Initial Study/Mitigated Negative Declaration for the Hunter Ranch Resort Golf Course Project

Lead Agency:
City of El Paso de Robles
1000 Spring Street
Paso Robles, California 93446

October 2025

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INTRODUCTION

LEGAL AUTHORITY

This Initial Study/Mitigated Negative Declaration has been prepared in accordance with the *Guidelines for Implementation of the California Environmental Quality Act* (State CEQA Guidelines) and relevant provisions of the California Environmental Quality Act (CEQA) of 1970, as amended.

Initial Study. Section 15063(c) of the State CEQA Guidelines provides that the purposes of an Initial Study are to:

(1) Provide the Lead Agency with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR) or a Negative Declaration;

(2) Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling a project to qualify for a Negative Declaration;

(3) Assist in the preparation of an EIR, if one is required;

(4) Facilitate environmental assessment early in the design of a project;

(5) Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;

(6) Eliminate unnecessary EIRs; and

(7) Determine whether a previously prepared EIR could be used with the project.

Pursuant to the provisions of CEQA and the State CEQA Guidelines, the City of Paso Robles is the Lead Agency and is charged with the responsibility of deciding whether to approve the proposed project.

IMPACT ANALYSIS AND SIGNIFICANCE CLASSIFICATION

The following sections of this Initial Study/Mitigated Negative Declaration provide discussions of the possible environmental effects of the proposed project for specific issue areas that have been identified in the State CEQA Guidelines Appendix G Initial Study Checklist. For each issue area, potential effects are isolated. A "significant effect" is defined by Section 15382 of the State CEQA Guidelines as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by a project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance." According to the State CEQA Guidelines, "an economic or social change by itself shall not be considered a significant effect on the environment, but may be considered in determining whether the physical change is significant."

INITIAL STUDY

1. PROJECT TITLE

Hunter Ranch Resort Master Plan Project (APN 025-701-004)
Planned Development 19-08

2. LEAD AGENCY and CONTACT PERSON

City of El Paso de Robles
1000 Spring Street
Paso Robles, California 93446
Contact: C.M. Florence, AICP, Contract Planner
(805) 541-4509

Document prepared by:
John F. Rickenbach, AICP
JFR Consulting
7675 Bella Vista Road
Atascadero, CA 93422

3. PROJECT APPLICANT

Applicant:
Hunter Ranch Golf Course, LLC
4041 Highway 46 East
Paso Robles, California 93446

Agent:
David Watson, AICP
Watson Planning Consultants
P.O. Box 385
Pismo Beach, California 93448

4. PROJECT SITE CHARACTERISTICS

Location and Surrounding Land Uses: The 204-acre project site (APN 025-701-004) is located south of Highway 46 and north of Mill Road in Paso Robles, California. Approxmately 172 acres are currently developed as an 18-hole golf course with related improvements. Proposed resort development activities are planned for the remainder of the parcel. Surrounding land uses include:

North – Sensorio visitor-serving development; Eberle winery
South – Agriculture
West – Vina Robles winery
East – Agriculture

The Project also includes the construction of an off-site public utilities corridor ("Utility Corridor"). The Utility Corridor will consist of a 12-inch diameter potable water line and a 12-inch diameter sewer line (both gravity and inverted siphon), a 12-inch diameter recycled water

line, and an associated 30-foot-wide± public utilities easement (PUE) that will span 7,765 linear feet. The Utility Corridor will begin at Union Road, cross Huer Huero Creek via a siphon, then follow the proposed road and trail alignment for approximately 0.3 miles southeast, then zig zag between properties north and east until it joins Mill Road, then east until it reaches the 204-acre project site. The fourteen (14) properties through which the Utilities Corridor will traverse have Agricultural (AG) and Parks and Open Space (POS) land use designations under the City's General Plan, and Agricultural (AG) land use designation where it crosses unincorporated portions of San Luis Obispo County.

Existing General Plan Designation (Land Use Category) and Zoning: The City of Paso Robles General Plan land use designation and zoning for the site are both Parks and Open Space (POS).

Surrounding land use designations include:

North – Parks and Open Space (POS)
South – Agriculture (AG) - unincorporated
West – Agriculture (AG)
East – Agriculture (AG) - unincorporated

5. PROJECT DESCRIPTION

Overview. The 18-hole Hunter Ranch Golf Course opened in 1994, and is located between Highway 46 and Mill Road, in the City of Paso Robles, California. The proposed project envisions up to 402 rooms, visitor-serving accommodations, a 36,500 square foot conference center, various support buildings, amenities, parking, and other improvements within the existing 204-acre golf course property. The project would be phased and focused within two primary locations within the northern and southern portions of the golf course property. The golf course itself would not be altered from its existing configuration, which encompasses nearly 85% of the property.

As noted above, the proposed project further includes the construction of an off-site public utilities corridor ("Utility Corridor"). The Utility Corridor will consist of a 12-inch diameter potable water line, a 12-inch diameter sewer line, a 12-inch diameter recycled water line, and an associated 30-foot-wide public utilities easement (PUE). The Utility Corridor will begin at Union Road, cross Huer Huero Creek via a siphon, then follow the proposed road and trail alignment for approximately 0.3 miles southeast, then zig zag between properties north and east until it joins Mill Road, then east until it reaches the 204-acre project site.

The project would require a Special Planned Development Overlay, Master Development Plan, Development Plan, Vesting Tentative Parcel Map for Commercial Condominium Purposes, an Oak Tree Removal Permit, and ultimately building permits to accommodate the proposed uses. A Development Agreement will also be executed as part of the project.

Figure 1 shows the project site in relation to its immediate vicinity.

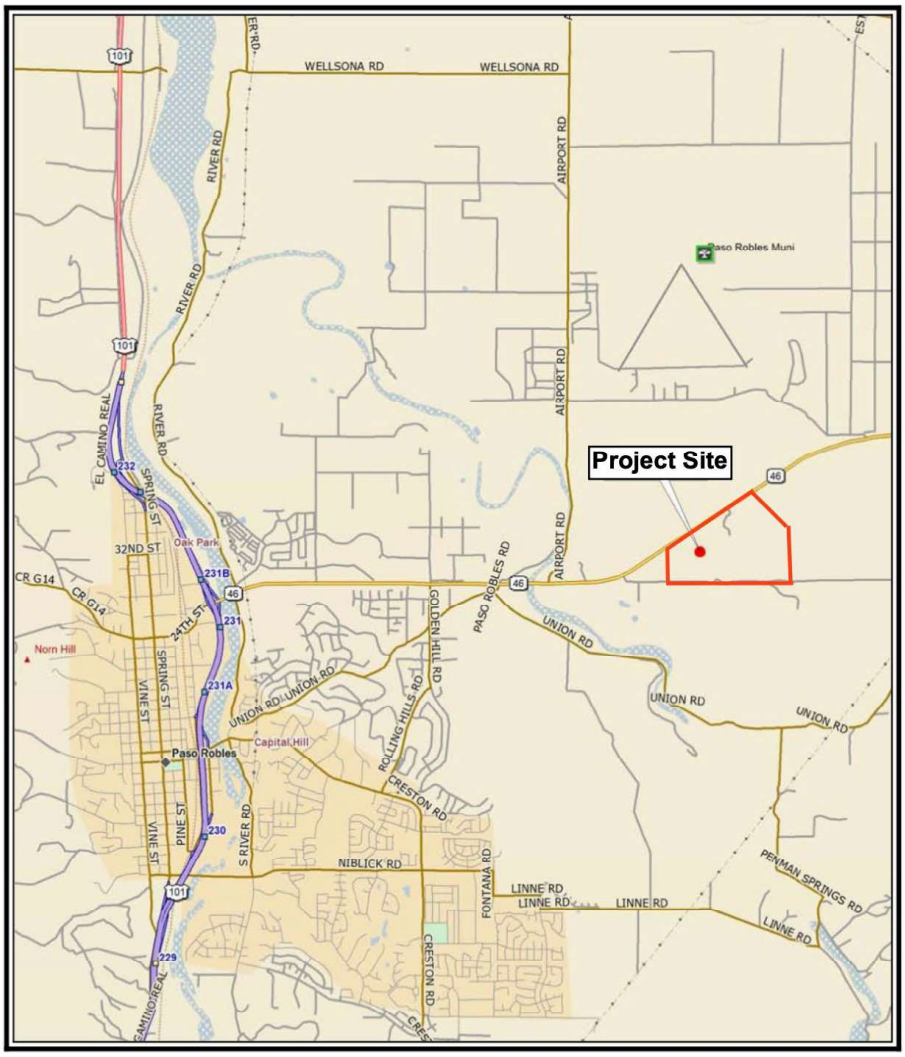


Figure 1. Project Site and Vicinity *(also see Figure 4 for Off-Site Utility Corridor detail)*

Existing Improvements. The 204-acre property (APN 025-701-004) includes the following existing improvements, which are currently served by on-site water wells and septic systems (onsite wastewater treatment system):

- 18-hole golf course;
- restaurant/lounge;
- pro/retail shop;
- slightly more than 100 existing parking spaces with solar covered carports at the entry to the course;
- maintenance building;
- lockers/restrooms; and
- back of house offices.

The architectural design of the existing improvements is ranch-craftsman. Except as noted below, the existing improvements will remain unaltered.

Proposed Master Plan Components. The proposed project would be developed based on a phased Master Plan for the property, which includes the following key features all of which will be served by City municipal services for domestic water and sewer system(s):

- 402 room visitor-serving units provided within small Casitas type buildings and multi-story hotel buildings;
- 36,500 square foot conference center with capacity for approximately 542 persons;
- Casitas lobby building;
- various swimming pools, including one (1) for the Casitas additions located near the eastern side of fairway #4; one (1) at the Lodge; and four (4) soaking lagoons located around the Casitas additions;
- creation of a single-lot condominium hotel air space subdivision for Casitas unit sales;
- resort laundry addition;
- golf cart charging-maintenance-storage facility;
- guest-serving spa, medical and conference centers;
- modification of the existing maintenance building into a wedding/events center;
- new maintenance building to replace the existing maintenance building, noted above;
- a "retail village" that includes shopping, restaurant and brewery uses;
- new parking,
- water and wastewater infrastructure to support the resort;
- new solar carport features over the parking lot planned for the Casitas lobby and retail village;
- proposed architecture will reflect similar details and materials as the ranch-craftsman style that characterizes existing development; and
- the on-site existing groundwater wells would be retained for irrigation of the golf course and for blending with future City recycled water under a *Private Well Agreement*.

These project components are identified on the proposed site plan as a series of structures lettered "A" through "T", which are referenced later in this document, and shown on **Figure 2** below.

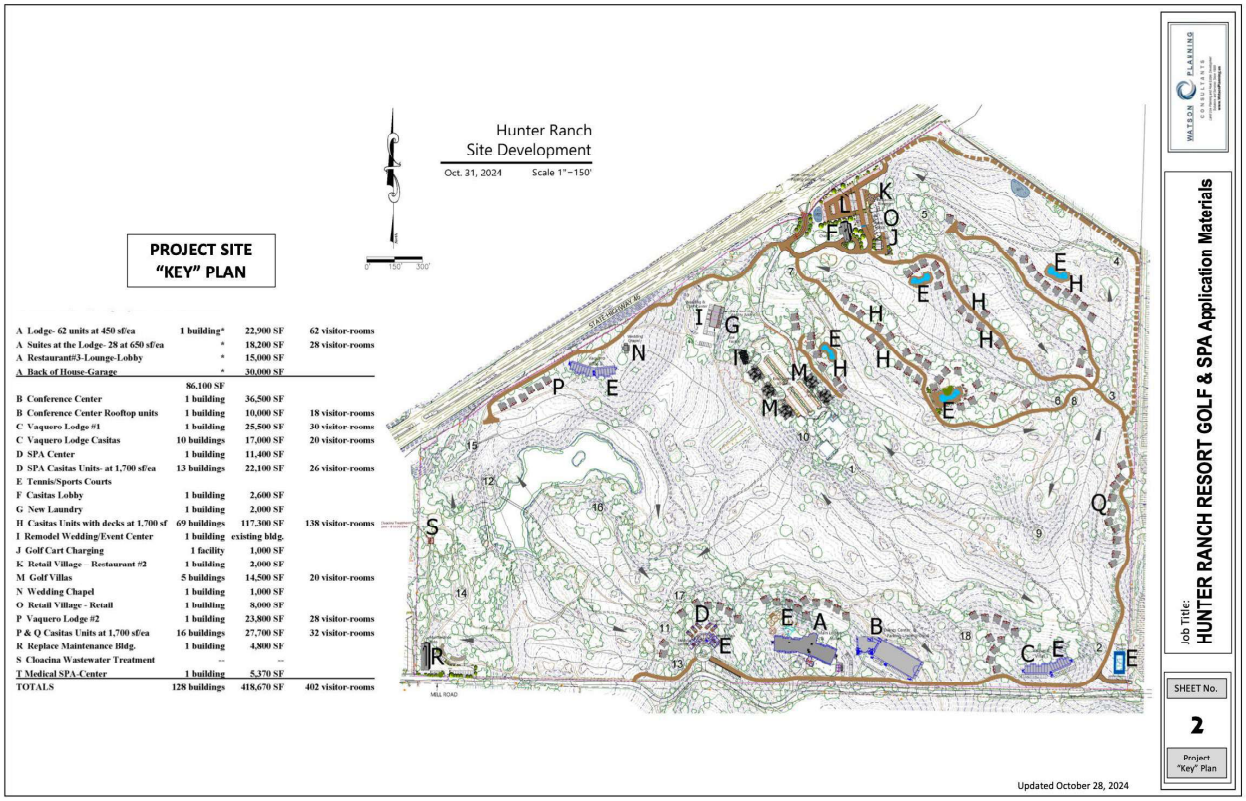


Figure 2. Project Site Plan

The Master Development Plan is envisioned to be built out in a manner that initially takes advantage of existing public infrastructure, with future phase development dependent upon additional infrastructure improvements. To that end, the proposed site improvements are divided into two groups: the "southern additions" would take access primarily from Mill Road while the "northern additions" would take access from State Route 46.

Proposed project internal circulation and access to adjacent roadways are shown in **Figure 3**.

Proposed Potable Water System. The Project will provide water main extensions necessary to supply water service to the project via connections to existing City water main lines in Union Road and in Mill Road, which will be dedicated to the City. The project will also install a private on-site water booster station to handle on-site domestic and fire delivery needs, consistent with any City Conditions of Approval, and applicable CEQA mitigation measures. (Please refer to Page 14 Off-Site Utilities Improvements, for further discussion.)

Proposed Recycled Water System. Provisions for on-site recycled water will be included in the proposed project in anticipation of City services in this area being available. At such time, blending of recycled water with existing groundwater sources will be done to provide irrigation to the existing golf course.

Proposed Wastewater System. The project will be served by a new City sewage lift station on Union Road (which will be completed by the City) and a new gravity sewer main extension from the Union Road lift station to the project site, which will be completed by the developer. (Please

refer to Page 14 Off-Site Utilities Improvements, for further discussion.) The sewer main extension shall be installed by the developer at the same time the water main extension is being constructed and will be dedicated to the City upon completion. If the Union Road sewage lift station is not available for initial phases, an interim Cloacina, an advanced wastewater treatment system designed to recycle the waste generated by the lodging units and used as landscape irrigation in and around each cluster of Casitas buildings and/or combined with well water or recycled water utilized for golf course irrigation. The project owner shall obtain all required permits from the Regional Water Quality Control Board prior to the installation of an on-site treatment system.

Dry utilities (i.e., electric, gas and communications) will be extended from Highway 46 and Mill Road.

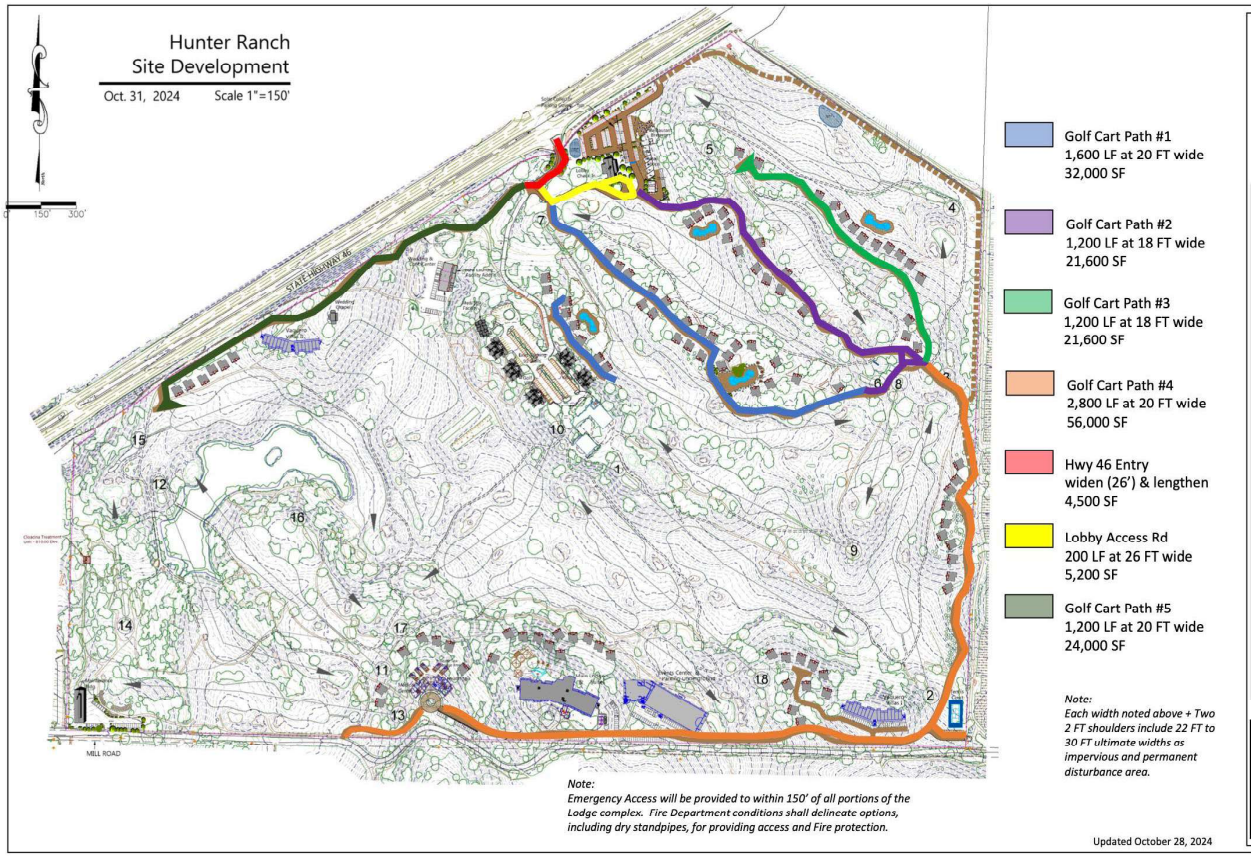


Figure 3. Project Circulation and Access

Project Phasing. As described in the following sections, there is not a precise or rigid phasing plan. This approach is intended to allow flexibility to address market conditions, financing requirements and completion of certain backbone infrastructure improvements, as follows:

1. The **Conference Center** (southern addition) will not be occupied until such time as either:

   - secondary vehicle access is available to Union Road, or
   - secondary vehicle access is available from Mill Road to Branch Road, or
   - a Transportation Management Plan (TMP) is approved and is implemented for the resort, and
   - availability of City sewer.

2. The following uses may be built and occupied prior to construction of the Fire Department approved internal access road connecting State Route 46 to Mill Road:

   - new maintenance building (Key Plan R)
   - laundry addition (Key Plan G)
   - "Model Units" = 1 Casitas and 1 villa (to be connected to the existing golf course septic on an interim basis) (Key Plan M-H)
   - Casitas parking lot and solar facilities (Key Plan L)

Development Areas. Project development would be focused in two different areas of the property, primarily based on where such development would take primary access. These are known as the "Southern Addition" and the "Northern Addition." Development in the Southern Addition would be generally accessed from Mill Road, which is along the southern edge of the property, while the Northern Addition would be accessed from Highway 46 along the northern edge. The specific development components within each area are described below.

Southern Addition

Proposed improvements in the Southern Addition would be accessed from Mill Road. The timing of these project components would be based on City-programmed roadway and vehicle access improvements in the immediate vicinity, as well as the timing of extension of City water, recycled water, and wastewater infrastructure. Details of each proposed project component in this area are as follows:

Key Plan A-B. Includes a 90-unit visitor-serving Lodge with Restaurant/Lounge and 28 larger suites included as part of the Lodge complex. A 15,000 square foot (SF) restaurant and lounge facility, as well as lobby complex as part of the Lodge, are also planned. A Conference Center of 36,500 SF is proposed to the immediate east of the Lodge. The Conference Center would include:

Conference Center Gross Meeting Space	**36,500 SF**
Pre-Function Area (20%)	7,300 SF
Meeting Storage for Chairs, Tables, etc (20%)	7,300 SF
Back of House (10%)	3,650 SF
Kitchen, Refrigeration & Dry Storage (5%)	2,000 SF
Assembly / Meeting Space	16,250 SF

Within the 16,250 SF "Assembly / Meeting Space," one half would be reserved for dining, while the other half would be the useable conference area, estimated to hold approximately 542 persons, assuming 15 SF per person. This estimate is based on other similar projects in the region. Conference uses would be deferred until a secondary vehicle access acceptable to the City is approved.

Parking areas, deliveries and vehicular access are also included for the Southern Addition along with wastewater disposal that will be addressed by either connection to the City wastewater lift station planned for Union Road, or an interim on-site Cloacina advanced wastewater treatment system (Key Plan S) intended to be in place until City wastewater services are available in this area, pursuant to the terms of the Development Agreement. Access to all these units will be from Mill Road.

Details of the proposed parking for these uses include the following:

Lodge (62 rooms)	62 stalls
Suites at the Lodge (28 suites)	28 stalls
Restaurant/Lounge/Lobby/Conferencing	103 stalls
Back of house (5,000 SF) Garage (25,000 SF)	30 stalls
Total Parking:	223 stalls

Key Plan D. This area will include the development of approximately 11,400 SF of Lodge Spa space for guests. Up to 13 Casitas buildings and a tennis court are planned around the spa facility. Parking areas, deliveries, and vehicular access are also included. Access to all these units will be from Mill Road. The spa facility will offer a variety of treatments and disciplines plus a specialty medical section. As an outpatient care facility, it will be able to provide diagnostic and limited procedures; more specifically, it will include orthopedic (co-flex procedures) and cosmetic treatments.

Details of the proposed parking for these uses include the following:

Spa Facility (11,400 AF)	32 stalls
Casitas Lodging (13 units; 26 rooms)	26 stalls
Tennis (including staff)	17 stalls
Total Parking:	75 stalls

Key Plan C. This area includes 30 hotel rooms/Casitas in several buildings referenced as Vaquero Lodge #1.

Details of the proposed parking for these uses include the following:

Vaquero Lodge #1 and Casitas	50 stalls
Staff Parking	10 stalls
Total Parking:	60 stalls

Proposed improvements in the Northern Addition would be accessed from Highway 46. Plans for the entry may include an engineering design to widen the access to three (3) lanes of traffic – one ingress and two egress lanes. The approximate 250-foot lengthening of the widened entry would occur entirely within the property. Should any part of the improvement be designed and/or constructed within the Caltrans right-of-way, application for an encroachment permit would be required.

Details of each proposed project component in this area are as follows:

Key Plan F-G-H-I-J. Includes a new stand-alone Casitas Lobby (2,600 SF) building near the main entrance from Highway 46. New visitor-serving units, referred to as "Casitas", would be similar to duplex units, with two (2) attached visitor lodging rooms under each Casitas roof that includes 75 Casitas buildings, for a total of 150 units. Guests would check in at the Casitas Lobby, and then exchange their vehicle for a golf cart, which would be used to access the units. A golf cart parking area would adjoin each Casitas. Access drives to the Casitas units would be designed consistent with Fire Department access requirements.

Each Casitas lodging unit will range from 800 to 900 SF each, making each Casitas building approximately 1,700 SF in size. Casitas units will be offered as hotel condominiums for sale under the subdivision map submitted with this application. No residential occupancy (i.e., 30 days or greater) would be permitted in the any of the Hunter Ranch visitor-serving uses.

Details of the proposed parking for these uses include the following:

Casitas (75 buildings; 150 rooms)	150 stalls (at Lobby)
Staff Parking	9 stalls (at Lobby)
Restaurant	29 stalls
Total Parking:	188 stalls

Golf Cart parking would also be available adjacent to the Casitas units.

Key Plan K-M-N-O-T. The project will include five (5) Golf Villas in this portion of the site, each of which will accommodate 4 guest units, for a total of 20 units. These buildings would be located near the existing golf pro shop and parking area. There would also be a 5,370-SF Medical Spa facility adjacent to the Golf Villas.

This portion of the site will include the construction of a new maintenance building which will allow the conversion of the existing building into a special event/weddings center. As noted previously, the Events center would not be constructed and would not operate until a secondary access to the resort is approved by the City.

Details of the proposed parking for these uses include the following:

5 Golf Villas (20 lodging rooms)	20 stalls (existing)
New Staff (max on shift)	9 stalls
Medical Spa	@ 1 space / 400 sf
Total Parking:	29 stalls

Key Plan P-Q. This area will include the development of Vaquero Lodge #2 (28 rooms), approximately 8,000 SF of Retail Village space and 6 Casitas buildings (12 rooms) adjoining Hole 15 of the golf course.

Details of the proposed parking for these uses include the following:

Vaquero Lodge #2 (28 lodging rooms)	28 stalls
Casitas (6 buildings; 12 rooms)	12 stalls
Commercial Retail (8,000 SF)	15 stalls
Total Parking:	55 stalls

Summary of Proposed Development. Table 1 summarizes the proposed development on the project site.

Table 1. Summary of Proposed Development				
Plan "Key"	**Project Feature**	**# of Buildings**	**Area (SF)**	**# of Rooms**
A	Lodge - 62 units at 450 sf/ea	1	22,900	62
A	Suites at the Lodge - 28 at 650 sf/ea	*	18,200	28
A	Restaurant #3-Lounge-Lobby	*	15,000	
A	Back of House-Garage	*	30,000	
	Subtotal	*1*	*86,000*	*90*
B	Conference Center (542 person occupancy)	1	36,500	
B	Conference Center Rooftop units	1	10,000	18
C	Vaquero Lodge #1	1	25,500	30
C	Vaquero Lodge Casitas	10	17,000	20
D	SPA Center	1	11,400	
D	SPA Casitas Units - at 1,700 sf/ea	13	22,100	26
E	Tennis/Sports Courts	-	-	
F	Casitas Lobby	1	2,600	
G	New Laundry	1	2,000	
H	Casitas Units with decks at 1,700 sf	69	117,300	138
I	Remodel Wedding/Event Center	1 (existing)		
J	Golf Cart Charging	1	1,000	
K	Retail Village – Restaurant #2	1	2,000	
L	Casitas Parking Lot/Solar Facilities			
M	Golf Villas	5	14,500	20
N	Wedding Chapel	1	1,000	
O	Retail Village - Retail	1	8,000	
P	Vaquero Lodge #2	1	23,800	28
P & Q	Casitas Units at 1,700 sf/ea	16	27,700	32
R	Replace Maintenance Building	1	6,400	
S	Cloacina Wastewater Treatment	-	-	
T	Medical SPA - Center	1	5,370	
	TOTAL	**128**	**420,270**	**402**

Development Agreement. Proposed development would be subject to terms included in a Development Agreement with the City. Authorized by statute pursuant to Government Code section 65864 – 65869.5, development agreements are legally binding contracts negotiated between a local jurisdiction and a project applicant to delineate the terms and conditions of a proposed development project. A development agreement in effect "freezes" all rules, regulations, and policies that are in place as of the execution of the agreement (Gov. Code Section 65866; *Santa Margarita Area Residents Together v San Luis Obispo County Bd. of Supervisors* (2000) 84 CA4th 221). Since large developments often take many years to complete, a development agreement provides assurance to the applicant that the project entitlements remain valid for the term of the agreement. In exchange for providing this assurance, a development agreement typically benefits the jurisdiction by strengthening the public planning process, facilitating comprehensive planning, reducing the economic costs of the development, and coming to agreement on conditions and requirements for the development to better meet community goals and needs.

The Applicant and City have tentatively agreed to terms that will be included in the project's Development Agreement, though final terms will be approved by the City Council.

