

## MEMORANDUM

**DATE:** February 4, 2025

**To:** Kim Fowler, Senior Planner, City of Morro Bay

**FROM:** Pam Reading, Principal  
Laurel Huntzinger, Associate, Project Manager

**SUBJECT:** California Environmental Quality Act (CEQA) Addendum for the  
Eisemann Multifamily Project Located at 541 Atascadero Road, Morro Bay,  
California

This document, prepared pursuant to the California Environmental Quality Act (CEQA) and the regulations and policies of the City of Morro Bay, is an Addendum to the 2021 Environmental Impact Report for the Morro Bay General Plan and Local Coastal Plan Update<sup>1</sup> (General Plan EIR), which was certified by the City of Morro Bay (City) in May 2021. The General Plan EIR consists of the Draft EIR and the Response to Comments Document, which combined constitute the Final EIR. This Addendum evaluates whether the proposed project would result in new or substantially more adverse significant effects than those identified in the General Plan EIR or require new mitigation measures not identified in the General Plan EIR. The proposed project includes the development of a two-story multifamily residence. See Attachment A for a full description of the proposed project. The City of Morro Bay is the Lead Agency under CEQA. In accordance with CEQA Section 21083 and 21166 and State CEQA Guidelines Section 15164, this document (including Attachments A and B) serves as an Addendum to the General Plan EIR, certified in May 2021, which is hereby incorporated by reference.

## INTRODUCTION

The approximately 0.207-acre project site is located at 541 Atascadero Road in the City of Morro Bay, San Luis Obispo County. The project site consists of a single parcel that is bound by residential uses to the north and east, Hill Street to the west, and Atascadero Road to the south. The proposed project includes the development of a two-story multifamily residence consisting of four (4) attached residences and one (1) attached accessory dwelling unit (ADU), on-site parking, site improvements, and landscaping. The project site is designated High Density Residential on the City's

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<sup>1</sup> Morro Bay, City of. 2021. *Morro Bay General Plan and LCP Update Final Environmental Impact Report*. State Clearinghouse No. 2017111026. February.

General Plan Land Use Map and is within the Residential High Density (RH) zoning district on the City's 2022 Zoning Map.<sup>2,3</sup>

This Addendum is prepared pursuant to State CEQA Guidelines Section 15164(a) which states: "The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." Section 15162 specifies that "no subsequent EIR shall be prepared for that project unless the lead agency determines ... one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete was adopted, shows any of the following:
  - (A) The project will have one or more significant effects not discussed in the previous EIR;
  - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative."

Pursuant to State CEQA Guidelines Section 15164(e), the purpose of this Addendum is to summarize the proposed project, assess the proposed project's consistency with the General Plan EIR, and identify the reasons for the City's conclusion that changes associated with the proposed project and its environmental effects do not meet the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent or supplemental environmental document.

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<sup>2</sup> Morro Bay, City of. 2021. *Plan Morro Bay*. May.

<sup>3</sup> Morro Bay, City of. 2022. Adopted Zoning Map. January 25. Website: <https://www.morrobayca.gov/Document-Center/View/18198/2022-Zoning-Map-with-Amendment> (accessed January 2025).

Attachment A to this Addendum provides a complete description of the proposed project, its location, existing site characteristics, proposed development, and required approvals and entitlements.

Attachment B to this Addendum provides the Environmental Checklist prepared for the proposed project. This checklist is used to: (1) compare the environmental impacts of the proposed project with impacts expected to result from development evaluated in the General Plan EIR; (2) identify whether the proposed project would result in new or more severe significant environmental impacts; and (3) identify whether substantial changes with respect to the circumstances under which the proposed project would be undertaken since the General Plan EIR was adopted would result in new or more severe significant environmental effects.

### **COMPARISON TO THE CONDITIONS LISTED IN STATE CEQA GUIDELINES SECTION 15162**

The following discussion summarizes the reasons that additional environmental review pursuant to State CEQA Guidelines Section 15162 is not required to evaluate the environmental effects of the proposed project, as its potential effects were adequately evaluated in the General Plan EIR as supported by the analysis contained in Attachment B.

#### **Substantial Changes**

Per the analysis included in Attachment B, Environmental Checklist, the proposed project is consistent with the development evaluated in the General Plan EIR and would not result in new significant impacts beyond those identified in the General Plan EIR, would not substantially increase the severity of impacts identified in the General Plan EIR, and would not require major revisions to the General Plan EIR. Therefore, an Addendum is the appropriate document to evaluate the project pursuant to CEQA.

#### **Substantial Changes in Circumstances**

As described in the Environmental Checklist for each topic, environmental conditions in and around the project site have not changed such that implementation of the proposed project would result in new significant environmental effects or a substantial increase in the severity of environmental effects identified in the General Plan EIR, and thus would not require major revisions to the General Plan EIR.

#### **New Information**

No new information of substantial importance, which was not known or could not have been known when the General Plan EIR was adopted, has been identified which shows that the proposed project would be expected to result in: (1) new significant environmental effects not identified in the General Plan EIR; (2) substantially more severe environmental effects than shown in the General Plan EIR; (3) mitigation measures or alternatives previously determined to be infeasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative. In addition, the proposed

project would require no new mitigation measures, as described throughout the Environmental Checklist, because no new or substantially more severe impacts are expected beyond those identified in the General Plan EIR.

## **CONCLUSION**

The proposed project described in this Addendum would not require major revisions to the General Plan EIR due to new or substantially increased significant environmental effects. The analysis contained in the Environmental Checklist confirms that the proposed project is within the scope of the General Plan EIR and would have no new or more severe significant effects and no new mitigation measures are required. Therefore, no subsequent or supplemental EIR or further CEQA review is required prior to approval of the proposed project, as described in this Addendum.

Attachments: A: Project Description  
B: Environmental Checklist

## ATTACHMENT A

### PROJECT DESCRIPTION

The following describes the proposed Eisemann Multifamily Project (proposed project). This section includes a summary description of the project's location, existing site characteristics and current site conditions, surrounding land uses, and the process for future development following approval of the proposed action. The City of Morro Bay (City) is the lead agency for review of the proposed project under the California Environmental Quality Act (CEQA).

#### 1.1 PROJECT SITE

The following section describes the location and characteristics of the project site and provides a brief overview of the existing land uses within and in the vicinity of the site.

##### 1.1.1 Location

The approximately 0.207-acre (9,013-square-foot) project site is located at 541 Atascadero Road in the City of Morro Bay, San Luis Obispo County. The project site consists of a single parcel (Assessor's Parcel Number [APN] 068-231-056) that is bound by residential uses to the north and east, Hill Street to the west, and Atascadero Road to the south. The project site is located within the Coastal Zone. Regional access to the project site is provided by State Route 41 (SR-41) located just south and parallel to unimproved Atascadero Road, which is accessible via State Route 1 (SR-1) approximately 0.2 mile (1,072 feet) west of the project site. Figure 1 shows the regional and local context of the project site. Figure 2 depicts an aerial photograph of the project site and surrounding land uses.

##### 1.1.2 Site Characteristics and Current Site Conditions

The project site is currently undeveloped with the exception of a partial perimeter fence along the west and south portions of the site. The project site fronts Hill Street along the site's western boundary, and slopes gently from north to south towards Atascadero Road. The project site is vegetated with sparse ornamental trees and shrubs along the site's perimeter, a small palm tree in the southwest corner of the site, and ruderal vegetation throughout the remainder of the site. Access to the project site is currently provided via an unimproved driveway located in the southeast corner of the site.

##### 1.1.3 Surrounding Land Uses

As shown on Figure 2, the project site is generally surrounded by residential and commercial/light industrial uses. The project site is bounded by residential uses to the north, Hill Street to the west across which is an undeveloped lot surrounded by residential uses, a private residential driveway to the east across which are residential uses, and Atascadero Road and SR-41 to the south across which are additional residential, commercial, and light industrial uses. SR-41, which runs parallel to unimproved Atascadero Road just south of the project site, connects to SR-1 providing access to the surrounding City of Morro Bay. Access to the Pacific Ocean is provided approximately 0.55 mile west of the project site at the intersection of Atascadero Road and Embarcadero Road.

#### 1.1.4 Regulatory Setting

The project site is designated High Density Residential on the City's General Plan Land Use Map. The High Density Residential designation allows for multifamily housing, including apartments, townhomes, condominiums, and some group housing uses with densities ranging from 15.1 to 27.0 dwelling units per acre (du/ac).<sup>1</sup>

The project site is located within the Residential High Density (RH) zoning district on the City's 2022 Zoning Map.<sup>2</sup> This zoning district implements the High Density Residential land use designation and is therefore intended to provide areas for a variety of medium to high-density residential development with housing types including single-unit attached, townhouses, condominiums, and apartment buildings at densities between 15.1 and 27 du/ac.

Multifamily residential uses, such as the proposed project, are permitted in the RH zoning district. The proposed project would have a density of approximately 19 du/ac and would be consistent with the allowable density.

### 1.2 PROPOSED PROJECT

The proposed project includes the development of a two-story multifamily residence consisting of four (4) attached residences and one (1) attached accessory dwelling unit (ADU), on-site parking, site improvements, and landscaping on an approximately 0.207-acre site, which is the equivalent of approximately 19 du/ac. The four residential units include one 2-bedroom ADU, two 2-bedroom residential units (one on the first floor and one on the second floor), and two 1-bedroom residential units on the second floor with enclosed garages provided on the 1<sup>st</sup> floor below each unit (refer to Table A below for the proposed size of each unit). Floor plans for the proposed units are included in the plan set provided in Attachment C.

The proposed project includes an approximately 1,578-square-foot (sf) concrete driveway; a 2,081 sf pervious paver parking lot; 466 sf of concrete walkways; and 2,118 sf of landscaping. The exterior of the proposed multifamily residence would consist of soft green horizontal siding on the first floor, light cream board and batten siding on the second floor, and a black/charcoal standing seal metal roof.

All exterior lighting would be fully shielded to direct lighting downward and designed to avoid glare and enhance skyward nighttime public views.

