kathleen's Canyon Overlook where the Conservancy has constructed recreational facilities that include hiking trails and a playground.

Figure 1 – Project Location



Name of Public Agency Approving Project: County of San Luis Obispo

Exempt Status/Findings: This project is covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. It can be seen with certainty that there is no possibility that this project may have a significant effect on the environment; therefore, the activity is not subject to CEQA. [Reference: State CEQA Guidelines sec. 15061(b)(3), General Rule Exemption].

Reasons why project is exempt:

Aesthetic and Visual Resources. The project site is located in an established commercial park east of State Route 1, a designated Scenic Highway, and adjacent to Manadella Street. The project site and subsequent development will be effectively screened from view of SR 1 by the intervening topography and existing buildings. Views of the project site from Manadella Street will be screened by a dense grove of eucalyptus trees that has been established along the east property line.

Agricultural Resources. The site is located within an established commercial business park and surrounded by urban development where soil-based agricultural activities would be infeasible.

Air Quality. As discussed in the project description, the area of disturbance is estimated to be about 36,934 square feet (0.84 acres) and will include an estimated 813 cubic yards of excavation to replace the existing septic system and construct the new collection system and leach field.

Based on the SLOAPCD's CEQA Air Quality Handbook (2012) and Clarification Memorandum (2017), estimated construction-related emissions were calculated and are shown in Table 1 below. As shown in Table 1 the project is not expected to exceed the daily thresholds for ROG and NOx combined and diesel particulates. The project is also not expected to exceed the quarterly threshold for fugitive particulate matter.

Table 1 -- Estimated Construction-Related Emissions, SLO Cal East (DRC2019-00051)

Pollutant	Total Estimated Project Emissions	APCD Emissions Threshold	Mitigation Required?
Reactive Organic Gases (ROG) + Nitrogen Oxide (NO_x) (combined)	9.19 lbs. [1]	137 lbs./day	No
	0.045 tons [1]	2.5 tons/quarter	No
Diesel Particulate Matter (DPM)	0.40 lbs. [2]	7 lbs./day	No
	0.0019 tons [2]	0.13 tons/quarter	No
Fugitive Particulate Matter (PM_{10})	0.63 tons[3]	2.5 tons/quarter	No

Notes:
1. Based on 813 cubic yards of material moved and 0.113 pounds of combined ROG and NOx emissions per cubic yard of material moved and 10 construction days.
2. Based 813 cubic yards of material moved and 0.0049 pounds of diesel particulate emissions per cubic yard of material moved.
3. Based on 0.82 acres of disturbance and 0.75 tons of PM10 generated per acre of disturbance per month and 10 days of construction.

Operational impacts are focused primarily on the indirect emissions associated with motor vehicle trips generated by new development. Table 1-1 of the SLOAPCD's CEQA Handbook provides screening criteria based on the size of different types of projects that would normally exceed the SLOAPCD's

operational thresholds of significance for greenhouse gases and ozone precursors. For example, a project consisting of 99 single family residences generating 970 average daily vehicle trips would be expected to exceed the 25 lbs/day operational threshold for ozone precursors. As discussed in the project description, the range of uses for the new shell building could include warehousing, storage, vehicle storage, and agricultural processing as allowed within the Industrial land use category. A trip generation study prepared for the project (OEG Engineering Group, 2022) provides an estimate of afternoon peak hour trips associated with the range of uses likely to occupy the new building as summarized in Table 2, below.

Table 2 – Estimated Trip Generation

Land Use	Quantity	PM Peak Hour Trip Rate	PM Peak Hour Trips
Light Industrial	6,603 sq.ft.	0.65 peak hour trips per 1,000 sq.ft.	4
Residential	1	0.44 peak hour trips per dwelling unit	0
Total:			4

Source: Orosz Engineering Group

As shown in Table 2, the new building could generate as many as 4 vehicle trips during the PM peak hour which would translate to about 40 trips per day which is well below the 970 average daily trips that would exceed the operational threshold for daily emissions.

The project site is located within 500 feet of a neighborhood of single family residences which may be occupied by sensitive receptors 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. However, construction of the proposed shell industrial building and associated parking is not expected to require the use of large earth moving equipment that would produce emissions that would adversely impact sensitive receptors.

Naturally Occurring Asbestos (NOA) is identified as a toxic air contaminant by the California Air Resources Board (CARB). Based on SLOAPCD's map, the project site is not located in a candidate area for soils containing NOA.

Biological Resources. As discussed in the baseline conditions, the project site is covered with an existing building and compacted all-weather gravel surfaces; construction of the proposed shell building will not require the removal of any natural vegetation. A dense grove of eucalyptus trees has been established along the eastern property line outside the area of disturbance. There are no USGS blue line features within or immediately adjacent to the project site and no drainages.

The project site does not contain any Environmentally Sensitive Habitat Areas as defined by the Coastal Act, nor does it contain suitable habitat for sensitive plants or animals. However, according to a biological assessment of the Callender Business Park (including the project site) prepared in 2021 (David Wolff Environmental, LLC, 2021), portions of the Business Park containing undisturbed coastal dune scrub is within the designated critical habitat of the La Graciosa thistle. However, none of these areas are within or adjacent to the project site or within the area of disturbance and the project will have no impact on these resources.

In addition, the Business Park and the area along the east property line of the project site contains dense stands of eucalyptus trees which may provide roosting habitat for monarch butterflies. A field survey

conducted in November 21, 2021 provided ideal conditions for observing monarch butterflies (sunny, little wind, temperatures in the 60's Fahrenheit). During that survey scanning all the trees in the vicinity of the Business Park with binoculars revealed less than about 25 monarch butterflies in flight and not all in one place. Typically, monarch butterflies are readily observable flying in and out of roost aggregations under these ideal conditions where they do occur. But as stated, no roost activities were observed. Given the Pismo monarch butterfly preserve recorded over 22,000 monarch butterflies in November 2021, it would be expected that a roost site would have been readily noticeable during the November 21st field survey. Therefore, the project is expected to have no impact to potential monarch butterfly habitat. It should also be noted that no eucalyptus trees will be removed or otherwise impacted by the project.

Cultural Resources. The project site does not contain a site under the Historic Site (H) combining designation and does not contain other structures of historic age (50 years or older) that could be potentially significant as a historical resource. The project site is not subject to the Archaeologically Sensitive combining designation and does not contain any known archeological resources. The site has been developed with a building and all-weather parking and access areas. Subsurface excavation for the proposed septic leach field will be confined to an area that was previously graded and covered with decomposed granite.

Energy. During construction activities, fossil fuels, electricity, and natural gas would be used by construction vehicles and equipment. The energy consumed during construction would be temporary in nature and would be typical of other similar construction activities in the county. Based on the size and scope of proposed earthwork and building construction, the project is not expected to result in adverse environmental impacts through its use of diesel fuel for construction equipment.

During operation, the project would rely on electricity provided by PG&E, which is fully compliant with state renewable energy regulations. PG&E utilizes clean energy sources, including 50% from renewable energy sources and 43% from other GHG-free energy sources (PG&E 2021). Operational energy use would include interior and exterior lighting and could include machinery used for light industrial operations, as well as natural gas for heating. However, energy demand from these sources would not be more intensive than other typical light industrial activities.

Geology and Soils. The project site is flat and has been previously graded. Soils consist of coastal dune sands of the Oceano Series. The project site is not located within the Geologic Study Area designation. The site's potential for liquefaction and landslide hazard is considered low. The project site is not located in an Alquist Priolo Fault Zone, and no active fault lines cross the project site (CGS 2018). Based on the Safety Element Landslide Hazards Map, proposed components are located in an area with a low potential for landslide risk.
The project site is not located within a 100-year flood hazard area. Drainage, sedimentation and erosion control plans are required for all construction and grading projects (LUO Sec. 22.52.100 and 22.52.110) to ensure there are no post-construction drainage impacts.

Proposed development on the project site will be served by a new septic system. According to a n onsite sewage disposal site evaluation prepared for the site in 2021 (Nexgen, 2021), the Oceano Series soils of the project site do not present significant limitations for the use of septic leach fields. The project site contains ample area for the location of a septic leach field if additional disposal area is needed to meet County and RWQCB standards.

Greenhouse Gas Emissions. Assuming the new shell building contains one single family residence (caretakers quarters) and 6,603 sq.ft. of industrial floor space the project would produce about 50 metric

tons CO2 equivalent (MTCO2e) each year which is well below the interim working threshold of 690 MTCO2e.