Off-Site Utilities Improvements. As discussed on page 5 of this Initial Study, the proposed project includes the extension of municipal offsite water and wastewater utilities to serve the project site. Specifically, the proposed project provides for the construction of an off-site City Utility Corridor. The Utility Corridor will consist of a 12-inch diameter potable water line, a 12-inch diameter sewer line, a 10-inch diameter recycled water line, and an associated 25 to 30-foot-wide public utilities easement (PUE). The Utility Corridor will begin at Union Road, cross Huer Huero Creek via an inverted siphon, then follow the proposed road and trail alignment for approximately 0.3 miles southeast, then zig zag between properties north and east until it joins Mill Road, then east until it reaches the 204-acre project site.

Figure 4 shows the preliminary alignment of the future utilities extension between Union Road and Mill Road, to where it would connect to the proposed Hunter Ranch project site. Please refer to Appendix G for the July 2025 Technical Design Report that describes these offsite improvements in greater detail.

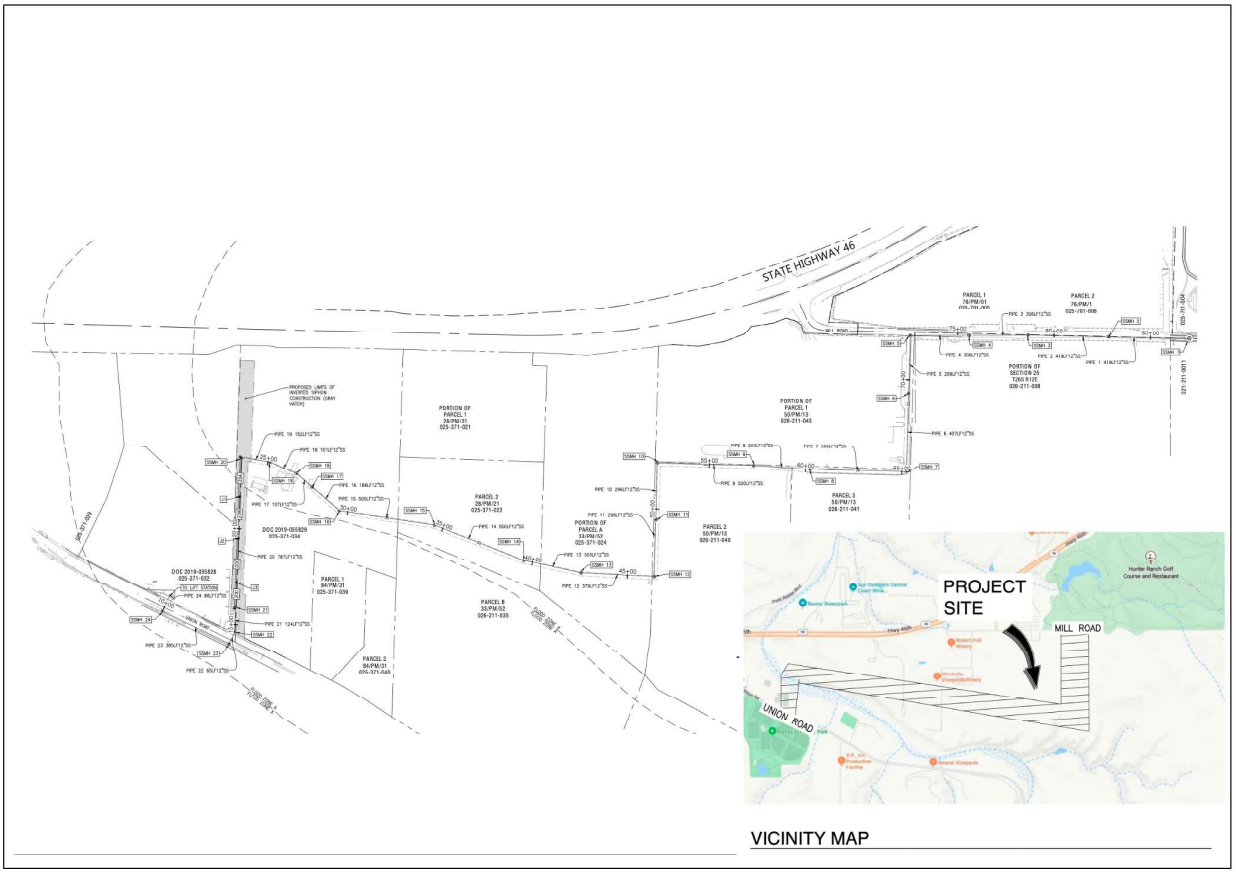


Figure 4. Proposed Off-Site Utilities Corridor

6. PUBLIC AGENCIES WHOSE APPROVAL MAY BE REQUIRED FOR SUBSEQUENT ACTIONS (e.g. permits, financing approval, or participation agreement):

- Caltrans (District 5)
- Regional Water Quality Control Board (Region 3)
- California Department of Fish and Wildlife
- U.S. Army Corps of Engineers (ACOE)
- San Luis Obispo County Air Pollution Control District

7. TRIBAL CONSULTATION. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

In accordance with AB 52, on May 6, 2025, formal notification was provided by the City to the designated contact or tribal representative of traditionally and culturally affiliated California Native American tribes that have requested notice. Patti Dunton of the Salinan tribe responded on July 16, 2025, requesting to be part of any cultural resource training for the construction crew, and to be notified if any resources are unearthed during project development.

ENVIRONMENTAL DETERMINATION

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Ag/Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology / Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	
☐ Mandatory Findings of Significance		

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project COULD have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the applicant. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Darren Nash
City Planner
City of El Paso de Robles

Date: October 20, 2025

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a Lead Agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). Earlier analyses and references are discussed at the end of the checklist.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) The analysis of each issue should identify:
   a) the significance criteria or threshold used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS - Would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In non-urbanized areas, Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

On-Site Project Development

a. Scenic Vistas. *Less than Significant Impact.* The project site is adjacent to Highway 46. City of Paso Robles General Plan Conservation Element identifies Highway 46 adjacent to the project site as an important "visual gateway" and "visual corridor", and sets forth the following relevant criteria for development along such corridors:

- Development shall be designed to make a positive visual impression and incorporate/preserve natural features;
- Limit range of land uses to preclude those commercial and industrial uses with outside processes and storage; and
- Billboards shall be limited in number, and shall be located to preserve views of natural features.

The proposed project would include retail and visitor lodging development visible from Highway 46. In general, the visual presentation will be similar to other existing visitor-serving development along Highway 46, consistent with the rural character of the project site and surrounding areas that feature rolling hillsides studded with oaks and vineyards. Based on the architectural plans submitted as part of the application, development appears consistent with the existing rural character of the site, and consistent with the character of similar development along the highway. In addition, the project will require formal review from the City's Development Review Committee, which will evaluate issues related to project design and its consistency with City policies. For these reasons, visual impacts related to scenic view corridors would be less than significant.

The Conservation Element also identifies the "oak-covered hillsides" as important natural landmarks. The project site includes numerous oak trees (primarily blue oaks, with some valley oaks), similar to adjacent properties on the eastern edge of Paso Robles, which contribute to the visual character of the City.

As a worst-case scenario, up to 96 oak trees could be impacted or removed as a result of project activities. Oak tree removal and replacement would be conducted consistent with the requirements of the City's Oak Tree Preservation Ordinance, and consistent with the recommendations of the

arborist's report. Moreover, as part of the project and pursuant to the Development Agreement, the project may result in planting up to 366 new oak trees on the project site, although this number could differ depending on the total number of trees removed or otherwise impacted (replacement would be based on the formula included in Section 10.01.050.F. of the Ordinance). The removal and replacement of trees will not impact views from Highway 46, as they are all at least 600 feet away or hidden from sight. Therefore, visual impacts related to the loss of oak trees would be less than significant. (Sources: 1, 2)

b. State Scenic Highways: *No Impact.* Caltrans identifies this stretch of Highway 46 as eligible for listing as a State Scenic Highway, but as yet it is not designated as such. Therefore, there would be no impact to any designated State Scenic Highway. (Sources: 1, 2)

c. Visual Character and Quality. *Less than Significant Impact.* The proposed project is located in a non-urbanized area; it would not substantially degrade the existing visual character or quality of public views of the site or its surroundings, and impacts relating to this issue would be less than significant. The 204-acre project site is located in a rural area south of Highway 46 and north of Mill Road in Paso Robles, California. Approxmately 172 acres are currently developed as an 18-hole golf course with related improvements. Surrounding land uses include wineries to the north and west, and agricultural uses to the south and east. The Vina Robles Amphitheater, which hosts musical events, is also west of the project area.

The site is zoned Parks and Open Space (POS), and would be required to adhere to the development requirements of this zone, which would ensure that the character of the site retains its current rural quality. The proposed project would exhibit a similar visual quality as the nearby wineries and other tourist commercial facilities and is also consistent with the character of the golf course development already on the site. Impacts would be less than significant. (Source: 3)

d. Light and Glare: *Less Than Significant.* Components of the proposed project will require nighttime lighting. The site is in a rural area, characterized by a golf course and surrounded with predominantly agricultural or related uses. The project will be required to conform to Zoning requirements related to lighting, and minimizing the impacts of lighting. Section 21.82.020 of the Zoning Code requires that

> *"all outdoor lighting shall be Dark-Sky compliant or equivalent. Light sources shall be designed and adjusted to direct light away from any road or street and away from any property or buildings outside the ownership of the applicant."*

Compliance with zoning requirements will ensure that potential impacts related to light and glare would be less than significant. In addition, standard conditions of approval will require any exterior lights to be shielded to prevent offsite glare. (Source: 3)

Off-Site Utilities Improvements

a. Scenic Vistas. *Less than Significant Impact.* Offsite water, recycled water and sewer utilities to serve the project would be constructed in a Utility Corridor, which will be located within a 25 to 30-foot-wide public utilities easement. The Utility Corridor will begin at Union Road, cross Huer Huero Creek via a siphon, then follow the proposed road and trail alignment for approximately 0.3 miles southeast, then zig zag between properties north and east until it joins Mill Road, then east until it reaches the 204-acre project site (see Figure 4). Construction activities will be visible, but once completed, these improvements will be underground, and not visible. As described

previously, oak trees contribute to the scenic quality of the area. Oak trees could be potentially removed or impacted as a result of the extension of off-site utilities. Construction activities would not affect any scenic vistas, as described in Section a. under "On-Site Project Development." (Sources: 27, 36)

b. State Scenic Highways: *No Impact.* Caltrans identifies this stretch of Highway 46 as eligible for listing as a State Scenic Highway, but as yet it is not designated as such. Therefore, there would be no impact to any designated State Scenic Highway. (Sources: 1, 2)

c. Visual Character and Quality. *Less than Significant Impact.* The off-site improvements within the PUC would be located in a non-urbanized area; it would not substantially degrade the existing visual character or quality of public views of the site or its surroundings, and impacts relating to this issue would be less than significant.

d. Light and Glare: *Less Than Significant.* Although utilities construction is anticipated to occur during daylight hours, it is possible that nighttime construction activity could also occur. Such activities would require lighting. The PUC is in a rural area, characterized by a golf course and surrounded with predominantly agricultural or related uses. Construction activities will be required to conform to Zoning requirements related to lighting, minimizing the impacts of lighting. Once completed, there will be no lighting associated with project water, recycled water, and sewer utilities within the PUC.

Findings and Mitigation: Impacts would be less than significant. No mitigation measures will be required.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES - Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to nonagricultural use?			X	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (per Public Resources Code § 12220(g), timberland (Public Resources Code § 4526, or timberland zoned Timberland Production (per Govt Code §51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?			X	

On-Site Project Development

a. Farmland Conversion. *No Impact.* The project site is identified in the City General Plan, Open Space Element in Figure OS-I, and State Farmland Mapping and Monitoring Program (FMMP) as "Urban and Built-Up Land," is not in agricultural production, and is not considered prime farmland. The property has been used primarily as a golf course with related developed uses. The project would not convert prime, unique or farmland of statewide importance to other uses. Therefore, this project would result in less than significant impacts to agricultural soils monitored in the State FMMP. (Source: 4)

b. Williamson Act. *No Impact.* There currently is no Williamson Act Conservation contract on the project site. Since there are no Williamson Act contracts or existing agricultural zoning designations within the project site, no impact associated with this issue would occur. No mitigation is required. (Source: 4)

c. and d. Forest or Timberland Zoning. *No Impact.* The proposed project would not conflict with any existing zoning for, or cause the rezoning of forest land or timberland, as none exists in the area. Therefore, no impact to forest land or timberland would occur and no mitigation is required. (Sources: 4)

e. Impacts to Nearby Farmland. *No Impact.* Agricultural uses are found to the east, west and south of the project site, on lands designated as Agriculture. However, proposed development would not impact adjacent agricultural operations, nor would it induce pressure to potentially convert such lands to non-agricultural uses. The project site is designated as Open Space, not Agriculture, so it is not converting land designated for agricultural use. Therefore, no impact with respect to conversion of agricultural lands to non-agricultural uses would occur and no mitigation is required. (Sources: 1, 4)

Off-Site Utilities Improvements

a. and e. Farmland Conversion and Impacts to Nearby Farmland. *Less Than Significant Impact*. The offsite utilities corridor would traverse agricultural lands between the project site and Union Road, as shown on **Figure 5** of this Initial Study. To the extent possible, the corridor would follow existing agricultural roads or property boundaries to minimize possible short-term disruption to existing land uses, including agricultural uses. From Mill Road, the corridor would head south and follow an existing roadway that accesses Robert Hall Winery before turning west along a ranch road between existing vineyards. From there, the corridor traverses the edge of vineyards without impacting the productive portions of the properties. When the corridor reaches Huer Huero Creek, it would go beneath the creek before terminating at Union Road, where it would connect to other existing utility infrastructure. As shown in Figure 5, this route would generally traverse non-agricultural lands (roadways), but would in short stretches cross lands designated as Unique or Prime farmland. However, in these instances, the corridor would actually follow agricultural roads that serve adjacent vineyards and would not impact these productive farmlands. Although there may be short-term temporary disruption during construction activities along the corridor, there would be no permanent conversion of productive agricultural lands to non-agricultural uses, and existing vineyard production would not be impacted. No agricultural or forestry resources would be impacted by proposed off-site utilities improvements.

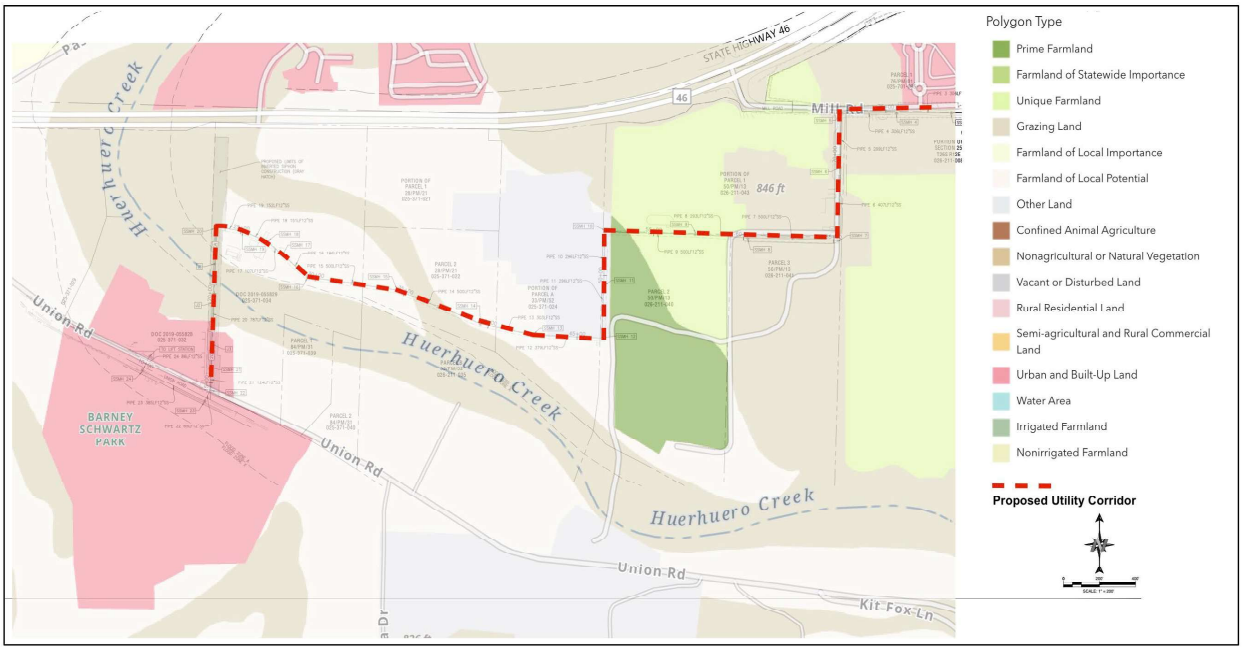


Figure 5. Agricultural Lands Along Proposed Utilities Corridor

b. Williamson Act. *No Impact.* There currently is no Williamson Act Conservation contract on parcels along the proposed utilities corridor. No impact associated with this issue would occur. No mitigation is required. (Source: 4)

c. and d. Forest or Timberland Zoning. *No Impact.* The proposed offsite utilities corridor would not conflict with any existing zoning for, or cause the rezoning of forest land or timberland, as none exists in the area. Therefore, no impact to forest land or timberland would occur and no mitigation is required. (Sources: 4)

ISSUES:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
III. AIR QUALITY - Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?		X		
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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?		X		
c) Expose sensitive receptors to substantial pollutant concentrations?		X		
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?		X		

The air quality analysis has been prepared based on an August 2023 report prepared by Ambient, which is attached as Appendix A to this Initial Study. The analysis included below summarizes the information in that report. (Source: 5)

On-Site Project Development and Off-Site Utilities Improvements

For the issue of air quality, impacts of both on- and off-site improvements are considered together in the discussion below.

State CEQA Guidelines Significance Criteria

Air quality impacts of a project are considered significant if they cause clean air standards to be violated where they are currently met, or if they substantially contribute to an existing violation of standards. Substantial emissions of air contaminants for which there is no safe exposure, or nuisance emissions such as dust or odors, that are generated by a project, would also be considered significant impacts. The *State CEQA Guidelines* significance thresholds are defined in the questions set forth in the Environmental Checklist shown above.

a. Air Quality Plan Consistency. *Less than significant impact with mitigation.*

SLOAPCD Clean Air Plan

As part of the California Clean Air Act (CCAA), the San Luis Obispo Air Pollution Control District (SLOAPCD) is required to develop a plan to achieve and maintain the state ozone standard by the earliest practicable date. The SLOAPCD's 2001 Clean Air Plan addresses the attainment and maintenance of state and federal ambient air quality standards. The Clean Air Plan was adopted by SLOAPCD on March 26, 2002.

The SLOAPCD's Clean Air Plan outlines the District's strategies to reduce ozone-precursor pollutants [i.e., reactive organic gas (ROG) and NO_X] from a wide variety of sources. The SLOAPCD's Clean Air Plan includes a stationary-source control program, which includes control measures for permitted stationary sources; as well as transportation and land use management strategies to reduce motor vehicle emissions and use. The stationary-source control program is administered by SLOAPCD. Transportation and land use control measures are implemented at the local or regional level, by promoting and facilitating the use of alternative transportation options, increased pedestrian access and accessibility to community services and local destinations, reductions in VMT, and promotion of congestion management efforts. In addition, local jurisdictions also prepare population forecasts, which are used by SLOAPCD to forecast population-related emissions and air quality attainment, including those contained in the SLOAPCD's Clean Air Plan. As a result, consistency with the SLOAPCD's Clean Air Plan has been evaluated based on the proposed project's consistency with the land use management strategies and transportation control measures identified in the Clean Air Plan. This analysis also provides an analysis of regional vehicle miles traveled (VMT) and consistency with regional VMT-reduction efforts. Regional VMT estimates are relied upon for regional air quality planning purposes. Regional VMT and growth projections are used to determine the strategies to be implemented sufficient to reach the emission reduction targets set by the ARB through Senate Bill (SB) 375 which is transportation legislation that supports the broader 2030 emission reduction targets required in SB 32.

Transportation and Land Use Control Measures

The SLOAPCD's Clean Air Plan includes multiple transportation and land use control measures intended to reduce emissions through reductions in VMT and the promotion of alternative forms of transportation. The project is not located along existing or planned public transit or pedestrian/bicycle routes, although the future extension of Mill Road (not part of the project) would include a multi-purpose trail or bike lane. However, mitigation measures have been included that would help to promote the use of alternative means of transportation, including provisions that would promote shuttle service to and from the downtown transit station, promotion of alternative fueled vehicle infrastructure, and bicycle use.

Projected Population, Employment & VMT Growth

According to the Regional Housing Needs Assessment, the City has about 27 percent more jobs than housing units, indicative of a "jobs-rich" community. The City's jobs to housing ratio is estimated to improve from a year 2015 ratio of 1.27 jobs/housing to a ratio of 1.19 jobs/housing by year 2030. The proposed project would result in increased employment which could further exacerbate this imbalance. However, based on the traffic analysis prepared for this project, implementation of the proposed project would result in overall reductions in regional VMT (CCTC 2023). As a result, the proposed project would not conflict with regional VMT-reduction efforts and associated reductions in mobile-source emissions accounted for in the SLOAPCD's Clean Air Plan. As a result, this impact would be considered *less than significant.*

In addition, the proposed project would have a less than significant impact on VMT. As noted in the traffic report for the project, "the employment-based uses proposed on the site would generate work VMT per employee below the City's threshold. The hotel uses would result in an increase in regional VMT before accounting for the mix of uses, pedestrian and bicycle facilities, and provision of electric golf carts on the site. Once those project features are included, the hotel VMT would be less-than-significant." (CCTC 2024). As a result, the proposed project would not conflict

with regional VMT-reduction efforts and associated reductions in mobile-source emissions accounted for in the SLOAPCD's Clean Air Plan. For these reasons, this impact would be considered *less than significant.*

Particulate Matter Report – Implementation of SB 656 Requirements

In July 2005, SLOAPCD adopted the *Particulate Matter Report* (PM Report). The PM Report identifies various measures and strategies to reduce public exposure to PM emitted from a wide variety of sources, including emissions from permitted stationary sources and fugitive sources, such as construction activities. As discussed in Section III.b, which assesses impacts related to construction and operation emissions, uncontrolled fugitive dust generated during construction may result in localized pollutant concentrations that may result in increased nuisance concerns to nearby land uses. Therefore, construction- generated emissions of PM would be considered to have a *potentially significant impact* with regard to air quality planning efforts.

Mitigation Measures

Implement Mitigation Measures AQ-1 through AQ-2 (described under Section III.b.)

Significance After Mitigation

Implementation of Mitigation Measures AQ-1 and AQ-2 would include measures to reduce construction- generated emissions. Additional mitigation measures have been included that would further reduce project- related operational emissions. Together these measures would help to reduce PM emissions and provide consistency with SLOAPCD's airborne PM-reduction efforts as well as measures identified in the SLOAPCD's Clean Air Plan. With mitigation, this impact would be considered *less than significant.*

b. Emissions from Project Construction and Operation. *Less Than Significant Impact with Mitigation.*

Impacts from Short-term Construction Emissions

Construction-generated emissions are of temporary duration, lasting only as long as construction activities occur, but have the potential to represent a significant air quality impact. Construction of the proposed project including off-stie utilities would result in the temporary generation of emissions associated with clearing, site prep, grading, building construction, paving, motor vehicle exhaust associated with construction equipment and worker trips, as well as the movement of construction equipment on unpaved surfaces. Short-term construction emissions would result in increased emissions of ozone-precursor pollutants (i.e., ROG and NO_X) and emissions of PM. Emissions of ozone-precursors would result from the operation of on- and off-road motorized vehicles and equipment. Emissions of airborne PM are largely dependent on the amount of ground disturbance associated with site preparation activities and can result in increased concentrations of PM that can adversely affect nearby sensitive land uses.

Estimated maximum daily and quarterly emissions associated with construction of the proposed project are presented in Tables 2 and 3 below, and in more detail in Appendix A Table 9 and Table 10, respectively. Construction generated emissions were compared to SLOAPCD's recommended significance thresholds (Daily, Quarterly Tier 1, and Quarterly Tier 2). As depicted in Table 1,

maximum daily emissions associated with project construction would total approximately 171 lbs/day of ROG+NO_X and 3 lbs/day of PM2.5 exhaust. As depicted in Table 3, maximum quarterly construction-generated emissions would total approximately 4.8 tons/quarter of ROG+NO_X, 0.1 tons/quarter of fugitive PM10 dust, and <0.1 tons/quarter of PM2.5 exhaust.

Maximum daily construction emissions would not exceed SLOAPCD's daily significance threshold. However, maximum quarterly construction emissions are predicted to exceed SLOAPCD's quarterly significance threshold without the implementation of mitigation. Emissions would be largely a result of mobile-source emissions associated with construction vehicle and equipment operations anticipated to occur during the grading. If uncontrolled, fugitive dust generated during construction may also result in localized pollutant concentrations that could exceed ambient air quality standards and result in increased nuisance concerns to nearby land uses. For this reason, construction-generated emissions would be considered to have a *potentially significant but mitigable impact.*

Table 2. Daily Construction Emissions Thresholds and Impacts without Mitigation (lbs/day)

Pollutant	Threshold	Impact	Exceed Threshold?
ROG + NO_X	137	84.67 (Year 1) 157.15 (Year 2) 171.31 (Year 3)	No **Yes** **Yes**
Carbon Monoxide (CO)	-	66.9 (Year 1) 74.84 (Year 2) 61.26 (Year 3)	- - -
Particulate Matter (PM-10)	-	10.90 (Year 1) 10.25 (Year 2) 4.72 (Year 3)	- - -
Particulate Matter (PM-2.5)	7 (exhaust)	3.13 (Year 1) 3.03 (Year 2) 2.15 (Year 3)	No No No
Particulate Matter (PM-2.5)	- (dust)	3.58 (Year 1) 3.52 (Year 2) 0.95 (Year 3)	- - -
Source: See Appendix A, Table 9 for detailed analysis, including results of CalEEMod modeling			

Table 3. Quarterly Construction Emissions Thresholds and Impacts without Mitigation (tons/quarter)

Pollutant	Threshold	Impact	Exceed Threshold?
ROG + NO_X (Tier 1/Tier 2)	2.5/6.3	4.75	**Yes (Tier 1)** No (Tier 2)
Particulate Matter (PM-10) - exhaust	-	0.06	-
Particulate Matter (PM-10) - dust	2.5 (Tier 1) None (Tier 2)	0.10	No (Tier 1)
Particulate Matter (PM-2.5) - exhaust	0.13 (Tier 1)	0.06	

	0.32 (Tier 2)		No (Tier 1) No (Tier 2)
Particulate Matter (PM-2.5) - dust	- (dust)	0.04	-
Source: See Appendix A, Table 10 for detailed analysis, including results of CalEEMod modeling			

Mitigation Measures

Consistent with the guidance and position of SLOAPCD, the following mitigation measures will reduce potential impacts to a less than significant level because post-mitigation modeling indicates that emissions will be reduced below applicable quantitative thresholds. These mitigation measures were developed and determined by SLOAPCD to be effective in terms of reducing potential impacts as indicated through post-mitigation modeling, as shown in Tables 4 and 5.

Mitigation Measure AQ-1. Fugitive Dust Mitigation. The following mitigation measures shall be implemented to reduce construction generated fugitive dust. These measures shall be shown on grading and building plans.

a. Reduce the amount of disturbed area where possible.
b. Use water trucks, SLOAPCD-approved dust suppressants (see Section 4.3 in the CEQA Air Quality Handbook), or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the District's limit of 20 percent opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water should be used whenever possible. Please note that since water use is a concern due to drought conditions, the contractor or builder shall consider the use of an APCD-approved dust suppressant where possible to reduce the amount of water used for dust control. For a list of suppressants, see Section 4.3 of the CEQA Air Quality Handbook.
c. All dirt stockpile areas should be sprayed daily or covered with tarps or other dust barriers as needed.
d. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
e. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between the top of load and top of trailer) in accordance with California Vehicle Code (CVC) Section 23114.
f. "Track-Out" is defined as sand or soil that adheres to and/or agglomerates on the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto any highway or street as described in CVC Section 23113 and California Water Code 13304. To prevent 'track out', designate access points and require all employees, subcontractors, and others to use them. Install and operate a 'track-out prevention device' where vehicles enter and exit unpaved roads onto paved streets. The 'track-out prevention device' can be any device or combination of devices that are effective at preventing track out, located at the point of intersection of an unpaved area and a paved road. Rumble strips or steel plate devices need periodic cleaning to be effective. If paved roadways accumulate tracked out soils, the track- out prevention device may need to be modified.

g. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil disturbing activities.
h. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established.
i. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD.
j. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.
k. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where possible. Roads shall be pre-wetted prior to sweeping when possible.
l. The burning of vegetative material shall be prohibited. Effective February 25, 2000, SLOAPCD prohibited developmental burning of vegetative material within San Luis Obispo County. If you have any questions regarding these requirements, contact the SLOAPCD Engineering & Compliance Division at (805) 781-5912.
m. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20 percent opacity, and to prevent the transport of dust off-site. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Compliance Division prior to the start of any grading, earthwork or demolition.