Access to the proposed multifamily residences would be provided via a private driveway off of Hill Street. The proposed project would provide 5 delineated parking spaces in the exterior paver parking lot. Additionally, the proposed project would construct a sidewalk with curb and gutter along the project's frontage with Hill Street and retaining walls surrounding the parking lot fronting Atascadero Road and along the north perimeter of the project site as shown in the plan set provided in Attachment C.

<sup>1</sup> Morro Bay, City of. 2021. *Plan Morro Bay*. January 25.

<sup>2</sup> Morro Bay, City of. 2022. Adopted Zoning Map. January 25. Website: <https://www.morrobayca.gov/DocumentCenter/View/18198/2022-Zoning-Map-with-Amendment> (accessed April 2024).

On-site drainage improvements would include installation of rock spillways, storm drains, and catch basins. The proposed project would connect to existing water, gas, and sewer infrastructure within and adjacent to Hill Street and landscaping would consist of native plant species within the “very low” to “low” water-use plant factor category (Region 1) as determined by the Water Use Classification of Landscape Species (WUCOLS) online database.<sup>3</sup>

**Table A: Proposed Unit Size**

Unit and Type	Proposed Size (square feet[sf])	Floor
ADU (2 bedroom)	733	1 <sup>st</sup>
Unit 1 (1 bedroom)	554 with 56 sf balcony	2 <sup>nd</sup>
Unit 1 Garage	394	1 <sup>st</sup>
Unit 2 (1 bedroom)	554 with 56 sf balcony	2 <sup>nd</sup>
Unit 2 Garage	394	1 <sup>st</sup>
Unit 3 (2 bedroom)	760	1 <sup>st</sup>
Unit 4 (2 bedroom)	870 with 108 sf balcony	2 <sup>nd</sup>
Mechanical and Common Access to Units 1 and 2	455	1 <sup>st</sup>

Source: Architectural Plan Set for 541 Atascadero Road (PJ Designs, April 27, 2023).

The proposed project would comply with the general development standards for the RH zoning district including, but not limited to, minimum building setbacks, minimum open space standards for each unit type, a minimum/maximum density of 15.1 to 27 du/ac, a maximum building height of 30 feet, and maximum lot coverage of 60 percent.

<sup>3</sup> UC Davis. 2024. California Center of Urban Horticulture, Water Use Classification of Landscape Species (WUCOLS). WUCOLS Update: January 2024. Website: <https://ccuh.ucdavis.edu/wucols> (accessed April 2024).






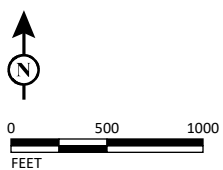
 Project Site

FIGURE 1



SOURCE: Esri Community Basemap; Esri Terrain Basemap

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Eisemann Multifamily Project  
Regional Location

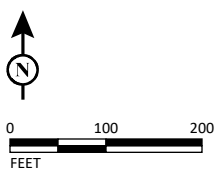




LSA

Project Site

FIGURE 2



SOURCE: Nearmap Aerial Image (June 21, 2023), City of Morro Bay

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*Eisemann Multifamily Project*  
Aerial Photograph of the Project Site and Surrounding Land Uses



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## ATTACHMENT B

### ENVIRONMENTAL CHECKLIST

## ATTACHMENT B

### ENVIRONMENTAL CHECKLIST PURSUANT TO CEQA GUIDELINES SECTION 15168

State CEQA Guidelines Section 15168(c)(4) recommends using a written checklist or similar device to confirm whether the environmental effects of a subsequent activity were adequately covered in a previous environmental evaluation. This checklist confirms that the proposed Eisemann Multifamily Project (proposed project) described in Attachment A is within the scope of the Morro Bay General Plan and Local Coastal Plan Update Environmental Impact Report (General Plan EIR)<sup>1</sup> and will have no new, previously unconsidered significant impacts or substantially more severe previously identified impacts, and no new mitigation measures are required.

In accordance with CEQA Sections 21083 and 21166 and State CEQA Guidelines Section 15164, this document (including the Memorandum and Attachment A) serves as an Addendum to the General Plan EIR, certified in May 2021, which is hereby incorporated by reference. This checklist describes and evaluates potential changes to environmental impacts from the proposed project as they relate to impacts identified in the General Plan EIR. As noted in Attachment A, Project Description, implementation of the proposed project would result in the development of a two-story multifamily residence. The development would consist of four (4) attached residences and one (1) attached accessory dwelling unit (ADU), on-site parking, site improvements, and landscaping on an approximately 0.207-acre site, which is the equivalent of approximately 19 development units per acre (du/ac).

This environmental checklist is used to: (1) compare the environmental impacts of the proposed project with impacts expected to result from development evaluated in the General Plan EIR; (2) identify whether the proposed project would result in new or more severe significant environmental impacts; and (3) identify whether substantial changes with respect to the circumstances under which the project would be undertaken since the General Plan EIR was certified would result in new or more severe significant environmental effects.

Mitigation measures are measures that would minimize, avoid, or eliminate a significant impact. The analysis contained herein evaluates each topic to identify whether additional mitigation measures beyond those identified in the General Plan EIR would be warranted. As discussed for each topic in the checklist, no new mitigation measures would be required for the proposed project.

For all environmental topics addressed in the checklist as identified in each topical section, there have been no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were evaluated and identified in the General Plan EIR. Therefore, a subsequent Environmental Impact Report (EIR) does not need to be prepared as there are no new, previously unconsidered or more severe impacts that result from the modified project,

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<sup>1</sup> Morro Bay, City of. 2021. *Morro Bay General Plan and LCP Update Final Environmental Impact Report*. State Clearinghouse No. 2017111026. February.

or the circumstances under which the project is undertaken, that would require major revisions to the General Plan EIR.

## 1.1 AESTHETICS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Except as provided in Public Resources Code Section 21099, would the project:				
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 a 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

### Scenic Vistas

The General Plan EIR did not identify any designated scenic vistas within the planning area but did identify views toward Morro Rock, Morro Bay Estuary, Los Osos and the Irish Hills, and Cayucos that function as scenic vistas within the city. The General Plan EIR determined that uses consistent with the General Plan Update would largely preserve the existing pattern of land uses and, thus, scenic views from these vistas in the planning area, with the exception of the proposed redevelopment of the former Morro Bay Power Plant and wastewater treatment plant, which could affect views of scenic resources such as Morro Rock. Implementation of the proposed project would result in the development of a multifamily residence, consistent with allowable uses on the project site and surrounding development. The project site is not located within the former Morro Bay Power Plant or wastewater treatment plant. Therefore, no new or substantially more severe impacts related to scenic vistas beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Scenic Resources within State Scenic Highways

The General Plan EIR determined that SR-1 is a designated scenic highway corridor and that new infill development and redeveloped properties could block views of scenic resources, including trees, rock outcroppings, and historic buildings. However, the General Plan EIR found that implementation of the goals and policies in the General Plan would minimize adverse effects on scenic resources.

The project site would not be visible to those travelling in either direction on SR-1. SR-41, which runs adjacent to the project site, is not designated as a scenic highway corridor. Implementation of the proposed project would result in the development of a multifamily residence, consistent with allowable uses on the project site and surrounding development. Because the project site would not

be visible to those traveling in either direction on SR-1, implementation of the proposed project would not block or adversely affect scenic resources visible from SR-1, including Morro Rock and the ocean. No new or more substantially severe impacts related to scenic resources within State Scenic Highways beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Scenic Quality

As described in Attachment A, Project Description, the project site is located in an urbanized area. The General Plan EIR determined that development facilitated by the General Plan Update would result in visual changes to the community, but if allowed development is consistent with the goals and policies included in the General Plan as well as the standards within the City's Zoning Code, development that is consistent with the General Plan would not impact scenic quality. As previously described, the proposed project would result in the development of a multifamily residence, consistent with allowable uses on the project site and surrounding development. Consistent with the findings of the General Plan EIR, the proposed project would be required to comply with the standards contained in the City's Zoning Ordinance, applicable to the Residential High Density zoning district. Therefore, no new or substantially more severe impacts related to scenic quality beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Light and Glare

The General Plan EIR determined that the General Plan Update would facilitate new development that could introduce new sources of light and glare, but that any future development would be required to comply with policies within the General Plan that would prevent new sources of light and glare. Consistent with the findings of the General Plan EIR, the proposed project would be required to comply with General Plan Policy C-9.5, which is described below. Therefore, no new or substantially more severe impacts related to light and glare beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

### Applicable Policies

#### General Plan Policies

- **Policy C-9.5: Lighting Standards.** Development shall be sited and designed to avoid illuminating, reduce glare, protect and enhance skyward nighttime public views, and minimize lighting in open spaces and natural areas. New lighting fixtures shall be mounted at low elevations and fully shielded to direct lighting downward. Lighting along walkways should be mounted on low bollards or ground buttons. Lighting shall be focused on targeted use areas and shall be limited



to what is necessary for public safety. Floodlighting shall be prohibited. Exterior lighting fixtures should complement the architectural style of structures.

### Conclusion

The General Plan EIR adequately evaluated the aesthetic impacts of the proposed project. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

## 1.2 AGRICULTURE AND FORESTRY RESOURCES

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 the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
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"/>

### Discussion

The General Plan EIR determined that agricultural uses are limited and primarily located on the east side of SR-1 near the southeast end of the city. Potential uses and activities associated with implementation of the proposed project would not involve or affect agriculture or forestry uses. The project site is located in an urban area and is designated as "Urban and Built-Up Land" by the California State Department of Conservation.<sup>2</sup> Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

<sup>2</sup> California Department of Conservation (DOC). 2022. California Important Farmland Finder (map). Website: <https://maps.conservation.ca.gov/dlrp/ciff/> (accessed January 2025).

### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

### Conclusion

The General Plan EIR adequately evaluated the agriculture and forestry impacts of the proposed project. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

### 1.3 AIR QUALITY

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.