Hazards and Hazardous Materials. Future tenents will be required to comply with all relevant regulations relating to the use, handling and storage of hazardous materials.
The project is located within a State Responsibility Area for fire protection but is not located within a "very high" severity risk area which could present a significant fire safety risk. The proposed project will be required to prepare a fire safety plan for review and approval prior to occupancy.

Hydrology and Water Quality. The project will result in an area disturbance area of about 0.84 acres. Accordingly, a sedimentation and erosion control plan will be required subject to the review and approval of the County Building Division in accordance with LUO Section 22.52.120.
The project is served by the Callender Grove Mutual Water Company. An e-mail from Mr. Rob Miller on behalf of the Water Company (January 11, 2018) states that the water company has capacity to serve the project, assuming 1 acre-foot of water per year.

The project would be required to comply with all National Pollution Discharge Elimination System (NPDES) requirements and prepare a SWPPP that incorporates BMPs during construction.
Based on the Safety Element Flood Hazard Map, the area of disturbance is not located within a 100-year flood zone (County of San Luis Obispo 2013).

Noise. Project construction would result in a temporary increase in noise levels associated with construction activities, equipment, and vehicle trips. Construction noise would be variable, temporary, and limited in nature and duration. The County LUO requires that construction activities be conducted during daytime hours to be able to utilize County construction noise exception standards and that construction equipment be equipped with appropriate mufflers recommended by the manufacturer.

Transportation. As discussed above under Air Quality, the project may be expected to generate as many as 4 afternoon peak hour trips. Based on the referral response from the Department of Public Works (David Grimm, May 9, 2023) the project is not expected to result in adverse impacts associated with roadway safety or capacity.

In addition, based on the project description and the baseline conditions provided above, the project will have no impacts relating to the following:

Land Use and Planning
Mineral Resources
Population and Housing
Public Services
Recreation
Tribal Cultural Resources
Utilities and Service Systems
Wildfire

Conclusions
The project site is within an established commercial business park which is served by a community water system, paved access and parking. The site is partially developed with an existing building and the remainder is covered with an all-weather parking surface; the site contains no biological or archaeological resources and is not visible from State Route 1 or the surrounding residential neighborhood.

In sum it can be seen with certainty that there is no possibility that the activity in question may have a significant effect and the project is exempt from CEQA.

The project will conform to the applicable General Plan and Area Plan standards, and no measures beyond those required by County Code are necessary to address the environmental impacts associated with the proposed project.

Additional Information: Additional information pertaining to this notice of general rule exemption may be obtained by reviewing the second page of this document and by contacting the Environmental Coordinator, 976 Osos St., Rm 200, San Luis Obispo, CA 93408 (805) 781-5600.

David Grimm, Department of Public Works referral response dated May 9, 2023
David Wolff Environmental, LLC, Botanical and Focused Biological Resources Assessment Addendum for the Callender Commercial LLC Lots 1 through 9
Orosz Engineering Group, August 15, 2022, 2600 Callender Road Lot 2 Trip Generation Study
NexGen Engineering and Consulting, Inc., Onsite Sewage Disposal Site Evaluation Report, December 10, 2021

Notice of General Rule Exemption

Project Title and No.: Callender Commercial, LLC for a Development Plan/Coastal Development Permit/ DRC2017-00016/ED23-173

Pursuant to section 15061 of the State California Environmental Quality Act (CEQA) Guidelines, the preliminary review of a project includes a determination as to whether a project is exempt from CEQA. This checklist represents a summary of this project's review for exemption.

		YES	NO
1.	Does this project fall within any exempt class as listed in sections 15301 through 15329 of the State CEQA Guidelines?	☐	☒
2.	Is there a reasonable possibility that the project could have a significant effect on the environment due to unusual circumstances?	☐	☒
3.	Is the project inconsistent with any Federal, State, or local law or administrative requirement relating to the environment?	☐	☒
4.	Will the project involve substantial public controversy regarding environmental issues?	☐	☒
5.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒
6.	Does the project have the potential to achieve short-term environmental goals to the disadvantage of achieving long-term environmental goals? (A short-term impact on the environment is one which occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future.)	☐	☒
7.	Does the project have adverse impacts which are individually insignificant, but cumulatively significant? Cumulatively significant means that the incremental effects of an individual project are substantially adverse when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.	☐	☒
8.	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒

On the basis of this initial evaluation, I find that the proposed project does not have the potential to cause a significant effect on the environment and is therefore exempt from CEQA.

Lead Agency Contact Person: Jeremy Freund (jfreund@co.slo.ca.us) **Telephone** 805-781-5621

If filed by applicant:
1. Attach certified document of exemption finding
2. Has a notice of exemption been filed by the public agency approving the project? Yes ☐ No ☐

Signature: Jeremy Freund Date: 12/28/2023

Name: Jeremy Freund Title: Senior Planner

On December 14, 2023 the project was Approved by:

☐ Board of Supervisors ☐ Subdivision Review Board ☐ Other Chief Building Official

☒ Planning Commission ☐ Planning Dept Hearing Officer

Date: May 9, 2023 (revised from June 20, 2018; January 26, 2022)

To: Cheryl Ku, Project Planner

From: David E. Grim, Development Services

Subject: DRC2017-00016, Callender Commercial Park CUP, Callender Rd., Nipomo, APN 040-289-012

Thank you for the opportunity to provide information on the proposed subject project. It has been reviewed by several divisions of Public Works, and this represents our consolidated response.

Public Works Comments

A. The project site is located on a privately maintained street in an industrial/commercial park off Callender Road, a Caltrans maintained roadway. Although not a State Route, this portion of Callender Road is maintained by Caltrans. The project proposes to take additional access off Monadella Street, which is County maintained.

B. The proposed project is within the South County Area 2 Road Fee Area. Payment of Road Improvement Fees is required prior to building permit issuance.

C. The proposed project is within a drainage review area. A drainage plan is required to be prepared by a registered civil engineer and will be reviewed at the time of Building Permit submittal by Public Works. The applicant should review Section 23.05.040 of the Land Use Ordinance prior to future submittal of development permits.

D. This project may be a regulated project as it is located in a Stormwater Management Area (MS4) and is therefore required to submit a Stormwater Control Plan (SWCP) Application or Stormwater Post Construction Requirements (PCRs) Waiver Request Form at time of construction permits.

E. If the project site disturbs 1.0 acre or more the applicant must enroll for coverage under California's Construction General Permit, which may require preparation of a project Stormwater Control Plan even if it is located outside a Stormwater Management Area.

F. The site is within the Santa Maria Groundwater Basin and may be subject to the Sustainable Groundwater Management Act (SGMA). However, the Groundwater Sustainability Agency responsible for overseeing SGMA compliance has not completed the planning efforts that will define the need for any groundwater mitigation requirements. In the interim, consideration of the project's impacts on the groundwater basin should be included in the project's CEQA analysis.

Recommended Project Conditions of Approval

Access

1. **At the time of application for construction permits**, the applicant shall submit to the Department of Public Works an encroachment permit application, plans, fees, and post a cash damage bond, to install improvements within the public right-of-way in accordance with County Public Improvement Standards,

unless already constructed and acceptable or design exceptions are approved by the Public Works Department in accordance with Section 1.2 of the Public Improvement Standards. The plans are to include, as applicable:

a. Construct a new Monadella site access connection in accordance with B-1 rural driveway approach and A-5 sight distance standards.

b. Public utility plan, showing all existing utilities and installation of all new utilities to serve the site.

c. Tree removal/retention plan for trees to be removed and retained associated with the required public improvements. The plan shall be approved jointly with the Department of Planning and Building.

d. Traffic control plan for construction in accordance with the California Manual on Uniform Traffic Control Devices (CA-MUTCD).

2. **On-going condition of approval (valid for the life of the project),** and in accordance with County Code Section 13.08, no activities associated with this permit shall be allowed to occur within the public right-of-way including, but not limited to, monument signage, tree planting, fences, etc., without a valid encroachment permit issued by the Department of Public Works.

3. **On-going condition of approval (valid for the life of the project),** the property owner shall be responsible for operation and maintenance of public road frontage sidewalks, landscaping (including the existing eucalyptus trees), maintaining County driveway sight distance standards in a viable condition and on a continuing basis into perpetuity.

4. **Prior to commencing permitted activities,** all work in the public right-of-way must be constructed or reconstructed to the satisfaction of the Public Works Inspector and in accordance with the County Public Improvement Standards; the project conditions of approval, including any related land use permit conditions; and the approved improvement plans.