Mitigation Measure AQ-2. Construction Emissions. The following measures shall be implemented to reduce construction emissions from on and off-road construction equipment (NOx, ROG, and DPM) and area sources. These measures shall be shown on grading and building plans:

a. Maintain all construction equipment in proper tune according to manufacturer's specifications.
b. Fuel all off-road and portable diesel-powered equipment with ARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road).
c. Heavy-duty (50 horsepower or greater) diesel-fueled construction equipment shall meet, at a minimum, ARB's Tier 3 certified engines, or cleaner, off-road heavy-duty diesel engines; be fitted with diesel exhaust particulate filters in accordance with manufacturer recommendations; and, comply with the State Off-Road Regulation. Heavy-duty equipment with Tier 4 engines shall be used to the extent locally available. Where Tier 3, or cleaner, equipment is not available, incorporate diesel emission control strategies/retrofits, such that emission reductions achieved equal or exceed that of a Tier 3 engine. Installing California Verified Diesel Emission Control Strategies. Verified diesel emissions control strategies can be found at: arb.ca.gov/diesel/verdev/vt/cvt.htm.
d. When applicable, portable equipment, 50 horsepower (hp) or greater, used during construction activities shall be registered with the California statewide portable equipment registration program (issued by the California Air Resources Board) or be permitted by the APCD. Such equipment may include power screens, conveyors, internal

combustion engines, crushers, portable generators, tub grinders, trammel screens, and portable plants (e.g, aggregate plant, asphalt plant, concrete plant).

e. Use on-road heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on- road heavy-duty diesel engines, and comply with the State On-Road Regulation.
f. All on and off-road diesel equipment shall not idle when not in use. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5-minute idling limit.
g. Construction equipment staging areas shall be located at the furthest distance possible from nearby noise-sensitive land uses.
h. To the extent locally available, electrified or alternatively powered construction equipment shall be used.
i. Substitute gasoline-powered in place of diesel-powered equipment, where possible; and
j. Use alternative-fueled construction equipment on-site where possible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.
k. Construction of the proposed project shall use low-VOC content paints not exceeding 50 grams per liter.
l. To the extent locally available, use prefinished building materials or materials that do not require the application of architectural coatings.
m. Meet or exceed Cal Green Tier 2 standards for reducing cement use in concrete mix as allowed by local ordinance and conditions.

Significance After Mitigation

Implementation of Mitigation Measures AQ-1 and AQ-2 include SLOAPCD-recommended standard and best available control measures to reduce construction-generated emissions of fugitive dust, mobile-source emissions associated with construction vehicles and equipment, and evaporative emissions from architectural coasting (e.g. low VOC-emission paint). Mitigated daily and quarterly construction emissions are presented in Tables 4 and 5, respectively. (See Appendix A, Table 12 and 13 for detailed calculations.) With mitigation, project-generated construction emissions would not exceed applicable significance thresholds. With mitigation, this impact would be considered *less than significant.*

Table 4. Daily Construction Emissions Thresholds and Impacts with Mitigation (lbs/day)

Pollutant	Threshold	Impact	Exceed Threshold?
ROG + NO_X	137	84.67 (Year 1) 84.08 (Year 2) 115.89 (Year 3)	No No No
Carbon Monoxide (CO)	-	66.9 (Year 1) 74.84 (Year 2) 85.32 (Year 3)	- - -
Particulate Matter (PM-10)	-	10.90 (Year 1) 10.25 (Year 2) 11.14 (Year 3)	- - -
Particulate Matter (PM-2.5)	7 (exhaust)	3.13 (Year 1) 3.03 (Year 2) 3.36 (Year 3)	No No No
Particulate Matter (PM-2.5)	- (dust)	3.58 (Year 1) 3.52 (Year 2) 3.58 (Year 3)	- - -
Source: See Appendix A, Table 12 for detailed analysis, including results of CalEEMod modeling			

Table 5. Quarterly Construction Emissions Thresholds and Impacts with Mitigation (tons/quarter)

Pollutant	Threshold	Impact	Exceed Threshold?
ROG + NO_X (Tier 1/Tier 2)	2.5/6.3	1.77	No (Tier 1) No (Tier 2)
Particulate Matter (PM-10) - exhaust	-	0.06	-
Particulate Matter (PM-10) - dust	2.5 (Tier 1) None (Tier 2)	0.10	No (Tier 1)
Particulate Matter (PM-2.5) - exhaust	0.13 (Tier 1) 0.32 (Tier 2)	0.06	No (Tier 1) No (Tier 2)
Particulate Matter (PM-2.5) - dust	- (dust)	0.04	-
Source: See Appendix A, Table 13 for detailed analysis, including results of CalEEMod modeling			

Impacts from Long-term Operational Emissions

Long-term operational emissions associated with the proposed project would be predominantly associated with mobile sources and area sources, such as landscape maintenance activities. To a lesser extent, emissions associated with the use of electricity and natural gas would also contribute to increased operational emissions.

Unmitigated operational emissions associated with the proposed project are summarized in Appendix A, Table 15, and reprinted below as Table 6. As depicted, daily operational emission from non-permitted sources would total approximately 65 lbs/day of ROG+NOx, 123 lbs/day of CO, 12 lbs/day of fugitive PM10 dust, and 0.7 lbs/day of PM2.5 exhaust. Annual operational emissions would total approximately 11 tons/year of ROG+NOx and 1.8 tons/year of fugitive PM10 dust. Predicted operational emissions would exceed SLOAPCD's recommended ROG+NOx threshold. As a result, this impact would be considered *potentially significant without the implementation of mitigation.*

Health Effects of Project-Generated Regional Emissions

Project-generated emissions are evaluated based on the pollutants' potential to affect local or regional air quality. As noted earlier in this report, regional pollutants of concern typically include ozone and particulate matter. Whereas, for development projects, localized pollutants of primary concern often include carbon monoxide, TACs, as well as airborne particulates. The health effects of these pollutants are discussed in Appendix A, and summarized in Table 1 of Appendix A.

For localized pollutants, health impacts can be evaluated using screening criteria or through dispersion modeling. However, for regional pollutants such as ozone, the change in health effects

associated with an individual project is a secondary pollutant created by NOx and ROG (also commonly referred to as VOCs). As previously discussed earlier in this report, ozone is not a directly emitted pollutant. NOx and ROG are not criteria air pollutants but, when in the presence of sunlight, they can form ozone and also contribute to the formation of secondary PM2.5. Because ozone is not a directly emitted pollutant and is created under specific meteorological conditions over a wide transport area, ozone concentrations are typically evaluated at a regional level using complex photochemical models. These models are capable of predicting concentrations that take into account varying amounts of precursor emissions (e.g., ROG, NOx), temperature, inversions, sunlight, hourly variations, ambient conditions, and wind flow over long distances (e.g., miles). At the project level of analysis, evaluation of ozone concentrations is "not practicable and not likely [to] yield valid information" (SJVAPCD 2015).

Of the criteria pollutants identified, ozone and PM2.5 have the most critical health effects. As a result, concentrations of these pollutants are typically relied upon for determining public health effects. In comparison to modeled regional emissions, the emissions associated with most individual projects would be negligible and too small to produce a measurable change in regional ozone or PM2.5 concentrations or associated public health effects. In addition, the Sacramento Metropolitan Air Quality Management District (SMAQMD) has recently conducted regional emissions modeling analyses using a chemical transport model to evaluate changes in emissions and associated health effects associated with an individual project. The modeling was based on very conservative assumptions representative of the largest projects, which assumed up to approximately eight times the threshold of significance (up to 656 lbs/day) of NOx, ROG and PM. This level of emissions would be more representative of large community plan projects. Based on the modeling conducted by SMAQMD, even these large projects would have "low overall health effects" (SMAQMD 2020).

It is important to reiterate that the health effects of criteria air pollutants are taken into consideration when the U.S. EPA establishes the NAAQS for individual pollutants. The health effects of a particular pollutant are analyzed on a regional basis based on the area's attainment of the NAAQS. The Air Quality Index (AQI) is one common method of evaluating public health impacts for criteria air pollutants of primary concern. Local air districts establish significance thresholds that are based on evaluation of an individual project's contribution to regional air quality conditions and associated health effects. Based on the above discussion and given that project-generated criteria pollutants would exceed applicable significance thresholds, project-generated emissions of regional criteria pollutants (e.g., ROG, NOx, PM) could have an effect on public health. Refer to the discussion in Section III.c. for localized air quality impacts.

Table 6. Operational Emissions without Mitigation (lbs/day)

Operational Source	Emissions[1]									
	ROG	NO_X	$ROG+NO_X$	CO	PM_{10}			$PM_{2.5}$		
					Exhaust	Dust	Total	Exhaust	Dust	Total
Daily Emissions (lbs/day)										
Mobile[2]	15.8	3.7	19.5	36.2	0.02	0.01	0.03	0.02	<0.01	0.02
Area	29.3	0.3	29.6	36.5	0.06	<0.01	0.06	0.05	<0.01	0.05
Energy[3]	0.4	6.3	6.6	5.3	0.48	<0.01	0.48	0.48	<0.01	0.48
SLOAPCD Significance Thresholds	--	--	**25**	**550**	--	**25**	--	**1.25**	--	--
Total Daily Emissions:	45.5	10.3	55.7	78.0	0.56	0.01	0.57	0.55	<0.01	0.55
Exceeds SLOAPCD Thresholds?[5]	--	--	**Yes**	No	--	No	--	No	--	--
Annual Emissions (tons/year)										
Total Annual Emissions[4]:	7.3	1.7	9.0	11.4	0.1	0.01	0.1	0.1	0.0	0.1
SLOAPCD Significance Thresholds	--	--	**25**	--	--	**25**	--	--	--	--
Exceeds SLOAPCD Thresholds?	--	--	No	--	--	No	--	--	--	--

Note: Based on operational year 2025. Totals may not sum due to rounding. Refer to Appendix A for modeling output files and assumptions.

1. *Daily emissions are based on the worst case between summer and winter buildout operational conditions.*
2. *Mobile emissions were based on trip-generation rates derived from the traffic analysis prepared for this project and CalEEMod default fleet mix and trip distances.*
3. *Includes consistency with current building standards related to the use of energy-efficient mechanical equipment/appliances.*
4. *Annual emissions were derived from the CalEEMod modeling. Annual emissions associated with onsite events were calculated based on the estimated daily emissions and assuming a total of 156 event days/year.*
5. *In accordance with current SLOAPCD-recommended guidance, project's exceeding the SLOAPCD's daily significance threshold for ozone shall implement all feasible SLOAPCD-recommended mitigation measures. Projects implementing all feasible SLOAPCD-recommended mitigation measures that do not exceed SLOAPCD's annual significance threshold for ozone would be considered to have a less-than-significant impact.*

Mitigation Measures

Consistent with the guidance and position of SLOAPCD, the following mitigation measures will reduce potential impacts to a less than significant level because post-mitigation modeling indicates that emissions will be reduced below applicable quantitative thresholds. These mitigation measures were developed and determined by SLOAPCD to be effective in terms of reducing potential impacts as indicated through post-mitigation modeling, as shown in Table 7.

Mitigation Measure AQ-3. Operational Emissions. The following mitigation measures shall be implemented to minimize operational emissions:

a. The project shall provide shade (e.g. through tree planting or built structures) over 50 percent of parking spaces to reduce evaporative emissions from parked vehicles, excluding areas where increased shade would affect the performance of solar PV systems.
b. Implement driveway design standards (e.g., speed bumps, curved driveway) for self-enforcement of reduced speed limits on unpaved driveways.
c. Use a SLOAPCD-approved suppressant on private unpaved roads leading to the site, unpaved driveways and parking areas applied at a rate and frequency that ensures compliance with SLOAPCD Rule 401: Visible Emissions and ensures off-site nuisance impacts do not occur.
d. Work with SLOCOG to create, improve, or expand an onsite or nearby transit/shuttle systems, including (but not limited to) transit stops, mobility hubs, park-and-ride lots.
e. Implement on-site circulation design elements in parking lots to reduce vehicle queuing and improve the pedestrian environment.
f. Provide employee lockers and showers to promote bicycle and pedestrian use. One shower and five lockers for every 25 new employees is recommended.
g. A minimum of 20 percent of on-site fleet vehicles owned by the project proponent shall be zero- emission vehicles.

h. Provide dedicated parking for carpools, vanpools, and/or high-efficiency vehicles to exceed by 20 percent Cal Green Tier 2 for non-residential land uses.
i. Work with SLO Regional Rideshare to educate occupants with alternative transportation and smart commute information (e.g., transportation board, electronic kiosk, new hire packets, web portal, newsletters, social media, etc.).
j. Encourage non-residential land uses to implement and promote programs to reduce employee vehicle miles traveled (e.g. incentives, SLO Regional Rideshare trip reduction program, vanpools, on-site employee housing, alternative schedules (e.g. 9–80s, 4–10s, telecommuting, satellite work sites, etc.).
k. Exceed CALGreen Tier 2 standards at the time of development for building energy efficiency.
l. CALGreen Tier 2 compliant electric vehicle (EV) charging stations shall be "EV Ready" as opposed to "EV Capable".
m. Implement a "No Idling" vehicle program which includes signage enforcement, etc.
n. Exceed CALGreen Tier 2 building standards at the time of development for utilizing recycled content materials.
o. Exceed CALGreen building standards at the time of development for water conservation (e.g., use of low flow water fixtures, water efficient water irrigation systems, and drought tolerant landscaping).
p. Exceed 2022 CALGreen standards for the use of greywater, rainwater, or recycled water where applicable/available.
q. Exceed 2022 CALGreen standards for using shading, trees, plants, cool roofs, etc. to reduce "heat island" effect.
r. To the extent allowed by the building code at the time of development, incorporate natural lighting in buildings to minimize daytime lighting demand.
s. Outdoor lighting shall be designed to minimize electrical demand, such as the use of solar-powered lighting and lighting controlled by motion sensors.
t. All built-in appliances shall be Energy Star certified or equivalent.
u. Utilize on-site renewable energy systems (e.g. solar, wind, geothermal, biomass and/or biogas) sufficient to exceed applicable building standards at the time of development with a goal of achieving zero net energy (ZNE) buildings.
v. Design roof trusses to handle dead weight loads of standard solar-heated water and PV panels.
w. Encourage the use of low-VOC content cleaning products that are certified as meeting U.S. EPA's Safer Product Standards.
x. Hotel rooms shall include the installation of occupancy sensors to minimize electricity use with the rooms not occupied.
y. Encourage hotel participation in SLO Car Free. SLO Car Free is a cooperative partnership initiated and led by SLOAPCD to promote travel to and from the County via alternative means of transportation (e.g., AMTRAK).
z. The proposed hotel shall offer shuttle service for onsite guests that provides service (at a minimum) to and from the North County Transit Station, which is located at 800 Pine Street, Paso Robles, CA.

Significance After Mitigation

In accordance with current SLOAPCD-recommended guidance, project's exceeding the SLOAPCD's daily significance thresholds shall implement all feasible SLOAPCD-recommended mitigation measures. Projects implementing all feasible SLOAPCD-recommended mitigation

measures that do not exceed SLOAPCD's annual significance threshold would be considered to have a less than significant impact, even if daily thresholds are still exceeded. Implementation of Mitigation Measure AQ-3 includes all feasible SLOAPCD-recommended mitigation measures. Additional mitigation measures have also been included to further reduce operational emissions. Post-mitigation emissions are shown in Table 7 below, which shows that post-mitigation annual emissions would be below the significance threshold. Therefore, impacts would be *less than significant* with mitigation.

The project also incorporates California Air Pollution Control Officers Association (CAPCOA)-recommended VMT reductions strategies within its site design. However, the effectiveness of the design features in reducing VMT and emissions from mobile sources is uncertain (CCTC 2021). It is important to note that the emissions calculations presented in this report are based on the daily trip-generation rates obtained from the traffic analysis and default vehicle trip distances identified in the CalEEMod model (refer to Table 7, which is reprinted from Table 16 in Appendix A). This analysis does not reflect changes in regional vehicle miles traveled (VMT) and associated regional emissions. Based on the traffic analysis prepared for this project, implementation of the proposed project is estimated to result in an overall net reduction in regional VMT of approximately 8,008 miles, which would be anticipated to result in overall reductions in regional pollutants, including emissions of ozone-precursors ROG and NO_X. For this reason and with implementation of Mitigation Measures AQ-3, this impact would be considered *less than significant*.

Table 7. Operational Emissions with Mitigation (lbs/day)

Operational Source	Emissions[1]									
	ROG	NO_X	ROG+NO_X	CO	PM_{10}			$PM_{2.5}$		
					Exhaust	Dust	Total	Exhaust	Dust	Total
Daily Emissions (lbs/day)										
Mobile[2]	15.8	3.7	19.5	36.2	0.02	0.01	0.03	0.02	<0.01	0.02
Area[3]	25.0	0.3	25.3	36.5	0.06	<0.01	0.06	0.05	<0.01	0.05
Energy	0	0	0	0	0	0	0	0	0	0
SLOAPCD Significance Thresholds	--	--	**25**	**550**	--	**25**	--	**1.25**	--	--
Total Daily Emissions:	39.5	4.0	43.5	72.7	0.8	0.01	0.9	0.1	<0.01	0.1
Exceeds SLOAPCD Thresholds?[5]	--	--	**Yes**	No	--	No	--	No	--	--
Annual Emissions (tons/year)										
Total Annual Emissions:	6.5	0.5	6.96	10.4	0.01	<0.01	0.01	0.01	<0.01	0.01
SLOAPCD Significance Thresholds	--	--	**25**	--	--	**25**	--	--	--	--
Exceeds SLOAPCD Thresholds?	--	--	No	--	--	No	--	--	--	--

Note: Based on operational year 2025. Totals may not sum due to rounding. Refer to Appendix A for modeling output files and assumptions.

1. *Daily emissions are based on the worst case between summer and winter buildout operational conditions.*
2. *Mobile emissions were based on trip-generation rates derived from the traffic analysis prepared for this project and CalEEMod default fleet mix and trip distances. No pedestrian/bicycle access or transit service is available in the vicinity of the project site.*
3. *Area sources include the use of consumer products, architectural coatings, and landscape equipment.*
4. *As per Mitigation Measure GHG-1 does not include emissions associated with natural gas.*
5. *In accordance with current SLOAPCD-recommended guidance, project's exceeding the SLOAPCD's daily significance threshold for ozone shall implement all feasible SLOAPCD-recommended mitigation measures. Projects implementing all feasible SLOAPCD-recommended mitigation measures that do not exceed SLOAPCD's annual significance threshold for ozone would be considered to have a less-than-significant impact. Mitigation Measure AQ-3 includes all feasible SLOAPCD-recommended mitigation measures.*

c. Sensitive Receptors Exposure to Substantial Pollutant Concentrations. *Less Than Significant Impact with Mitigation.* Air quality impacts are analyzed relative to those persons with the greatest sensitivity to air pollution exposure. Such persons are called "sensitive receptors." Sensitive receptors include the elderly, young children, the acutely and chronically ill (e.g., those with cardio-respiratory disease, including asthma), and persons engaged in strenuous work or exercise.

The proposed project would not result in the installation of any equipment or processes that would be considered a major emission source. However, the proposed project would result in localized

increases of pollutant concentrations during project construction. The proposed project's potential contribution to localized air pollutants is discussed, as follows:

Short-Term Construction Activities

Naturally-Occurring Asbestos (NOA)
NOA has been identified as a Toxic Air Contaminant (TAC) by the ARB. Based on a review of the SLOAPCD's map depicting potential areas of NOA, the project site is not located in or near an area that has been identified as having a potential for NOA. As a result, this impact would be considered *less than significant.*

Localized Construction PM Concentrations
Fugitive dust emissions would be primarily associated with site preparation, grading, and vehicle travel on unpaved and paved surfaces. On-site off-road equipment and trucks would also result in short-term emissions of DPM, which could contribute to elevated localized concentration at nearby receptors. Uncontrolled emissions of fugitive dust may also contribute to potential increases in nuisance impacts to nearby receptors. Short-term exposure to airborne particulates can result in irritation of eyes and the respiratory system and may affect sensitive individuals, including those suffering from asthma and other medical conditions. For these reasons, localized uncontrolled concentrations of construction-generated PM would be considered to have a *potentially significant impact without the implementation of mitigation*.

Mitigation Measures

Implement Mitigation Measures AQ-1 and AQ-2 (described in Section III.b.)

Significance After Mitigation

With the implementation of Mitigation Measure AQ-1 and AQ-2 construction-related emissions of PM would be substantially reduced, as shown in Tables 4 and 5. With mitigation, short-term exposure to localized pollutants would be considered to have a *less than significant impact*.

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

The proposed project would not result in the installation of any equipment or processes that would be considered major odor-emission sources. In addition, no known odor sources are within one mile of the project site. However, construction of the proposed project would involve the use of a variety of gasoline or diesel-powered equipment that would emit exhaust fumes. Exhaust fumes, particularly diesel-exhaust, may be considered objectionable by some people. In addition, pavement coatings and architectural coatings used during project construction would also emit temporary odors. However, construction-generated emissions would occur intermittently throughout the workday and would dissipate rapidly with increasing distance from the source. For

these reasons, short-term construction activities would not expose a substantial number of people to frequent odorous emissions. Potential exposure of sensitive receptors to odorous emissions would be considered *less than significant*.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project result in:				
a) Have a substantial adverse effect 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?		X		
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?		X		
c) Have a substantial 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?		X		
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?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		X		
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?				X

The biological resource impact analysis has been prepared based on a January 2022 biological resource assessment and December 2021 kit fox evaluation, both prepared by Terra Verde Environmental Consulting and a subsequent survey for the presence of sensitive plant species, Ed Mercurio, Biological Consultant, May 16, 2023. Impacts related to the construction of off-site utilities are addressed in a biological resource assessment prepared by Althouse and Meade, Inc. in April 2025. These reports are attached as Appendix B to this Initial Study and are included for reference. The analysis included below summarizes the key information included in those reports relative to assessing potential impacts. (Source: 6, 7, 28, 36)

On-Site Project Development

a. Impacts to Special Status Species and Habitat. *Less Than Significant With Mitigation.* The following discusses potential impacts to special status plant and animal species, as well as to oak trees, which are protected through state and local ordinance.

A survey to assess potential habitat and associated species was conducted in December 2021. The survey area is dominated by heavily modified/landscaped and maintained golf course and developed areas (see Appendix E – Representative Site Photographs). Five soil units, nine ephemeral drainages, three swales, eleven wetlands, a pond, and six natural vegetation communities were documented within the survey area. Although suitable habitat for various common and special-status plants and wildlife exists within the habitat types observed, the proposed project footprint and surrounding areas have been subjected to regular anthropogenic disturbances (e.g., rural residential development, agriculture, etc.). Historical and current land management practices have greatly reduced the potential for sensitive biological resources within the property.

Special Status Plants

Based on a review of the relevant literature and an assessment of site conditions, Terra Verde determined that there is suitable habitat on site for 18 special-status botanical species. In addition to species listed on the federal and California Endangered Species Acts, special-status plant species include those that are assigned a California Rare Plant Rank (CRPR) by the California Native Plant Society. Species are assigned a listing status based on the degree of rarity (Lists 1A through 4) and threat level (0.1, 0.2, and 0.3) (CNPS 2021a). Additionally, individual oak trees (Quercus spp.) and oak woodlands are considered a sensitive resource by the State of California and the City.

The following lists the sensitive plant species that have the potential to occur on site. For a full description of the life history, range, and conservation status for each special-status species, please refer to Appendix B of this Initial Study.

- Indian Valley Spineflower (Aristocapsa insignis), CRPR 1B.2
- Salinas Milkvetch (Astragalus macrodon), CRPR 4.3
- Dwarf Calycadenia (Calycadenia villosa), CRPR 1B.1
- Hardham's Evening-primrose (Camissoniopsis hardhamiae), CRPR 1B.2
- San Luis Obispo Owl's-clover (Castilleja densiflora subsp. obispoensis), CRPR 1B.2
- Lemmon's Jewelflower (Caulanthus lemmonii), CRPR 1B.2
- Douglas' Spineflower (Chorizanthe douglasii), CRPR 4.3
- Straight-awned Spineflower (Chorizanthe rectispina), CRPR 1B.3
- Yellow-flowered Eriastrum (Eriastrum luteum), CRPR 1B.2
- Elegant Wild Buckwheat (Eriogonum elegans), CRPR 4.3
- Trumpet-throated Gilia (Gilia tenuiflora subsp. amplifaucalis), CRPR 4.3
- Santa Lucia Dwarf Rush (Juncus luciensis), CRPR 1B.2
- Ferris' Goldfields (Lasthenia ferrisiae), CRPR 4.2
- Salinas Valley Goldfields (Lasthenia leptalea), CRPR 4.3
- Spring Lessingia (Lessingia tenuis), CRPR 4.3
- Jones' Bush-mallow (Malacothamnus jonesii), CRPR 4.3

- Spreading Navarretia (Navarretia fossalis), Federal Threatened, CRPR 1B.1
- Shining Navarretia (Navarretia nigelliformis subsp. radians), CRPR 1B.2

No special-status botanical species were documented within the survey area during the December 2021 field survey.

A follow-up plant survey was conducted in May 2023 (Source: 15). In that survey, one sensitive plant species was observed in the area of potential disturbance, the San Luis Obispo owl's-clover (CRPR 1B.2). This was located in the southwest corner of the property. The fact that only six individuals of this species were observed in this location on this current survey, and none were observed in this same location in the spring survey of 2022 indicates that this site is likely marginal habitat for this species. Seeds of San Luis Obispo owl's-clover are present in the soil of this generally more dry and open area with somewhat heavier soil, and it took the record rainfall of this year for a small number of individuals to be able to germinate and grow.

Another sensitive plant species, Salinas Valley goldfields (*Lasthenia leptalea*), was observed within some of the proposed project areas of the Hunter Ranch Golf Course Property on a survey of the entire property conducted on April 20 and April 21 of 2022. None of these areas are included in the specific areas of the Hunter Ranch Golf Course Property where new developments are proposed as shown on the Overall Utility Plan of April 18, 2023 and no Salinas Valley goldfields were observed in these areas. The specific locations where Salinas Valley goldfields was observed and the recommendations for the management of this species on the Hunter Ranch Golf Course Property are presented and mapped in the spring biological survey for the Hunter Ranch Golf Course by Ed Mercurio, Biological Consultant, dated May 28, 2022.

One sensitive habitat, herbaceous riparian marsh vegetation, was observed along the path of the proposed new sewer line from the proposed new temporary sewage treatment plant to the lake on the floor of the deepest drainage in the local area which ends at the dam for the lake. Management practices for the presence of San Luis Obispo owl's-clover and for the presence of herbaceous riparian marsh vegetation where they occur in the areas where development is proposed are presented.

The proposed project may impact special-status species, if present, so impacts are potentially significant unless mitigated. As such, an appropriately timed survey (i.e., April – May) would be necessary to confirm presence or absence of special-status botanical species and appropriate mitigation measures to offset potential impacts, as necessary.

Oak Trees

Mature oak trees are located within the property. The worst-case would be that up to 96 oak trees could be removed or otherwise impacted, although that number may be potentially reduced depending on final design details. Oak tree removals and/or impacts, including trimming and/or disturbance within the critical root zone, may be required for project implementation, so as a worst-case scenario, impacts are presumed to be potentially significant before mitigation. Impacts to individual oak trees and oak woodland habitat are regulated under California Public Resources Code 21083.4 and the City of El Paso de Robles Oak Tree Preservation Ordinance No. 835 (City 2002). Implementation of oak tree protection measures will be required during construction (e.g., protective fencing) in accordance with Municipal Code Sections 10.01.090 (Safeguarding Trees During Construction) and 10.01.070 (Preservation and Maintenance of Existing Oak Trees). In

addition, mitigation for impacted oak trees will be required. Please refer to Mitigation Measures BIO-4 and BIO-5 described at the end of this section.

Special Status Wildlife

Based on a review of the relevant literature and an assessment of site conditions, it was determined that suitable habitat for 13 special-status wildlife species occurs within the survey area, in addition to nesting habitat for migratory bird species. In addition to species listed on the federal and California Endangered Species Acts, special-status wildlife species include those that are on the CDFW Special Animals List (CDFW 2021b). The following lists these sensitive wildlife species. For a more complete description and analysis of each species, please refer to Appendix B. Although none were found on the site during surveys conducted in December 2021, impacts are potentially significant in the event they are found, and mitigation measures are required to reduce such impacts to a less than significant level.