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 type="checkbox"/>	<input checked="" type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

The General Plan EIR determined that the General Plan Update would result in an increase in vehicle miles traveled (VMT) that would exceed the projected rate of population growth in the City, which would be inconsistent with the San Luis Obispo County Air Pollution Control District (SLOAPCD) Clean Air Plan, and that this impact would be significant and unavoidable. The General Plan EIR found that impacts related to increases in criteria pollutants could be reduced to a less-than-significant level with the implementation of General Plan EIR Mitigation Measure AQ-2, which requires following standard mitigation measures, as applicable, to reduce reactive organic gases (ROG), nitrogen oxides (NO<sub>x</sub>), and diesel particulate matter (DPM) emissions from construction equipment. Additionally, the General Plan Update includes goals and policies, such as Policy LU-3.6, intended to promote compact and infill development to reduce VMT, which would reduce criteria pollutant emissions associated with new development on the project site. Air quality impacts related to substantial pollutant concentrations and other emissions adversely affecting people would be less than significant with compliance with General Plan policies.

The project site is located within the High Density Residential General Plan designation and the Residential High Density zoning district. The proposed project would develop a multifamily residence with a density of 19 du/ac, which is consistent with allowable uses and residential density on the project site and surrounding development. Because a density of 19 du/ac is consistent with allowable densities under the Residential High Density zoning district, VMT associated with the proposed project would be consistent with the VMT analyzed in the General Plan EIR for the project site. The proposed project would be required to implement General Plan EIR Mitigation Measure AQ-2, which requires standard mitigation for all construction equipment. Additionally, the proposed project would be consistent with General Plan Update Policy LU-3.6 described below, which promotes infill development as the preferred strategy for new development in Morro Bay.

Therefore, no new or substantially more severe impacts related to air quality beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

#### **General Plan EIR Mitigation Measure AQ-2: Standard Mitigation for Construction Equipment.**

Proponents of individual land use projects, or other projects requiring grading or building permits, shall require construction contractors to incorporate the following standard mitigation measures, as applicable, to reduce ROG, NO<sub>x</sub>, and DPM emissions from construction equipment. Mitigation measures shall be listed on project construction plans, and the project proponent shall perform periodic site inspections during construction to ensure that mitigation measures are being implemented.

- Maintain all construction equipment in proper condition according to manufacturer's specifications.
- Fuel all off-road and portable diesel powered equipment with California Air Resources Board's (CARB)-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road).
- Use diesel construction equipment meeting CARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State Off-Road Regulation.
- Use on-road heavy-duty trucks that meet CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation.
- Construction or trucking companies with fleets that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g., captive or NO<sub>x</sub> exempt area fleets) may be eligible by proving alternative compliance.
- All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5 minute idling limit.
- Diesel idling within 1,000 feet of sensitive receptors is not permitted.
- Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors.
- Electrify equipment when feasible.
- Substitute gasoline-powered in place of diesel-powered equipment, where feasible.

- Use alternatively fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel.

### Applicable Policies

#### General Plan Policies

- **Policy LU-3.6: Infill Development.** Promote infill development on vacant or underutilized properties in the city as the preferred strategy for most new development in Morro Bay.

### Conclusion

The General Plan EIR adequately evaluated the impacts related to air quality of the proposed project. The proposed project would not result in substantial construction- or operational-period emissions above those previously analyzed in the General Plan EIR. Therefore, with implementation of General Plan EIR Mitigation Measure AQ-2, the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, and potential impacts would be less than significant and additional mitigation is not required.



## 1.4 BIOLOGICAL RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

The General Plan EIR determined that biological resources, including special-status species, habitats, wetlands, and other sensitive natural communities are primarily associated with areas identified as Environmentally Sensitive Habitat Areas (ESHAs) within the General Plan. The General Plan EIR concluded that new development or redevelopment that occurs within ESHAs and is facilitated by the General Plan Update would be subject to the policies in the General Plan and Municipal Code related to sensitive natural communities, ESHAs, wetlands, and riparian areas within the City. The project site is not located within the boundaries of an ESHA, adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other local, regional or State conservation plan.

The project site does not include any ESHA, is not located near any other sensitive natural communities as mapped in the General Plan EIR and is currently surrounded by developed areas. As discussed in the General Plan EIR, infill development could reduce local movement opportunities for small- and medium-sized terrestrial wildlife by reducing the number and altering distribution of vacant lots. Although the proposed project would develop a currently vacant lot, the project site does not contain sensitive natural communities, wetlands, or riparian areas, and the proposed

project would not include long segments of fencing or lighting that would have a significant impact on wildlife movement in the area. The proposed project would be required to comply with General Plan Policy C-1.14, which requires the protection of any natural resources that are not ESHAs. The proposed project would not require the removal of any of the trees located on the northeastern perimeter of the project site. Applicable General Plan policies are described below. Therefore, no new or substantially more severe impacts related to biological resources beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

### Applicable Policies

#### General Plan Policies

- **Policy C-1.14: Natural Resource Protection.** Natural resources that are not ESHA shall also be protected as much as feasible.

### Conclusion

The General Plan EIR adequately evaluated the impacts related to biological resources for the proposed project. No known special-status species, ESHAs, or other sensitive natural communities or wetlands are located within or adjacent to the project site, and the proposed project would be required to comply with General Plan Policy C-1.14. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

## 1.5 CULTURAL RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
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 type="checkbox"/>	<input checked="" type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

The General Plan EIR determined that future development facilities by the General Plan Update could result in adverse effects to known or unknown historic resources, and the ground-disturbing activities associated with development facilitated by the General Plan Update would have the potential to damage or destroy previously unknown historic or prehistoric archaeological resources. General Plan EIR Mitigation Measures CR-1(a) and CR-1(b) were identified to reduce potential impacts to historical and unique archaeological resources to a less-than-significant level. The General Plan EIR determined that impacts related to the disturbance of human remains would be less than significant, as all future development facilitated by the General Plan Update would be required to comply with the requirements of Public Resources Code (PRC) Section 5097, which includes specific provisions for the protection of human remains and establishes procedures to be implemented if Native American skeletal remains are discovered.

In accordance with General Plan EIR Mitigation Measures CR-1(b), a Phase I Cultural Resources Study was conducted in May 2018 for the proposed project, and a Phase II Subsurface Archaeological Evaluation of the project site was conducted in May 2018. The evaluation identified that the project area lies within the boundary of CA-SLO-165, the archaeological remains of a substantial Native American settlement. Native American consultation resulted in three comment letters that expressed concern for ground-disturbing activities on the project site within the CA-SLO-165 boundary. Consultation resulted in requests for Phase I and Phase II studies, construction design that limits ground disturbance, and tribal monitors. The Phase II Subsurface Evaluation found that the proposed project development area entirely contains disturbed culturally modified soil, and no indication of disturbed human remains was observed. No cultural features were identified other than the homogenized mass of cultural soil, shell, debitage, and modern trash that underlies the project site.

Implementation of the proposed project would develop a new multifamily residence on the project site that could have an impact on historical and unique archaeological resources, through uncovering previously unknown archaeological resources during ground-disturbing activities, excavation, or grading. The proposed project would be required to comply with General Plan Policy C-2.3 which, as fully described below, requires the protection of cultural resources. The Phase II Subsurface Archaeological Evaluation found the project site to be within the CA-SLO-165 boundary

but no cultural resources or human remains were discovered during the subsurface investigation. Based on the findings of the Phase II Subsurface Archaeological Evaluation and Native American consultation, an archaeological and Native American monitor would be required during all future soil disturbance associated with implementation of the proposed project. Additionally, adherence to the procedures outlined in General Plan EIR Mitigation Measure CR-1(a), the procedures outlined in the Phase II Subsurface Archaeological Evaluation, and compliance with PRC Section 5097, which pertains to inadvertent discovery of human remains, would ensure the proposed project would have a less-than-significant impact related to the discovery of previously unidentified cultural resources or human remains. Therefore, no new or substantially more severe impacts related to cultural resources beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

**General Plan EIR Mitigation Measure CR-1(a): Avoidance or Minimization of Historic, Cultural, and Archaeological Resources Impacts.** Policy C-2.3 of the General Plan and Local Coastal Program (LCP) Update shall be revised to read:

**Policy C-2.3: Protection of Cultural Resources.** Ensure the protection of historic, cultural, and archeological resources during development, construction, and other similar activities. Development shall avoid, to the maximum extent feasible, adversely impacting historic, cultural, and/or archaeological resources, and shall include adequate BMPs to address any such resources that may be identified during construction, including avoidance, minimization, and mitigation measures sufficient to allow documentation, preservation, and other forms of mitigation. If the resource(s) in question are of Native American origin, develop avoidance or minimization measures in consultation with appropriate Native American tribe(s).

### Applicable Policies

#### General Plan Policies

- **Policy C-2.3: Protection of Cultural Resources.** Ensure the protection of historic, cultural, and archeological resources during development, construction, and other similar activities. Development shall avoid, to the maximum extent feasible, adversely impacting historic, cultural, and/or archaeological resources, and shall include adequate BMPs to address any such resources that may be identified during construction, including avoidance, minimization, and mitigation measures sufficient to allow documentation, preservation, and other forms of mitigation. If the resource(s) in question are of Native American origin, develop avoidance or minimization measures in consultation with appropriate Native American tribe(s).

## Conclusion

The General Plan EIR adequately evaluated the impacts related to cultural resources for the proposed project. No historic or archaeological resources have been identified on the project site and no known human remains are located within or adjacent to the project site, and the proposed project would be required to comply with General Plan EIR Mitigation Measure CR-1(a) and General Plan Policy C-2.3. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

## 1.6 ENERGY

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

The General Plan EIR found that the General Plan Update would not result in the inefficient, wasteful, or unnecessary consumption of energy during construction or operational activities as there are policies and implementation actions that would result in indirect energy conservation and would promote greater energy efficiency in municipal and community operations and development. In addition, the General Plan EIR found that the General Plan Update would allow for more efficient use of existing infrastructure and would improve citywide efforts to reduce greenhouse gas (GHG) emissions, and therefore would facilitate the consistency of future development projects with both mandatory and voluntary measures of the Morro Bay Climate Action Plan (Morro Bay CAP).