5. **At the time of application for construction permits,** the applicant shall provide evidence to the Department of Planning and Building that onsite circulation and pavement structural sections have been designed and shall be constructed in conformance with Cal Fire, or the regulating fire agency standards and specifications back to the nearest public maintained roadway.

Fees

6. **Prior to the issuance of construction permits,** and in accordance with Title 13.01 of the County Code, the applicant must pay to the Department of Public Works the South County Area 2 Road Improvement Fee based on the latest adopted area fee schedule and 4.00 peak hour trips as estimated in the trip generation report (OEG, dated August 15, 2022). The estimated fee is $30,972 ($7,743/PHT x 4.00 PHT).

   The applicant shall be responsible for paying to the Department of Public Works the South County Area 2 Road Improvement Fee consistent with the approved fee schedule at the time of issuance of building permit, or within 30 days of land use permit approval if no building permit is required. In accordance with Government Code section 66020(d)(1), the County provides notice to the applicant that the 90-day approval period in which the applicant may protest imposition of the Road Improvement Fee has begun.

Drainage & Flood Hazard

7. **At the time of application for construction permits,** the applicant shall submit complete drainage plans for review and approval in accordance with Section 23.05.040 of the Land Use Ordinance.

8. **At the time of application for construction permits,** the applicant shall submit complete erosion and sedimentation control plan for review and approval in accordance with Section 23.05.036 of the Land Use Ordinance.

9. **At the time of application for construction permits,** the applicant shall demonstrate that the project construction plans are in conformance with their Stormwater Control Plan.

Stormwater Pollution Prevention Plan (SWPPP)

10. **At the time of application for construction permits,** if the project disturbs more than 1.0 acre or is part of a common plan of development, the applicant must enroll for coverage under California's Construction General Permit. Sites that disturb less than 1.0 acre must implement all required elements within the site's erosion and sediment control plan as required by San Luis Obispo County Codes.

Stormwater Control Plan (SWCP)

11. **At the time of application for construction or grading permits**, the applicant shall demonstrate whether the project is subject to post-construction stormwater requirements by submitting a Stormwater Control Plan application or Stormwater Post Construction Requirements (PCRs) Waiver Request Form.
    a. The applicant must submit a SWCP for all regulated projects subject to Performance Requirement #2 and above. The SWCP must be prepared by an appropriately licensed professional and submitted to the County for review and approval. Applicants must utilize the County's latest SWCP template.
    b. If post-construction stormwater control measures (SCMs) are proposed, the applicant must submit a draft Stormwater Operations and Maintenance Plan for review by the County. The plan must consist of the following Planning & Building Department forms;
        1. Structural Control Measure Description (Exhibit B)
        2. Stormwater System Contact Information
        3. Stormwater System Plans and Manuals
    c. If applicable, following approval by the County, the applicant shall record with the County Clerk-Recorder the Stormwater Operation and Maintenance Plan and an agreement or provisions in the CCRs for the purpose of documenting on-going and permanent storm drainage control, management, treatment, inspection and reporting.
12. **Prior to acceptance of the improvements (if applicable),** the Stormwater Operations and Maintenance plan and General Notice must be updated to reflect as-built changes, approved by the County, and re-recorded with the County Clerk-Recorder as amendments to the original document.

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David Wolff Environmental, LLC
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Los Osos, CA 93402
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(805)235-5223

December 14, 2021

Cliff Branch
Callender Commercial LLC c/o
Puglisi Architects
569 Higuera Street, Suite A
San Luis Obispo, CA 93401

SUBJECT: **BOTANICAL AND FOCUSED BIOLOGICAL RESOURCES ASSESSMENT ADDENDUM FOR THE CALLENDER COMMERCIAL LLC LOTS 1 TO 9 PROJECT SITE, DRC2017-00016, SAN LUIS OBISPO COUNTY, CA**

Dear Mr. Branch:

David Wolff Environmental (DWE) is pleased to submit this Botanical and Focused Biological Resources Assessment Addendum (2021 BRA Addendum) for the Callender Commercial LLC Lots 1 to 9 Project Site, DRC2017-00016, San Luis Obispo County, California. DWE has prepared this 2021 BRA Addendum to the June 1, 2018 Sage Institute, Inc. (SII) Botanical Resources Survey Report (2018 Botanical Report) to address and information requests from San Luis Obispo County (County) on January 11, 2018, June 27, 2018, and July 3, 2018, and the July 2, 2018 peer review comments. Principal Ecologist David Wolff (now DWE) was the lead investigator for the 2018 Botanical Report, and conducted a site visit of the project site east and west of west of Highway 1 on November 21, 2021 to gather data to address the County information requests and peer review comments.

1.0 JANUARY 11, 2018 SAN LUIS OBISPO COUNTY INFORMATION REQUEST

The County January 11, 2018 information request specifically stated the requirement for a seasonally appropriate botanical survey focusing on the as-built site conditions and proposed monument sign. The County request did not specify a full biological resources assessment, which is typically required for most projects, because of the proposed development is within the existing disturbed areas within the fenced yard with existing industrial uses. SII conducted the seasonally appropriate botanical resources survey as required by the County and provided the 2018 Botanical Report that followed and met industry standards and County guidelines for botanical resources surveys. The report provided an overall on-site habitat map and description of the botanical resources within and outside of the fenced area on the east side of Highway 1. No target rare plant species (noted by the County) or any other rare, threatened or endangered plants were observed in the study area, including the proposed monument sign area, during the 2018 Botanical Resources study.

The County January 11, 2018 letter and the July 2, 2018 peer review letter suggest an Environmentally Sensitive Habitat Area (ESHA) with a potential to occur within the study area may be present as a "wooded wetland" or wetland associated plants (arroyo willow). These comments were raised in the subsequent information request and peer review comments and are discussed in detail below.

2.0 JUNE 27, 2018 SAN LUIS OBISPO COUNTY INFORMATION REQUEST

The County June 27, 2018 information request item 4.1 and subsequent bullet points request clarification and discussion on the La Graciosa thistle designated critical habitat, willow trees, an updated habitat map, potential monument sign impacts, and pending peer review comments on the botanical resources report.

- **La Graciosa Thistle Critical Habitat** – It is important to note that federally designated critical habitat does not provide any regulatory authority or protections over projects such as this that do not have any federal nexus (i.e. permits, funding, or other approvals). Even then, it only requires analysis and evaluation in consultation between federal "approving" agencies and the USFWS. Further, designated Critical Habitat does not automatically determine a species presence, but can provide a very broad-brush regional overview of a species potential to occur if the primary constituent elements (PCEs) are found within a site as discussed below.
    - **Critical Habitat Unit 1** – Upon close inspection of the La Graciosa thistle Unit 1 Critical Habitat map (attached as Exhibit A-1 for reference) and review of Google Earth aerial photographs, it's clear that the project site lots are not included in the Critical Habitat designation east or west of Highway 1. The Critical Habitat "nose" projecting across Highway 1 is north of the project site in a clearly identifiable extension of existing Guadalupe dune sheet and a riparian corridor. Further, the Critical Habitat appears to follow the existing expression of the dune sheet not extending into currently developed areas.
    - **Primary Constituent Elements (PCEs)** – In summary, La Graciosa thistle PCEs are based on mesic (moist) wetland sites in sandy soils commonly associated with the seeps and springs, dune slack ponds/wetlands, coastal and valley freshwater marsh, riparian scrub (mule fat scrub and/or willow scrub), or riparian forest. It is often growing in and amongst a mat of low-growing, herbaceous, wetland plants including rushes, sedges, wetland grasses, and broadleaf wetland species. No wetland habitats, or La Graciosa thistle remnants were observed within any parcels during the 2018 study east of Highway 1, or the November 21, 2021 DWE field survey. Specifically, no topographic low-lying mesic areas with any type of wetland plants were observed on the project site lots west side of Highway 1.

- **Lot 4 Willows** – The arroyo willows mapped on Lot 4 are not part of a naturally occurring riparian or wetland area. The clump of willows appears to be two individuals with many small shoots growing on top of a berm at the downhill end of a slightly sloping paved surface within the fenced industrial development. Likely the runoff from the impervious surface provides the moisture on the berm needed by the willows. There is no connection to any other willows or riparian areas, just this isolated clump of willows growing on a berm supported by runoff from development. Arroyo willows have a wetland plant indicator status of Facultative Wetland (FACW) that have a 67% to 99% probability to occur in wetlands, but also a 1% to 33% probability to occur in non-wetlands. Clearly the Lot 4 willows fall into the 1% to 33% non-wetland category. As such, the willows are not a wetland, should not be considered a wetland just because of the probability to occur in wetlands, do not provide wetland services and values, do not represent an ESHA, and do not meet any ESHA criteria (discussed further below).
- **Updated Figure 4 Habitat Map** – Attached Exhibit A-2 is the requested revised habitat map. Exhibit A-3 provides a set of representative photographs showing the existing conditions of the project lots west of Highway 1 from the November 21, 2021 survey.