Sensitive Amphibian Species

- California Red-legged Frog (CRLF; *Rana draytonii*), Federal Threatened (FT) / State Species of Special Concern (SSC)
- Western Spadefoot Toad (*Spea hammondii*), SSC

Sensitive Mammal Species

- American Badger (*Taxidea taxus*), SSC
- San Joaquin Kit Fox (*Vulpes macrotis mutica*), Federal Endangered (FE) / State Threatened (ST)

Sensitive Reptile Species

- Northern California Legless Lizard (*Anniella pulchra*), SSC
- San Joaquin Coachwhip (*Masticophis flagellum ruddocki*), SSC
- Southwestern Pond Turtle (*Actinemys marmorata*), SSC

Sensitive Invertebrate Species

- Vernal Pool Fairy Shrimp (VPFS; *Branchinecta lynchi*), Federal Threatened

Migratory Nesting Birds and Sensitive Avian Species

- Burrowing Owl (*Athene cunicularia*), SSC
- Horned Lark (*Eremophila alpestris actia*), State Watch List
- Golden Eagle (*Aquila chrysaetos*), State Fully Protected (FP)
- Swainson's Hawk (*Buteo swainsoni*), ST
- Tricolored Blackbird (*Agelaius tricolor*), SSC

Migratory Nesting Birds

In addition to those species protected by the state or federal government, all native avian species are protected by state and federal legislature, most notably the Migratory Bird Treaty Act (MBTA)

and the CDFW Fish and Game Code. Collectively, these regulations make it unlawful to collect, sell, pursue, hunt, or kill native migratory birds, their eggs, nests, or any parts thereof. Avian species are expected to occur within the project area during all seasons and throughout construction of the proposed project. The potential to encounter and disrupt these species is generally highest between February 1 and August 31, when nests are likely to be active, with eggs and/or young present. The individual oak trees in the survey area present the highest quality habitat for nesting birds, but open grasslands may also provide nesting habitat for various ground-nesting species. Raptors are particularly drawn to large trees and structures, and they are generally less tolerant of disturbances than other species. Mitigation is required to address this *potentially significant impact*.

Impacts to Special Status Wildlife

Special-Status Amphibians

Amphibians can be slow-moving, cryptic, and most active during inclement weather events, particularly rainstorms and at night, presenting crushing hazards in the presence of relatively fast-moving equipment. All special-status amphibians presumed to be on the project site rely heavily on burrows or emergent vegetation for shelter from the elements, protection from predators, and/or seasonal estivation. Heavy equipment and ground disturbing activities may collapse burrow systems or completely remove them, if present, resulting in injury or death of the inhabitants or exclusion by the removal of a vital resource. Vegetation onsite provides habitat for the prey species of amphibians. If CRLF and/or western spadefoot toad occur on or near the project site, they will be particularly vulnerable during the rainy season when they are most actively moving through upland areas. Mitigation is required to address this *potentially significant impact*.

Special-Status Mammals

If American badger or SJKF occur at the site, there is potential for direct or indirect impacts to occur during construction. Construction poses several risks to wildlife, such as vehicle strikes, and crushing by equipment, and destruction of resources (e.g., burrows or dens). Further, construction may impact or deter use of valuable habitat (e.g., burrows or dens), yielding it unsuitable for special-status mammals. Increased short- and long-term anthropogenic activity in the vicinity of viable populations has potential to indirectly impact these species as a result of permanent habitat conversion, increased light pollution, and primary and secondary exposure to residential-use chemicals including rodenticides. Mitigation is required to address this *potentially significant impact*.

Special-Status Reptiles

The proposed project site provides suitable habitat for northern California legless lizard, San Joaquin coachwhip, and southwestern pond turtle. Construction activities pose risks for direct and indirect impacts to special-status reptiles. For example, reptiles basking on roadways will be especially vulnerable to vehicle strikes. Reptiles can be slow-moving, both because of behavioral adaptations to be camouflaged from predators and because of their ectothermic nature. This trait presents crushing hazards in the presence of relatively fast-moving equipment or even foot traffic.

All special-status reptiles presumed to be on the project site rely heavily on burrows or emergent vegetation for shelter from the elements, protection from predators, and/or reproduction. Heavy equipment and ground disturbing activities may collapse burrow systems or completely remove them, resulting in injury or death of the inhabitants or exclusion by the removal of a vital resource. Vegetation may also be removed as a result of construction activities. Ectotherms rely on

vegetative cover for temperature regulation and, further, vegetation provides critical habitat for prey species of reptiles. Mitigation is required to address this *potentially significant impact*.

Special-Status Invertebrates

The current project design impacts potential habitat for Vernal Pool Fairy Shrimp (VPFS). If VPFS are present, direct impacts to this species may occur during construction of the proposed development features. Additionally, indirect impacts may occur if construction activities result in the alteration or degradation of hydrologic patterns in proximity to the potential vernal pool. Furthermore, introduction of sediment via erosion and runoff from project areas into adjacent habitat could be deleterious to the vernal pool habitat area and VPFS, if present. Mitigation is required to address this *potentially significant impact*.

Sensitive and Nesting Birds

Direct impacts to burrowing owl, horned lark, golden eagle, Swainson's hawk, tricolored blackbird, and other bird species are most likely to occur if construction activities take place during the typical avian nesting season, generally February 1 through August 31, and as early as January 1 for golden eagles. Direct and indirect impacts may occur if tree trimming or removal is required. For example, these actions can destroy nests, remove nesting habitat, or cause disturbance that may lead to nest failure or otherwise harass nesting, resident, or transient birds. Mitigation is required to address this *potentially significant impact*.

San Joaquin Kit Fox Habitat Evaluation

Terra Verde wildlife biologists with experience working with San Joaquin kit foxes conducted a San Joaquin kit fox habitat assessment consisting of a background review of historically documented kit fox observations and a site visit during which existing site conditions were noted; the overall biological community was identified; and the proposed development areas of the property were surveyed for the presence of suitable habitat, sign, or direct observations of San Joaquin kit fox.

No San Joaquin kit foxes or their sign (e.g., scat or tracks) were observed in the project area during the site visit. The nearest extant San Joaquin kit fox core population occurs approximately 75 miles southeast of the project site in the California Valley/Carrizo Plain National Monument area (Recovery Plan for Upland Species of the San Joaquin Valley, USFWS 1998). A historic subpopulation of kit foxes is documented within the Salinas River Watershed (i.e., Camp Roberts), approximately 9 miles northwest of the project site. Therefore, the Hunter Ranch Golf Course property may be considered within a movement corridor, linking the extant core population in Carrizo Plain with intact habitat that once supported a population of kit foxes. Observation records in the California Department of Fish and Wildlife's California Natural Diversity Database within 5 miles of the project site are few and occurred during the early 1990s, prior to large amounts of residential and vineyard/winery development. The undeveloped areas of the project site consist of highly modified and maintained golf greens, remnant blue oak (Quercus douglasii) woodland with ruderal herbaceous cover, and bare ground. A small patch of scattered coyote brush (Baccharis pilularis) is present on the eastern side of the Phase 1 - Parcel 2 area and young blue oak mitigation plantings from previous development are present along the eastern boundary of the property. There is little evidence of prey species, such as California ground squirrel (Otospermophilus beecheyi) and Botta's pocket gopher (Thomomys bottae), except for few burrows in relatively loose soils on slopes. In most undeveloped areas, the soil was highly compacted with no sign of mammalian prey. Photos depicting the state of the property as of November 3, 2021, are included in the kit fox evaluation, which is part of Appendix A.

No new fences are proposed, and the project is not expected to have a future impact on passage for kit foxes between adjacent properties, mainly due to the size and quality of the areas proposed for development and the low suitability of habitat for kit foxes in the surrounding areas. Likely paths of kit fox travel in the project vicinity are the Dry Creek and Huer Huero Creek corridors, as well as the existing unpaved roads in the surrounding property's rather than through the existing golf course. Once the project is complete, there may be an increase in traffic on Mill Road and State Route 46 or on unpaved roads surrounding the property, which could affect dispersing kit foxes. However, because kit fox use of the potential corridor in which the property lies is largely unknown, the potential for increased mortality of kit foxes due to the proposed project is unknown.

County-designated SJKF Mitigation Area
The project's location within the County-designated 3:1 mitigation area requires implementation of mitigation measures pursuant to the County Guide to SJKF Mitigation Procedures under CEQA, so impacts are presumed to be potentially significant. Construction and implementation of the proposed project will result in permanent and temporary impacts to disturbed grassland and oak woodland areas on site. For projects 40 acres or larger, completion of a SJKF habitat evaluation form must be completed to evaluate the habitat quality and assist CDFW with the appropriate mitigation requirements. Mitigation must be fulfilled by contribution to the preservation of habitat through a conservation easement agreement, compensation to a pre-determined mitigation bank (presently Palo Prieto Conservation Bank), or payment of an in-lieu fee to the San Francisco office of The Nature Conservancy. These requirements are included in Mitigation Measure BIO-8 below.

Mitigation Measures

Mitigation Measure BIO-1. Environmental Awareness Training. An environmental awareness training shall be presented to all construction personnel by a qualified biologist prior to the start of any project activities. The training shall include color photographs and a description of the ecology of all special-status species known or with potential to occur, as well as other sensitive resources requiring avoidance during construction. The training shall also include a description of protection measures required by discretionary permits, an overview of the Federal and State Endangered Species Acts, and implications of noncompliance with these regulations. This will include an overview of the required avoidance, minimization, and mitigation measures. A sign-in sheet with the name and signature of the qualified biologist who presented the training, and the names and signatures of the environmental awareness trainees will be kept. A fact sheet conveying the information provided in the environmental awareness training will be provided to all project personnel.

Mitigation Measure BIO-2. Site Maintenance and General Operations. The following general measures shall be implemented to minimize impacts during active construction:

- The use of heavy equipment and vehicles shall be limited to the proposed project limits and defined staging areas/access points. The boundaries of each work area shall be clearly defined and marked with high visibility fencing. No work shall occur outside these limits.
- Project plans, drawings, and specifications shall show the boundaries of all sensitive resource areas and the location of erosion and sediment controls, delineation of construction limits, and other pertinent measures to ensure the protection of sensitive habitats and resources.

- Staging of equipment and materials shall occur in designated areas with appropriate demarcation and perimeter controls. No staging areas shall be located within 100 feet of sensitive habitat or aquatic resources.
- Secondary containment, such as drip pans, shall be used to prevent leaks and spills of potential contaminants.
- Washing of concrete, paint, or equipment, and refueling and maintenance of equipment shall occur only in designated staging areas. These activities will occur at a minimum of 100 feet from sensitive habitat or aquatic resources, including drainages. Sandbags and/or absorbent pads and spill control kits shall always be available on site to clean up and contain fuel spills and other contaminants.
- Construction equipment shall be inspected by the operator daily to ensure that equipment is in good working order and no fuel or lubricant leaks are present.
- Plastic monofilament netting (erosion control matting) or similar material will not be used on site due to the potential to entangle special-status wildlife. Acceptable substitutes are coconut coir matting, biodegradable fiber rolls, or tackified hydroseeding compounds.
- The use of pesticides (including rodenticides) and herbicides on the property shall be in compliance with all local, state, and federal regulations to avoid primary and secondary poisoning of sensitive species that may be using the site.
- After completion of the project's construction, all protective fencing/flagging used to delineate sensitive biological resources shall be removed from the project area and disposed of in appropriate waste receptacles or reused.

Mitigation Measure BIO-3. Lighting. Any permanent lighting introduced for new developments shall be positioned and/or shielded to avoid direct lighting of off-site natural habitat features suitable for special-status species (i.e., adjacent grassland and oak woodland).

Mitigation Measure BIO-4. Oak Tree Avoidance and Protection. To the maximum extent feasible, impacts to oak trees shall be avoided and minimized. The following avoidance and minimization measures shall be implemented to address potential impacts to or removal of oak trees:

- The canopy edge and trunk location of oak trees located within 50 feet of proposed construction shall be surveyed and placed on all plan sets. The tree map shall be used to identify impacts and will inform the mitigation plan, if required.
- Impacts to oak tree canopy or sensitive root zone should be avoided to the extent feasible.
- Prior to ground-breaking, tree protection fencing shall be installed as close to the outer limit of the sensitive root zone as practicable for construction operations to protect trees located within 50 feet of construction that will be preserved. The fencing shall be in place throughout the duration of construction. Demarcation such as t-posts and a minimum of two strands of yellow rope are adequate.
- No grading or staging shall occur within the fenced areas around protected trees.
- A certified arborist will be hired for removal of existing roots and branch trimming per International Society of Arboriculture (ISA) standards. Any roots exposed during construction shall be covered with a layer of soil to match existing topography.
- An oak tree survey shall be completed once development plans are finalized; if direct or indirect impacts will occur, they shall be assessed by a licensed arborist or qualified botanist prior to final inspection and reported to the City.

Mitigation Measure BIO-5. Oak Tree Mitigation. In the event of oak tree removals or impacts during project implementation, the owner shall provide mitigation (on-site if feasible) per the City's guidelines, typically 4:1 for removals and 2:1 for impacted trees. A mitigation plan shall be prepared that details the methods and requirements for oak tree mitigation. The plan shall be provided to the City for approval prior to project implementation. At a minimum, the plan shall:

- Include a detailed inventory of the species and quantity (i.e., diameter at breast height/DBH) of all oak trees to be removed or impacted.
- Discuss the proposed construction methods, construction schedule, and the implementation schedule of activities proposed as part of the plan.
- Quantify and describe the anticipated impacts to individual oak trees and/or oak woodland habitat, as applicable.
- Identify all appropriate methods for fulfillment of required mitigation (e.g., on-site plantings, conservation easement, or in-lieu fee).
- Describe detailed planting methods, as appropriate.
- Identify suitable areas for establishment of new oak trees and/or protection of existing oak woodland habitat, as appropriate.
- Describe short-term and long-term monitoring protocols and/or vegetative growth performance criteria for mitigation success.
- The plan shall be prepared by a qualified botanist or arborist and be submitted to the City for approval prior to the start of construction.

Pursuant to the City's Municipal Code, the total replacement DBH requirement may be satisfied by planting any number of varying-sized trunk caliper measurement trees, as long as their combined DBH reaches the total impacted inches of tree diameters. This approach allows for a mix of tree sizes. Additionally, a minimum of two, 24-inch box, one and one-half inch minimum trunk caliper measurement trees shall be required for each oak tree removed. (SOURCE: MC 10.01-050 E)

Mitigation Measure BIO-6. Jurisdictional Waters. In addition to **Mitigation Measure BIO-2**, the following recommendations have been provided to protect drainages and aquatic resources on site:

- Prior to project impact of these areas, all applicable agency permits with jurisdiction over the project area (i.e., CDFW, RWQCB, and/or Corps) shall be obtained. Additional mitigation measures may be required by these agencies and shall be implemented as necessary throughout the project. If other agency permits are not required, provide evidence, accordingly.
- To prevent erosion and sedimentation into drainages during construction, an erosion and sedimentation control plan shall be developed and implemented. It shall outline Best Management Practices (BMPs) for short-term, temporary stabilization. Acceptable stabilization methods include the use of weed-free, natural fiber (i.e., non-monofilament) rolls, jute or coir netting, and/or other industry standards. Erosion control devices shall be installed and maintained for the duration of the project. BMPs shall be installed and maintained for the duration of the project.
- Construction activity within 100 feet of drainages shall only occur when appropriate BMPs are in place to protect aquatic features from indirect impacts.

Mitigation Measure BIO-7. Pre-construction Survey for American Badger and San Joaquin Kit Fox. A qualified biologist shall conduct a pre-construction survey within 30 days prior to the start of initial project activities to ensure American badger and SJKF are not present within proposed work areas. If potential dens are discovered, they shall be monitored with a remote camera or tracking medium for at least three days to determine if they are occupied. If the qualified biologist determines that a den may be active, a no-entry exclusion buffer shall be established within 50 feet of the den and the appropriate resource agencies shall be contacted for further guidance. If active dens are found during the breeding and rearing season, no activity shall occur within 200 feet (American badger) or 500 feet (SJKF) of the den without agency guidance and approval. Exclusion buffers shall be prominently flagged and encircle the den. If an exclusion buffer is not feasible, the applicant will contact the City for further guidance prior to initial project activities. The results of the survey shall be provided to the City prior to initial project activities. If construction lapses beyond 30 days from the survey, an additional survey will be required.

Mitigation Measure BIO-8. County Standard Mitigation of Impacts to San Joaquin Kit Fox Habitat. In accordance with the County Guide to SJKF Mitigation Procedures under CEQA, the project shall adopt the Standard Kit Fox CEQA Mitigation Measures and shall include these measures on development plans. The following summarizes those that are applicable to this project:

- The applicant shall mitigate for the loss of SJKF habitat either by:
    1. Establishing a conservation easement on-site or off-site in a suitable San Luis Obispo County location and provide a non-wasting endowment for management and monitoring of the property in perpetuity;
    2. Depositing funds into an approved in-lieu fee program; or
    3. Purchasing credits in an approved conservation bank in San Luis Obispo County.

- A maximum 25 mile-per-hour speed limit shall be required at the project site during construction activities.
- All construction activities shall cease at dusk and not start before dawn.
- A qualified biologist shall be on-site immediately prior to initiation of project activities to inspect for any large burrows (e.g., known and potential dens) and to ensure no wildlife are injured during project activities. If dens are encountered, they should be avoided as discussed below.
- Exclusion zone boundaries shall be established around all known and potential SJKF dens.
- All excavations deeper than 2 feet shall be completely covered at the end of each working day or provided with one or more escape ramps constructed of earth fill or wooden planks every 200 feet.
- All pipes, culverts, or similar structures with a diameter of four inches or greater, stored overnight at the project site shall be inspected for SJKF and other wildlife before burying, capping, or moving. If a kit fox is found within material stored onsite, the material will not be moved until the kit fox has left on its own.
- All food-related trash shall be removed from the site at the end of each workday as to not attract SJKF fox to the project site.
- Project-related equipment shall be prohibited outside of designated work areas and access routes.
- Disturbance to burrows shall be avoided to the greatest extent feasible.

- No rodenticides or herbicides shall be applied in the project area.
- No firearms shall be allowed on the project site.
- No pets, such as dogs or cats, shall be permitted on the project site to prevent harassment, mortality of kit foxes, or destruction of dens.
- Permanent fences shall allow for SJKF passage through or underneath (i.e., an approximate four-inch passage gap shall remain at ground level).

In the event that it can be determined that the existing Hunter Ranch Golf Course can be considered Urban/Disturbed as determined by the project Biologist, the California Department of Fish and Wildlife, and the City, Mitigation Measure Bio-8 may not need to be implemented.

Mitigation Measure BIO-9. Surveys and Monitoring for Special-status Amphibians and Reptiles. A qualified biologist shall conduct a pre-construction survey immediately prior to the start of work to ensure special-status amphibians and reptiles are not present within proposed work areas. During the survey, the biologist shall gently disturb or rake the scrub understory and upper layers of oak tree duff to uncover or rouse northern California legless lizards. Construction monitoring shall be conducted by a qualified biologist during all initial ground disturbing and vegetation removal activities (e.g., grading, grubbing, vegetation trimming) within suitable habitat. If these species are found during pre-construction surveys or monitoring, they shall be allowed to leave the work area on their own volition or be hand captured and relocated to suitable habitat outside of the area of impact, if permitted. To minimize the potential for impacts to dispersing amphibians, work within 100 feet of hydrologic features shall occur during dry conditions, as feasible. If work within 100 feet of drainages or the pond is scheduled to start during the typical rainy season (October through April), when western spadefoot toads and CRLF are most likely to be dispersing through upland habitat, a follow up survey shall be conducted following any rain event of 0.25 inch or greater. All vehicles, equipment, and materials staged on site overnight shall be inspected by a designated member of the construction crew. If special-status wildlife is found within the work area, it shall be allowed to leave on its own volition and, as appropriate, the resource agencies shall be contacted.

Mitigation Measure BIO-10. Vernal Pool Fairy Shrimp Critical Habitat. The boundaries of potential VPFS habitat areas on site and associated watersheds shall be included on all project plans. The limits of all workspaces, access routes, and staging areas shall also be included on project plans and clearly delineated in the field with brightly colored flagging and/or fencing. In addition, a biologist familiar with vernal pool characteristics and associated watersheds shall conduct occasional site inspections to document compliance with species and permit protection measures, including maintenance of workspace delineation fencing. Weekly biological monitoring reports shall be submitted to the City. If compliance deficiencies are identified during monitoring, the deficiency shall be documented, and follow-up actions will be required under the direction of the City representative to alleviate the compliance concern. In addition to the protection measures identified in Measures 1 and 2 above, these measures provide protection for VPFS by ensuring that no unanticipated impacts occur within suitable habitat for this species.

Approximately 0.01 acre of vernal pool habitat will be permanently impacted as a result of development. These impacts will need to be mitigated for in accordance with any permit conditions that may be set forth by the California Department of Fish and Wildlife and the Regional Water Quality Control Board, as appropriate.

Mitigation Measure BIO-11. Pre-construction Survey and Avoidance Measures for Nesting Birds. To protect nesting birds, if work is planned to occur between February 1 and August 31, a qualified biologist shall survey the area for nesting birds within one week prior to activity beginning on site. In addition, if work is planned to occur as early as January 1, a qualified biologist shall complete a focused survey for nesting golden eagles within one-quarter mile of the project site, as feasible based on access. Surveys for raptors shall be conducted within a 250-foot radius of the project site. If any active non-listed raptor nests are observed, these nests and nest trees shall be protected, and a no-work buffer of 250 feet shall be established until the young have fledged and are no longer reliant on the nest tree or parental care, or the nest is no longer active. Surveys for other non-listed avian species shall be conducted within a 50-foot radius of the project site. If any active nests are observed, these nests and nest trees shall be protected with a 50-foot no-work buffer. All activity will remain outside of the designated buffers until a qualified biologist has determined that the young have fledged or that proposed construction activities would not cause adverse impacts to the nest, adults, eggs, or young. If work activities are deemed to not be a threat to a given nest within a buffer zone, a qualified biologist may monitor the nest during work to ensure that the nesting birds are not disturbed (e.g., showing signs of stress or changes in behavior as a result of work activity). If special-status avian species are identified and nesting within the work area, no work will begin until an appropriate buffer is determined in consultation with CDFW, and/or the USFWS.

Mitigation Measure BIO-12. San Luis Obispo Owls-Clover Management. San Luis Obispo owl's clover was observed in one area of the Hunter Ranch Golf Course Property within the site of the proposed new maintenance building, public water main and public sewer main at the southwest corner of the property. The specific area of observation is outlined on the map of the approximate location where San Luis Obispo owl's clover was observed on the property in the May 16, 2023 survey report by Ed Mercurio.

The following mitigation measures shall be implemented to ensure less than significant impacts to the San Luis Obispo owl's clover:

1. The area where this species has been observed growing is approximately 4225 square feet in size, as shown on a map in the 2023 survey report by Ed Mercurio. As much of this area as possible should be left as natural as possible, without additional plantings or supplemental watering.
2. Where development will take place within the area where this species has been observed growing, the superficial soil layer, which contains the seeds, shall be scraped off of areas that will be completely altered or covered, and the soil then deposited and leveled to a thin layer by raking in the closest areas to where the development is that have similar environmental conditions. This shall be done during times when the population is seeds and not actively growing plants, which is between mid-summer and fall. The area where the soil is deposited should be an area of like size, or about 4225 square feet, where no development will take place.
3. Minimize impacts to the impacts to San Luis Obispo owl's clover by avoiding disturbing the areas where they are during their blooming period, which is typically from March to June.
4. Two monitoring inspections shall be conducted within three months of completion of each of the developments and one in the following year between April 15 and May 15.

Mitigation Measure BIO-13. Herbaceous Riparian Marsh Vegetation Management. Most of the length of the immediate drainage bottom in general proximity to proposed activities near Huer Huero Creek (see Figures 8a and 8b of the April 2025 Biological Resources Assessment) is currently green with herbaceous riparian marsh vegetation. Riparian and wetland vegetations are classified as sensitive habitats that must be protected from impacts during and after development. This can be achieved in the following way:

1. Direct impacts to the herbaceous riparian marsh habitat must be avoided. No development can take place within the entire length and width of the corridor of riparian marsh habitat. Development can take place alongside of the riparian corridor but not within it.
2. Indirect impacts to the herbaceous riparian marsh habitat must be avoided. Plastic sheet barrier fencing (silt/exclusion fencing) will be properly installed prior to the start of any construction that breaks ground between the area of development and the edge of the corridor of riparian marsh habitat.
3. Two monitoring inspections shall be conducted within three months of completion of each of the developments and one in the following year between April 15 and May 15.

Significance After Mitigation

With the implementation of the mitigation measures described above, impacts would be reduced to *a less than significant* level.

b. and c. Impacts to Riparian Habitat, Sensitive Natural Communities and Wetlands. *Less than Significant with Mitigation.* The following analysis evaluates potential impacts to federal and state jurisdictional waters, wetland areas, USFWS-designated critical habitat, CDFW sensitive natural communities, and county-designated mitigation area for the San Joaquin Kit Fox. Please refer to Appendix B for additional detail with regard to the location, status and extent of wetlands and drainage features identified in the impact analysis included below.

A total of nine ephemeral drainages, 11 wetlands, three swales, and a pond were identified within the survey area. Some of the drainages flow to or are tributaries of Dry Creek (see Appendix B of this Initial Study, Figure 5: Hydrologic Resources, included in Appendix A of that report). Each of the hydrologic features and their associated jurisdiction are described in further detail below and summarized in Table 8 (also see Appendix B, Table 1, Summary of Jurisdictional Aquatic Features).

Table 8. Summary of Jurisdictional Aquatic Features

Feature ID	Feature Type	Feature Designation *	Agency Jurisdiction *
Drainage 1	Ephemeral	Waters of the State	CDFW, RWQCB
Drainage 2	Ephemeral	Waters of the State	CDFW, RWQCB
Drainage 3	USGS blueline; ephemeral	Waters of the State and US	CDFW, RWQCB, ACOE
Drainage 4	Ephemeral	Waters of the State	CDFW, RWQCB
Drainage 5	Ephemeral	Waters of the State and US	CDFW, RWQCB, ACOE
Drainage 6	Ephemeral	Waters of the State and US	CDFW, RWQCB, ACOE
Drainage 7	Ephemeral	Waters of the State and US	CDFW, RWQCB, ACOE
Drainage 8	Ephemeral	-	-
Drainage 9	Ephemeral	Waters of the State and US	CDFW, RWQCB, ACOE
Swale 1	Ephemeral	-	-

Table 8. Summary of Jurisdictional Aquatic Features			
Feature ID	**Feature Type**	**Feature Designation ***	**Agency Jurisdiction ***
Swale 2	Ephemeral	-	-
Swale 3	Ephemeral	-	-
Wetland 1	In-channel feature associated with Drainage 1	Waters of the State	CDFW, RWQCB
Wetland 2	Isolated feature	-	-
Wetland 3	In-channel feature associated with Drainage 2	Waters of the State	CDFW, RWQCB
Wetland 4	Isolated feature	-	-
Wetland 5	Isolated feature	-	-
Wetland 6	Isolated feature	-	-
Wetland 7	Isolated feature	-	-
Wetland 8	In-channel feature	Waters of the State and US	CDFW, RWQCB, ACOE
Wetland 9	In-channel feature	Waters of the State and US	CDFW, RWQCB, ACOE
Wetland 10	In-channel feature	Waters of the State and US	CDFW, RWQCB, ACOE
Wetland 11	Isolated feature	-	-
Pond	In-channel impoundment	Waters of the State and US	CDFW, RWQCB, ACOE
** A formal delineation of waters and wetlands was not completed; jurisdictional determinations are based on the field assessments completed by Terra Verde and are subject to concurrence from the relevant agencies.*			

Each of these features is described in more detail, along with a map showing their locations as well as photos, in the attached Biological Resources Assessment (Appendix A). As noted in Table 8, preliminary jurisdictional determinations were based on field observations completed by Terra Verde.

Federal and State Waters and Wetlands
Direct and/or indirect impacts to the drainages on site may occur during the implementation of the proposed project. Direct impacts may occur during utility installation, if culverts are replaced/upgraded, or new crossings are planned. In addition, indirect impacts to these features could result from erosion, sedimentation, and/or discharges of hazardous materials, such as fuel, from construction equipment. Impacts to such features are potentially significant but mitigable.