The proposed project would develop a multifamily residence, consistent with allowable uses on the project site and surrounding development. As noted in Attachment A, the project site currently is undeveloped and surrounded by commercial and residential uses. Infill developments improve energy efficiency as the resulting development pattern places City residents closer to places of employment, businesses that residents patronize, and public transit opportunities. Therefore, the proposed project would have beneficial impacts as it would further policies within the General Plan Update related to encouraging infill development to reduce transportation impacts, including Policy CIR-2.1, which is described below.

As described in Section 1.8, Greenhouse Gas Emissions, the proposed project would be required to comply with the applicable strategies from the Morro Bay CAP, which includes various strategies that promote the efficient use of energy, such as building performance strategies and strategies to increase participation in energy efficiency programs. Therefore, no new or substantially more severe impacts related to energy beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation would be required.



## Applicable Policies

### General Plan Policies

- **Policy C-6.2: Renewable Energy in Home and Commercial Uses.** Encourage the use of solar energy systems in homes and commercial businesses as a form of renewable energy, including in support of zero net energy goals.
- **Policy CIR-2.1: Compact Development.** Support mixed-use, compact-style, and other land use development patterns within existing developed areas so as to facilitate easy active transportation and transit use.

## Conclusion

The General Plan EIR adequately evaluated the impacts related to energy for the proposed project. The proposed project would develop a multifamily residence, consistent with allowable uses on the project site, and would be required to comply with the Morro Bay CAP. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

## 1.7 GEOLOGY AND SOILS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

The General Plan EIR determined that potential impacts related to geology and soils would be less than significant with compliance with the California Building Code (CBC) and implementation of General Plan Policies PS-2.2, PS-2.8, PS-2.9 and PS-2.12. The General Plan EIR also determined that potential impacts related to paleontological resources would be less than significant with implementation of the policies and mitigation measures discussed in Section 1.5, Cultural Resources.

### Fault Rupture and Strong Seismic Ground Shaking

The project site is located in a seismically active area of California and is subject to seismic-related hazards, including but not limited to, earthquakes and fault rupture. As shown on Figure 4.5-2 of the General Plan EIR, there are no fault traces located within or immediately adjacent to the project site, and therefore potential impacts related to fault rupture would be less than significant.

As required by General Plan Policy PS-2.13, the proposed project would be required to comply with the most recent CBC, which provides for stringent construction requirements for projects in areas of high seismic risk. The project design and construction are required to conform with, or exceed, current best standards for earthquake resistant construction in accordance with the CBC and with

the generally accepted standards of geotechnical practice for seismic design in California. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

#### Ground Failure, Erosion, and Unstable Soils

As shown on Figure 4.5-3 and 4.5-4 of the General Plan EIR, the project site is located within an area of low potential for liquefaction and an area of high potential for landslide hazards. Therefore, the proposed project would be required to comply with General Plan Policies PS-2.2 and PS-2.9, which limit new development in areas subject to landslide hazards and require a detailed design review and the incorporation of additional structural safety measures. The proposed project would implement all recommendations included in the Soils Engineering Report (Geo Solutions, Inc., January 15, 2016) prepared for the proposed project including building design, such as compliance with the CBC, and construction recommendations. Implementation of recommendations discussed in the Soils Engineering Report would ensure that potential impacts related to ground failure, soil erosion, and unstable or expansive soils would be less than significant. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

#### Alternative Wastewater

As described in the General Plan EIR, new development under the General Plan Update would occur where existing roads, water, and sewer systems are in place, minimizing the need to develop new wastewater disposal systems. The proposed project would connect to the existing wastewater infrastructure and would not require the use of alternative wastewater systems. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

#### Paleontological Resources

The project site is currently vacant, and therefore, there is the potential that undiscovered paleontological significance may exist. Ground-disturbing activities associated with the proposed project would have the potential to adversely affect these resources, especially due to excavation. As described in the General Plan EIR, implementation of Policy C-2.3 and Mitigation Measures CR-1 (a) and CR-1(b), which are discussed in Section 1.5, Cultural Resources, would also apply to paleontological resources (i.e., a paleontology study would be required for areas with known paleontological sensitivity) and would ensure that any potential impacts would be reduced to a less-than-significant level. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

#### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation would be required.

## Applicable Policies

### General Plan Policies

- **Policy PS-2.2: New Development in High-Risk Areas.** Require new development to be located outside of areas subject to natural hazards from tsunamis, geologic, flood, and wildfire conditions to the maximum feasible extent. If development must occur in such high-risk areas, including if development cannot be feasibly sited in a manner that avoids such areas entirely, ensure that such development is sited, designed, and conditioned to minimize risks to life and property while mitigating the development's impacts to coastal resources, particularly to public recreational beach access. Development shall also ensure stability and structural integrity; shall not create nor contribute significantly to erosion, geologic instability, or destruction of the site; shall not substantially alter natural landforms; and shall not include shoreline protective devices.
- **Policy PS-2.8: Structural Stability.** Require new development to ensure structural stability while not creating or contributing to erosion or geologic instability or destruction of the site or surrounding area.
- **Policy PS-2.9: New Development in High-Risk Areas.** Require that new development in areas subject to liquefaction and/or landslide hazards is located in a manner that will minimize risks to life and property.
- **Policy PS-2.11: New Development Proposals.** Require new development proposals in seismic hazard areas to consider risks caused by seismic activity and to include project features that minimize these risks.
- **Policy PS-2.12: Grading and Cut-and-Fill Operations.** Require new development to minimize grading and cut-and-fill operations.
- **Policy PS-2.13: Additional Standards for Development Subject to Geologic and Seismic Hazards.** In addition to other hazard requirements that may apply, development in areas that are potentially subject to geologic hazards, (including Alquist-Priolo earthquake hazard zones and areas subject to landslides, liquefaction, steep slopes averaging greater than 30 percent, and unstable slopes regardless of steepness) shall comply with the seismic safety standards of the Alquist-Priolo Act (California Public Resources Code Sections 2621. et seq.) and all applicable seismic provisions and criteria in the most recent version of State and County codes; shall incorporate siting and design techniques to mitigate any such geologic hazards; and shall not create a hazard or diminish the stability of the area.

## Conclusion

The General Plan EIR adequately evaluated the impacts related to geology and soils for the proposed project. Because the proposed project would be constructed in compliance with the CBC, would implement all recommendations included in the Soils Engineering Report, and would comply with General Plan EIR Mitigation Measure CR-1 (a) and General Plan Policies PS-2.2, PS-2.8, PS-2.9, PS-2.11, PS-2.12, PS-2.13, and C-2.3, impacts related to geology and soils would be less than significant. Therefore, because the proposed project would not result in any new, previously unconsidered

significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

## 1.8 GREENHOUSE GAS EMISSIONS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

The General Plan EIR determined that buildout of the General Plan would be consistent with SLOAPCD's adopted annual efficiency threshold of 4.9 metric tons (MT) of carbon dioxide (CO<sub>2</sub>) equivalent (CO<sub>2</sub>e) per service population. However, the General Plan EIR notes that new individual development projects within the City could result in GHG emissions that would be inconsistent with statewide per capita emissions goals, as individual project details are not known. Individual projects would be required to complete Appendix C of the Morro Bay CAP, which is the CAP Compliance Worksheet, and implement mandatory measures consistent with the CAP. Any project that is found to not be in compliance with the CAP would be required to demonstrate that its GHG emissions would fall below SLOAPCD's adopted GHG significance thresholds.

At the time that the General Plan EIR was finalized, the SLOAPCD annual efficiency threshold was based on the State's 2020 GHG emissions reduction goal from the Global Warming Solutions Act (Assembly Bill [AB] 32). Because project horizons are now beyond 2020, SLOAPCD does not recommend the use of the threshold in CEQA evaluations. In 2021, SLOAPCD developed the Interim CEQA GHG Guidance for the San Luis Obispo County Air Pollution Control District's 2012 CEQA Air Quality Handbook to provide clarification on thresholds of significance for GHG emissions.<sup>3</sup> In lieu of the previous threshold, the 2021 guidance included the following to be considered: consistency with a qualified CAP, no-net increase in GHG emissions relative to baseline conditions, and lead agency adopted defensible CEQA GHG thresholds.

As noted in Attachment A, the project site is currently undeveloped and the proposed project would develop a multifamily residence with a density of 19 du/ac. The project site is located within the High Density Residential General Plan designation and the Residential High Density zoning district. A density of 19 du/ac is consistent with allowable densities in these areas. As discussed in Section 1.6, Energy, the proposed project would be consistent with General Plan Policy LU-3.6, related to reducing GHG emissions by promoting infill development, and Policy CIR-2.1, related to encouraging infill development to reduce transportation impacts. The proposed project would further General

<sup>3</sup> San Luis Obispo County Air Pollution Control District (SLOAPCD). 2021. Interim CEQA GHG Guidance for the San Luis Obispo County Air Pollution Control District's 2012 CEQA Air Quality Handbook. Website: [https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/CEQA-GHGInterimGuidance\\_Final2.pdf](https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/CEQA-GHGInterimGuidance_Final2.pdf) (accessed January 28, 2025).



Plan policies related to infill development, which in turn would reduce vehicular trips and encourage alternative transportation (i.e., walking or bicycling), thereby reducing GHG emissions within the city. Additionally, the proposed project has been designed to minimize construction waste reducing energy required to produce construction materials, reducing landfill waste, and reducing vehicle trips associated with material deliveries to the project site. The proposed project would also comply with the City's adopted California Energy Code and features an energy efficient design. Although new GHG emissions would be generated from the proposed project compared to the project site's existing, undeveloped, condition, the proposed project would be required to be consistent with the Morro Bay CAP, either by implementing the mandatory measures and documenting them in the CAP Compliance Worksheet, or by demonstrating adherence to SLOAPCD's 2021 interim GHG guidance and that the project would not substantially interfere with implementation of the CAP. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation would be required.