3.0 JULY 3, 2018 SAN LUIS OBISPO COUNTY SUPPLEMENT TO REVIEW INFORMATION REQUEST

- **Character of Vegetation** – The 2018 Botanical Report provided a general description of the character of vegetation within the study area mostly pointing to the majority of the site being disturbed ruderal vegetation within the fenced developed areas stating:

> *"The Callender Commercial property supported mostly developed buildings, parking lots, and compacted graveled storage yards. Several areas of ruderal grassland habitat with some native plants but mostly weedy non-native plants are within the fenced boundary of the property. Eucalyptus trees and acacia shrubs border the outside of much of the fenced compound. A small patch of coastal scrub habitat remains along the Highway 1 frontage outside of the fenced compound with some scattered acacia shrubs."*

Table 1 in the 2018 Botanical Report provided a floristic inventory plant species list. The character of the ruderal disturbed areas is that of highly varied non-native herbaceous plant species represented in Table 1 with much exposed open ground. The native coastal scrub vegetation outside of the developed compound can be characterized by a predominance of shrubs including beach blue lupine, mock heather, California buckwheat, and coyote brush. Herbaceous plants with much bare ground include non-native veldt grass, non-native annual grasses, miniature and sky lupines, suncups, and California poppy.

The property west of Highway 1 is characterized by stands of eucalyptus trees with abundant tree bark and leaf debris precluding growth other plants under the canopy, with coastal scrub habitat as characterized above for the area east of the Highway 1. The potential for future mitigation in this area is noted, but not needed at this time.

- **Monument Sign Impacts** – The monument sign appears to be mostly located in disturbed ruderal vegetation under eucalyptus trees, over an existing paved road, and partially in the very north limit of the coastal scrub vegetation. See the revised habitat map attached as Exhibit A-2. Approximately 545 square feet (0.0125 ac.) of coastal scrub vegetation would be impacted and replaced with landscape plantings. The remaining monument sign impacts are approximately 3,485 square feet (0.08 ac.) of eucalyptus trees, and 3,050 square feet (0.07 ac.) of developed ruderal area. Overall, the small amount of native and non-native habitat impacts from the monument sign would be considered less than significant.
- **Althouse and Meade 2004 Tract 2459 Monardella Report** – This is a mitigation monitoring and reporting plan for the adjacent to the east Tract 2459 development impacts on the San Luis Obispo monardella (*Monardella frutescnes*), that has been taxonomically renamed to *Monardella undulata* ssp. *undulata*, but still has its CNPS 1B ranking. The DWE November 21, 2021 field survey affirmed that "Population 3" as documented by a 1999 McLeod survey used as the basis for the 2004 report is extant based on observations of what appeared to be dried *Monardella* plants. This occurrence is on the adjacent property (within the railroad right-of-way?) and not within any of the project lots. Population 2 is likely extant and offsite south of Lot 9 west of Highway 1, however, there were no readily identifiable dried *Monardella* plants observed on the November 21st field survey. Further, the proposed mitigation receiver site is not within any of the proposed project lots and is to the south of Lot 9 on the west side of Highway 1. No *Monardella* plants were observed within the 2018 study area during the 2018 botanical resources survey. No Callender Commercial development is currently proposed west of Highway 1.
- **Lot 4 Willows, Coastal Wetland Definition, and Unmapped ESHA** – As described above, the small clump of two arroyo willows does not constitute a wetland under any definition. As such, they are not automatically an unmapped ESHA. The California Coastal Act defines ESHA in Section 30107.5 that states:

  > *"Environmentally sensitive area" means any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.*

  The willow clump on a constructed berm likely supported by developed impervious surface runoff is in no manner a rare habitat worthy of ESHA designation. The small isolated willow clump is not especially valuable in the ecosystem because it is not associated with a creek and is not part of a riparian corridor. Associated trees are non-native acacia and eucalyptus. Nearby human activities appear to be the reason the willows are there and not a degrading influence. For these reasons, the willows are not an unmapped ESHA or wetland.

- **La Graciosa Thistle Critical Habitat** – It is important to note that federally designated critical habitat does not provide any regulatory authority or protections over projects such as this that do not have any federal nexus (i.e. permits, funding, or other approvals). Even then, it only requires analysis and evaluation in consultation between federal "approving" agencies and the USFWS. Further, designated Critical Habitat does not automatically determine a species presence, but can provide a very broad-brush regional overview of a species potential to occur if the primary constituent elements (PCEs) are found within a site as discussed below.
    - **Critical Habitat Unit 1** – Upon close inspection of the La Graciosa thistle Unit 1 Critical Habitat map (attached as Exhibit A-1 for reference) and review of Google Earth aerial photographs, it's clear that the project site lots are not included in the Critical Habitat east or west of Highway 1. The Critical Habitat "nose" projecting across Highway 1 is north of the project site in a clearly identifiable extension of existing Guadalupe dune sheet and a riparian corridor. Further, the Critical Habitat appears to follow the existing expression of the dune sheet and does not extend into currently developed areas.
    - **Primary Constituent Elements (PCEs)** – In summary, La Graciosa thistle PCEs are based on mesic (moist) wetland sites in sandy soils commonly associated with the seeps and springs, dune slack ponds/wetlands, coastal and valley freshwater marsh, riparian scrub (mule fat scrub and/or willow scrub), or riparian forest. It is often growing in and amongst a mat of low-growing, herbaceous, wetland plants including rushes, sedges, wetland grasses, and broadleaf wetland species. No wetland habitats, or La Graciosa thistle remnants were observed within any parcels during the 2018 study east of Highway 1, or the November 21, 2021 DWE field survey. Specifically, no topographic low-lying mesic areas with any type of wetland plants were observed on the project site lots west side of Highway 1.
- **Habitats and Potential Wetlands West of Highway 1** – As described above, no wetlands were observed on the west side of Highway during the DWE November 21, 2021 field survey. Topography was varied (dune like) and close inspection of the topographic low areas did not reveal any wetland plants or other indicators of wetlands (such hydrology creating dried algal mats, mud-stained leaf litter, or wetland plants). The character of vegetation west of Highway is described above.
- **2018 Survey Dates** – The noted 2016 date is a typo. All 2018 Botanical Survey Report surveys were conducted in 2018 in concert with the ideal spring and summer seasonal timeframe for identifiable plant expression including a Nipomo Mesa lupine reference site.

- **Sensitive Wildlife** – The 2018 Botanical Survey Report was prepared in response to the County request for a botanical survey. As noted in this County letter, because the Lot 2 Shell project was within the existing fenced and disturbed compound, a full BRA was not requested (that would have included an evaluation of common and sensitive wildlife) and, therefore, was not conducted. The 2018 Botanical Report met the County standards for this focused technical report. The following is a brief review of potential sensitive wildlife known from the region.
    - **T&E Species** – No formally listed threatened or endangered species are expected to occur such as the snowy plover (coastal strand) or California red-legged frog (fully aquatic ponds and creeks).
    - **Monarch Butterfly Roost Sites** – The project site has many stands of eucalyptus trees onsite and in the surrounding vicinity. The November 21, 2021 field survey was an ideal day for observing monarch butterflies (sunny, little wind, temperatures in the 60's F°). During that survey scanning all the trees in the vicinity with binoculars revealed less than about 25 monarch butterflies in flight and not all in one place. Typically, monarch butterflies are readily observable flying in and out of roost aggregations under these ideal conditions where they do occur. But as stated, no roost activities were observed. Given the Pismo monarch butterfly preserve recorded over 22,000 monarch butterflies in November 2021, it would be expected that a roost site would have been readily noticeable during the November 21st field survey (albeit a brief survey). Most importantly, no eucalyptus tree removal is part of the project. As such, no mitigation measures are recommended.
    - **Sensitive Wildlife** – Non-formally listed sensitive wildlife that are known from the region in coastal scrub habitats with friable (sandy) soils include northern legless lizard *(Anniela pulchra),* Blainvilles's (coast) horned lizard *(Phrynosoma blainvillii),* and the American badger *(Taxidea taxus).* No evidence of badger use was observed (large half-moon shaped burrows with multiple entrances) during the 2018 or 2021 field surveys. The legless lizard (mostly subterranean) and horned lizard have the potential to occur but are not always readily observable. Pre-construction surveys and salvage efforts during initial ground disturbing monitoring mitigation measures are recommended below to reduce any potentially significant impacts on non-listed sensitive wildlife to a less than significant level.
    - **Birds** – Common and sensitive bird species are protected against active nest destruction and could occur in the small amount of coastal scrub around the monument sign. To ensure no destruction of active nests during project implementation, the standard nesting bird avoidance mitigation measures are recommended below to reduce any potentially significant impacts on nesting birds to a less than significant level.