USFWS-designated Critical Habitats
The wetlands within the survey area may provide the physical and/or biological features essential for the conservation of VPFS. As currently designed, direct impacts to Wetlands 4 and 6 will occur. Additionally, indirect impacts to Wetland 3 may occur if construction activities result in the alteration or degradation of hydrologic patterns on site. Furthermore, introduction of sediment via erosion and runoff from project areas into adjacent habitat could be deleterious to the potential VPFS habitat area. Impacts to such features are potentially significant but mitigable.

CDFW Sensitive Natural Communities
Coastal and Valley Freshwater Marsh was identified and mapped within Drainage 3, Wetland 5, and along the edges of the Pond. No direct impacts are currently proposed to these features. However, indirect impacts to this CDFW Sensitive Natural Community could result from erosion, sedimentation, and/or discharge of hazardous materials, such as fuel, from construction equipment.

Mitigation Measures

Implement Mitigation Measures BIO-1, BIO-2, BIO-6, BIO-7, BIO-8 and BIO-10 as described above.

Significance After Mitigation

With the implementation of the mitigation measures described above, impacts would be reduced to *a less than significant* level.

d. Wildlife Movement. *Less than Significant Impact.* Maintaining connectivity between areas of suitable habitat is critical for the survival and reproduction of plants and wildlife. Intact habitats benefit plants by ensuring proper dispersal of pollen and seeds, which sustains or grows the population and contributes to the genetic health of the species. Wildlife needs contiguous habitats to attain sufficient food resources for their energetic demands; to locate proper resting, burrowing, and/or nesting sites; to facilitate long- distance travel or migration to seek out mates or resources; and for the safe and successful dispersal of young. The project site is in a semi-rural portion of the City of Paso Robles, within the City limits, surrounded by an active golf course, existing agricultural operations, rural residential and commercial developments, and active airport operations. Existing barriers to migration to and from non-developed portions of the project site, particularly for wildlife, are influenced by the high density of agriculture in the region, which typically correlates with a high frequency of land manipulation, wildlife-exclusion fences, and pest management activities. The proposed project as planned may reduce the quality of natural habitat on site but is not expected to substantially increase the current level of habitat fragmentation in the region nor is it expected to create a significant barrier to wildlife movement.

e. and f. Consistency with Plans, Policies, and Habitat Conservation Plans. *Less than Significant.* The project is not within the boundaries of a Habitat Conservation Plan (HCP), although it is subject to various state and local regulations related to species and habitat projection. Potential impacts related to those regulations are described previously, especially with respect to impacts to special status species, sensitive habitat, wetlands, and jurisdictional waters. With the implementation of the mitigation measures as prescribed above, impacts would be *less than significant*.

Mitigation Measures

Implement Mitigation Measures BIO-1 through BIO-11 as described above.

Significance After Mitigation

With the implementation of the mitigation measures described above, impacts would be reduced to *a less than significant* level.

Off-Site Utilities Improvements

The following discussion is based on a Biological Resources Assessment for the Mill Road Circulation and Annexation performed by Althouse and Meade, Inc., dated April 2025, which included analysis of the off-site utilities corridor, as well as other circulation improvements that are not associated with the proposed project. The full report is included in Appendix B attached to this Initial Study. Applicable mitigation measures from that report are referenced below, or if there is overlap with other mitigation measures described for the proposed project, the reader is directed to those mitigation requirements (Source: 36)

a. Impacts to Special Status Species and Habitat. *Less Than Significant With Mitigation.* The following discusses potential impacts to special status plant and animal species, as well as to oak trees, which are protected through state and local ordinance.

Table 8 and Figure 8a of the April 2025 Althouse and Meade report identify potential impacts to special status species and habitat associated with the proposed utility corridor. As shown, the alignment would traverse the following habitat types:

- Developed/disturbed
- Vineyard
- Ruderal
- California Annual Grassland
- Fremont Cottonwood Forest and Woodland

Among these habitat types, only the Fremont Cottonwood Forest and Woodland is considered potentially sensitive, as it is considered riparian habitat (see discussion under Item b. below). Impacts to California annual grassland habitat, vineyard, ruderal, and developed/disturbed lands are considered less than significant except where these habitat impacts affect other sensitive biological resources such as sensitive plants, sensitive animals and nesting birds.

Impacts to Special Status Plants

Based on the April 2025 Althouse and Meade report, no special-status plants were found within the proposed utilities corridor.

Oak Woodland and Individual Oak Trees
Construction of the proposed utility corridor may require removal of or create impacts to individual oak trees and could alter the understory of several individual oaks along the corridor. Figure 8a in the Althouse and Meade report shows four valley oaks and seven blue oaks along the corridor that would be potentially affected. Impacts are potentially significant but mitigable.

Impacts to Special Status Wildlife

Special-Status Amphibians
Western spadefoot toads were found breeding in two seasonal pools within the study area in 2023. Spadefoots are opportunistic breeders that will lay eggs in seasonal pools within their range, including newly created pools such as the southern pond located in a motorcycle track. The proposed utility easement could impact the southern pond within the motorcycle track. Impacts to this species are *potentially significant but mitigable*.

Special-Status Mammals
If American badger or San Joaquin Kit Fox (SJKF) occur at the site, there is potential for direct or indirect impacts to occur during construction. Construction poses several risks to wildlife, such as vehicle strikes, and crushing by equipment, and destruction of resources (e.g., burrows or dens). Further, construction may impact or deter use of valuable habitat (e.g., burrows or dens), yielding it unsuitable for special-status mammals. Mitigation is required to address this *potentially significant impact*.

Loss of oak woodland and annual grassland habitat may adversely affect the pallid bat through the loss of available roosting sites, reduction of prey, and loss of protective cover. Although no oak woodland would be lost along the corridor, annual grassland could be temporarily impacted during construction. These bats are known to roost in buildings, under bridges, tree hollows, tree cavities, and tree canopies. The study area is adjacent to structures (the Highway 46 bridge) with appropriate day-roosting habitat, and suitable trees and snags with cavities are present on-site. Removal of snags and oak trees could affect these bats. The breeding season for bats is April to October. Project activities including tree removal, grading and other excavation work could result in take of bat species, or disturbance of bat roosts. Impacts are *potentially significant but mitigable*.

Special-Status Reptiles

The proposed project site provides suitable habitat for northern California legless lizard, San Joaquin coachwhip, and southwestern pond turtle. Construction activities pose risks for direct and indirect impacts to special-status reptiles. For example, reptiles basking on roadways will be especially vulnerable to vehicle strikes. Reptiles can be slow-moving, both because of behavioral adaptations to be camouflaged from predators and because of their ectothermic nature. This trait presents crushing hazards in the presence of relatively fast-moving equipment or even foot traffic.

All special-status reptiles presumed to be along the utility corridor rely heavily on burrows or emergent vegetation for shelter from the elements, protection from predators, and/or reproduction. Heavy equipment and ground disturbing activities may collapse burrow systems or completely remove them, resulting in injury or death of the inhabitants or exclusion by the removal of a vital resource. Vegetation may also be removed because of construction activities. Ectotherms rely on vegetative cover for temperature regulation and, further, vegetation provides critical habitat for prey species of reptiles. Mitigation is required to address this *potentially significant impact*.

Special-Status Invertebrates

One seasonal pond could be impacted by the proposed Project. The pond is the southern one shown on Figure 8a in the April 2025 Althouse and Meade report. This pond is a depression in a dirt motorcycle track created and frequently manipulated by area residents. It is very unlikely to support vernal pool fairy shrimp due to its recent creation and frequent manipulation. No further surveys or mitigation measures are recommended.

Sensitive and Nesting Birds

Direct impacts to burrowing owl, horned lark, golden eagle, Swainson's hawk, tricolored blackbird, and other bird species are most likely to occur if construction activities take place during the typical avian nesting season, generally February 1 through August 31, and as early as January 1 for golden eagles. Direct and indirect impacts may occur if tree trimming or removal is required. For example, these actions can destroy nests, remove nesting habitat, or cause disturbance that may lead to nest failure or otherwise harass nesting, resident, or transient birds. Mitigation is required to address this *potentially significant impact*.

American Badger and San Joaquin Kit Fox

American badger and San Joaquin kit fox have potential to occur on the project site and along the utilities corridor. If present, activities such as grading and excavation work could result in direct injury or mortality to these animals, or indirect take by disturbance of natal dens and abandonment by adult badgers or kit fox.

Kit foxes are considered to be rare in this part of the County. The Property is within the historic range of the kit fox, within a movement corridor area between satellite populations in Cholame Valley and Camp Roberts. Additionally, the Study Area is located within the San Luis Obispo County San Joaquin kit fox habitat range, and specifically within the 3:1 mitigation ratio area as shown on the San Luis Obispo County Land Use View Maps (County 2016). These requirements are included in Mitigation Measure BIO-8.

Please refer to the discussion of potential impacts related to the proposed development project for further analysis of this issue.

Mitigation Measures

Special Status Plant Species

Implement Mitigation Measures BIO-1 through BIO-5 as described previously.

Special Status Wildlife Species

Implement Mitigation Measures BIO-1 through BIO-11 as described above. In addition, the following additional mitigation measure is required:

Mitigation Measure BIO-14. Roosting Bat Pre-construction Survey and Passive Relocation. Within 30 days before construction, between April and September, the Project biologist shall inspect structures, and trees or snags to be removed or pruned that are greater than 20 inches diameter-at-breast-height for bats. If a bat roost is found, the qualified biologist shall implement passive relocation measures such as installation of one-way valves. For each occupied roost removed, one bat box shall be installed in similar habitat to those which are removed. Bat maternity colonies shall not be disturbed. If a bat roost is detected during the maternal season (April through September), a minimum 50-foot no-disturbance buffer shall be maintained.

Significance After Mitigation

With the implementation of the mitigation measures described above, impacts would be reduced to *a less than significant* level.

b. and c. Impacts to Riparian Habitat, Sensitive Natural Communities and Wetlands. *Less than Significant with Mitigation.* Table 8 and Figure 8a of the April 2025 Althouse and Meade report identify potential impacts to riparian habitat, sensitive natural communities and wetlands associated with the proposed utility corridor. Construction of the off-site utilities corridor is anticipated to impact up to 0.4-acre of riparian habitat associated with the Fremont Cottonwood Forest and Woodland habitat type, which is found adjacent to Huer Huero Creek. Impacts to riparian habitat could occur from development and ground disturbance resulting from the construction of utilities improvements, although these would generally be located outside the bed/bank of Huer Huero Creek (in developed/disturbed land). No identified wetlands would be impacted.

Mitigation Measures

Permanent impacts to riparian habitat would be mitigated through habitat creation and enhancement of City-owned property located along Huer Huero Creek that is currently disturbed in quality, as identified in a Habitat Mitigation and Monitoring Plan (HMMP). Any temporary impacts from construction would be mitigated by habitat re-establishment at a 1:1 ratio through weed abatement and application of seed approved by the Project Biologist, as identified in the HMMP. Impacts to non-wetland waters will require federal (USACE) and state (RWQCB and CDFW) permit approval and coordination.

In addition to Mitigation Measures BIO-1, BIO-2, and BIO-6, the following additional mitigation measures are required:

Mitigation Measure BIO-15. Habitat Mitigation and Monitoring Plan. To minimize impacts on riparian habitat, prior to commencement of construction activities, prepare and implement a Habitat Mitigation and Monitoring Plan (HMMP). Temporary impacts typically require a minimum 1 to 1 ratio restoration (area of restored habitat to impacted habitat) and permanent impacts to riparian areas typically require a minimum 3 to 1 ratio creation and enhancement (area of created or enhanced habitat to impacted habitat).

Mitigation Measure BIO-16. Agency Coordination. To address potential impacts to Huer Huero Creek and its associated riparian zone, construction of off-site utilities improvements is anticipated to require permits from U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife. The Owner/Applicant shall comply with all state and federal permitting requirements. The Owner/Applicant shall obtain and produce for the city correspondence from applicable state and federal agencies regarding compliance of the proposed development with state and federal laws.

Significance After Mitigation

With the implementation of the mitigation measures described above, impacts would be reduced to *a less than significant* level.

d. Wildlife Movement. *Less than Significant Impact.* Maintaining connectivity between areas of suitable habitat is critical for the survival and reproduction of plants and wildlife. Existing barriers to migration to and from the proposed utilities corridor, particularly for wildlife, are influenced by the high density of agriculture in the region, which typically correlates with a high frequency of land manipulation, wildlife-exclusion fences, and pest management activities. Construction and operation of the off-site utilities is not expected to increase the current level of habitat fragmentation in the region nor is it expected to create a significant barrier to wildlife movement.

e. and f. Consistency with Plans, Policies, and Habitat Conservation Plans. *Less than Significant.* The proposed utilities corridor is not within the boundaries of a Habitat Conservation Plan (HCP). It is subject to various state and local regulations related to species and habitat projection. Potential impacts related to those regulations are described previously, especially with respect to impacts to special status species, sensitive habitat, wetlands, and jurisdictional waters. With the implementation of the mitigation measures as prescribed above, impacts would be *less than significant*.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES - Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		X		
c) Disturb any human remains, including those interred outside of formal cemeteries?		X		

On-Site Project Development

The cultural resource impact analysis for the proposed development has been prepared based on a September 2021 archaeological resource survey conducted by Cultural Resource Management Services in September 2021, with an Addendum to that survey prepared in April 2023. The analysis included below summarizes the key information included in those reports relative to assessing potential impacts. (Sources: 8, 9)

a. Historical Resources. *No Impact.* The State Historic Property Data Files, National Register of Historic Places, National Register of Determined Eligible Properties, California Historical Landmarks, California Points of Historic Interest, California OHP Archaeological Determinations of Eligibility, and the Caltrans State and Local Bridge Surveys were searched. No historic property evaluations were found within the search radius. *No impact* would occur.

b. Archaeological Resources. *Less Than Significant With Mitigation Incorporated.* A records and literature search was conducted for the project site at the Central Coast Information Center (CCIC), Santa Barbara Natural History Museum, which is the State-designated regional clearinghouse for archaeological site information for San Luis Obispo County. Eight previous cultural resource studies have been conducted within a one-quarter mile radius of the project area (Soule 1984; PAR 1992; Glover 1999; Conway 2001; Gibson 1993, 2006; Anastasio 2013; Haas et al. 2015). Four of these previous reconnaissance level investigations included part or all the project area. Although no archaeological sites have been identified within the search radius, two isolated artifacts, a Monterey chert projectile point and a sandstone mortar fragment, were found during grading at two locations on the Hunter Ranch (Gibson 1993).

In addition, a Sacred Lands search was conducted at the Native American Heritage (HAHC) commission in Sacramento. The results of that search were negative. In accordance with the results letter from the NAHC, letters were written to the interested Native Americans and groups listed in their response.

A field inspection of the project area was made on September 15, 2021 by Nancy Farrell and Ron Rose of CRMS. The survey was accomplished by walking transects across each designated development area spaced at four-meter intervals. The mineral surface visibility was excellent in most areas, from 75-95%. Additionally, the high number of rodent burrows afforded excellent views of the soil. Although a few pieces of Monterey chert (a preferred flaked stone tool material) were present, no prehistoric or historic cultural resources were encountered during the survey.

On April 5, 2023, two additional areas were examined by Nancy Farrell and Ron Rose. The survey was accomplished by walking transects across each designated development area spaced at one-meter intervals. The mineral surface visibility was good, from 40-75%. Additionally, the abundance of rodent burrow spoil piles afforded views of the soil. As with the previous field inspection, no archaeological materials were found.

Since no significant cultural resources were located within the survey area, no further archaeological investigations are recommended at this time. However, there is the potential that previously unidentified archaeological resources may be discovered during construction-related ground disturbance for the project. For this reason, impacts are considered *potentially significant, but mitigable*.

Mitigation Measures

Mitigation Measure CR-1. Pre-Construction Awareness Training. A pre-construction meeting will be held, at which the field archaeologist will conduct awareness training for the construction crew and supervisors. This will include a description of the types of artifacts that may be encountered and a discussion of why these are of importance to the Native American community as well as for an understanding of our local history. Pertinent laws and regulations protecting archaeological sites will be briefly reviewed and archaeologists monitoring methods will be explained. Also included in the training will be a discussion regarding protocol in the event of a discovery by a construction crew member. The crew will be instructed to stop work in the immediate area and advise the archaeological monitor of the discovery so that it can be evaluated in a timely manner.

Mitigation Measure CR-2. Encountering Unknown Resources. If cultural resources, such as prehistoric or historic artifacts, bone, or other cultural materials are encountered during project activities, all work within 50 feet of the discovery should be redirected. The City Environmental Coordinator should be notified so that the extent and location of discovered materials may be evaluated by a qualified archaeologist. The archaeologist will assess the situation, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Upon completion of the assessment, the archaeologist should prepare a report documenting the methods and results of the investigation and provide recommendations for the treatment of the archaeological materials discovered.

Significance After Mitigation

With the implementation of the mitigation measures described above, impacts would be reduced to *a less than significant* level.

c. Impacts to Human Remains. *Less Than Significant With Mitigation Incorporated.* The proposed project site has been previously disturbed and used as a golf course. No known cemetery has occurred at this site, so it is not expected to contain human remains, including those interred outside of formal cemeteries. However, the potential exists for previously unknown human remains to be discovered at the project site during project construction activities. For this reason, impacts are considered *potentially significant, but mitigable*.

Mitigation Measures

Mitigation Measure CR-3. Procedures if Human Remains are Encountered. If human remains (or remains that may be human) are discovered at the project site or within the off-site project improvement areas during ground-disturbing activities, the construction contractors, project archaeologist, and/or designated Native American tribal representative shall immediately stop all activities within 100 feet of the find. The project proponent shall then inform the San Luis Obispo County Coroner and the City of Paso Robles immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).

If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC), which will identify the "Most Likely Descendent" (MLD). Despite the affiliation with any Native American tribal representative(s) at the site, the NAHC's identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of Native American human remains and may recommend to the project proponent means for treatment or disposition, with appropriate dignity of the human remains and any associated grave goods. The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains will be determined in consultation between the project proponent and the MLD. In the event that there is disagreement regarding the disposition of the remains, State law will apply and median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98(e) and 5097.94(k)).

The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The locations will be documented by the consulting archaeologist in conjunction with the various stakeholders and a report of findings will be filed.

Significance After Mitigation

With the implementation of the mitigation measures described above, impacts would be reduced to *a less than significant* level.

Off-Site Utilities Improvements

The cultural resource impact analysis for the off-site utilities corridor improvements has been prepared based on a June 2023 archaeological resource survey conducted by Central Coast Archaeological Research Consultants. The analysis included below summarizes the key information related to assessing potential impacts. (Source: 29)

a. Historical Resources. *No Impact.* The State Historic Property Data Files, National Register of Historic Places, National Register of Determined Eligible Properties, California Historical Landmarks, California Points of Historic Interest, California OHP Archaeological Determinations of Eligibility, and the Caltrans State and Local Bridge Surveys were searched. No historic property evaluations were found within the search radius. *No impact* would occur.

b. Archaeological Resources. *Less Than Significant With Mitigation Incorporated.* A records and literature search was conducted for the project site at the Central Coast Information Center (CCIC), Santa Barbara Natural History Museum, which is the State-designated regional clearinghouse for

archaeological site information for San Luis Obispo County. Nine previous cultural resource studies have been conducted within a one-quarter mile radius of the project area. Five of these previous reconnaissance level investigations included part or all of the project area (Dills, 1990; Glover et al, 1999; Singer, 2004; Gibson, 2006; Anastasio, 2013). Within the 0.25-mile search radius, four isolates and two archaeological sites were recorded. None are within 350 meters of proposed project activities.

In addition, a Sacred Lands search was conducted at the Native American Heritage Commission (NAHC) in Sacramento. The results of that search were negative. In accordance with the results letter from the NAHC, letters were written to the interested Native Americans and groups listed in their response.

A field inspection of the project area was made on May 20-23, 2023 by qualified CCARC staff. The survey was accomplished by walking transects across each designated development area spaced at ten-meter intervals.

Ground surface visibility was variable throughout the project area and was dependent on the current land use. Large areas of recent land preparation were present in both the southeastern and northwestern project area, providing excellent ground surface visibility (100%). Approximately one half of the project area was being used for the cultivation of wine grapes and visibility in the vineyards ranged from 40-60%. Dense vegetation, built environments, and landscaping reduced ground surface visibility to 0-20% in the remaining areas. When surveying through dense vegetation, crew members used boot scrapes to improve visibility and inspected extensive gopher burrows and back dirt for evidence of subsurface archaeological remains. The wide subsurface profile in Huer Huero Creek banks allowed for the inspection of potential subsurface deposits. Significant disturbances were observed within the survey area, these included large scale grading, the construction of motorcycle tracks, and irrigation ponds.

The field investigation returned to a previous recorded isolated lithic scatter (P-40-038417) and identified one isolated historic artifact (a piece of olive-colored Colonial-era glass; P-40-038418) within the survey area. P-40-038418 is not considered a significant resource under CEQA and no additional studies are required at this location. If the project cannot avoid the lithic scatter (P-40-038417) in the area directly south of the barn, additional studies would be required to explore the possibility of subsurface site components related to this resource. Impacts to this resource are considered *potentially significant but mitigable*.

Mitigation Measures

In addition to Mitigation Measure CR-2, the following mitigation measure is required:

Mitigation Measure CR-4. Measures Related to Resource P-40-038417. An Extended Phase I testing program and consultation with the Chumash and Salinan community are required at isolated lithic scatter P-40-038417 within the current project area prior to any ground disturbing activities if the location cannot be avoided. If the location can be avoided, an Environmental Sensitive Area (ESA) fencing should be placed at the mapped area by a qualified archaeologist prior to construction. The testing program should be conducted to: 1) determine if the project area contains subsurface archaeological deposits; and 2) assess whether these deposits constitute an archaeological site and retains sufficient integrity for the evaluation of eligibility for the CRHR.

Significance After Mitigation

With the implementation of the mitigation measures described above, impacts would be reduced to *a less than significant* level.

c. Impacts to Human Remains. *Less Than Significant With Mitigation Incorporated.* The off-site utilities corridor has been previously disturbed with road construction and or agricultural uses. No known cemetery has occurred at this site, so it is not expected to contain human remains, including those interred outside of formal cemeteries. However, the potential exists for previously unknown human remains to be discovered along the off-site corridor during project construction activities. For this reason, impacts are considered *potentially significant, but mitigable*.

Mitigation Measures

Implement Mitigation Measure CR-3, described previously.

Significance After Mitigation

With the implementation of the mitigation measures described above, impacts would be reduced to *a less than significant* level.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY - Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

On-Site Project Development and Off-Site Utilities Improvements

The 2013 *City of Paso Robles Climate Action Plan* (2013 CAP) is a long-range plan to reduce greenhouse gas (GHG) emissions from City government operations and community activities within Paso Robles (City of El Paso de Robles 2013). The 2013 CAP seeks to achieve multiple community goals, such as lowering energy costs, reducing air pollution, supporting local economic development, and improving public health and quality of life. All standards presented in the 2013 CAP respond to the needs of development through achieving more efficient and sustainable use of resources, including energy.

The energy provider for the City of Paso Robles is Central Coast Community Energy (3CE), formerly Monterey Bay Community Power. 3CE will provide 100% carbon-free electricity by the year 2030, which is 15 years ahead of California's Senate Bill (SB) 100 requirement of zero-carbon energy by 2045 (3CE 2021).

Building Energy Efficiency Standards

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2022 Title 24 standards, which became effective on January 1, 2023. The 2022 Title 24 standards include efficiency improvements to the lighting, and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers.

The 2022 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, went into effect on January 1, 2023. The 2022 CALGreen Code includes mandatory measures for non-residential development related to site development; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. Specifically, the code requires the following measures that are applicable to energy use:

New buildings with tenant spaces that have 10 or more tenant-occupants to provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility.

New buildings that require 10 or more parking spaces to provide a specific number of spaces to facilitate the present and future installation of electric vehicle supply equipment. The raceways are required to be installed at the time of construction.

Senate Bill 100

Senate Bill 100 (SB 100) was signed into law September 2018 and increased the goal of the California RPS Program to achieve at least 50 percent renewable resources by 2026, 60 percent renewable resources by 2030, and 100 percent renewable resources by 2045. SB 100 also includes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

California is one of the lowest per capita energy users in the United States, ranked 48th in the nation, due to its energy efficiency programs and mild climate (United States Energy Information Administration [EIA] 2018). California consumed 292,039 gigawatt-hours (GWh) of electricity and 2,110,829 million cubic feet of natural gas in 2017 (California Energy Commission [CEC] 2019; EIA 2018). In addition, Californians consume approximately 18.9 billion gallons of motor vehicle fuels per year (Federal Highway Administration 2019). The single largest end-use sector for energy consumption in California is transportation (39.8 percent), followed by industry (23.7 percent), commercial (18.9 percent), and residential (17.7 percent) (EIA 2018).

Most of California's electricity is generated in-state with approximately 30 percent imported from the Northwest (Alberta, British Columbia, Idaho, Montana, Oregon, South Dakota, Washington, and Wyoming) and Southwest (Arizona, Baja California, Colorado, Mexico, Nevada, New Mexico, Texas, and Utah) in 2017. In addition, approximately 30 percent of California's electricity supply comes from renewable energy sources such as wind, solar photovoltaic, geothermal, and biomass (CEC 2018). Adopted on September 10, 2018, SB 100 accelerates the State's Renewables Portfolio Standards Program by requiring electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

To reduce statewide vehicle emissions, California requires that all motorists use California Reformulated Gasoline, which is sourced almost exclusively from refineries located in California. Gasoline is the most used transportation fuel in California with 15.5 billion gallons sold in 2017 and is used by light-duty cars, pickup trucks, and sport utility vehicles (California Department of Tax and Fee Administration 2018). Diesel is the second most used fuel in California with 4.2 billion gallons sold in 2015 and is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy- duty construction and military vehicles (CEC 2016). Both gasoline and diesel are primarily petroleum- based, and their consumption releases greenhouse gas (GHG) emissions, including carbon dioxide and nitrogen oxides. The transportation sector is the single largest source of GHG emissions in California, accounting for 41 percent of all inventoried emissions in 2016 (California Air Resources Board [CARB] 2018).

a. Energy Consumption Related Impacts. *Less Than Significant Impact.* Proposed construction activities would require the use of energy in the form of diesel fuel, gasoline, electricity for worker

and construction vehicles and equipment. Such activities would be subject to state and local diesel idling restrictions and other equipment standards.

While future development would be subject to applicable green building standards, operation of the project would potentially result in an increase in the use of electricity and other energy sources on-site. Nevertheless, compliance with applicable state and local regulations would ensure that impacts would be less than significant. The project would not result in potentially significant environmental impacts resulting from wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.

b. Consistency with state or local energy plans. *Less Than Significant Impact.* The City would review project site plans to verify compliance with the Building and Energy Efficiency Standards in the California Energy Code prior to issuing a building permit. As a regulatory requirement, the project would be reviewed for consistency with applicable state and local plans for renewable energy and efficiency, including CALGreen Code Title 24 standards. CALGreen Code standards require projects to provide energy saving features, establish minimum standards for energy efficient construction practices, and require increased energy efficiency. The project would be built to the codes in effect at the time of construction. In addition, the project would provide the required bicycle parking spaces and EV accommodations (parking spaces that are EV-capable or EV-ready, as well as spaces with EV charging equipment installed) that meet or exceed requirements of CALGreen. In addition, new development would be required to comply with the 2013 CAP and implement energy efficient building and other design features in order to achieve more efficient and sustainable use of energy resources.

As the project would comply with regulatory requirements for building efficiency and incorporate features that encourage a reduction in the use of gasoline-fueled vehicles, the project would not conflict with a state or local plan for renewable energy or energy efficiency.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS - Would the project:				
a) Expose people or structures to 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?				X
ii) Strong seismic ground shaking?			X	
iii) Inundation by seiche, tsunami, or mudflow?				X
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?			X	
d) Be located on expansive soil creating substantial risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

On-Site Project Development and Off-Site Utilities Improvements

The Geology and Soils impact analysis was prepared based in part on soils and geotechnical reports prepared for the site. The analysis included below summarizes the key information included in those reports relative to assessing potential impacts. (Sources: 10, 11, 12)

a.i. Earthquake Fault Rupture. *No Impact.* Neither the subject property nor the proposed public utilities corridor are located within any Alquist-Priolo Study Zone or near other known faults that would be subject to surface rupture. Therefore, no impact would occur. (Source: 1, 12)

a.ii. Seismic Ground Shaking. *Less Than Significant Impact.* The City of Paso Robles and surrounding areas are susceptible to seismic hazards from movement along several regional faults. Active faults within the region include the San Andreas, Nacimiento, and Rinconada Faults, as well as other offshore faults. Most seismic activity within the city has been associated with the San Andreas Fault, which is located approximately 22 miles northeast of the city. The project site is located approximately 4 miles northeast from the Rinconada Fault zone, which trends through the center of the Salinian Block, and approximately 22 miles west of the San Andreas Fault (DOC 2015). Regional faults are depicted in the City of El Paso de Robles General Plan 2003 Safety Element (City of Paso Robles 2014). Other geologic hazards associated with seismicity in the City of Paso Robles area include fault rupture, ground shaking, liquefaction and seismically induced settlement, expansive soils, and erosive soils. As described in the 2019 Local Hazard Mitigation Plan, the liquefaction potential on the parcel is low.