### Applicable Policies

#### General Plan Policies

- **Policy C-6.2: Renewable Energy in Home and Commercial Uses.** Encourage the use of solar energy systems in homes and commercial businesses as a form of renewable energy, including in support of zero net energy goals.
- **Policy CIR-2.1: Compact Development.** Support mixed-use, compact-style, and other land use development patterns within existing developed areas so as to facilitate easy active transportation and transit use.
- **Policy LU-3.6: Infill Development.** Promote infill development on vacant or underutilized properties in the city as the preferred strategy for most new development in Morro Bay.

### Conclusion

The General Plan EIR adequately evaluated the impacts related to greenhouse gas emissions for the proposed project. The proposed project would result in infill development and would be required to comply with the Morro Bay CAP. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

## 1.9 HAZARDS AND HAZARDOUS MATERIALS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>
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 2 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

The General Plan EIR determined that compliance with existing regulations and implementation of policies included in the General Plan Update would ensure potential impacts related to the transport, use, or disposal of hazardous materials, hazardous material releases related to accidents, the emission of hazardous materials within 0.25 mile of a school, and sites included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would all be less than significant. The General Plan EIR Update includes policies that would ensure adequate evacuation routes and emergency response is available throughout the City. Nevertheless, the General Plan EIR determined that the project site is not located within an airport land use plan or associated safety zone.

### Routine Use and Accident Conditions

The General Plan EIR notes that new development within the City could result in new residential units adjacent to commercial and industrial land uses, which could use and store hazardous

materials. According to the General Plan Land Use Map,<sup>4</sup> the project site is surrounded by existing residential land use. There are no industrial or commercial land uses immediately adjacent to the project site. However, the proposed project would be required to comply with the regulations, standards, and guidelines established by the United States Environmental Protection Agency, the State of California, San Luis Obispo County, and the City related to storage, use, and disposal of hazardous materials. Therefore, adherence to these existing regulations would ensure that any potential impacts related to the use, transport, storage, or disposal of hazardous materials would be less than significant. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

#### Hazardous Emissions within 0.25 Mile of an Existing or Proposed School

Morro Bay High School is located approximately 0.3 mile southwest of the project site. Construction of the proposed project could include the transport, storage, and short-term use of petroleum-based fuels, lubricants, pesticides, and other similar materials. The amount of hazardous chemicals present during construction would be limited and would be in compliance with existing federal, State, and local regulations. Compliance with such regulations related to hazardous materials would minimize the risks associated with potential exposure of sensitive receptors to hazardous materials. Similarly, project operation would involve the typical use of household hazardous materials (e.g., pesticides, fertilizer, solvents, cleaning products, and paints) that, when used correctly and in compliance with existing laws and regulations, would not result in a significant hazard to the public or the environment. Operation of the proposed project would not involve the use or storage of large amounts hazardous materials. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

#### Cortese List

The project site is not included on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.<sup>5</sup> Three leaking underground storage tank (LUST) cleanup sites are approximately 0.2 mile west of the project site; however, as of 2008, their status was determined completed and the cases were closed.<sup>6</sup> Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

#### Airport Safety Hazards

The closest airport to the project site is the San Luis Obispo Regional County Airport located approximately 17 miles southeast the project site and, as noted above, the project site is not within an airport land use plan or associated safety zone. Therefore, no new or substantially more severe

<sup>4</sup> Morro Bay, City of. 2023. Plan Morro Bay. Website: <https://www.morrobayca.gov/DocumentCenter/View/18200/2023-Land-Use-Map-Amendment> (accessed January 28, 2025).

<sup>5</sup> California Environmental Protection Agency (CalEPA). 2025. Cortese List Data Resources. Website: <https://calepa.ca.gov/sitecleanup/corteselist/> (accessed January 28, 2025).

<sup>6</sup> State Water Resources Control Board (SWRCB). n.d. GeoTracker. Website: <https://geotracker.waterboards.ca.gov/ma/> (accessed January 28, 2025).

impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Emergency Response

The proposed project would not result in a land use designation change or result in the alteration of any roadways in the area, and therefore would not impact the emergency access routes or impair implementation of an emergency response plan or emergency evacuation plan. The proposed project would be subject to review by the Morro Bay Fire and Police departments for compliance with adopted emergency response plans. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Wildland Fires

As described in Section 1.20, Wildfire, the project site is not located within or near a very high fire hazard zone. Therefore, the proposed project would have no impact related to wildfire. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation would be required.

### Applicable Policies

#### General Plan Policies

- **Policy PS-2.7: Additional Fire Protection Standards for All Development.** In addition to other hazard requirements that may apply, the following fire protection standards apply to all development:
  - **New Development and Fire Safety.** New development shall meet all applicable fire safety standards and shall be sited and designed to minimize fuel modification and brush clearance to the maximum feasible extent, and to avoid such activities within ESHA and ESHA buffers on-site and on neighboring property, as well as parkland. All such requirements shall be applied as conditions of approval applicable for the life of the development.
  - **Existing Development and Fire Safety.** Removal of major vegetation adjacent to existing development for fire safety purposes shall only be allowed upon a finding that fuel modification and brush clearance techniques are required in accordance with applicable fire safety regulations and are being carried out in a manner which reduces coastal resource impacts to the maximum feasible extent. In addition to the foregoing requirements, removal of ESHA, or removal of materials in an ESHA buffer, shall only be allowed for fire safety purposes if it is not already prohibited by coastal permit conditions; if there are no other

feasible alternatives for achieving compliance with required fire safety regulations; and if all ESHA and related impacts are mitigated in a manner that leads to no net loss of ESHA resource value.

### Conclusion

The General Plan EIR adequately evaluated the impacts related to hazards and hazardous materials for the proposed project. The proposed project would be required to comply with existing regulations related to the transport, use, storage, and disposal of hazardous materials. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

## 1.10 HYDROLOGY AND WATER QUALITY

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input 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 offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

The General Plan EIR determined that the General Plan Update would have a less-than-significant impact related to hydrology and water quality with compliance with the National Pollutant Discharge Elimination System (NPDES) permit requirements, the Central Coast Regional Water Quality Control Board's (RWQCB) post-construction permit requirements for stormwater management, the policies included in the General Plan Update, and the Morro Bay Municipal Code.

### Water Quality Standards, Waste Discharge Requirements, Surface or Groundwater Quality, and Erosion

The project site is currently undeveloped and only includes pervious area. The proposed project would develop a multifamily residence, consistent with the allowable land use and surrounding development. Development of the proposed project would not alter the course of any stream or river. Construction of the proposed project has the potential to alter existing drainage patterns on the site and result in soil erosion due to earth-moving activities. During construction, disturbed soils would be susceptible to erosion from wind and rain, resulting in sediment transport via stormwater runoff from the project site. Because the proposed project would disturb less than 1 acre of soil, the proposed project would not be subject to the requirements of the State Water Resources Control

Board's (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ, NPDES No. CAS000002) (Construction General Permit). However, the proposed project would be required to implement Best Management Practices (BMPs) during construction to control runoff, erosion, and sediment movement during construction in accordance with the Morro Bay Municipal Code. The potential for erosion and sedimentation resulting from ground-disturbing activities associated with the development of allowable uses on the project site would be similar with any development allowed under the current land use designation as analyzed in the General Plan EIR.

The project site is not located within a flood hazard zone designated by the Federal Emergency Management Agency (FEMA).<sup>7</sup> Therefore, the proposed project would not impede or redirect flood flows or risk the release of pollutants as a result of flood conditions.

The proposed project would be required to comply with the requirements of the NPDES General Permit for Storm Water Discharges from Small MS4s, Order No. 2013-0001-DWQ NPDES No. CAS000004 as amended by order WQ 2015-0133-EXEC, Order WQ 2016-0069-EXEC, WQ order 2017-XXXX-DWQ, order WQ 2018-0001-EXEC, and order WQ 2018-0007-EXEC (MS4 Permit). The MS4 Permit requires that Regulated Projects implement Low Impact Development, source control, site design, and stormwater treatment BMPs. As such, BMPs would be required to be incorporated into project design to capture, treat, and reduce pollutants of concern on site before stormwater runoff enters the City's system. Required compliance with the MS4 Permit including incorporation of post-construction BMPs to target pollutants of concern, would reduce operation impacts related to waste discharge requirements, water quality standards, degradation of water quality, and erosion to less than significant. Additionally, in compliance with General Plan Policy C-7.13, Drainage Technologies, the proposed project would be required to employ innovative and efficient drainage technologies that comply with federal and State water quality requirements and reduce runoff and water quality impacts to downstream environments. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

#### Groundwater Supplies and Recharge, and Sustainable Groundwater Management Plan

The proposed project would be connected to existing water infrastructure within and adjacent to Hill Street and would not require the use of groundwater or require groundwater extraction. According to the Soils Engineering Report, groundwater was not encountered during two exploratory borings reaching depths of 15 feet below ground surface (bgs). Depth of excavation would not extend below 3 feet bgs, and therefore, the proposed project would not interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. For these reasons, there would be no impacts related to a decrease in groundwater supplies or interference with groundwater recharge.

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<sup>7</sup> Federal Emergency Management Agency (FEMA). 2017. Map No. 06079C0813H. May 16.

The Sustainable Groundwater Management Act (SGMA) was enacted in September 2014.<sup>8</sup> SGMA requires governments and water agencies of high- and medium-priority basins to halt overdraft of groundwater basins. SGMA requires the formation of local groundwater sustainability agencies (GSAs), which are required to adopt Groundwater Sustainability Plans to manage the sustainability of the groundwater basins. The City has access to and water rights permits for the Morro and Chorro Groundwater Basins.<sup>9</sup> Both basins are identified by the California Department of Water Resources as very low priority; therefore, development of a Groundwater Sustainability Plan is not required. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Surface Runoff, Flooding, Storm Drain Capacity, and Polluted Runoff

As discussed previously, construction and post-construction BMPs would be required for the proposed project to address surface runoff, flooding, storm drain capacity, and to reduce pollutants in stormwater runoff. With implementation of BMPs, impacts related to the introduction of additional sources of polluted runoff would be less than significant. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

### Applicable Policies

#### General Plan Policies

- **Policy C-7.5: New Development and Reuse Projects.** Manage new development and reuse projects and existing land uses to mitigate impacts and/or facilitate improvements to the City's water systems.
- **Policy C-7.13: Drainage Technologies.** Require that new development projects employ innovative and efficient drainage technologies that comply with federal and state water quality requirements and reduce runoff and water quality impacts to downstream environments.
- **Policy C-7.14: Pollutant Runoff.** Reduce pollutants in runoff from agriculture and new development by requiring the use of the most effective best management practices currently available. All runoff shall be filtered and treated to remove expected pollutants prior to being directed to infiltration areas and/or stormwater systems. Where runoff cannot be adequately

<sup>8</sup> California Department of Water Resources. 2024. SGMA Groundwater Management. Website: [water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management](https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management) (accessed January 28, 2025).