- **Recommended Mitigation Measures**

  - **MM BIO-1:** *Prior to ground disturbing activities, a qualified biologist shall conduct a pre-construction survey within 30 days of initial ground disturbance (clearing, grubbing, grading) to identify whether any non-listed special-status upland wildlife species (i.e. coast horned lizard, silvery legless lizard) are using any portion of the project area where ground disturbance is proposed. If no special-status reptiles are found, then no further mitigation shall be required.*

    If silvery legless lizards or coast horned lizards are observed within the project site during the pre-construction survey, a biological monitor shall be present during initial ground disturbing and vegetation removal activities to implement a salvage and nearby relocation effort for the silvery legless lizard and coast horned lizard.

  - **MM BIO-2:** *Vegetation removal and initial site disturbance shall be conducted between September 1 and January 31 outside of the nesting season for birds. If vegetation and/or tree removal is planned for the bird nesting season (February 1 to August 31), then preconstruction nesting bird surveys shall be conducted by a qualified biologist to determine if any active nests would be impacted by project construction. If no active nests are found, then no further mitigation shall be required.*

    If any active nests are found that would be impacted by construction, then the nest sites shall be avoided with the establishment of a non-disturbance buffer zone around active nests as determined by a qualified biologist. Nest sites shall be avoided and protected with the non-disturbance buffer zone until the adults and young of the year are no longer reliant on the nest site for survival as determined by a qualified biologist. As such, avoiding disturbance or take of an active nest would reduce potential impacts on nesting birds to a less-than-significant level.

4.0 JULY 2, 2018 PEER REVIEW COMMENTS

The Terra Verde peer review comments are mostly captured in the above July 3, 2018 County information request letter as noted below.

- **(1.) County Guidelines** – The County January 11, 2018 information request specifically stated the requirement for a seasonally appropriate botanical survey focusing on the as-built site conditions and proposed monument sign. The County request did not specify a full biological resources assessment, which is typically

required for most projects, because of the proposed development is within the existing disturbed areas within the fenced yard with existing industrial uses. SII conducted the seasonally appropriate botanical resources survey as required by the County and provided the 2018 Botanical Report that followed and met industry standards and County guidelines for botanical resources surveys.

- **(a.) Description of Vegetation Communities** – The 2018 Botanical Report provided a general description of the character of vegetation within the study area mostly pointing to the majority of the site being disturbed ruderal vegetation within the fenced developed areas stating:

  "The Callender Commercial property supported mostly developed buildings, parking lots, and compacted graveled storage yards. Several areas of ruderal grassland habitat with some native plants but mostly weedy non-native plants are within the fenced boundary of the property. Eucalyptus trees and acacia shrubs border the outside of much of the fenced compound. A small patch of coastal scrub habitat remains along the Highway 1 frontage outside of the fenced compound with some scattered acacia shrubs."

  Table 1 in the 2018 Botanical Report provided a floristic inventory plant species list. The character of the ruderal disturbed areas is that of highly varied non-native herbaceous plant species represented in Table 1 with much exposed open ground. The native coastal scrub vegetation outside of the developed compound can be characterized by a predominance of shrubs including beach blue lupine, mock heather, California buckwheat, and coyote brush. Herbaceous plants with much bare ground include non-native veldt grass, non-native annual grasses, miniature and sky lupines, suncups, and California poppy.

  The property west of Highway 1 is characterized by stands of eucalyptus trees with abundant tree bark and leaf debris precluding growth other plants under the canopy, with coastal scrub habitat as characterized above for the area east of the Highway 1.

- **(b.) Prior Impacts and Potential to Support Rare/Sensitive Plants** – This analysis is highly speculative and would be impossible to quantify. Based on the 2018 botanical survey of the remaining coastal scrub habitat along the Highway 1 frontage that did not observe any special-status plants, it could be speculated that there were no prior impacts on sensitive plants. Given no *Monardella* were recorded on the project site east of Highway 1 in the 1999 McLeod and 2004 Althouse and Meade studies, it could be further speculated that there were no prior impacts on *Monardella* or other sensitive plants.

➢ **(2.) 2018 Survey Dates** – The noted 2016 date is a typo. All 2018 Botanical Survey Report surveys were conducted in 2018 in concert with the ideal spring/summer seasonal timeframe for identifiable plant expression including a Nipomo Mesa lupine reference site.

- **(3.) Sensitive Wildlife – Sensitive Wildlife** – The 2018 Botanical Survey Report was prepared in response to the County request for a botanical survey. As noted in this County letter, because the Lot 2 Shell project was within the existing fenced and disturbed compound, a full BRA was not requested (that would have included an evaluation of common and sensitive wildlife) and, therefore, was not conducted. The 2018 Botanical Report met the County standards for this focused report. The following is a brief review of potential sensitive wildlife known from the region.
  - **T&E Species** – No formally listed threatened or endangered species are expected to occur such as the snowy plover (coastal strand) or California red-legged frog (fully aquatic ponds and creeks).
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  - **Sensitive Wildlife** – Non-formally listed sensitive wildlife that are known from the region in coastal scrub habitats with friable (sandy) soils include northern legless lizard *(Anniela pulchra),* Blainvilles's (coast) horned lizard *(Phrynosoma blainvillii),* and the American badger *(Taxidea taxus).* No evidence of badger use was observed (large half-moon shaped burrows with multiple entrances) during the 2018 or 2021 field surveys. The legless lizard (mostly subterranean) and horned lizard have the potential to occur but are not always readily observable.
  - **Birds** – Common and sensitive bird species are protected against active nest destruction and could occur in the small amount of coastal scrub around the monument sign.
- **(4.) Wetlands & ESHA** – The arroyo willows mapped on Lot 4 are not part of a naturally occurring riparian or wetland area. The clump of willows appears to be two individuals with many small shoots growing on top of a berm at the downhill end of a slightly sloping paved surface within the fenced industrial development.

Likely the runoff from the impervious surface provides the moisture needed by the willows. There is no connection to any other willows or riparian areas, just this isolated clump of willows growing on a berm supported by runoff from development. Arroyo willows have a wetland plant indicator status of Facultative Wetland (FACW) that have a 67% to 99% probability to occur in wetlands, but also a 1% to 33% probability to occur in non-wetlands. Clearly the Lot 4 willows fall into the 1% to 33% non-wetland category. As such, the willows are not a wetland, should not be considered a wetland just because of the probability to occur in wetlands, do not provide wetland services and values, do not represent an ESHA, and do not meet any ESHA criteria (discussed further below).

The small clump of two arroyo willows does not constitute a wetland under any definition. As such, they are not automatically an unmapped ESHA. The California Coastal Act defines ESHA in Section 30107.5 that states:

> *"Environmentally sensitive area" means any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.*