The project area is situated with a seismically active region, which has historically resulted in strong and damaging ground motion from earthquakes. The San Andreas Fault to the east of the project area has generated several earthquakes of 5.0 to 6.5 magnitude or greater approximately every 20 years (on average), with the maximum ranging from 6.5 to 8.0 magnitude (CDCR 2010). Due to the proximity of the project area to several active and potentially active fault zones, including the San Andreas Fault, Rinconada Fault, and others, seismically induced ground shaking/ground motions may be expected at the project site during a seismic event.

Any issues related to seismic ground shaking would be addressed through building construction that is consistent with the California Building Code, which is intended to minimize impacts related to seismic safety to the extent possible. Therefore, the potential impact would be less than significant. (Sources: 1, 12, 13)

a.iii. Seiche, Tsunami and Mudflow. *No Impact.* There is no seiche, tsunami or mudflow potential on the project site or within the offsite utilities corridor. No impact is anticipated. (Source: 1)

a.iv. Landslides. *No Impact.* The project area, including the proposed utilities corridor, is relatively flat and does not have steep slopes with the potential for landslides. Therefore, impacts related to this issue would be less than significant. (Source: 1, 10, 12 13)

b. Soil Erosion and Loss of Topsoil. *Less Than Significant Impact.* Construction activities have the potential to result in soil erosion or the loss of topsoil. However, erosion would be addressed through the implementation of existing state and federal requirements and minimized through compliance with the National Pollutant Discharge Elimination System (NPDES) general construction permit, which requires that a Storm Water Pollution Prevention Plan (SWPPP) be prepared prior to and implemented during construction activities. The SWPPP will identify Best Management Practices to be implemented to address soil erosion. Through compliance with these standard regulatory requirements, the construction of the proposed project would not result in substantial soil erosion or the loss of topsoil. Therefore, construction-related impacts would be less than significant and no mitigation is required.

Once construction of the proposed project is complete, portions of the project site would be paved and developed with buildings, a parking lot, and landscaping. With respect to the utilities corridor, all utilities will be placed underground and the surface would be returned to a state similar to what existed prior to installation of those utilities. Therefore, no soil erosion would occur from long-term operation of the project or associated utilities corridor.

c. Unstable Soils (including Subsidence and Liquefaction Potential). *Less than Significant Impact.* The geotechnical report prepared for the site concludes that "based on the presence of hard sandy material at a depth of about 5 feet and no groundwater in the area, the likelihood of liquefaction of the site is very low." Impacts would be *less than significant*. (Source: 1, 10, 11, 12, 13)

d. Expansive Soils. *Less Than Significant Impact.* The project site and off-site utilities corridor are not located on a geologic unit or soil that is unstable, or would become unstable as a result of the project; the project would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. In addition, the geotechnical study prepared for the project site describes the surface soils as consisting of a "very low expansive sandy material underlain with low expansive sandy soils." Impacts would be *less than significant*.

e. Suitability for Septic Systems. *Less Than Significant Impact.* The 204-acre property is currently served by on-site water wells and septic systems (onsite wastewater treatment system). The proposed project could include model units that are connected to the golf course septic system on an interim basis (Key Plan M-H). In addition, an interim on-site Cloacina, an advanced wastewater treatment system (Key Plan S), could be used on an interim basis until City wastewater services are available in this area, pursuant to the terms of the Development Agreement. (Source: 10, 11, 12)

The suitability of septic systems was evaluated in a percolation test dated January 12, 2023, conducted by Mid-Coast Geotechnical (Source: 16). During the testing, no groundwater nor evidence of historical high groundwater was encountered; the soils are thus suitable for additional septic systems as an interim solution until the project connects to the citywide wastewater disposal system. For that reason, impacts related to the proposed project are considered *less than significant.*

The proposed utilities corridor does not require the use of septic systems. No impact related to these off-site improvements would occur.

f. Paleontological Resources. *Less Than Significant With Mitigation Incorporated.* Ground-disturbing activities, including offsite trenching and grading, may impact geologic units with variable paleontological sensitivity, increasing with depth. Should fossils be encountered, either with respect to construction of the proposed project or the off-site utilities corridor, they would be at risk of damage or destruction from earthwork activities. Impacts are *potentially significant but mitigable*.

Mitigation Measures

The following mitigation measures are required to address the potential for encountering paleontological resources.

Mitigation Measure GEO-1. Paleontology Awareness Training. A City of Paso Robles (City)-approved paleontologist shall be retained by the Applicant that meets the qualifications of a Qualified Professional Paleontologist as defined by the Society of Vertebrate Paleontology to develop and conduct a Workers Environmental Awareness Program training for project personnel involved in ground-disturbing activities, such as grading, excavation, trenching, and other earthwork. The training shall describe applicable laws and regulations regarding paleontological resources, types of resources that may be found in the project area, and the required procedures in the event of an inadvertent discovery.

Mitigation Measure GEO-2. Paleontological Resources Management Plan. The City of Paso Robles (City)-approved paleontologist shall develop and submit a Paleontological Resources Management Plan (PRMP) to the City for review and approval. The approved PRMP shall be implemented during all construction activities. The PRMP shall include provisions for documenting the site according to the standards developed by the National Research Council (1987) and shall include, at a minimum:

1. All ground disturbances greater than or equal to 5 feet below ground surface, or that impact older alluvium or Paso Robles Formation regardless of depth, shall be monitored by the City-approved paleontologist;

2. A map, based on final grading plans, showing the areas where monitoring shall occur;
3. Processes and procedures for paleontological monitoring, fossil salvaging, reporting, and curation;
4. In the event paleontological resources are identified during construction, all work within 50 feet of the discovery shall immediately cease so that the City-approved paleontologist can evaluate the significance of the discovery;
5. Preservation of significant fossils found during construction by prompt removal and/or stabilization whenever feasible; and
6. Cataloguing and curation of all artifacts and records detailing the results of the investigations at a recognized, nonprofit paleontological specimen repository with permanent curator, such as a museum or university, or at the discretion of the paleontologist, at a City-approved facility.

At the conclusion of paleontological monitoring, the City-approved paleontologist shall prepare a final Paleontological Resources Monitoring Report that documents the implementation of the PRMP, as well as any paleontological resources discoveries, and submit the final report to the City.

Significance After Mitigation

With the implementation of the mitigation measures described above, impacts would be reduced to *a less than significant* level.

ISSUES:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS - Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		X		
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?		X		

On-Site Project Development and Off-Site Utilities Improvements

The analysis of Greenhouse Gas (GHG) Emissions section has been prepared based on an August 2023 report prepared by Ambient, which is attached as Appendix A to this Initial Study. The analysis included below summarizes the information in that report. (Source: 5)

Greenhouse Gas (GHG) Emissions Overview

To fully understand global climate change, it is important to recognize the naturally occurring "greenhouse effect" and to define the GHGs that contribute to this phenomenon. Various gases in the earth's atmosphere, classified as atmospheric GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space and a portion of the radiation is absorbed by the earth's surface. The earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation. GHGs, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride.

These greenhouse gases and their relative contribution to global climate change are discussed in greater detail in Appendix A of this Initial Study. In addition, an inventory of statewide and local GHG emissions is also included in Appendix A.

Effects of Global Climate Change

There are uncertainties as to exactly what the climate changes will be in various local areas of the earth. There are also uncertainties associated with the magnitude and timing of other consequences of a warmer planet: sea-level rise, spread of certain diseases out of their usual geographic range, the effect on agricultural production, water supply, sustainability of ecosystems, increased strength and frequency of storms, extreme heat events, increased air pollution episodes, and the consequence of these effects on the economy.

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

Regulatory Setting

The following includes a summary of relevant federal, state, and local regulations associated with GHG emissions. Please refer to Appendix A of this Initial Study for a full discussion of the regulatory framework for this issue.

Federal

Executive Order 13514 and the Federal Clean Air Act

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

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

State of California

Executive Order S-3-05

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

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

Assembly Bill 32, The Global Warming Solutions Act of 2006

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

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

Pursuant to AB 32, CARB identified 427 million $MTCO_2e$ as the total statewide aggregated 1990 GHG emissions level, which served as the 2020 emissions limit. The state achieved its 2020 GHG emissions reductions target of returning to 1990 levels in 2016.

Climate Change Scoping Plan

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

zone, approve, and permit how land is developed to accommodate population growth and the changing needs of their jurisdictions. ARB further acknowledges that decisions on how land is used will have large impacts on the GHG emissions that will result from the transportation, housing, industry, forestry, water, agriculture, electricity, and natural gas emissions sectors. With regard to land use planning, the Scoping Plan expects approximately 5.0 MMTCO2*e* would be achieved with the implementation of SB 375, which is discussed further below.

The initial Scoping Plan was first approved by ARB on December 11, 2008, and is updated every five years. The first update of the Scoping Plan was approved by the ARB on May 22, 2014, which looked past 2020 to set mid-term goals (2030-2035) on the road to reaching the 2050 goals. The most recent update released by ARB is the *2017 Climate Change Scoping Plan*, which was released on November 2017. The *2017 Climate Change Scoping Plan* incorporates strategies for achieving the 2030 GHG-reduction target established in SB 32 and Executive Order B-30-15. Most notably, the *2017 Climate Change Scoping Plan* encourages zero net increases in GHG emissions. However, the *2017 Climate Change Scoping Plan* recognizes that achieving net zero increases in GHG emissions may not be possible or appropriate for all projects and that the inability of a project to mitigate its GHG emissions to zero would not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA.

Senate Bill 1078 and Governor's Order S-14-08

SB 1078 (Public Utilities Code Sections 387, 390.1, 399.25 and Article 16) addresses electricity supply and requires that retail sellers of electricity, including investor-owned utilities and community choice aggregators, provide a minimum 20 percent of their supply from renewable sources by 2017. This Senate Bill will affect statewide GHG emissions associated with electricity generation. In 2008, Governor Schwarzenegger signed Executive Order S-14-08, which set the Renewables Portfolio Standard target to 33 percent by 2020. It directed state government agencies and retail sellers of electricity to take all appropriate actions to implement this target.

Executive Order S-14-08 was later superseded by Executive Order S-21-09 on September 15, 2009. Executive Order S-21-09 directed the ARB to adopt regulations requiring 33 percent of electricity sold in the State come from renewable energy by 2020. Statute SB X1-2 superseded this Executive Order in 2011, which obligated all California electricity providers, including investor-owned utilities and publicly owned utilities, to obtain at least 33 percent of their energy from renewable electrical generation facilities by 2020.

Mandatory Reporting of GHG Emissions

The California Global Warming Solutions Act (AB 32, 2006) requires the reporting of GHGs by major sources to the ARB. Major sources required to report GHG emissions include industrial facilities, suppliers of transportation fuels, natural gas, natural gas liquids, liquefied petroleum gas, and carbon dioxide, operators of petroleum and natural gas systems, and electricity retail providers and marketers.

Cap-and-Trade Regulation

The cap-and-trade regulation is a key element in California's climate plan. It sets a statewide limit on sources responsible for 85 percent of California's GHG emissions and establishes a price signal needed to drive long- term investment in cleaner fuels and more efficient use of energy. The cap-and-trade rules came into effect on January 1, 2013, and apply to large electric power plants and

large industrial plants. In 2015, fuel distributors, including distributors of heating and transportation fuels, also became subject to the cap-and- trade rules.

Under the cap-and-trade regulation, companies must hold enough emission allowances to cover their emissions and are free to buy and sell allowances on the open market. California held its first auction of GHG allowances on November 14, 2012. California's GHG cap-and-trade system is projected to achieve an approximate 80 percent reduction from 1990 levels by 2050.

Senate Bill 32

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

Senate Bill 97

SB 97 was enacted in 2007. SB 97 required the Office of Planning and Research (OPR) to develop, and the Natural Resources Agency to adopt, amendments to the CEQA Guidelines addressing the analysis and mitigation of GHG emissions. Those CEQA Guidelines amendments clarified several points, including the following:

- Lead agencies must analyze the GHG emissions of proposed projects and must reach a conclusion regarding the significance of those emissions.
- When a project's GHG emissions may be significant, lead agencies must consider a range of potential mitigation measures to reduce those emissions.
- Lead agencies must analyze potentially significant impacts associated with placing projects in hazardous locations, including locations potentially affected by climate change.
- Lead agencies may significantly streamline the analysis of GHGs on a project level by using a programmatic GHG emissions reduction plan meeting certain criteria.
- CEQA mandates analysis of a proposed project's potential energy use (including transportation- related energy), sources of energy supply and ways to reduce energy demand, including through the use of efficient transportation alternatives.

As part of the administrative rulemaking process, the California Natural Resources Agency developed a Final Statement of Reasons explaining the legal and factual bases, intent, and purpose of the CEQA Guidelines amendments. The amendments to the CEQA Guidelines implementing SB 97 became effective on March 18, 2010.

Senate Bill 100

SB 100 was signed by Governor Jerry Brown on September 10, 2018. SB 100 sets a goal of phasing out all fossil fuels from the state's electricity sector by 2045. SB 100 increases to 60 percent, from 50 percent, how much of California's electricity portfolio must come from renewables by 2030. It establishes a further goal to have an electric grid that is entirely powered by clean energy by 2045, which could include other carbon-free sources, like nuclear power, that are not renewable.

Senate Bill 375

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

Senate Bills 1383 & 1206

SB 1383 requires California to reduce hydrofluorocarbon (HFC) emissions associated with the use of refrigerants to 40 percent below 2013 levels by 2030. Starting in 2022, new facilities will be required to use refrigerants that can reduce their emissions by up to 90 percent. The intent of the new rules is to eliminate the use of very high-GWP refrigerants in every sector that uses non-residential refrigeration systems. Compliance begins for most home air conditioning equipment in 2025. Senate Bill 1206, signed into law in September 2022, prohibits the sale or distribution of HFCs that exceed a specified GWP. Under this new law, refrigerants would not be allowed to exceed 2,200 GWP beginning January 1, 2025; 1,500 GWP beginning January 1, 2030; and, 750 GWP beginning January 1, 2030.

California Green Building Standards

The focus of green building standards is to improve environmental performance within the framework of the California Building Code. The 2019 Building Energy Efficiency Standards (2019 Standards), adopted in May 2018, addressed four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to the exterior and vice versa), residential and nonresidential ventilation requirements, and non-residential lighting requirements. The 2019 Standards required new residential and non-residential construction; as well as major alterations to existing structures, to include EV-capable parking spaces which have electrical panel capacity and conduit to accommodate future installation. In addition, the 2019 Standards also required the installation of PV systems for low-rise residential dwellings, defined as single-family dwellings and multi-family dwellings up to three-stories in height.

Short-Lived Climate Pollutant Reduction Strategy

In March 2017, the ARB adopted the *Short-Lived Climate Pollutant Reduction Strategy* (*SLCP Strategy*) establishing a path to decrease GHG emissions and displace fossil-based natural gas use. Strategies include avoiding landfill methane emissions by reducing the disposal of organics through edible food recovery, composting, in-vessel digestion, and other processes; and recovering methane from wastewater treatment facilities, and manure methane at dairies, and using the methane as a renewable source of natural gas to fuel vehicles or generate electricity. The *SLCP Strategy* also identifies steps to reduce natural gas leaks from oil and gas wells, pipelines, valves, and pumps to improve safety, avoid energy losses, and reduce methane emissions associated with natural gas use. Lastly, the *SLCP Strategy* also identifies measures that can reduce HFC emissions

at national and international levels, in addition to State-level action that includes an incentive program to encourage the use of low-GWP refrigerants, and limitations on the use of high-GWP refrigerants in new refrigeration and air-conditioning equipment (ARB 2017).

Regional and Local

San Luis Obispo County Air Pollution Control District

SLOAPCD is a local public agency with the primary mission of realizing and preserving clean air for all county residents and businesses. Responsibilities of the SLOAPCD include, but are not limited to, preparing plans for the attainment of ambient air quality standards, adopting and enforcing rules and regulations concerning sources of air pollution, issuing permits for stationary sources of air pollution, inspecting stationary sources of air pollution and responding to citizen complaints, monitoring ambient air quality and meteorological conditions, and implementing programs and regulations required by federal and state regulatory requirements.

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

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

City of Paso Robles Climate Action Plan

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

Significance Thresholds

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

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

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

In accordance with SLOAPCD recommendations, the proposed project would be considered to be consistent with the State's carbon neutrality goals and would be considered to have a less than significant impact if: 1) the project is deemed consistent with regional VMT-reduction targets; 2) the project incorporates best management practices (BMPs) to support the State's GHG-reduction

efforts; and 3) the project would not result in a wasteful, inefficient, or unnecessary energy use as determined by the analysis required under Public Resources Code Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

The SLOAPCD has not identified recommended BMPs for development projects. However, other air districts in the State have recently released BMP-related guidance for the evaluation of GHG impacts. For instance, the Bay Area Air Quality Management District (BAAQMD) has recently released recommended GHG significance thresholds that are based on a "fair share" approach for achieving carbon neutrality goals and to ensure consistency with the State's GHG-reduction efforts, including the State's Climate Change Scoping Plan. Accordingly, the BAAQMD recommends that the installation of natural gas infrastructure for development projects be prohibited to the extent that alternatively powered options are available. Similarly, the SMAQMD has also recently released BMPs, which also discourage the installation of natural gas infrastructure for development projects as well as a requirement that projects meet current CalGreen Tier 2 standards for electric-vehicle (EV) spaces, except that EV-capable spaces shall instead be EV ready. This additional requirement requires the installation of electrical infrastructure sufficient to service the future installation of EV chargers. The BAAQMD and SMAQMD thresholds are based on an approach endorsed by the Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015). Although not located within these jurisdictions, development in San Luis Obispo County and associated GHG emissions are comparable to those generated by developments within other areas of the state, including the BAAQMD and SMAQMD jurisdictions. Given that climate change is inherently a cumulative impact that occurs on a global scale, these BMPs would, likewise, be considered representative of the project's "fair share" of what would be required to meet the State's long-term climate goals, including achieving carbon neutrality by 2045 and ensuring consistency with the State's Climate Change Scoping Plan. It is also important to note that the CARB 2022 Scoping Plan states that under the Lead Agency's discretion with supporting evidence projects that incorporate some but not all key attributes could be found by the lead agency as being consistent with the State's Scoping Plan. Project-related operational GHG impacts were assessed based on consistency with applicable GHG reduction plans. Refer to Appendix A for emissions modeling assumptions and results.

Emissions associated with the construction of the proposed project were calculated using CalEEMod, version 2022.1.1.28, computer program. Project construction is anticipated to occur over an approximately 24-month period beginning in December 2024. Construction phase durations were based on the provided information. No existing structure would be demolished. Based on information provided by the project proponent, no fill will be imported or exported. Additional construction information such as off-road equipment use, worker vehicle trips, and equipment load factors were based on default parameters contained in the model. Construction-generated GHG emissions attributable to the proposed project are presented for informational purposes. Refer to Appendix A for emissions modeling assumptions and results. Long-term operational emissions were calculated using the CalEEMod, version 2022.1.1.28 for opening year 2025 and future year 2030 conditions. Mobile-source emissions were calculated based on vehicle trip-generation rates derived from the traffic analysis prepared for this project. Area source and energy use-related emissions were calculated based largely on default parameters contained in CalEEMod for San Luis Obispo County. Operational GHG emissions attributable to the proposed project are presented for informational purposes. Project-related operational GHG impacts were assessed based on consistency with applicable GHG reduction plans. Emission modeling files are provided in Appendix A.

a. Generation of Greenhouse Gas Emissions. *Less Than Significant Impact with Mitigation.* Estimated GHG emissions attributable to future development would be primarily associated with increases in CO2 from mobile sources. To a lesser extent, other GHG pollutants, such as CH4 and N2O, would also be generated. Short-term and long-term GHG emissions associated with the development of the proposed project are discussed in greater detail, as follows:

Short-term Construction GHG Emissions

Estimated increases in GHG emissions associated with the construction of the proposed project are summarized in Table 9. Based on the modeling conducted, construction-related GHG emissions would total approximately 820 MTCO2*e*. Amortized GHG emissions, when averaged over the assumed 30-year minimum life of the project, would total approximately 27.3 MTCO2*e*/year. There would also be a small amount of GHG emissions from waste generated during construction; however, this amount is speculative. Actual emissions may vary, depending on the final construction schedules, equipment required, and activities conducted. Amortized construction-generated GHG emissions are included in the operational GHG emissions impact discussion provided below.

The project as proposed does not include BMPs that would constitute its "fair share" of what would be required to meet the State's long-term climate goals, including achieving carbon neutrality by 2045. Specifically, the project as proposed does not prohibit the installation of natural gas-fueled appliances/equipment, nor require that current CALGreen Tier 2 compliant EV spaces be *EV Ready*, as opposed to *EV Capable*. As a result, this impact would be considered *potentially significant but mitigable*, with mitigation directed toward incorporating BMPs to support the State's GHG-reduction efforts, and reducing wasteful, inefficient or unnecessary energy use.

Table 9. Construction-Generated GHG Emissions

Construction Year	GHG Emissions ($MTCO_2e$/Year)
2024	34
2025	580
2026	206
Total Construction Emissions:	820
Amortized Construction Emissions:	27.3
Amortized emissions are quantified based on a minimum 30-year project life. Refer to Appendix A for modeling assumptions and results.	

Long-term Operational GHG Emissions

For informational purposes, estimated long-term increases in GHG emissions associated with the proposed project for the year 2025 and future year 2030 conditions are summarized in Table 10. As depicted, operational GHG emissions for the proposed project, with the inclusion of amortized construction GHGs, would total approximately 963.3 MTCO2*e* /year under operational year 2025 conditions and approximately 953.7 MTCO2*e* under operational year 2030 conditions. A majority of the operational GHG emissions would be associated with motor vehicle use, energy use, and refrigerant. To a lesser extent, operational GHG emissions would also be associated with solid waste generation and water use.

As previously discussed, the proposed project would be consistent with the regional VMT-reduction targets. However, the proposed project does not include BMPs that would constitute its "fair share" of what would be required to meet the State's long-term climate goals, including

achieving carbon neutrality by 2045. Specifically, the project as proposed does not prohibit the installation of natural gas-fueled appliances/equipment, nor require that current CALGreen Tier 2 compliant EV spaces be *EV Ready*, as opposed to *EV Capable*. As a result, this impact would be considered *potentially significant but mitigable*, with mitigation directed toward incorporating BMPs to support the State's GHG-reduction efforts, and reducing wasteful, inefficient or unnecessary energy use.

Table 10. Operational GHG Emissions

Operational Year/Source	GHG Emissions ($MTCO_2e$/Year)	
	Opening Year 2025	Future Year 2030
Mobile[1]	100	90.4
Area Source[2]	22.5	22.5
Energy Source	556.0	556.0
Water[3]	33.7	33.7
Waste[4]	58.8	58.8
Refrigerant[5]	165	165
Amortized Construction Emissions:	27.3	27.3
Total Emissions:	963.3	953.7

1. *Based on default fleet mix for land uses contained in CalEEMod for San Luis Obispo County.*
2. *Area sources include emissions associated primarily with consumer products and the use of landscape maintenance equipment.*
3. *Includes use of low-flow water fixtures and water-efficient irrigation systems, per current building code requirements.*
4. *Based on an average annual waste diversion/recycling rate of 50% based on statewide averages.*
5. *Reduced service leak emissions.*
6. *Includes energy efficient appliance and as per Mitigation Measure GHG-1 does not include emissions associated with natural gas*

Refer to Appendix A for modeling assumptions and results.

Mitigation Measures

Implement Mitigation Measures AQ-2, AQ-3 (described in Section III.b.) and the following:

Mitigation Measure GHG-1. GHG Reduction Measures. The project shall include the following mitigation measures:

a. CALGreen Tier 2 compliant electric vehicle (EV) charging stations shall be "EV Ready" as opposed to "EV Capable."

b. Install electrically powered appliances and building mechanical equipment in place of natural-gas-fueled equipment. If natural gas equipment is to be installed, the following shall be implemented: (1) Install electrical service to the natural gas equipment location sufficient to allow for the future conversion from natural gas to electrical service; (2) A Greenhouse Gas (GHG) Reduction Plan shall be prepared for the proposed project. The GHG Reduction Plan shall include a menu of all possible onsite GHG reduction measures sufficient to offset operational natural-gas source emissions. In the event that the City of Paso Robles (City) adopts an updated Climate Action Plan or the San Luis Obispo County Air Pollution Control District (SLOAPCD) releases updated recommended GHG significance thresholds that address future-year GHG emissions reductions, the GHG-Reduction Plan may be evaluated in comparison to the GHG thresholds and reduction measures identified in the Climate Action Plan or those identified by the SLOAPCD and adjusted in order for the project to be in compliance with the Climate Action Plan. The GHG Reduction plan shall be approved by the City prior to issuance of building construction permits.

Under California Environmental Quality Act Guidelines Section 15126.4(c)(3) and (c)(4), respectively, a project's GHG emissions may also be reduced by offsite measures, including offsets that are not otherwise required by existing regulations and measures that sequester GHGs. In the event that feasible onsite GHG-reduction measures are insufficient to offset operational natural-gas source GHG emissions, offsite mitigation measures may be included to the extent feasible. Offsite mitigation measures may include "Direct Reduction Activities" located in the City of Paso Robles or the SLOAPCD jurisdictional areas. "Direct Reduction Activities" means undertaking or funding activities that will reduce or sequester GHG emissions. GHG reduction credits shall achieve GHG emission reductions that are real, permanent, quantifiable, verifiable, and enforceable. GHG reduction credits shall be undertaken for the specific purpose of reducing project-generated GHG emissions and shall not include reductions that would otherwise be required by law. All Direct Reduction Activities and associated reduction credits shall be confirmed by an independent, qualified third-party air consultant retained by the Applicant.

c. The project shall provide organic waste pick up and shall provide the appropriate on-site enclosures consistent with the provisions of the City of Paso Robles Development Standards for Solid Waste Services.

Significance After Mitigation

Implementation of Mitigation Measures AQ-2 and GHG-1 would reduce project-generated GHG emissions to ensure consistency with future year 2030 GHG-reduction targets. With mitigation, project-related activities would be considered consistent with the regional GHG-reduction planning efforts, which have been deemed consistent with State-wide GHG-reduction planning efforts.

Mitigation Measure GHG-1 would require the installation of EV-ready parking spaces in support of the State's carbon neutrality goals. With regard to CALGreen EV parking requirements, "EV Capable" is defined as including the installation of a "raceway" (the enclosed conduit that forms the physical pathway for electrical wiring to protect it from damage) and adequate future installation of a dedicated branch circuit and charging station(s). "EV Ready" includes "EV Capable" requirements plus the addition of dedicated branch circuit(s) (electrical pre-wiring), circuit breakers, and other electrical components, including a receptacle (240-volt outlet) or blank cover needed to support future installation of one or more charging stations. Mitigation has also been included to promote the use of electrically powered appliances/equipment (as opposed to natural gas-fueled appliances/equipment) and to reduce waste per applicable City development standards. It is important to note that, as currently proposed, natural gas service to the project site is not anticipated. Implementation of Mitigation Measure GHG-1c would help to reduce GHG emissions associated with waste generation. Mitigation Measure AQ-2 would help to reduce GHG emissions associated with construction-related activities, including short-lived climate pollutants, such as black carbon. Mitigation Measure AQ-3 includes various measures that would help to reduce operational emissions of GHGs, including those associated with the proposed hotel (see AQ-3w, AQ-3x, and AQ-3y). With mitigation, the project would be considered consistent with the local, regional, and state GHG- reduction planning efforts. With mitigation, this impact would be considered *less than significant.*

b. Consistency with Adopted Plans. *Less Than Significant Impact with Mitigation.* As noted in Table 10, operational GHG emissions attributable to the proposed project and related off-site utilities would be primarily associated with energy use, refrigerant emissions, and mobile sources. Applicable GHG-reduction plans related to reducing operational GHG emissions are the *County of San Luis Obispo's Regional Transportation Plan/Sustainable Communities Strategy,* ARB's *2022 Climate Change Scoping Plan,* and the *City of Paso Robles CAP*. The project's consistency with these plans is discussed in greater detail, as follows:

City of Paso Robles Climate Action Plan
The City's Climate Action Plan is a long-range plan to reduce GHG emissions from City government operations and community activities within the community. The City's Climate Action Plan includes numerous measures to reduce GHG emissions associated with energy use, motor vehicle use, water use, waste generation, and construction. It is important to note, however, that the City's Climate Action Plan is based on year 2020 GHG-reduction targets and has not yet been updated to reflect year 2030 GHG-reduction targets, per SB 32. Nonetheless, a summary of the proposed Project's consistency with the measures identified in the City's Climate Action Plan are summarized in Table 11. As noted, and with implementation of proposed mitigation measures, the project would be consistent with the GHG-reduction measures identified in the City's currently adopted Climate Action Plan (City of Paso Robles 2013).