<sup>9</sup> California Department of Water Resources. 2019. SGMA Basin Prioritization Dashboard. Website: [gis.water.ca.gov/app/bp-dashboard/p2](https://gis.water.ca.gov/app/bp-dashboard/p2) (accessed January 28, 2025).



accommodated onsite through on-site systems, any excess runoff shall be conveyed inland in a nonerosive manner. Also encourage green infrastructure on designated “Green Streets” where stormwater and runoff would be managed, captured and cleansed in public rights-of-way. Main Street should be studied for potential as a Green Street.

- **Policy C-7.15: Water Quality.** To reduce the potential for degradation or impairment of water quality, the City shall continue to investigate and implement new measures to reduce potential pollutants in stormwater and irrigation runoff and require the following:
  - To the maximum extent feasible, development shall include specific measures to help reduce potential pollutants and water quality impairment, including controlling the disposal of chemicals and hazardous materials, controlling the use of pesticides and herbicides, maintaining existing stormwater capture programs, applying low-impact development designs, and requiring on-site retention and/or reuse of runoff. The City shall utilize ecologically responsible pest control methods and integrated pest management to the extent feasible on public property and encourage this practice on private property.
  - Drainage plans and erosion, sediment, and pollution control measures shall be required as conditions of approval of every application for new development that has the potential to impair water quality.
  - Construction phase stormwater pollutant controls shall be required for development with the potential for water quality impairment, including erosion controls, sediment traps and filtering of off-site stormwater flows, capture of site-generated pollutant sources, street sweeping of dirt tracked off-site, litter control, post-construction monitoring, and other best management practices. Construction-phase water quality impacts shall be avoided by minimizing the disturbed area, phasing grading activities, implementing soil stabilization and pollution prevention measures, and preventing unnecessary soil compaction. Development with the potential for water quality impairment shall, at a minimum, be designed to meet National Pollutant Discharge Elimination System stormwater runoff requirements.
  - Additionally, development shall be planned, sited, and designed in a manner that maintains or enhances on-site infiltration, reduces runoff, minimizes the transport of pollutants in runoff generated from the development, and recharges groundwater. Development shall ensure that runoff is appropriately collected, filtered, and treated by best management practices (BMPs) to minimize pollutant loading to the maximum degree feasible.
- **Policy C-7.17: Impervious Surfaces.** Development shall minimize new impervious surfaces, especially impervious areas directly connected to water and marine resources, and, where feasible, increase the area of pervious surfaces in redevelopment to reduce runoff.
- **Policy PS-2.8: Structural Stability.** Require new development to ensure structural stability while not creating or contributing to erosion or geologic instability or destruction of the site or surrounding area.

- **Policy PS 2.12: Grading and Cut-and-Fill Operations.** Require new development to minimize grading and cut-and-fill operations.
- **Policy PS-3.17: Resilient Buildings.** Require new and significantly renovated buildings and all public buildings to be designed and constructed to withstand severe storms, flooding, and other impacts that are expected to result from a changing climate.

### Conclusion

The General Plan EIR adequately evaluated the impacts related to hydrology and water quality for the proposed project. The proposed project would be required to comply with MS4 permit requirements, the Central Coast RWQCB post-construction permit requirements for stormwater management, the policies included in the General Plan Update, and the Morro Bay Municipal Code. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

## 1.11 LAND USE AND PLANNING

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

#### Divide an Established Community

The General Plan EIR determined that impacts related to the physical division of a community would be less than significant, as the General Plan Update would include policies to improve connectivity within the City. Projects that have the potential to physically divide an established community include projects such as new freeways and highways, major arterials, streets, and railroad lines. The proposed project would not result in changes to land use designations on the project site and is not anticipated to result in the alteration of existing roadways adjacent to the site or other conditions which could physically divide an established community. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

#### Conformance with Land Use Plans

According to CEQA, policy conflicts do not, in and of themselves, constitute a significant environmental impact. Policy conflicts are considered to be environmental impacts only when they would result in direct physical impacts or where those conflicts relate to avoiding or mitigating environmental impacts. As such, associated physical environmental impacts are discussed in this addendum under specific topical sections. The proposed project's conformance with applicable General Plan and zoning requirements are discussed in this land use section and are also discussed under specific topical sections.

As described in Attachment A, Project Description, the proposed project would develop a multifamily residence on the project site, consistent with the allowable land use. The project site is designated High Density Residential on the City's General Plan Land Use Map and is within the Residential High Density (RH) zoning district on the City's 2022 Zoning Map.<sup>10</sup> The High Density Residential designation allows for multifamily housing, including apartments, townhomes, condominiums, and some group housing uses with densities ranging from 15.1 to 27.0 du/ac.<sup>11</sup> The RH zoning district implements the High Density Residential land use designation.

<sup>10</sup> Morro Bay, City of. 2022. Adopted Zoning Map. January 25. Website: <https://www.morrobayca.gov/DocumentCenter/View/18198/2022-Zoning-Map-with-Amendment> (accessed January 2025).

<sup>11</sup> Morro Bay, City of. 2021. *Plan Morro Bay*. January 25.

Multifamily residential uses, such as the proposed project, are permitted in the RH zoning district and the proposed project would have a density of approximately 19 du/ac, consistent with the allowable density. Further, the proposed project would comply with the general development standards for the RH zoning district including, but not limited to, minimum building setbacks, a maximum building height of 30 feet, and maximum lot coverage of 60 percent.

Therefore, because the proposed project would comply with the General Plan designation for the project site and comply with the general development standards for the RH zoning district, there would be no new or more severe impacts related to land use plans beyond those previously identified in the General Plan EIR.

### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

### Applicable Policies

#### General Plan Policies

- **Policy LU-1.1: Land Use Pattern.** Maintain the current pattern of Morro Bay's land use to preserve the distinct character areas and community form, while enhancing and transforming areas with the greatest potential for change to improve economic activity and align them with the community vision. (See Figure LU-4, Land Use Map, in *Plan Morro Bay*.)<sup>12</sup> New development shall be located within, contiguous with, or in close proximity to existing developed areas with adequate public services and where it will not have significant effects, either individually or cumulatively, on coastal resources.
- **Policy LU-3.6: Infill Development.** Promote infill development on vacant or underutilized properties in the city as the preferred strategy for most new development in Morro Bay.

### Conclusion

The General Plan EIR adequately evaluated the impacts related to land use and planning. The proposed project would not result in the removal or modification of any public rights-of-way in the vicinity of the project site and the proposed project would comply with the development standards in the General Plan and Zoning Ordinance. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

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<sup>12</sup> Morro Bay, City of. 2021. *Plan Morro Bay*. January 25.

## 1.12 MINERAL RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
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 type="checkbox"/>	<input checked="" type="checkbox"/>
b. 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 type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

The General Plan EIR determined that there are no existing mineral extraction operations within the city. The project site does not contain any known mineral resources and is not used as a mineral resource recovery site. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

### Conclusion

The General Plan EIR adequately evaluated the impacts to mineral resources. The project site is not located in an area where mineral resources are known to occur. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

### 1.13 NOISE

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project result in:				
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 2 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

The General Plan EIR determined that implementation of General Plan policies related to noise control and reduction would reduce noise and avoid generation of excessive noise and vibration and that noise-sensitive uses would not be exposed to aircraft noise.

#### Ambient Noise Levels and Vibration

The proposed project would be required to comply with Section 9.28.030 of the Morro Bay Municipal Code which restricts the timing of construction activities authorized by a City permit to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday and 8:00 a.m. to 7:00 p.m. on weekends and holidays. In addition, as required by Policy NOI-3.5, if vibratory rollers are required for construction, they should not be used near vibration-sensitive receptors.

As described in Attachment A, Project Description, implementation of the proposed project would develop a multifamily residence on the project site, consistent with the allowable use. Development of the project site could result in increased vehicle trips on roadways near the project site, which could expose noise-sensitive land uses to incremental increases in traffic noise. The proposed project would be required to comply with General Plan Policies NOI-1.3, NOI-1.4, NOI-2.1, NOI-2.3, and NOI-3.1 through NOI-3.6 described below, which would provide for compliance with noise standards and enforcement of the City's stationary noise standards. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

#### Airport Noise

As described in Section 1.9, Hazards and Hazardous Materials, the closest airport to the project site is the San Luis Obispo County Regional Airport located approximately 17 miles southeast of the project site and is not within an airport land use plan or associated safety zone. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

## Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

## Applicable Policies

### General Plan Policies

- **Policy NOI-1.3: Noise-Reducing Project Features.** Incorporate design and construction features into residential and mixed-use projects that shield noise-sensitive land uses from excessive noise.
- **Policy NOI-1.4: Acoustical Studies.** Require an acoustical study for proposed projects in areas where existing or projected noise levels exceed or would exceed the maximum allowable levels established in this element. Adopt procedures to ensure project compliance with mitigation measures and enforcement of noise standards.
- **Policy NOI-2.1: Transportation Noise Standards.** Mitigate noise created by any existing or new transportation noise source so that it does not exceed the exterior or interior sound levels specified in this element. Routes for use by heavy trucks will be located away from noise-sensitive land uses when feasible.
- **Policy NOI-2.3: Project Design Techniques.** Prioritize use of site planning and project design techniques to mitigate excessive noise. The use of noise barriers shall be considered a means of achieving the noise standards only after all other practical design-related noise mitigation measures have been integrated into the project.
- **Policy NOI-3.1: Source Reduction.** Reduce construction, maintenance, and nuisance noise at the source as the first and preferred strategy to reduce noise conflicts.
- **Policy NOI-3.3: Construction Shielding.** Encourage shielding for construction activities to reduce noise levels and protect adjacent noise-sensitive land uses.
- **Policy NOI-3.4: Construction Hours.** Limit allowable hours for construction activities and maintenance operations located adjacent to noise-sensitive land uses.
- **Policy NOI-3.5: Vibration Control.** Control construction vibration by avoiding the use of vibratory rollers near vibration-sensitive receptors and scheduling construction activities with the highest potential to produce vibration to hours with the least potential to affect sensitive land uses.
- **Policy NOI-3.6: Construction Vibration Notification.** Developers shall notify neighbors of scheduled construction activities that would generate vibration.