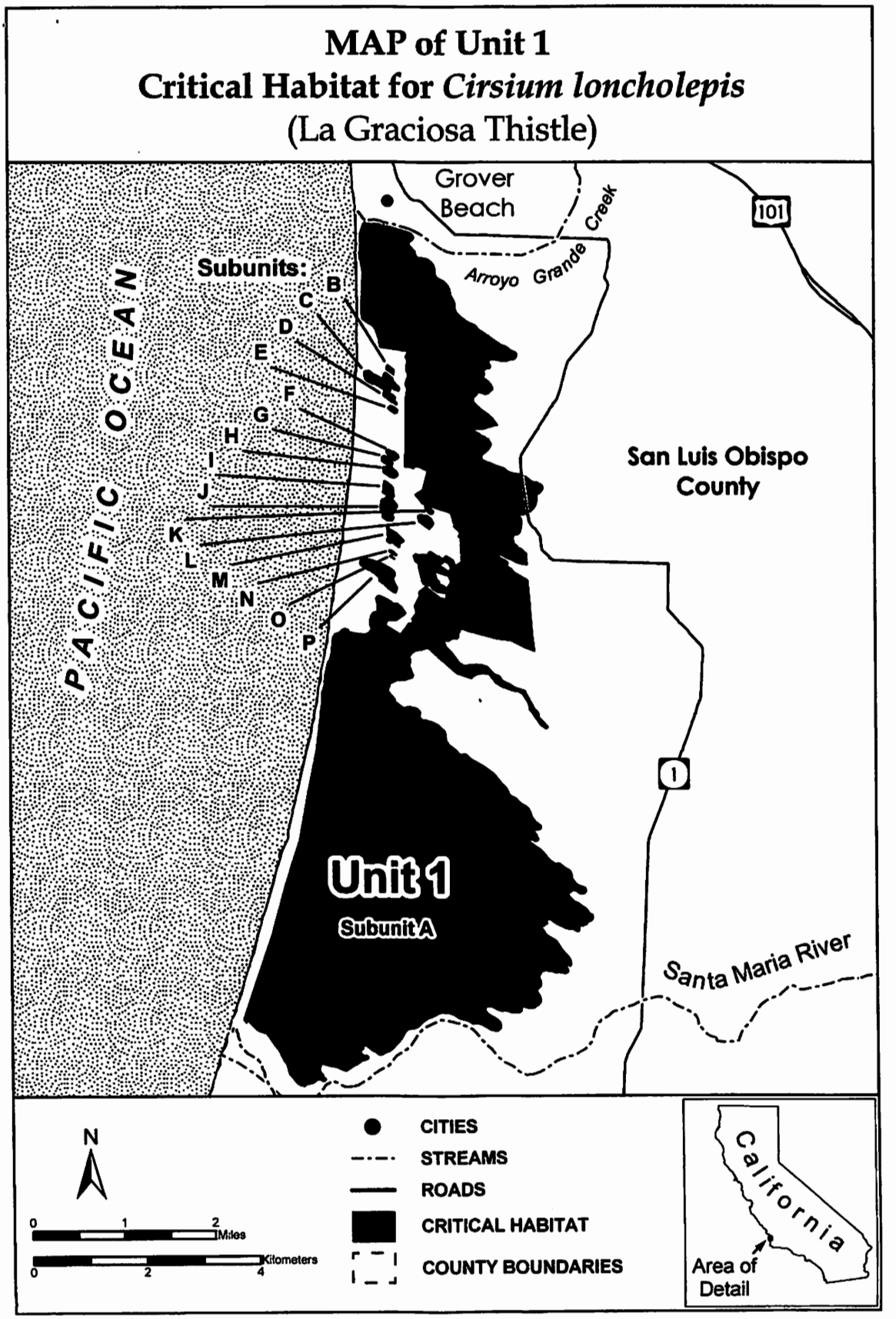
The willow clump on a constructed berm likely supported by developed impervious surface runoff is in no manner a rare habitat worthy of ESHA designation. The small, isolated willow clump is not especially valuable in the ecosystem because it is not associated with a creek and is not part of a riparian corridor. Associated trees are non-native acacia and eucalyptus. Nearby human activities appear to be the reason the willows are there, therefore, not a degrading influence. For these reasons, the willows are not an unmapped ESHA or wetland.

Thank you very much for using DWE for your environmental consulting services. Please contact me directly if you have any questions or need additional information.

Very truly yours,

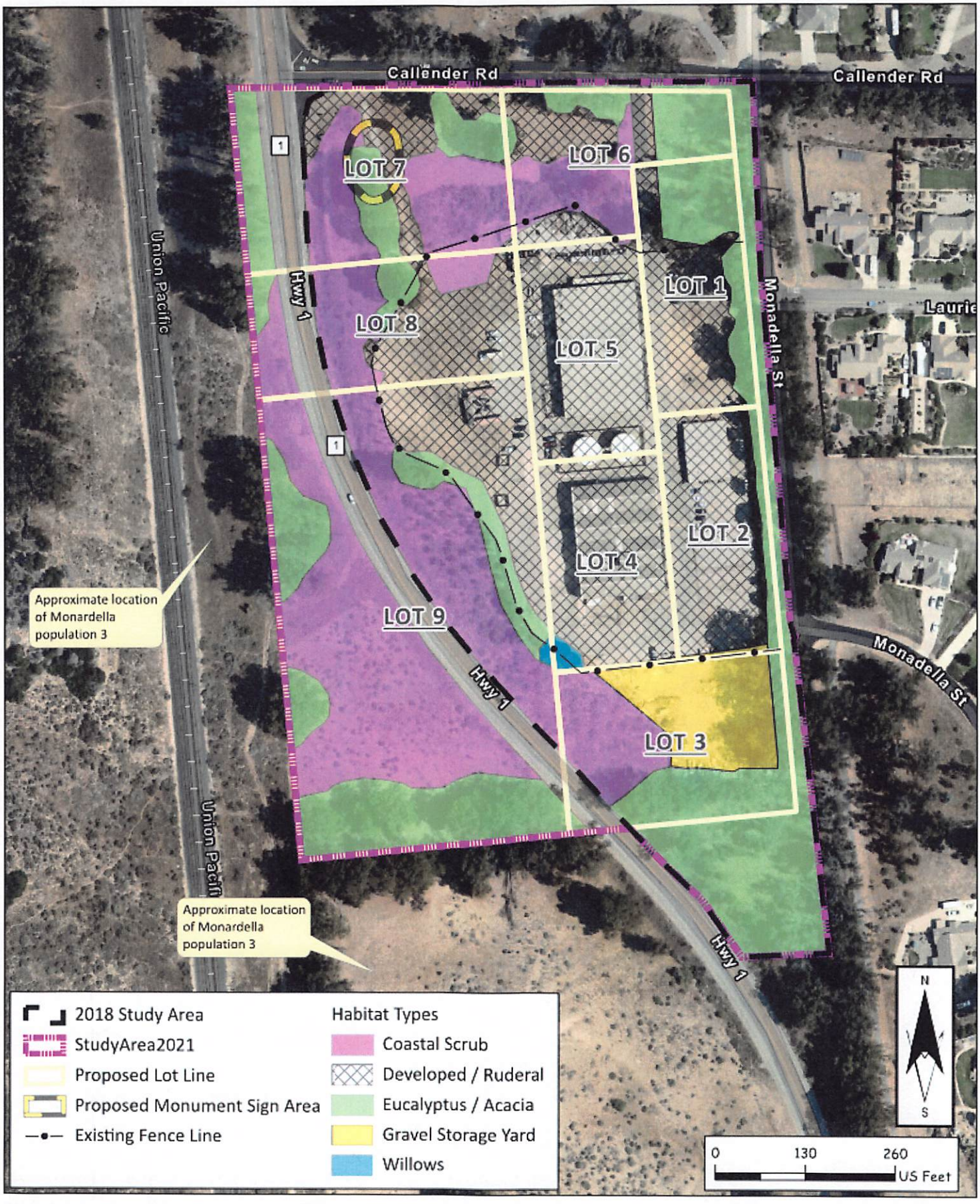
David K. Wolff, Principal Ecologist

Attachments: Exhibit A-1 – La Graciosa Thistle Critical Habitat Unit 1 Map
Exhibit A-2 – Revised Habitat Map
Exhibit A-3 – 2021 Representative Photographs



BILLING CODE 4310-55-C

Exhibit A-1



sage institute updated: 12/13/2021	Callender Commercial	**Exhibit A-2**
	Botanical and Biological Resources Assessment	Habitat Map - Revised

Photo 1: View south at monument sign area paved road, grassland, eucalyptus, and north end of coastal scrub along Hwy 1. **11/21/2021**

Photo 2: View east at monument sign area paved road, grassland, eucalyptus, and north end of coastal scrub along Hwy 1. **11/21/2021**

Photo 3: View north at isolated willows growing on berm next to impervious pavement likely supporting runoff moisture. **11/21/2021**

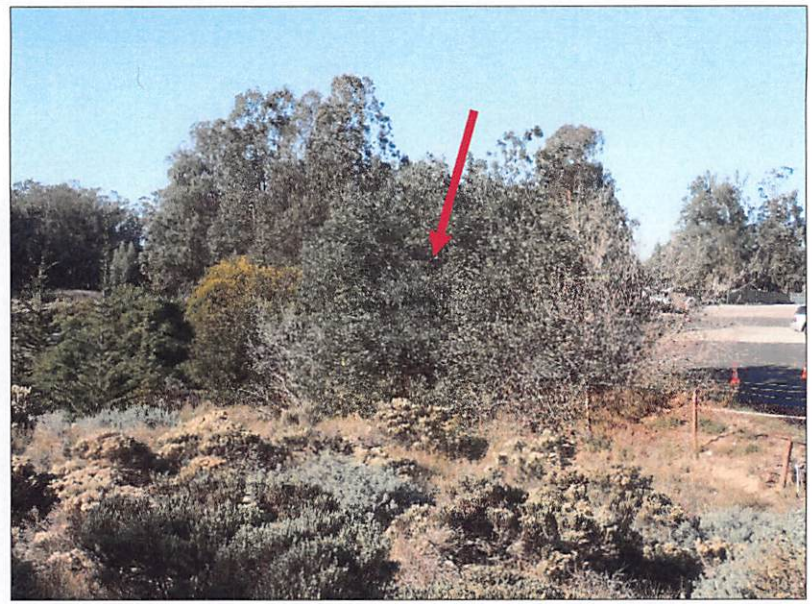


Photo 4: View north at isolated willows on berm next to acacia, cypress, & eucalyptus amongst coastal scrub west of fenced compound. **11/21/2021**