County of San Luis Obispo 2023 Regional Transportation Plan/Sustainable Communities Strategy
The 2023 RTP was adopted by the SLOCOG Board in June 2023. The RTP includes the region's SCS, which outlines how the region will meet or exceed its GHG reduction targets as required by SB 375 through the promotion of a variety of transportation demand management & system management tools and techniques to maximize the efficiency of the transportation network. Consistency with the requirement of SB 375 ensures consistency with the GHG-reduction targets set by ARB. The 2023 SCS was found to be consistent with the requirement of SB 375 and is also consistent with the general plans of the region's jurisdictions (SLOCOG 2023). Based on the VMT analysis prepared for the project, project-generated VMT would not exceed the City's VMT significance threshold (CCTC 2024). As a result, the project would not be considered to conflict with regional VMT-reduction efforts.

California's 2022 Climate Change Scoping Plan
The previously adopted 2017 Climate Change Scoping Plan incorporated the State's GHG emissions reduction target of 40 percent below 1990 emissions levels by 2030, as mandated by SB 32. On November 16, 2022, the ARB approved the 2022 Scoping Plan for Achieving Carbon Neutrality. The recently adopted 2022 Scoping Plan continues the path to achieve the SB 32 2030 target and expands upon earlier Scoping Plans by targeting an 85 percent reduction in GHG below 1990 levels by 2045. A significant part of achieving the SB 32 goals are strategies to promote sustainable communities, such as the promotion of zero net energy buildings, and improved transportation choices that result in reducing VMT. Other measures include the increased use of low-carbon fuels and cleaner vehicles (ARB 2022).

Table 11. Project Consistency with City's Climate Action Plan

Climate Action Plan Measures	Project Consistency
Energy Measures	
Does the project exclusively include "All-electric buildings"?	**Consistent with Mitigation**. A mitigation measure has been included to encourage the installation of electrically-powered appliances in place of natural gas to the extent possible. Where natural gas service for equipment is required, electrical service to the equipment shall also be required to promote the future conversion from natural gas to electrical service. In addition, mitigation has also been included to require the installation of infrastructure to facilitate the future installation of alternative energy sources, such as the installation of photovoltaic systems (refer to Mitigation Measure GHG-1).
If the project/plan includes a new mixed-fuel building or buildings (plumbed for the use of natural gas as fuel for space heating, water heating, cooking, or clothes drying appliances) does that building/those buildings exceed the City's Energy Reach code?	
Transportation and Land Use Measures	
Does the project comply with requirements in the City's Municipal Code with no exceptions, including bicycle parking, bikeway design, and EV charging stations?	**Consistent with Mitigation**. The project is not located near public transit. Mitigation measures have been included to require shuttle service to and from the downtown transit station and EV-Ready charging stations.
Is the estimated project-generated VMT within the City's adopted thresholds, as confirmed by the City's Transportation Division?	**Consistent**. Based on the traffic analysis prepared for this project, project-generated VMT is within the City's adopted thresholds.
If "No", does the project/plan include VMT mitigation strategies and/or a Transportation Demand Management (TDM) Plan approved by the City's Transportation Division?	
Does the project demonstrate consistency with the City's Bicycle Network Plan?	**Not Applicable**. The project is not located along an existing or planned City bicycle route.
Off-Road Measure	
Will the project work to reduce GHG emissions by reducing off-road equipment and vehicle usage and idling?	**Consistent with Mitigation**. Mitigation measures have been included to require the project to restrict idling and vehicle usage when feasible and to use alternatively-powered equipment where possible (refer to Mitigation Measure AQ-2).
Water Measure	
Does the project comply with water efficiency and conservation requirements?	**Consistent with Mitigation**. A mitigation measure has been included to require the use of low-flow water fixtures, water-efficient irrigation systems, and drought-tolerant landscaping (refer to Mitigation Measure AQ-3).
Waste Measure	
Does the project include an operational commitment to reduce the amount of trash and other waste and recycle as many materials as possible?	**Consistent.** The project shall provide organic waste pick up and shall provide the appropriate on-site enclosures consistent with the provisions of the City of Paso Robles Development Standards for Solid Waste Services (refer to Mitigation Measure GHG-1).
Tree Planting Measure	
Does the project include an operational commitment to maintain a healthy urban forest and incorporate native drought-tolerant trees?	**Consistent with Mitigation**. Mitigation measures have been included to require the installation of trees and drought-tolerant landscaping (refer to Mitigation Measure AQ-3).

For land use development projects, additional reductions in GHG emissions may be required to meet the project's fair share of the statewide reductions required to achieve carbon neutrality, consistent with EO B-55-18 and ARB's Draft 2022 Scoping Plan Update. Neither the SLOAPCD nor the City have developed recommended thresholds of significance that are based on achieving carbon neutrality by the year 2045. However, the Bay Area Air Quality Management District (BAAQMD) has recently released recommended GHG significance thresholds that are based on a "fair share" approach for achieving carbon neutrality goals. Consistent with this approach, new land use development projects would be considered to be consistent with the State's carbon neutrality goals and would be considered to have a less-than-significant impact if: 1) the project is deemed consistent with regional VMT-reduction targets; 2) the project prohibits the installation of natural gas infrastructure (to the extent that alternative power sources are available); and 3) the project would not result in a wasteful, inefficient, or unnecessary energy use as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA

Guidelines. Similarly, the SMAQMD has also recently released Best Management Practices (BMPs), which also include the prohibited installation of natural gas infrastructure for development projects, as well as a requirement that projects meet current CALGreen Tier 2 standards for EV spaces, except that *EV-capable* spaces shall instead be *EV ready*. This additional requirement requires the installation of electrical infrastructure sufficient to service the future installation of EV chargers. The BAAQMD and SMAQMD thresholds are based on an approach endorsed by the Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015). Although not located within these jurisdictions, development in San Luis Obispo County and associated GHG emissions are comparable to those generated by developments within other areas of the state, including the BAAQMD and SMAQMD jurisdictions. Given that climate change is inherently a cumulative impact that occurs on a global scale, these BMPs would, likewise, be considered representative of the project's "fair share" of what would be required to meet the State's long-term climate goals, including achieving carbon neutrality by 2045, as identified by the BAAQMD and the SMAQMD.

As noted above, the proposed project would be consistent with the regional VMT-reduction targets, which is a key factor in determining that the project's impacts would be less than significant. However, it is unclear whether the project as proposed includes BMPs that would constitute its "fair share" of what would be required to meet the State's long-term climate goals, including achieving carbon neutrality by 2045. Specifically, the project does not prohibit the installation of natural gas-fueled appliances/equipment, nor require that current CALGreen Tier 2 compliant EV spaces be *EV Ready*, as opposed to *EV Capable*. With mitigation to address required BMPs, this impact would be considered *less than significant.*

Mitigation Measures

Implement Mitigation Measures AQ-2, AQ-3 (described in Section III.b), and GHG-1 (described under Section VIII.a.). Please refer to the mitigation measures described following the discussion of impacts related to short-term and long-term GHG emissions.

Significance After Mitigation

Please refer to the discussion of Significance After Mitigation following the discussion of impacts related to short-term and long-term GHG emissions. With mitigation, impacts would be reduced to a *less than significant* level.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS - Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
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?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
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?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?			X	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

On-Site Project Development and Off-Site Utilities Improvements

a. Hazardous Materials Transport. *Less Than Significant Impact.* The projected uses would be non-industrial in nature, and more consistent with residential and visitor-serving commercial uses. No use or transport of hazardous materials is anticipated. The proposed project would not create a significant hazard to the public or the environment through the routine transportation, use, or disposal of hazardous materials as no hazardous materials are associated with the proposed project. Off-site utilities would not require the transport of hazardous materials to facilitate their construction or use. Therefore, the potential impacts would be less than significant. No mitigation is required. (Source: 1)

b. Risk of Upset. *Less Than Significant Impact.* The projected uses would be non-industrial in nature, and more consistent with residential and visitor-serving commercial uses. No use or transport of hazardous materials is anticipated. The proposed project would not result in hazardous emissions or involve the handling of hazardous or acutely hazardous materials, substances, or waste. The proposed project has a less than significant potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment due to state and local requirements. Off-site utilities would not require the transport of hazardous materials to facilitate their construction or use, so no risk of upset is anticipated. Therefore, the potential impacts would be less than significant impact. (Sources: 1)

c. Hazard Release Near Schools. Neither the project site nor the off-site utilities improvements would be located within one-quarter mile of an existing or proposed school. The nearest school is Winifred Piper Elementary School, located at 1350 Creston Road, about 2.9 miles southwest of the project site. No impact would occur.

d. Hazards List. *No Impact.* Neither the project site nor the site of off-site utilities improvements are on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impact related to this issue would occur (Sources: 1)

e. Airport Safety Hazards. *Less Than Significant Impact.* Projects within close proximity to an airport have the potential to expose people to excessive noise hazard from aircraft activity. The project site is located about one mile south of the Paso Robles Municipal Airport. According to the Airport Land Use Plan (ALUP) for the Paso Robles Municipal Airport, a large majority of the project site is located in Safety Zone 5 with a small area along Mill Road in Safety Zone 6 (Source: 17).

Based on the Paso Robles Municipal Airport Land Use Compatibility Matrix, Aircraft Fuel, Aircraft Sales and Aircraft Repairs, and Flying Schools are the only prohibited land uses within Zones 5 or 6. All other land uses, such as those proposed, are considered to be compatible land uses, and do not present a significant risk to the safety of persons on the ground or to persons in aircraft overlying the proposed use. (Source: 17)

The entire project site is located outside the 55 decibel (dB) community noise equivalent level (CNEL) airport noise contour. There are no incompatibility issues with respect to noise anticipated as a result of the proposed project. Project construction workers and occupants of proposed land uses would not be subject to excessive noise, and impacts would be less than significant.

Off-site utilities improvements would not be subject to airport safety hazards. No impact with respect to these improvements would occur.

f. Interference with Emergency Response or Evacuation. *Less Than Significant Impact.* No breaks in utility service to the surrounding properties would occur as a result of project construction. Any construction-related temporary road closures and associated detours would include proper signage, designate alternate routes (if necessary), and notification and would be short-term and limited in nature and duration. During operation, the project would generate trips that would result in an incremental increase in vehicle traffic along SR 46E in the event of an evacuation. However, due to the low density of residential uses within the project vicinity and proximity to a major highway (SR 46E), vehicle traffic contributed by the project during emergency evacuations would not be substantial enough to impair evacuation of the area. Therefore, potential impacts associated with impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan would be *less than significant*.

Off-site utilities improvements would not interfere with emergency response. No impact with respect to these improvements would occur.

g. Wildland Fire Hazard. *Less than Significant Impact.* Regulations pertaining to wildfires include provisions set forth by the California Fire Code, California Building Code, the City of Paso Robles Safety Element, the City Fire Department, and the City of Paso Robles Local Hazard Mitigation

Plan. According to the City's Safety Element, the proposed project site is not located within an identified High Fire Hazard Area or within an area susceptible to wildfires. This conclusion is confirmed by the most recent Fire Hazard Severity Map adopted by San Luis Obispo County in March 2025.

All proposed resort accommodations will meet City fire code requirements, including the installation of smoke alarms and automatic fire sprinkler systems to provide both early warning to occupants and protection against the growth of fires initiating within the buildings. All proposed development components associated with the project would be required to comply with all applicable fire safety rules and regulations including the California Fire Code and Public Resources Code prior to issuance of building permits. Access to the Resort site will be through all-weather roads and pathways, and fully accessible to all emergency personnel vehicles and equipment.

In addition, the project design will help mitigate wildland fire risk. About half of the entire project area already includes a developed and fully irrigated golf course. The golf course itself provides significant fire breaks throughout the site. In the event of a wildland fire in the vicinity, the developed nature of the golf course will assist in slowing down fire spread. Moreover, the Casitas will be dispersed over the property in a manner that produces wide distances between buildings (from 10 to 50 feet apart). The separation of the Casitas units would limit the fire exposure hazard each building presents to its neighbor and reduces the chances of an isolated structure fire growing to a multi-building conflagration. This would reduce the risk to the site structures from an attacking wildfire and reduces the chance of an out- of-control structure fire initiating on site and causing an escaping wildfire. Impacts related to wildland fires would be *less than significant*.

Off-site utilities improvements would not be subject to wildland fire hazard. No impact with respect to these improvements would occur.

Mitigation Measures

None required.

Significance After Mitigation

Impacts would be less than significant.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY - Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?		X		
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X
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:			X	
i. result in substantial erosion or siltation on- or off-site?		X		
ii. substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?		X		
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?		X		
iv. impede or redirect flood flows?			X	
d) In flood hazard, tsunami or seiche zones, rick release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?		X		

On-Site Project Development

a. Water Quality Standards. *Less Than Significant Impact.* The project would involve grading and construction, which, through potential waste discharge, has the potential to impact water quality of surface and groundwater resources, notably nearby Huer Huero Creek. However, the project will be required to comply with federal, state, and local regulations that address surface water and groundwater resources and their associated water quality for the protection of watersheds, floodplains, and water quality. These agencies regulate surface water and groundwater so that identified beneficial uses are not impaired. Water quality regulations are designed to limit the discharge of pollutants into the environment, maintain surface water and groundwater quality, protect fish and wildlife and their habitats, and protect beneficial uses.

Key regulations include the Federal Clean Water Act, State of California Porter-Cologne Water Quality Control Act, and various local controls.

The protection of water quality within San Luis Obispo County, including the City of Paso Robles, is under the jurisdiction of the Central Coast Regional Water Quality Control Board (RWQCB). The Central Coast RWQCB establishes discharge requirements and limitations to maintain water quality objectives identified in the Water Quality Control Plan for the Central Coast Basin (Basin Plan; RWQCB 2019). The Central Coast RWQCB identifies 20 categories of beneficial uses. Each body of water in the state has a set of beneficial uses, each of which requires different water quality

control. Each beneficial use has a set of water quality objectives designed to protect that use (RWQCB 2019).

The City has enrolled in the SWRCB Waste Discharge Requirements (WDRs) for Small MS4s (Order No. 2013-0001-DWQ) and the NPDES General Permit No. CAS000004 (general permit). As required by this general permit, the City adopted its Stormwater Control ordinance, which regulates the entry of pollutants and non-stormwater discharges into the city storm drain system. The requirements are set forth in the City's Municipal Code Chapter 14.20 Storm Water Control, and include the following provisions:

- Construction activities must comply with the statewide general construction permit, which is applicable to construction sites of 1 acre or more.
- Any construction activity requiring a grading permit, regardless of size, must prepare and submit a site-specific erosion and sediment control plan.
- Industrial and commercial activities must comply with the statewide general permit for industrial activities.
- All new development must comply with the post-construction stormwater management requirements in Section V, design guidelines, of the city Public Works standard details and specifications. Those requirements reference the Low Impact Development (LID) guidelines as developed by the Central Coast RWQCB or other performance standards that may superseded them.
- Land uses involving specific pollutant-generating activities identified in the Municipal Code must implement permanent and operation source control measures consistent with BMPs.

The City is also enrolled in the Phase II Municipal Stormwater Program as required by SWRCB. The program requires the City to develop and implement a Stormwater Management Plan (SWMP) to reduce or eliminate pollutants in stormwater runoff and non-stormwater discharges.

The City's General Plan also addresses hydrology and water quality issues through implementation of its policies and programs, as included in the Land Use, Conservation and Safety Elements.

As described in the preliminary stormwater control plan for the project, the project will implement Low Impact Development (LID) design strategies, consistent with SWRCB WDRs. These include:

1. Optimization of Site Layout
    a. *Preservation of natural drainage features*. Existing drainage features will be preserved to the extent feasible. Existing USFWS wetland areas will be left untouched, and existing drainage channels will be maintained.
    b. *Minimization of imperviousness*. Most proposed roadways will be surfaced with all-weather gravel, in lieu of asphalt or concrete. For calculations, the gravel was assumed to be impervious. Additionally, 2 and 3-story buildings are being proposed onsite to minimize impervious.
    c. *Use of drainage as a design element*. Existing drainage patterns will be maintained. Intermediate bioretention basins and swales will be incorporated upstream of the existing drainage basin to provide treatment. Bioretention features have been designed to mimic existing topography to make them blend in.

2. Dispersal of Runoff to Pervious Areas. Most of the site will remain pervious. Proposed impervious areas will be drained to pervious bioretention features for treatment.

3. Stormwater Control Measures. The development is proposing to construct multiple bioretention features to satisfy the applicable post-construction stormwater requirements. The existing drainage basin will be utilized for flood control purposes only, no treatment.

In addition the project application includes a grading and drainage plan that includes the following elements:

1. All clearing, grubbing, site preparation, over-excavation, earthwork, engineered fill, geotextile material and material testing will be in compliance with the project's geotechnical engineering report;
2. Approximately 72,900 cubic yards (cy) of cut and 31,900 cy of fill, resulting in a net of 41,000 cy of cut material, which will be dispersed onsite in possible fill areas; and
3. A total of 32.7 acres would be disturbed as a result of these activities.

The project proponent would be required to obtain a National Pollutant Discharge Elimination System (NPDES) General Construction permit, which includes a Stormwater Prevention Pollution Plan (SWPPP) to address erosion and discharge impacts associated with the proposed on-site grading. Best Management Practices (BMPs) will be identified in the SWPPP and implemented to reduce impacts to surface water from construction or stormwater discharges. BMPs utilized during the construction phase may include the use of gravel bags, silt fences, hay bales, check dams, hydroseed, and soil binders. The WQMP is required to be incorporated by reference or attached to the project's SWPPP as the Post-Construction Management Plan.

The project is compelled to comply with all federal, state and local water quality standards and waste discharge requirements addressing stormwater runoff and nuisance drainage onsite, and post-construction erosion and discharge impacts. The project would also be subject to the requirements of the project's SWPPP, but it has not yet been prepared. As such, the impacts are considered potentially significant until such time as the SWPPP's contents are defined and prepared, which is included as a mitigation measure to address this impact. Potential impacts would be *less than significant with mitigation*. (Sources: 1, 20)

Mitigation Measure

Mitigation Measure HYD-1. Storm Water Pollution Prevention Plan. Prior to the issuance of grading permits or building permits, the Applicant shall prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) according to General Permit Order 2009-0009 for approval by the City of Paso Robles (City) Public Works Department and the Central Coast Regional Water Quality Control Board (RWQCB). The SWPPP shall include best management practices (BMPs) to reduce erosive and polluted runoff during all phases of project construction. BMPs shall be approved by the City and Central Coast RWQCB along with the SWPPP. BMPs may include, but are not limited to, erosion and sediment controls and vehicle and equipment monitoring and maintenance, as identified below:

1. Erosion and sediment controls, including silt fences, straw wattles, berms, sediment basins, runoff diversions, or other erosion control measures approved by the Central

Coast RWQCB shall be installed properly to increase effectiveness of the SWPPP and shall be maintained regularly during the project's construction.

2. Construction equipment and vehicles shall be checked and maintained daily by the construction contractors to prevent spills of fuel, oil, and other hazardous materials. A designated staging area shall be established on the project site for construction vehicle and equipment parking and storage of fuel, lubricants, and solvents. Any staging areas for the offsite improvements that cannot be accommodated onsite shall be located a minimum of 50-feet from Huer Huero Creek. All fueling and maintenance activities shall take place in the designated staging area(s).

Compliance with the SWPPP during project construction shall be monitored by the City's Public Works Department during all construction phases.

Significance After Mitigation

Impacts would be less than significant with the implementation of required mitigation.

b. Groundwater Supplies. *No Impact.* The Project will be served by water main extensions necessary to supply water service to the project via connections to existing City water main lines in Union Road and in Mill Road, which will be dedicated to the City. The project will also install a private on-site water booster station to handle on-site domestic and fire delivery needs. Provisions for on-site recycled water will be included in the proposed project in anticipation of City services in this area being available. At such time, blending of recycled water with existing groundwater sources will be done to provide irrigation to the existing golf course. This approach will offset some existing groundwater use associated with the golf course, so the impact to groundwater resources is potentially beneficial. *No impact* to groundwater resources is anticipated.

c. Drainage Patterns and Erosion. *Less Than Significant Impact.* A total of nine ephemeral drainages, three swales, and a pond were identified within the project area (Source: 6). Some of the drainages flow to or are tributaries of Dry Creek (see Appendix B of this Initial Study, Figure 5: Hydrologic Resources, included in Appendix A of that report). There is potential for grading and construction activities to temporarily alter these existing drainage features onsite if there is soil discharge to them. The temporary alteration of these features may result in an increase of erosion and siltation at the project site during construction activities, which has the potential to result in downstream erosion impacts if not mitigated. Impacts are *potentially significant but mitigable.*

Mitigation Measure

Mitigation Measures HYD-1, BIO-15, and BIO-16 are required to address potential erosion-related impacts to Huer Huero Creek.

Significance After Mitigation

Impacts would be less than significant with the implementation of required mitigation.

d. Impacts related to Redirecting Flood Flows. *Less than Significant Impact.* The proposed project site is not located within an area identified as a 100-year floodplain. Because the proposed project

is not located within an area identified as being subjected to flood hazards by the Federal Emergency Management Agency, placement of structures within a flood hazard area would not occur and would not impede or redirect flood flows. Therefore, no impact related to this issue would occur and no mitigation is required.

The project would be subject to Central Coast RWQCB PCRs 1, 2, 3, and 4 for long-term stormwater control. A Stormwater Control Plan has been prepared for the project, to be approved prior to issuance of building permits and implemented to control long-term stormwater runoff. (Source: 20). The Stormwater Control Plan includes design strategies to retain a 95th percentile storm, which would ensure the increase in impervious surface area onsite does not result in flooding. Therefore, upon approval of the Stormwater Control Plan, the project would not result in a substantial increase in surface water runoff that could result in flooding and impacts would be *less than significant*.

e. Flood Hazard, Tsunami and Seiche. *No Impact.* According to FEMA FIRMs 06079CO425G (dated 11/16/2012) and 06079CO394H (dated 6/6/2024), the project site is located within Zone X, an area of minimal flood hazard (FEMA 2020). Based on the San Luis Obispo County Tsunami Inundation Maps, the project site is not located in an area with potential for inundation by a tsunami (CGS 2021). In addition, the project site and the offsite improvements areas are not located in an area that would be at risk of seiche. The project site is not located within an identified flood hazard, tsunami, or seiche zone; therefore, implementation of the project would not result in the risk of pollutant release due to project inundation. No impact would occur. (Source: 21)

e. RWQCB Standards. *Less Than Significant Impact.* The project would be required to comply with the Basin Plan, which aims to preserve and enhance water quality within the June 2019 Edition of the Central Coast Basin. The Basin Plan establishes specific water quality objectives for surface and groundwater resources. Project construction has the potential to increase temporary erosive and pollutant runoff from the site. Impacts are *potentially significant but mitigable*.

Mitigation Measure

Mitigation Measure HYD-1. (See description of this mitigation measure under Section X.a.)

Mitigation Measure HYD-1 requires the project to prepare a SWPPP with appropriate BMPs to be approved prior to issuance of building permits and to be implemented during project construction activities. Construction BMPs would avoid or minimize construction-related erosive or polluted runoff that could runoff and degrade surface water quality. Operation of the project would be required to comply with PCRs for stormwater runoff to reduce potential erosive or polluted discharge from entering the Salinas River. A Stormwater Control Plan has been prepared for approval, which outlines strategies to meet all PCRs. Wastewater for the project would be treated and disposed of using City facilities.

Upon implementation of Mitigation Measure HYD-1 and approval of the Stormwater Control Plan, runoff from construction and operational components of the project would be less than significant. In addition, the project would be required to comply with the Paso Basin GSP and Paso Robles Groundwater Basin Plan. As previously discussed, the project would not interfere with groundwater recharge at the site based on implementation of proposed stormwater detention facilities. As discussed in Section 4.14, Utilities/Service Systems and Energy, the project would not significantly decrease groundwater supply based on the City's diverse sources of water supply.

Therefore, the project would not result in groundwater use in manner that would conflict with the Paso Basin GSP, no mitigation would be required, and long-term impacts would be less than significant.

Significance After Mitigation

Impacts would be less than significant with the implementation of required mitigation.

Off-Site Utilities Improvements

a. Water Quality Standards. *Less Than Significant Impact.* Construction of off-site utilities would involve grading and construction on a limited basis, which, through potential waste discharge, has the potential to impact water quality of surface and groundwater resources, notably nearby Huer Huero Creek. However, the project will be required to comply with federal, state, and local regulations that address surface water and groundwater resources and their associated water quality for the protection of watersheds, floodplains, and water quality. These agencies regulate surface water and groundwater so that identified beneficial uses are not impaired. Water quality regulations are designed to limit the discharge of pollutants into the environment, maintain surface water and groundwater quality, protect fish and wildlife and their habitats, and protect beneficial uses.

Key regulations include the Federal Clean Water Act, State of California Porter-Cologne Water Quality Control Act, and various local controls. Please refer to the discussion under Item X.a. with respect to the proposed project for additional discussion of key regulations, which would also apply to the construction of off-site improvements.

Off-site improvements are compelled to comply with all federal, state and local water quality standards and waste discharge requirements addressing stormwater runoff and nuisance drainage onsite, and post-construction erosion and discharge impacts. These improvements would also be subject to the requirements of the project's SWPPP, but it has not yet been prepared. As such, the impacts are considered potentially significant until such time as the SWPPP's contents are defined and prepared, which is included as a mitigation measure to address this impact. Potential impacts would be *less than significant with mitigation*. (Sources: 1, 20)

Mitigation Measure

Mitigation Measure HYD-1 is required for the construction of off-site improvements.

Significance After Mitigation

Impacts would be less than significant with the implementation of required mitigation.

b. Groundwater Supplies. *No Impact.* The proposed utilities improvements will provide water main extensions necessary to supply water service to the project via connections to existing City water main lines in Union Road and in Mill Road, which will be dedicated to the City. *No impact* to groundwater resources is anticipated.

c. Drainage Patterns and Erosion. *Less Than Significant Impact.* There is potential for grading and construction activities associated with the off-site utilities improvements to result in soil

erosion, which could potentially discharge into Huer Huero Creek, which is generally downstream of the proposed improvements. Impacts to the creek related to erosion are *potentially significant but mitigable*.

Mitigation Measure

Mitigation Measures HYD-1, BIO-15, and BIO-16 are required to address potential erosion-related impacts to Huer Huero Creek.

Significance After Mitigation

Impacts would be less than significant with the implementation of required mitigation.

d. Impacts related to Redirecting Flood Flows. *Less than Significant Impact.* While the majority of the off-site utilities corridor is not located within an area identified as a 100-year floodplain, portions closest to Huer Huero Creek cross portions of the floodplain. However, the utilities will be designed to follow a siphon to cross the creek and would not present a profile that has the potential to redirect flood flows.

In addition, off-site utilities improvements would be subject to Central Coast RWQCB PCRs 1, 2, 3, and 4 for long-term stormwater control. As noted previously, a Stormwater Control Plan has been prepared for the project, to be approved prior to issuance of building permits and implemented to control long-term stormwater runoff. (Source: 20). The Stormwater Control Plan includes design strategies to retain a 95th percentile storm, which would ensure the increase in impervious surface area onsite does not result in flooding. Therefore, upon approval of the Stormwater Control Plan, the project, including off-site utilities, would not result in a substantial increase in surface water runoff that could result in flooding and impacts would be *less than significant*.

e. Flood Hazard, Tsunami and Seiche. *Less than Significant Impact.* According to FEMA FIRM 06079CO394H (dated 6/6/2024), portions of the proposed utilities corridor is located within Zone X, an area of minimal flood hazard (FEMA 2020), while the portion near Huer Huero Creek is located in Zone A, which is subject to 100-year flood hazard. However, the utilities will be designed to withstand flood hazard in the portion of corridor subject to flooding, as they will follow a siphon across the creek. Based on the San Luis Obispo County Tsunami Inundation Maps, proposed off-site improvements would not be located in an area with potential for inundation by a tsunami (CGS 2021). In addition, the offsite improvements areas are not located in an area that would be at risk of seiche. Potential impacts would be less than significant. (Source: 21)

e. RWQCB Standards. *Less Than Significant Impact.* Project-related activities, including off-site utilities improvements, would be required to comply with the Basin Plan, which aims to preserve and enhance water quality within the June 2019 Edition of the Central Coast Basin. The Basin Plan establishes specific water quality objectives for surface and groundwater resources. Project construction has the potential to increase temporary erosive and pollutant runoff from the site. Impacts are *potentially significant but mitigable*.