## Conclusion

The General Plan EIR adequately evaluated the impacts related to noise. Future development allowed by the proposed project would be required to comply with existing General Plan policies related to noise, including those listed above, which would ensure that construction- and operational-period noise would remain less than significant. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.



## 1.14 POPULATION AND HOUSING

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
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 type="checkbox"/>	<input checked="" 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"/>

### Discussion

The General Plan EIR found that buildout of the General Plan Update would result in an increase in total population from 10,714 to 12,062 (1,348 new residents) and an increase in residential units from 6,414 to 7,295 (881 new residential units) by 2040. The San Luis Obispo Council of Governments (SLOCOG) regional growth forecast projections anticipate an increase in total population from 10,714 to 12,092 (1,378 new residents) and an increase in residential units from 4,988 to 5,660 (678 new residential units).<sup>13</sup> Both projections are equivalent to an average annual population growth of approximately 0.5 percent through the year 2040. Additionally, any growth in the City must be consistent with Measure F, which limits the City population to 12,200 residents.

As described in Attachment A, Project Description, the proposed project would develop a multifamily residence that would include four (4) attached residences and one (1) attached accessory dwelling unit (ADU). The four residential units include one 2-bedroom ADU, two 2-bedroom residential units (one on the first floor and one on the second floor), and two 1-bedroom residential units on the second floor. Based on the existing population and residential units within the City, the average household includes 2.15 persons.<sup>14</sup> The proposed project could increase the population by approximately 11<sup>15</sup> more residents. However, because the project site is zoned residential, the land use and zoning designations would not change under the proposed project, and the proposed project is consistent with the density evaluated for the project site in the General Plan EIR, the buildout of the General Plan Update would still be below SLOCOG's regional growth projects and less than 12,200. Therefore, implementation of the proposed project would be consistent with local and regional growth projections and would not cause the City's projected population growth to exceed allowable limits.

The project site does not currently contain any residential uses, and therefore the proposed project would not necessitate the construction of replacement housing elsewhere. Therefore, no new or

<sup>13</sup> The SLOCOG 2040 Housing Unit Projections are based on occupied units, and therefore are lower than the City's projected residential units as that projection included both occupied and unoccupied units.

<sup>14</sup>  $10,714 / 4,988 = 2.15$

<sup>15</sup>  $5 \text{ units} \times 2.15 \text{ persons} = 10.75 \text{ persons (or 11 persons when rounded to the nearest whole number)}$

substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### **Applicable Mitigation**

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

### **Conclusion**

The General Plan EIR adequately evaluated the potential population and housing impacts for the proposed project. The proposed project would result in an increase in the amount of residential units on the project site, but this increase would be consistent with the zoning designation of the project site, allowable density, and local and regional growth projections, and would not result in the demolition of any existing residential units. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

## 1.15 PUBLIC SERVICES

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

## Discussion

The General Plan EIR determined that potential impacts associated with public services would be less than significant with no mitigation required. Compliance with existing City ordinances and policies would ensure the proposed project would not impact public services. As noted below, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

**Fire and Police Protection.** Fire protection at the project site is provided by the Morro Bay Fire Department (MBFD), and police protection services are provided by the Morro Bay Police Department (MBPD). As described in Section 1.14, Population and Housing, implementation of the proposed project would result in an increase in population. However, this increase would be minimal (estimated 11 persons) and would be consistent with SLOCOG's regional growth projects and would not increase the citywide population above the limit set by Measure F (12,200). Furthermore, the proposed project would be required to comply with General Plan Policy PS-2.6, described below, which would ensure all applicable fire safety standards are met. Therefore, the proposed project would not substantially increase fire and police service ratios or response times such that new or physically altered facilities would be required to maintain performance objectives and, the proposed project would not result in any new or more severe impacts beyond those that were identified in the General Plan EIR.

**Schools.** The General Plan EIR determined that development facilitated by the General Plan Update would result in an increase of 184 elementary age students and 82 high school age students that would need to be accommodated by Del Mar Elementary and Morro Bay High School, respectively, based on the San Luis Coastal Unified School District's (SLCUSD) student yield rates of 0.209 for grades K through 6, and 0.093 for grades 9 through 12. The General Plan EIR determined that the coastal areas of the SLCUSD have the capacity for an additional 480 students.

Based on the SLCUSD's student yield rates, full buildout of the project site (i.e., 5 residential units) would result in two additional students at Del Mar Elementary School and one additional student at Morro Bay High School.<sup>16 17</sup> Therefore, there would be adequate school capacity to serve the proposed project. Additionally, the proposed project would be required to pay City-required public facilities impact fees to offset the impact of developments on public services and facilities. Therefore, the proposed project would not result in any new or more severe impacts related to schools beyond those that were identified in the General Plan EIR.

**Parks and Other Public Facilities.** As noted above, with implementation of the proposed project, the increase in population would be minimal and consistent with SLOCOG's regional growth projections and the limit set by Measure F. Therefore, the proposed project would not result in any new or more severe impacts related to parks or other public facilities in the area beyond those that were identified in the General Plan EIR.

### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

### Applicable Policies

#### General Plan Policies

- **Policy PS-2.6: Additional Fire Protection Standards for All Development.** In addition to other hazard requirements that may apply, the following fire protection standards apply to all development:
  - **New Development and Fire Safety.** New development shall meet all applicable fire safety standards and shall be sited and designed to minimize fuel modification and brush clearance to the maximum feasible extent, and to avoid such activities within ESHA and ESHA buffers on-site and on neighboring property, as well as parkland. All such requirements shall be applied as conditions of approval applicable for the life of the development.
  - **Existing Development and Fire Safety.** Removal of major vegetation adjacent to existing development for fire safety purposes shall only be allowed upon a finding that fuel modification and brush clearance techniques are required in accordance with applicable fire safety regulations and are being carried out in a manner which reduces coastal resource impacts to the maximum feasible extent. In addition to the foregoing requirements, removal of ESHA, or removal of materials in an ESHA buffer, shall only be allowed for fire safety purposes: if it is not already prohibited by coastal permit conditions; if there are no other feasible alternatives for achieving compliance with required fire safety regulations; and if all

<sup>16</sup>  $0.209 \text{ (SLCUSD grades K-6 yield rate)} \times 5 \text{ (residential units)} = 1.045 = 2 \text{ students}$

<sup>17</sup>  $0.093 \text{ (SLCUSD grades 9-12 yield rate)} \times 5 \text{ (residential units)} = 0.465 = 1 \text{ student}$

ESHA and related impacts are mitigated in a manner that leads to no net loss of ESHA resource value.

### Conclusion

The General Plan EIR adequately evaluated the potential public services impacts for the proposed project. The proposed project would not result in a substantial increase in population that was not already planned for or substantially increase the need for public services such that new or physically altered facilities would be required. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

## 1.16 RECREATION

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
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 type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

The General Plan EIR found that new Open Space/Recreational land use designated areas, in combination with Quimby Act in-lieu fees intended to provide additional open space and parkland, would allow the City to meet the parkland ratio included in the General Plan Update as Open Space Element Policy 1.1. Therefore, the General Plan EIR determined that the General Plan Update would contribute to the need for new or expanded park or recreation facilities, but would also provide the policy framework and physical opportunities to provide expanded park or recreational facilities, and found this impact to be less than significant.

As shown in Table A in Attachment A, Project Description, the proposed project would develop a multifamily residence with four attached residences and one attached ADU. The proposed project would result in a maximum population increase of approximately 11 persons. The density of the proposed project is consistent with the land use and zoning designation and was therefore accounted for in the General Plan EIR impact analysis for recreational resources. Furthermore, the population increase would be minimal compared to the existing and planned population within the City, and would not result in the accelerated physical deterioration of recreational facilities or require new recreational facilities to be constructed. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

### Conclusion

The General Plan EIR adequately evaluated the potential recreation impacts for the proposed project. The proposed project would not result in a substantial increase in population. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.



## 1.17 TRANSPORTATION

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
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 type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

The General Plan EIR determined that the General Plan Update would have a less-than-significant impact related to programs and plans addressing the circulation system, design hazards, and emergency access. However, the General Plan EIR did identify a significant and unavoidable impact related to VMT, as buildout of the General Plan Update would result in increased service population VMT and no feasible mitigation is available that would fully address the anticipated increase.

### Conflict with an Applicable Plan, Ordinance, or Policy

As described in Attachment A, Project Description, the proposed project would develop a multifamily residence on a currently vacant project site, consistent with the site's allowable use. The proposed project would be consistent with General Plan Policy CIR-2.1, which supports mixed-use, compact-style, and other land use development patterns, such as infill development, within existing areas so as to facilitate easy active transportation and transit use. The proposed project would not conflict with an applicable plan, policy, or ordinance related to transportation and circulation. No new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### CEQA Guidelines Section 15064.3

Effective December 28, 2018, the CEQA Guidelines were updated and require the evaluation of VMT as the criteria for analyzing transportation impacts for land use projects. As noted in CEQA Guidelines Section 15064.3(c), the provisions of CEQA Guidelines Section 15064.3 shall apply prospectively as described in CEQA Guidelines Section 15007. The provisions of CEQA Guidelines Section 15064.3 began applying statewide on July 1, 2020.