EXHIBIT A-3 – 2021 REPRESENTATIVE PHOTOGRAPHS

Photo 5: View south at narrow portions of Lot 7 and Lot 8 along eucalyptus row west of Hwy 1. **11/21/2021**

Photo 6: View south at narrow portions of Lot 7 and Lot 8 along windrow of eucalyptus next to disturbed railroad ROW. **11/21/2021**

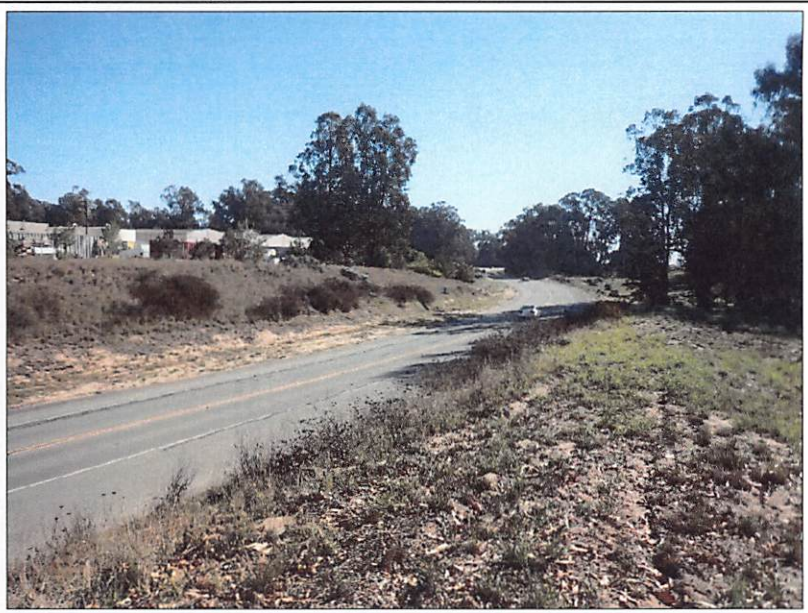


Photo 7: View south at Lot 9 east and west of Hwy 1 coastal scrub, ruderal grassland, and eucalyptus. **11/21/2021**

Photo 8: View south at Lot 9 west of Hwy 1 showing sparse coastal scrub and veldt grass grassland cover. **11/21/2021**

EXHIBIT A-3 – 2021 REPRESENTATIVE PHOTOGRAPHS

Photo 9: View northwest at Lot 9 east and west of Hwy 1. **11/21/2021**

Photo 10: View west at eucalyptus grove on southern edge of Lot 9 on west side of Hwy 1. **11/21/2021**

Photo 11: View south at likely *Monardella* population 3 on adjacent property to the west of Lot 9. **11/21/2021**

Photo 12. View north at possible offsite location of *Monardella* population 2, south of Lot 9 (eucalyptus grove) on west side of Hwy 1. **11/21/2021**

EXHIBIT A-3 – 2021 REPRESENTATIVE PHOTOGRAPHS

August 15, 2022 OEG Ref 22-501

Mr. Jeff Bague
Steven Puglisi Architects, Inc.
569 Higuera Street, Suite A
San Luis Obispo, CA 93401

Subject: 2600 Callender Road Callender Commercial Park Lot 2 – Trip Generation Study – Callender Commercial Development, Arroyo Grande Area, CA - APN 091-152-004

Dear Mr. Bague:

Orosz Engineering Group, Inc. (OEG) has prepared the following letter report for a Trip Generation Analysis for the subject project. Based the project description provided by Puglisi Design, there is a need to provide an updated trip generation for this lot in the Commercial Park based on new direction for possible tenants and land use. The Callender Commercial Park in located in the County of San Luis Obispo in the Arroyo Grande area adjacent to Highway 1.

Project Description

Previously a cannabis project was proposed for this lot. Currently, Lot 2 within the Callender Commercial Park is a 1.21 acre site that is proposed for a new two story industrial building with 6,403 Square Feet (SF) of warehouse space, 200 SF of office/restroom area, and an 1830 SF caretaker residential unit. Cannabis uses are not proposed with this project.

The current land plan anticipated for the project site includes the potential for one of the following varieties of light industrial uses for the project:

- Water Wells
- Storage Yards
- Food and Kindred Products
- Furniture and Fixture Products
- Caretaker Residence
- Warehousing
- Storage/Accessory
- Vehicle Storage
- AG Processing

Project Trip Generation

The County of San Luis Obispo has trip generation rates that are approved for use on projects within the County. The current 2022 trip generation rates reference the 11th edition of the Institute of Transportation Engineers (ITE) trip generation reference. For the proposed uses, the county has identified ITE Land Use Code 110 with a PM peak hour trip rate of 0.65 Peak Hour Trips (PHT) for the proposed project uses. For the caretaker unit, the County's Accessory Dwelling Unit (ADU) was used for this analysis due to the number of residential units.

Using these trip generation rates and the proposed project development, the project trip generation is summarized in Table 1.

Table 1
2600 Callender Road – Lot 2 – Callender Commercial Park
PM Peak Hour Trip Generation Summary

Land Use	Size	ITE Land Use Code	PM Peak Hour Trip Generation Rate	PM Peak Hour Trips
Light Industrial Use	6.603 KSF	110	0.65 PHT/KSF	4
Residential Use - ADU	1 ADU	County of SLO	0.44 PHT/DU	**0**
Total Project Net Trips				**4**

As seen in Table 1, the project is expected to add four (4) PM peak hour trips to the surrounding road system.

South County Area 2 - Road Improvement Fee

The project is located within the South County Area 2 for road improvement fee purposes The current Road Improvement Fee for this area of the County is set at $7,359 per (other) PM peak hour trip. Based on the trip generation estimate for the project of 4 PM peak hour trips (no residential or ADU trips) , the South County Area 2 Road Improvement Fee that could be assessed to the would be $29,436.00

This concludes our trip generation and road improvement fee calculation for the proposed project. Should you have any questions, feel free to contact us.

Sincerely,

Stephen A Orosz

Stephen A. Orosz, P.E.
Traffic Engineer
Orosz Engineering Group, Inc.

ONSITE SEWAGE DISPOSAL
SITE EVALUATION REPORT

Callender Commercial Properties, LLC Property
Callender Commercial Park
2600 Callender Road, Arroyo Grande
County of San Luis Obispo, California 93420

December 10, 2021

NexGen
Engineering & Consulting LLC

1043 Nichols Drive, Suite 200
Rocklin, California 95765
Job Number: 7442.01

TABLE OF CONTENTS

1.0 INTRODUCTION

At the request and authorization of the Client (Steve Puglisi Architects Inc.), NexGen Engineering and Consulting LLC (NexGen) has prepared this Onsite Sewage Disposal Site Evaluation Report for the subject property located at 2600 Callender Road, in the City of Arroyo Grande, County of San Luis Obispo, California. The purpose of this report is to present the results of recent soils testing and provide recommendations in support of an onsite sewage disposal system for the subject property.

2.0 SITE DESCRIPTION

The subject property encompasses nine contiguous parcels totaling approximately 14.9 acres in size. The site is bound by Callender Road to the north, Mondella Street to the east, an undeveloped commercial property to the south, and Highway 1 to the west. There are three existing concrete buildings and two water tanks located on this industrial site. Sewer and water services are provided by private sewage disposal systems and public water main (Callender Grove Mutual Water Company). The site generally slopes from north to south.

The Client intends to construct various improvements in support of cannabis cultivation activities. Sewer service will be provided by a new sewage disposal system. Water service will be continue to be provided by the existing public water main.

3.0 SOIL TESTING RESULTS

Soil testing was conducted at the subject property by Landsite, Inc. (Landsite) on August 16, 2017. The results are presented in the Onsite Wastewater Domestic Disposal System Design Report on file with the San Luis Obispo County Department of Environmental Health Services (County). Inclusion of the referenced data within NexGen's report does not warrant nor guarantee the work product of Landsite.

The soils encountered appear to be classified as the Oceano Series by the U.S. Department of Agriculture Soil Conservation Service. Oceano soils consist of deep, excessively drained soils near the ocean on rolling dune like topography with slopes of 0 to 50 percent. The soils are formed in material weathered from sandy eolian deposits. on rolling dune-like topography.

4.0 RECOMMENDATIONS

Based on the results of the soils/percolation testing, as well as our engineering analysis, the subject property can accommodate a sewage disposal system and replacement area. The recommended system type is the Presby Environmental, Inc. Advanced Enviro-Septic (AES) System (Presby System). The conceptual site plan exhibit shows the designated areas for the primary and replacement systems. Preliminary system design and replacement area calculations are provided in Tables 1a and 1b on the following page.

Table 1a – Preliminary System Design Calculations	
Daily design flow: *(Firma Consultants Inc. flow data plus 200% commercial application facter per Section 2.D.9, County LAMP)*	2,260 GPD
Conventional soil application rate based on soil group: *(Table 7, County LAMP based on sand)*	0.8 GPD/ft^2 ==> Use 0.6 GPD/ft^2
Allowable reduction in disposal bed area sizing: *(Decreased leaching area allowance)*	30%
Minimum disposal bed area: *(2,260 GPD ÷ 0.6 GPD/ft^2 x 0.7)*	2,637 ft^2
Maximum allowable system slope/site slope: *(Table D, Presby Design Manual)*	20%/25%
Minimum lineal footage of AES pipe: *(2,260 GPD ÷ 2.14 GPD/ft)*	1,057 ft
Minimum number of serial sections (i.e. beds) required: *(2,260 GPD ÷ 750 GPD)*	4
Total number of rows:	12 (6 rows per bed)
Row length: *(1,057 ft ÷ 6)*	177 ft ==> Use2 beds, each with 6-90 ft long rows
Row spacing:	1.5 ft
Pipe layout width (PLW): *[((6 - 1) x 1.5 ft) + 1 ft]*	8.5 ft
System sand bed width (SSBW): *[2,637 ft^2 ÷ ((90 ft + 1 ft) x 2)]*	14.5 ft
System sand extension (place on downslope side): *[14.5 ft – (8.5 ft + 1 ft)]*	5.0 ft

Table 1b – Preliminary Replacement Area Calculations	
Daily design flow: *(Firma Consultants Inc. flow data)*	1,130 GPD
Conventional soil application rate based on soil group: *(Table 7, County LAMP based on sand)*	0.8 GPD/ft^2 ==> Use 0.6 GPD/ft^2
Allowable reduction in disposal bed area sizing: *(Decreased leaching area allowance)*	0%
Minimum disposal bed area: *(1,130 GPD ÷ 0.6 GPD/ft^2)*	1,884 ft^2

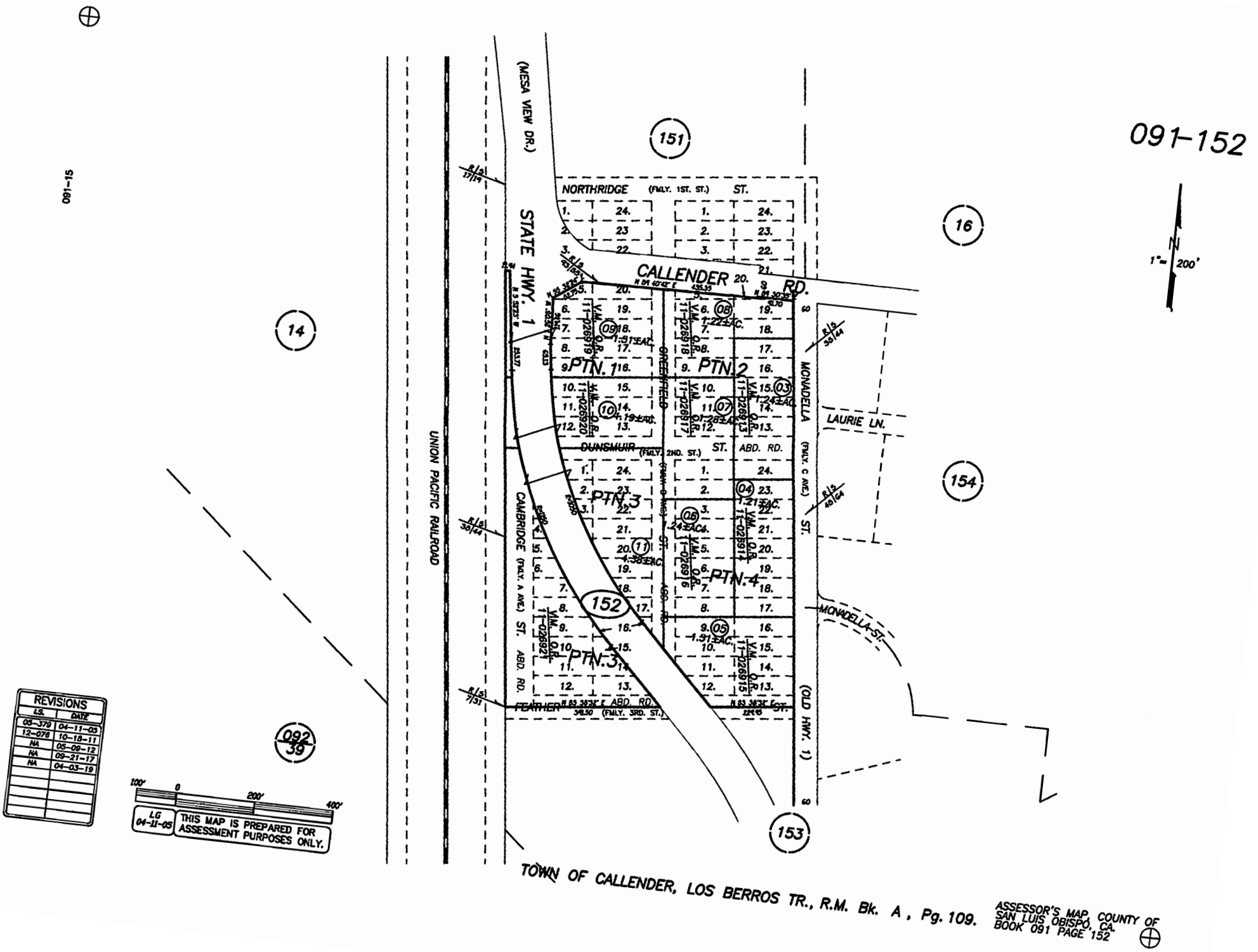
All septic systems shall be designed by a qualified septic system designer per County requirements.

Any deviations from the recommendations contained in this report should be discussed with the County prior to sewage system design and installation.

Any alterations (such as grading, creating cuts or fills, utility installation, etc.) within or adjacent to the primary and replacement disposal areas may void this report.

This report is not a construction permit. A permit to install this system must be obtained from the County. At the time of building permit application, a complete design package including hydraulic calculations, material specifications, disposal field construction details and disposal trench design drawings will be required.

ASSESSOR PARCEL MAP


091-152
091-15
092-39
14
151
152
153
154
16
STATE HWY. 1
(MESA VIEW DR.)
UNION PACIFIC RAILROAD
NORTHRIDGE (FMLY. 1ST. ST.) ST.
CALLENDER RD.
GREENFIELD
MONADELLA (FMLY. C AVE.) ST.
LAURIE LN.
DUNSMUIR (FMLY. 2ND. ST.) ST. ABD. RD.
CAMBRIDGE (FMLY. A AVE.) ST. ABD. RD.
FEATHER ABD. RD. (FMLY. 3RD. ST.)
MONADELLA ST.
(OLD HWY. 1)
PTN. 1
PTN. 2
PTN. 3
PTN. 4
1.91±AC.
1.22±AC.
1.24±AC.
1.28±AC.
1.21±AC.
2.43±AC.
1.38±AC.
1.31±AC.
1" = 200'
REVISIONS
LS. DATE
05-379 04-11-05
12-076 10-18-11
NA 05-09-12
NA 09-21-17
NA 04-03-19
100' 0 200' 400'
LG 04-11-05
THIS MAP IS PREPARED FOR ASSESSMENT PURPOSES ONLY.
TOWN OF CALLENDER, LOS BERROS TR., R.M. Bk. A, Pg. 109.
ASSESSOR'S MAP, COUNTY OF SAN LUIS OBISPO, CA.
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