The City has not yet adopted significance thresholds for evaluating potential VMT impacts. In the absence of a locally-adopted threshold, the Governor's Office of Planning and Research published a

technical advisory that includes recommendations for analyzing VMT.<sup>18</sup> The technical advisory includes a number of screening thresholds for land use projects, including small projects, map-based screening for residential and office projects, and affordable housing projects.

Based on the proposed project's 19 du/ac density, the proposed project would meet the screening criteria for small projects. The Governor's Office of Planning and Research technical advisory includes the following screening for small projects, "Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day<sup>19</sup> generally may be assumed to cause a less than significant transportation impact."<sup>20</sup> The proposed project would develop four residential units with one attached ADU which would house approximately 11 people. Due to the minimal increase in population, the proposed project would generate fewer than 110 trips per day and result in a minimal increase in VMT in the area. Therefore, the proposed project would meet the screening criteria for a small project and would not require the preparation of a VMT analysis under CEQA. No new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

#### Design Feature Hazards and Emergency Access

The proposed project would be consistent with the allowable use of the project site and comply with the General Plan and Zoning regulations related to emergency access and infrastructure safety. Access to the proposed residence would be provided via a private driveway off of Hill Street. The proposed project would provide adequate access for emergency response and would not increase hazards due to a design feature. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

#### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

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<sup>18</sup> California, State of. 2018. Governor's Office of Planning and Research. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December.

<sup>19</sup> CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, as long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines, §15301, subd. (e)(2).) Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110–124 trips per 10,000 square feet. Therefore, absent of substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact.

<sup>20</sup> California, State of. 2018. Governor's Office of Planning and Research. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December.

## Applicable Policies

### General Plan Policies

- **Policy CIR-2.1: Compact Development.** Support mixed-use, compact-style, and other land use development patterns within existing developed areas so as to facilitate easy active transportation and transit use.

## Conclusion

The General Plan EIR adequately evaluated the potential transportation impacts for the proposed project. The proposed project would be consistent with General Plan Policy CIR-2.1. Additionally, the proposed project meets the small projects screening criteria under the City's established screening criteria for VMT and therefore does not require a transportation study. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

## 1.18 TRIBAL CULTURAL RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. 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 type="checkbox"/>	<input checked="" type="checkbox"/>
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 type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

The General Plan EIR determined that implementation of Mitigation Measures CR-1(a) and CR-1(b) and General Plan Policies C-2.1, C-2.2, C-2.3, and C-2.4 would ensure that potential impacts related to tribal cultural resources would be less than significant.

As noted in Section 1.5, Cultural Resources, a Phase I Cultural Resources Study and a Phase II Subsurface Archaeological Evaluation were conducted for the proposed project, in compliance with General Plan EIR Mitigation Measure CR-1 (b). The Phase II Subsurface Archaeological Evaluation found the project site to be within the CA-SLO-165 boundary, the archaeological remains of a substantial Native American settlement. However, the project site was found to be highly disturbed, and no cultural resources or human remains were identified during the subsurface investigation. Based on the findings of the Phase II Subsurface Evaluation and Native American consultation, an archaeological and Native American monitor would be required during all future soil disturbance associated with implementation of the proposed project. Additionally, adherence to the procedures outlined in General Plan EIR Mitigation Measure CR-1(a), the procedures outlined in the Phase II Subsurface Archaeological Evaluation and compliance with General Plan Policy C-2.3, would ensure that the proposed project would not result in any new or more severe impacts related to cultural resources, and this impact would be less than significant. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

## Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

**General Plan EIR Mitigation Measure CR-1(a): Avoidance or Minimization of Historic, Cultural, and Archaeological Resources Impacts.** Policy C-2.3 of the General Plan and LCP Update shall be revised to read:

**Policy C-2.3: Protection of Cultural Resources.** Ensure the protection of historic, cultural, and archeological resources during development, construction, and other similar activities. Development shall avoid, to the maximum extent feasible, adversely impacting historic, cultural, and/or archaeological resources, and shall include adequate BMPs to address any such resources that may be identified during construction, including avoidance, minimization, and mitigation measures sufficient to allow documentation, preservation, and other forms of mitigation. If the resource(s) in question are of Native American origin, develop avoidance or minimization measures in consultation with appropriate Native American tribe(s).

## Applicable Policies

### General Plan Policies

- **Policy C-2.3: Protection of Cultural Resources.** Ensure the protection of historic, cultural, and archeological resources during development, construction, and other similar activities. Development shall avoid, to the maximum extent feasible, adversely impacting historic, cultural, and/or archaeological resources, and shall include adequate BMPs to address any such resources that may be identified during construction, including avoidance, minimization, and mitigation measures sufficient to allow documentation, preservation, and other forms of mitigation. If the resource(s) in question are of Native American origin, develop avoidance or minimization measures in consultation with appropriate Native American tribe(s).

## Conclusion

The General Plan EIR adequately evaluated the potential tribal cultural resources impacts for the proposed project. No known tribal cultural resources have been identified on the project site and no known human remains are located within or in the immediate vicinity of the project site. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

## 1.19 UTILITIES AND SERVICE SYSTEMS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

The General Plan EIR determined that buildout of the General Plan Update would be consistent with the OneWater Morro Bay Plan, which outlines the availability of water supplies for the City through 2050 for a population of 12,200, and would not require any additional entitlements or water supplies. Additionally, implementation of the OneWater Morro Bay Plan and completion of the new Water Reclamation Facility (WRF), which is designed to meet the needs and future demand associated with General Plan buildout based on a population of 12,200, would ensure adequate wastewater systems and infrastructure to meet future demands. Finally, the General Plan EIR found that Cold Canyon Landfill has adequate capacity to accommodate buildout of the General Plan Update.

### Water, Wastewater, Stormwater, Solid Waste Services, and Energy

As described in Attachment A, the proposed project would connect to the existing utilities in the vicinity of the project site and would not require the expansion or relocation of existing utilities.

Development of residential uses on the project site would result in additional demand for water supply compared to existing conditions. However, because the proposed project is consistent with the zoning and land use designations for the project site, water demand from the development of residential uses on site was analyzed in the General Plan EIR. As noted above, the General Plan EIR found that sufficient water supplies would be available through implementation of the OneWater Morro Bay Plan, which assumes a maximum population of 12,200. As described in Section 1.14, Population and Housing, development facilitated by the proposed project would result in a minimal increase in population (approximately 11 persons). However, the project site is zoned residential



and consistent with the allowable density, and the land use and zoning designations would not change under the proposed project. Therefore, as concluded in the General Plan EIR, the proposed project would not cause the citywide population to exceed 12,200 by 2040. Similarly, the new WRF is designed to have capacity for a population of 12,200. Therefore, sufficient water capacity would be available for the proposed project.

The proposed project would nominally increase wastewater generation at the site compared to existing conditions. However, because the proposed project is consistent with the land use designation and zoning for the project site, the increase in wastewater generation was accounted for in the General Plan EIR analysis. Therefore, the nominal increase in wastewater would not exceed the City's wastewater treatment capacity. Furthermore, the proposed project would not generate surface runoff that would exceed the capacity of existing stormwater drainage facilities. Additionally, new solid waste generated by the proposed project would be accommodated by existing solid waste disposal facilities and the nominal increase in energy demand would be accommodated by existing infrastructure and suppliers, as noted in the General Plan EIR.

Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe significant impacts, and no new mitigation measures are required.

### Applicable Policies

#### General Plan Policies

- **Policy C-7.4: Sustainable Water Supply and Wastewater Capacity.** Development shall only be approved if it is first clearly demonstrated that the development will be served by an adequate existing water allocation and sustainable long-term public water supply, as well as adequate wastewater capacity. Consistency with Housing Element Program H-1.1 shall be maintained to prioritize allocation of water to projects containing affordable housing on existing legal lots of record. In addition, priority shall be given to Coastal Act priority uses.
- **Policy C-7.5: New Development and Reuse Projects.** Manage new development and reuse projects and existing land uses to mitigate impacts and/or facilitate improvements to the City's water systems.
- **Policy C-7.7: Water Conservation Features.** New development shall incorporate and utilize feasible and innovative water conservation features. Minimize economic hardship on existing residents and businesses.
- **Policy C-8.3: Diversion in Multi-Family and Visitor-Serving Uses.** Improve waste diversion options in multi-family and visitor-serving accommodations.

## Conclusion

The General Plan EIR adequately evaluated the potential utilities impacts for the proposed project. The General Plan EIR determined that adequate utility capacity and supply would be available for the proposed project. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

## 1.20 WILDFIRE

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion

The General Plan EIR determined that the entire planning area is within a Local Responsibility Area (LRA) wherein the City has responsibility for fire protection. In addition, the majority of the developed portion of the City, including the project site, is located outside of a mapped fire hazard severity zone. The General Plan EIR determined that any new development located in a very high fire hazard zone in an LRA would be required to comply with the standards in California Government Code Section 51182 to minimize fire risk.

The project site is not located within a State Responsibility Area (SRA) for fire service<sup>21</sup> and is not located within a very high fire hazard zone. Therefore, the proposed project would have no impact related to wildfire. Therefore, no new or substantially more severe impacts beyond those identified in the General Plan EIR would result from implementation of the proposed project.

### Applicable Mitigation

No substantial changes in environmental circumstances have occurred for this topic, nor revisions to approved land uses, nor new information that could not have been known at the time the General Plan EIR was certified leading to new or more severe impacts, and no new mitigation measures are required.

<sup>21</sup> California, State of. 2024. Office of the State Fire Marshal. FHSZ Viewer. Website: <https://egis.fire.ca.gov/FHSZ/> (accessed February 14, 2024).

## Conclusion

The General Plan EIR adequately evaluated the wildfire impacts of the proposed project. The project site is not located within an SRA and is not located within a very high fire hazard severity zone. Therefore, because the proposed project would not result in any new, previously unconsidered significant impacts or substantially more severe impacts than those analyzed in the General Plan EIR, potential impacts would be less than significant and additional mitigation is not required.

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