Mitigation Measures

Mitigation Measures HYD-1, BIO-15, and BIO-16 are required to address potential erosion-related impacts to Huer Huero Creek.

Significance After Mitigation

Impacts would be less than significant with the implementation of required mitigation.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING - Would the project:				
a) Physically divide an established community?				X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?		X		

On-Site Project Development and Off-Site Utilities Improvements

a. Physical Division of Established Communities. *No Impact.* The proposed project site is an area with existing golf course development and would provide resort amenities consistent with that development. As such, it does not divide an established community. Proposed off-site utilities are intended to serve future development and would not divide any existing or future community. *No impacts* would occur.

b. Plan and Policy Consistency. *Less Than Significant Impact.* The City of Paso Robles General Plan land use designation and zoning for the project development site are both Parks and Open Space (POS). The proposed resort development supports a recreational use (the existing golf course), and as such is consistent with the General Plan designation. Table 21.32-1 of the Paso Robles Zoning Code identifies "Commercial Recreation Facility – Outdoor" as a use allowed subject to a Conditional Use Permit. As the project is ancillary to and in support of an existing outdoor recreational facility (the golf course), the visitor-serving project is consistent with existing zoning, subject to conditions set forth by the City.

The proposed off-site utilities are not a land use but are intended to serve the development. As such, they are inherently consistent with future development envisioned under the General Plan.

Other sections of this Initial Study discuss the project's consistency with various federal, state and local land use regulations. Please refer to the sections of this Initial Study that address the following issues for further discussion of the project's consistency with applicable regulatory documents and related policies:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Public Services
- Recreation

- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

For certain issues, mitigation was required. As mitigated, the project is not in conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be *less than significant*.

Mitigation Measures

Please refer to mitigation measures set forth in the following sections of this Initial Study:

- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Transportation

Significance After Mitigation

Potential impacts related to plan and policy consistency would be less than significant with the implementation of required mitigation.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES - 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?				X
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?				X

On-Site Project Development and Off-Site Utilities Improvements

a. and b. Mineral Resources: *No Impact.* Based on the Mineral Resource Zones (MRZ) established by California Department of Conservation, neither the project site nor the proposed off-site utility corridor are located within an MRZ area. The California Department of Conservation is primarily interested in preservation of access to significant mineral resources in MRZ areas. There are no known mineral resources on the project site or within the utility corridor. No impacts would occur.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XIII. NOISE - 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?		X		
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	

On-Site Project Development and Off-Site Utilities Improvements

The noise analysis has been prepared based on a November 2023 report prepared by Ambient, which is attached as Appendix D to this Initial Study. The analysis included below summarizes the information in that report. (Source: 22)

The *City of Paso Robles General Plan Noise Element* was adopted in 2019. The General Plan Noise Element includes noise standards for determination of compatibility of newly proposed land uses in comparison to existing noise environments. Because the proposed project is a new land use it must satisfy the City's land use compatibility standards. The City's General Plan identifies quantitative noise standards for both transportation and non-transportation noise sources (i.e., stationary). The City's General Plan noise standards for non-transportation noise sources are consistent with those identified in the City's municipal code, as discussed below. With regard to transportation noise, the City's General Plan noise standard for new hotels is 65 dBA Ldn/CNEL for outdoor activity areas and 45 dBA Ldn/CNEL for interior spaces (City of Paso Robles 2019).

The City's municipal code identifies quantitative noise standards to be applied to interior and exterior noise levels. The exterior standards for hotels range from 70 to 80 dBA Lmax for instantaneous noise levels and 50 to 60 dBA Leq for average- hourly noise levels, depending on time of day. Likewise, interior noise standards for hotels range from 45 to 60 dBA Lmax and 35 to 45 dBA Leq. For residential land uses, these exterior noise standards are reduced by 5 dBA. (City of Paso Robles 2023).

The CEQA Guidelines do not define the levels at which temporary and permanent increases in ambient noise are considered "substantial." As discussed previously in this section, a noise level increase of 3 dBA is barely perceptible to most people, an increase of 5 dBA is readily noticeable, and a difference of 10 dBA would be perceived as a doubling of loudness. For purposes of this analysis, a significant increase in ambient noise levels would be defined as an increase of 5 dBA, or greater, that would exceed applicable noise standards.

It is important to note that no standardized criteria have been developed by the State of California or the City for assessing construction noise impacts. However, the Federal Transit Administration (FTA) has identified criteria for the assessment of construction-generated noise levels. For noise-sensitive land uses, such as residential land uses, the FTA criteria identify daytime and nighttime

average-hourly noise limits of 90 and 80 dBA Leq, respectively (FTA 2018). Short-term construction noise levels exceeding these levels would be determined to have a potentially significant impact.

Similarly, the CEQA Guidelines also do not define the levels at which groundborne vibration levels would be considered excessive. For this reason, California Department of Transportation (Caltrans) recommended groundborne vibration thresholds were used for the evaluation of impacts based on increased potential for structural damage and human annoyance, as identified in Table 6. No fragile or historic buildings were identified in the project area. For purposes of this analysis, risks of architectural damage (i.e., minor cracking of plaster walls and ceilings) would be considered potentially significant if construction-generated ground vibration levels at nearby structures would exceed 0.5 in/sec ppv. Ground vibration in excess of 0.2 in/sec ppv would be expected to result in a potential for significant short-term increases in levels of annoyance for occupants of nearby sensitive structures (e.g., residential dwellings).

a. Short-Term (Construction) and Long-Term (Traffic) Noise.

Short-Term Construction Noise Impacts

Short-term noise impacts associated with construction activities were analyzed in Ambient's November 2023 noise report based on typical construction equipment noise levels and distances to the nearest noise-sensitive land uses. Noise levels were predicted based on representative off-road equipment noise levels derived from the Federal Highway Administration's (FHWA) Roadway Construction Noise Model based on average equipment usage rates and assuming a noise-attenuation rate of 6 dB per doubling of distance from the source.

Construction noise typically occurs intermittently and varies depending upon the phase (e.g., land clearing, grading, excavation, and erection). Noise generated by construction equipment, including earthmovers, material handlers, and portable generators can reach high levels.

Construction noise typically occurs intermittently and varies depending upon the phase (e.g., land clearing, grading, excavation, and erection). Noise generated by construction equipment, including earthmovers, material handlers, and portable generators can reach high levels. Noise levels commonly associated with off-road equipment anticipated to be used during project construction are summarized in Table 12.

Table 12. Typical Construction Equipment Noise Levels

Equipment	Typical Noise Level (dBA) at 50 Feet from Source	
	L_{max}	L_{eq}
Air Compressor	78	74
Backhoe	78	74
Concrete Mixer	79	75
Crane, Mobile	81	73
Dozer	82	78
Grader	85	81
Loader	79	71
Paver	77	74
Roller	80	73
Saw	90	83

dBA = A-weighted decibels; L_{max} = Maximum sound level; L_{eq} = Equivalent sound level
Source: FHWA Roadway Construction Noise Model

As noted in Table 12, instantaneous noise levels generated by individual pieces of off-road equipment typically range from approximately 77 to 90 dBA Lmax at 50 feet. Typical operating cycles may involve 2 minutes of full power, followed by 3 or 4 minutes at lower settings. Based on typical off-road equipment usage rates, average hourly noise levels for individual equipment would be approximately 83 dBA Leq, or less, at 50 feet. Assuming that multiple pieces of equipment could be operating simultaneously, predicted average-hourly noise levels could reach levels of approximately 85 dBA at 50 feet.

The nearest noise-sensitive land uses located in the vicinity of the proposed project site include rural residential dwellings, which are located approximately 75 feet south of the proposed on-site development area. Depending on the location and types of onsite activities conducted, predicted noise levels at the nearest existing residences could potentially exceed an average-hourly noise limit of 80 dBA Leq without implementation of mitigation. With respect to the proposed off-site utilities corridor, the nearest residences are those closest to the project site identified above, and so potential construction impacts would be similar. Furthermore, with regard to residential land uses, activities occurring during the more noise-sensitive evening and nighttime hours could result in increased levels of annoyance and potential sleep disruption to occupants of nearby residential land uses. For these reasons, this impact would be considered *potentially significant without the implementation of mitigation*.

Mitigation Measures

Mitigation Measure N-1. Construction Noise Reduction. The following measures shall be implemented to reduce short-term construction-related noise impacts:

a. Noise sources associated with construction shall be limited to between 7 a.m. and 7 p.m. on weekdays. Construction activities shall be prohibited on Sundays and federal holidays.
b. Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.
c. When not in use, off-road equipment shall be turned off and shall not be allowed to idle.

Significance After Mitigation

Use of mufflers would reduce individual equipment noise levels by approximately 10 dBA. Implementation of the above mitigation measures would limit construction activities to the less noise-sensitive periods of the day. With implementation of the above mitigation measures and because activities would be short-term, this impact would be considered *less than significant.*

Long-Term Operational Noise Impacts

On-Site Stationary Noise Sources

On-site stationary source noise levels would be primarily influenced by activities at the proposed event center, onsite building mechanical equipment, and noise associated with the use of the onsite maintenance building. Noise levels and potential impacts to nearby existing land uses are discussed, as follows:

Event Center

Noise associated with the event center could expose other nearby land uses (both existing and project related) to increases in ambient noise levels. Noise typically associated with such development includes amplified music and voices. Based on noise measurement data obtained from similar venues, noise levels associated with the event center would be approximately 70 dBA Leq at 50 feet. This representative noise level includes the use of an amplified sound system consisting of a mix of music and announcements conducted over an approximate one-hour period. The nearest noise-sensitive land use is a residential dwelling located approximately 2,245 feet southwest of the project's event center, along Mill Road. Assuming an operational noise level of 70 dBA Leq with the use of an amplified sound system, predicted noise levels at the nearest noise-sensitive land use would be approximately 37 dBA Leq. Predicted noise levels would not exceed the City's noise standards for non-transportation noise sources of 45 dBA Leq during the nighttime hours or 55 dBA Leq during the daytime hours. As a result, this impact would be *less than significant*.

Building Mechanical Equipment

Noise generated by building mechanical equipment (e.g., heaters, air conditioning units) can result in increases in ambient noise levels. Building heating units are typically located within the structure and would not be expected to result in detectable increases in exterior ambient noise levels. Air conditioning units would operate primarily during the day and evening hours and less frequently at night. Air conditioning units typically generate noise levels of approximately 60 to 65 dBA Leq at 3 feet when operating. Typical operational cycles for residential units occur for periods of approximately 10 minutes in 20-to-30-minute intervals. The nearest existing noise-sensitive land use (i.e., residential dwelling) is located approximately 175 feet south of the proposed Maintenance Building, along Mill Road. Assuming that the proposed maintenance building includes installation of an air conditioning unit and a maximum noise level of 65 dBA Leq, predicted average-hourly exterior noise levels at this nearest residential land use would be approximately 30 dBA Leq. Predicted noise levels at other nearby existing land uses would be less. Predicted noise levels would not exceed the City's noise standards for non-transportation noise sources of 45 dBA Leq during the nighttime hours or 55 dBA Leq during the daytime hours. As a result, this impact would be *less than significant*.

Maintenance Building

The highest noise levels commonly associated with maintenance buildings typically include the operation of pneumatic tools and air compressors, although for this project, it is uncertain whether either piece of equipment will be used. Nevertheless, this analysis considers their possible use as a worst-case scenario. The operation of pneumatic tools and air compressors can generate noise levels of approximately 80 to 85 dBA Leq at 50 feet. The nearest existing noise-sensitive land use (i.e., residential dwelling) is located approximately 175 feet south of the proposed Maintenance Building, along Mill Road. Assuming a maximum noise level of 85 dBA Leq at 50 feet from the proposed maintenance building, based on a worst-case assumption that equipment (e.g., air compressor) were to be located at the exterior of the structure, predicted noise levels at the outdoor activity area of the nearest residential land use would be approximately 62 dBA Leq. Predicted operational noise levels would exceed the City's applicable noise standards. As a result, this impact would be considered *potentially significant.*

Off-Site Utilities Improvements

Once constructed, off-site utilities serving project development would not generate operational noise. *No impact* from this source is anticipated.

Mitigation Measures

Mitigation Measure N-2. Operational Noise Reduction. The following mitigation measures shall be implemented to reduce operational noise levels associated with the proposed maintenance building:

a. Mechanical equipment (e.g., air compressors) shall be located within the interior of the proposed maintenance building.
b. Bay doors on the maintenance building shall be closed to the extent possible.
c. Doors and windows shall not be installed along the southern façade of the proposed maintenance building.
d. The operation of maintenance building mechanical equipment and power tools (e.g., air compressors, pneumatic tools, grinders) shall be limited to the hours of 7:00 a.m. to 7:00 p.m.

Significance after Mitigation

With implementation of the above mitigation measures, operational activities associated with the proposed maintenance building would be limited to the daytime hours of 7:00 a.m. to 7:00 p.m. The enclosure of mechanical equipment would reduce operational noise levels by approximately 10 dBA, or more. With mitigation, predicted noise levels at the nearest residence would be reduced to approximately 52 dBA Leq. Predicted operational noise levels would not exceed the City's daytime noise standard of 55 dBA Leq. With mitigation, this impact would be considered less than significant.

Highway Noise Increase from Project-Generated Vehicle Traffic

The project is predicted to generate 3,220 new daily trips (CCTC 2023). A doubling of vehicle traffic is typically required before a noticeable increase (e.g., 3 dB, or greater) in traffic noise levels occurs. Based on Caltrans 2021 traffic data (Caltrans 2023), the segment of SR-46 adjacent to the project site has an average daily traffic (ADT) volume of 27,000. The project would not result in a doubling of vehicle volumes and would, therefore, not result in a noticeable increase in traffic noise levels. As a result, increases in traffic noise levels along SR-46 would be considered *less than significant.*

b. Groundborne Vibration. *Less Than Significant Impact.* Vibration is like noise in that it involves a source, a transmission path, and a receiver. While vibration is related to noise, it differs in that noise is generally considered to be pressure waves transmitted through air, whereas vibration usually consists of the excitation of a structure or surface. As with noise, vibration consists of amplitude and frequency. A person's perception of the vibration will depend on their individual sensitivity to vibration, as well as the amplitude and frequency of the source and the response of the system which is vibrating. Vibration can be measured in terms of acceleration, velocity, or displacement.

The effects of groundborne vibration levels, with regard to human annoyance and structural damage, is influenced by various factors, including ground type, the distance between source and receptor, and duration. Overall effects are also influenced by the type of vibration event, defined as either continuous or transient. Continuous vibration events would include most construction

equipment, including pile drivers, and compactors, whereas, transient sources of vibration create single isolated vibration events, such as demolition ball drops and blasting.

In comparison to existing operations, operational activities associated with the proposed project would not involve the use of any new equipment or processes that would result in potentially significant levels of ground vibration. Increases in groundborne vibration levels attributable to the proposed project would be primarily associated with short-term construction-related activities. Construction equipment required for proposed project typically includes smaller equipment (e.g., concrete saws, concrete mixers, welders, forklifts, compressors, pneumatic tools, and jack hammers). Groundborne vibration levels associated with these types of construction equipment would be approximately 0.003 in/sec ppv at 25 feet (Caltrans 2020).

The nearest existing off-site structures in relation to proposed onsite construction areas would be located approximately 175 feet, or more, from on-site construction areas. Based on this distance and assuming a maximum vibration level of 0.003 in/sec ppv at 25 feet, predicted vibration levels at the nearest off-site structures would be <0.01 in/sec ppv. Predicted vibration levels at the nearest existing structures would not be projected to exceed commonly applied criteria for structural damage or human annoyance (i.e., 0.5 and 0.2 in/sec ppv, respectively). As a result, this impact would be considered *less than significant.*

c. Airport Noise. *Less Than Significant Impact.* The nearest airport is the Paso Robles Municipal Airport located approximately 1.5 miles north of the project site. The proposed project site is not located within the projected noise contours of Paso Robles Municipal Airport (Source: 17). Implementation of the proposed project would not result in the exposure of sensitive receptors to excessive aircraft noise levels, nor would the proposed project affect airport operations. This impact is considered *less than significant.*

Proposed off-site utility improvements are not considered noise-sensitive, so there would be *no impacts* related to airport noise.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING -- 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)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

On-Site Project Development

a. Population Growth: *Less than Significant Impact.* The proposed project would not have a direct impact on population growth in the City because it does not propose the development of new housing units for permanent residents.

The proposed project has the potential to result in new short-term sources of employment during its construction period. Construction workers typically commute to job sites throughout their home-based region. Additionally, many construction workers are specialized in some skill (e.g., plumbers, steel workers, etc.) and are only on a specific job site for a limited duration to exercise their skill, and generally are not on-site for the entire construction duration. In some instances, workers may seek transient lodging options (e.g., hotels, motels) for some or all of the construction duration. The employment generated by the construction of the proposed project would be temporary and is not expected to result in significant permanent relocation of workers into the city.

In addition, the project could create a small number of permanent jobs associated with the operation of the resort facility. These permanent jobs would not substantially add to the regional employment base, or result in a substantial increase in population within the City and region.

A *less than significant impact* related to population growth would occur.

b. Displacement: *No Impact.* The proposed project would not result in the removal of any existing housing, require the construction of replacement housing, nor displace any existing residents. Since no relocation of existing residents or construction of replacement housing would result, no impact associated with this issue would occur.

Off-Site Utilities Improvements

a. Population Growth: *Less Than Significant Impact.* The proposed off-site utility improvements would connect the project site to the City's utilities grid, including water and sewer connections. The connection would be made at Union Road near Barney Schwartz Park, a distance of about one mile. The existing land uses along this route include rural development, including vineyards and wineries, on land designated as either Commercial Service (CS), Agriculture (AG), or Parks and Open Space (POS). A portion of the AG-designated land is within unincorporated San Luis Obispo County.

Although the new utilities corridor is intended to serve the proposed project, the parcels between the connection to existing City utilities along Union Road and the project site could potentially be served by the extension of these utilities through this area. While this extension would remove a possible obstacle to such development, it would not by itself induce development or growth in these areas. The City's General Plan and zoning place substantial constraints on the density and type of development allowed in such areas. Housing, for example, is not contemplated or allowed in these zones. In addition, there are significant physical constraints to non-agricultural development of such areas. Among the constraints facing development in this general area include the possible conversion of agricultural use, impacts related to airport operations, flood issues near Huer Huero Creek, and potentially insufficient roadway infrastructure to serve higher density uses. The General Plan was specifically crafted to recognize these constraints to development. Thus, the extension of utilities through this area would not induce growth, because the underlying constraints on parcels in this area—both physical and regulatory—would preclude such development without extensive further study, mitigation, and modification to the City's existing policy framework.

Less than significant impacts related to population growth would occur with respect to the off-site utilities corridor.

b. Displacement: *No Impact.* The extension of off-site utilities to the project site would not result in the removal of any existing housing, require the construction of replacement housing, nor displace any existing residents. Since no relocation of existing residents or construction of replacement housing would result, no impact associated with this issue would occur.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES - Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?			X	
d) Parks?			X	
e) Other public facilities?			X	

On-Site Project Development and Off-Site Utilities Improvements

a. Fire Services: *Less than Significant Impact.* The City of Paso Robles Fire and Emergency Services Department (Paso Robles Emergency Services) provides emergency medical and fire protection services to the city. Paso Robles Emergency Services has automatic and mutual aid contractual agreements with CAL FIRE and the other surrounding municipal departments for emergency response to areas outside, but near the city. There are three fire stations serving the city. The nearest Paso Robles Emergency Services station to the project site is Paso Robles Fire Station Number 3, located at 2924 Union Road, approximately 1.5 miles west of the site. (Source: 23). This new fire station became operational in 2023.

The 2001 Growth Management Plan and 2003 City of Paso Robles General Plan Safety Element include an adopted response time goal of 4 minutes or less at least 90% of the time. This goal was achieved 57% of the time in 2022 (Source: 23). Average response time citywide that year was 5 minutes and 42 seconds. The new fire station is expected to substantially reduce response times in the northeastern portion of the City, including to the project site.

Project development would increase the number of calls for service and would incrementally increase the average response time to calls by Paso Robles Emergency Services and could result in increased simultaneous calls where a call must wait for the current call to clear, or for a mutual aid response.

Potential impacts related to an increased demand on Paso Robles Emergency Services for fire protection services would be reduced through the required payment of Development Impact Fees per the July 2021 Development Impact Fee Summary Resolution 19-017 Exhibit "A-2" (City of El Paso de Robles 2021b), which would be required as standard conditions of approval. Additionally, project plans would be reviewed by Paso Robles Emergency Services personnel for compliance with the California Fire Code to ensure structures are designed to minimize fire risk and that adequate emergency access is provided on the site. As part of this process, a registered Fire Protection Engineer (FPE) will be required to provide a comprehensive technical analysis of all fire suppression system related components including water storage, fire hydrants and pumps, and sprinkler systems. Compliance with the California Fire Code would ensure the quality and safety of the project's structures, which would reduce demand on Paso Robles Emergency Services

to respond to incidents. Paso Robles Emergency Services is required to conduct annual fire pump inspections and annual inspections on buildings deemed high hazard. Every 5 years, Paso Robles Emergency Services conducts an in-depth test of the fire sprinkler system and underground fire line system. Therefore, the city would have adequate fire protection facilities to accommodate buildout of the proposed project, and payment of Development Impact Fees would further reduce impacts. Therefore, impacts would be *less than significant*.

The operation of off-site utilities would not by itself generate the need for fire services. *No impact* would occur with respect to this aspect of the project.

b. Police Services: *Less than Significant Impact.* Police protection in the city of Paso Robles is provided by the Paso Robles Police Department (PRPD). The PRPD service area consists of over 19.9 square miles with a service population of approximately 32,496. PRPD's police station is located approximately four miles southwest of the project site at 900 Park Street. The PRPD has an adopted response time goal of 4 minutes and an average response time of approximately 14.8 minutes to the project vicinity between 2019 and 2021 (PRPD, 2021).

A new police department substation is planned at 4305 and 4317 Second Wind Way, within an existing vacant office building and airport hangar, which will be renovated to accommodate law enforcement uses. A contract for design services for the renovations was approved December 7, 2021. (Source: 13)

Based on implementation of individual security measures and the fact the project would not result in permanent population growth within the city, the project would not result in significant new demand on police protection services, which is currently operating under the personnel ratio and adopted response time goal established in the LUE. However, the incremental increased demand on police protection services generated by the project would be offset by the required payment of Development Impact Fees per the July 2021 Development Impact Fee Summary Resolution 19-017 Exhibit "A-2" (City of El Paso de Robles 2021b), as updated annually via the Annual Development Impact Fee Report per Government Code §66006, which would be required as standard conditions of approval. The Development Impact Fees allow the City to build new public facilities, purchase new equipment for those facilities, and pay for staffing. Development Impact Fees are not intended to correct service-level deficiencies caused by existing development. Additional staffing supported by Development Impact Fees would help the City meet its personnel ratio and adopted response time goal for police protection services. As discussed above, the project is not anticipated to significantly degrade the established service ratios for police protection services and therefore would not trigger the need for new or expanded police protection facilities. Therefore, the city would have adequate police protection facilities to accommodate buildout of the proposed project and impacts would be less than significant.

The operation of off-site utilities would not by itself generate the need for police services. *No impact* would occur with respect to this aspect of the project.

c. School Services: *Less than Significant Impact.* Public school facilities serving the city of Paso Robles, including the project site, are provided and maintained by the Paso Robles Joint Unified School District (PRJUSD). The proposed project would not directly create a source of school-aged children as it does not include any housing for permanent residents. Therefore, it would not generate the need for new or physically altered school facilities and impacts would be less than significant. However, it may indirectly affect schools by providing a source of planned

employment that may draw new residents into the area. Appropriate developer impact fees, as required by state law, would be assessed and paid to the school district. Any potential impacts would be considered incremental and would be offset through the payment of the appropriate development impact fees. Thus, the proposed project would not result in substantial adverse physical impacts related to schools. Therefore, potential impacts would be less than significant.

The operation of off-site utilities would not by itself generate the need for school services. *No impact* would occur with respect to this aspect of the project.

d. Parks: *Less than Significant Impact.* The Parks and Recreation Element establishes a goal to provide 7 acres of parkland per 1,000 population. Based on the population of 31,490 (U.S. Census Bureau 2020), the city should provide approximately 225 acres of parkland to reach this goal. According to the LUE, there are approximately 1,630 acres of combined parks and open space within the city (City of Paso Robles 2014b).

The proposed project would not directly create a demand for additional public park facilities as it does not include any housing for permanent residents. The project would enhance an existing private recreational facility, proving resort accommodations associated with the Hunter Ranch Golf Course.

The development of new visitor-serving uses may contribute to a slight increase in persons in the area that could increase demand on public recreation facilities, though project visitors and employees would have access to the on-site open space and green space amenities, which could reduce off-site recreational facility use. The project would be subject to the payment of Development Impact Fees, which would be included as a standard condition of approval for the project. Therefore, with payment of required fees, impacts related to public recreation facilities would be *less than significant*.

The operation of off-site utilities would not by itself generate the need for parks. *No impact* would occur with respect to this aspect of the project.

e. Other Public Facilities: *Less than Significant Impact.* The proposed project, including off-site infrastructure extension, would not directly increase the demand for library or any other public services because it does not include new housing for permanent residents.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION -				
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?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?				X

On-Site Project Development and Off-Site Utilities Improvements

a. Demand for Parks and Recreation: *Less than Significant Impact.* The proposed project is a non-residential development and does not include new recreational facilities. It would not have an impact or increase the demand for new parks or recreational facilities. Therefore, no impact would occur. (Source: 1, 15)

The proposed project would not directly create a demand for additional public park or recreational facilities as it does not include any housing for permanent residents. The project would enhance an existing private recreational facility, proving resort accommodations associated with the Hunter Ranch Golf Course.

The development of new visitor-serving uses may contribute to a slight increase in persons in the area that could increase demand on public recreation facilities, though project visitors and employees would have access to the on-site open space and green space amenities, which could reduce off-site recreational facility use. The project would be subject to the payment of Development Impact Fees, which would be included as a standard condition of approval for the project. Therefore, with payment of required fees, impacts related to public recreation facilities would be *less than significant*.

The operation of off-site utilities would not by itself generate the need for parks. *No impact* would occur with respect to this aspect of the project.

b. Construction of Recreational Facilities: *No Impact.* The proposed project would construct new facilities to enhance an existing private recreational resort. It would accommodate an existing demand for such services, relieving pressure to construct other similar facilities within the City. Therefore, *no impact* would occur.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION - Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?			X	
c) Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d) Result in inadequate emergency access?			X	

On-Site Project Development and Off-Site Utilities Improvements

The transportation impact analysis has been prepared based on a July 2024 report prepared by Central Coast Transportation Consulting, which is attached as Appendix E to this Initial Study. The analysis included below summarizes the information in that report. (Source: 24)

Vehicle miles traveled (VMT) and safety were analyzed consistent with recently mandated changes to the California Environmental Quality Act (CEQA) and state Office of Planning and Research (OPR) guidance. The City's 2022 Transportation Impact Analysis (TIA) Guidelines Supplement provides VMT and safety thresholds consistent with OPR guidance. The Supplement notes that projects resulting in a net decrease in regional VMT would have a less than significant impact, and that retail and hotel projects may have a significant impact if they cause a net increase in regional VMT.

Projects may have a significant impact if they exacerbate an existing high-priority or similar safety location, introduce a design feature that substantially increases hazards, or propose features that do not meet City design standards.

Caltrans relies on VMT and safety to evaluate transportation impacts and published a VMT Focused TIS Guide in May 2020 which replaced the prior guide reliant on LOS. The TIS Guide notes that lead agencies have the discretion to choose VMT thresholds and methods and generally conforms to OPR guidance.

a. Potential Conflicts with Transportation Plans and Policies. *Less Than Significant Impact.* The 2019 SLOCOG RTP identifies that San Luis Obispo has a jobs-to-housing imbalance across the county. Specifically, the central portion of the county (i.e., San Luis Obispo) has more jobs than housing units, with more than two jobs per housing unit, and the rest of the county, including the Paso Robles region, has more housing units than jobs, with less than one job per housing unit. This regional imbalance results in congestion on regional roadways during the AM and PM peak hours as commuters travel to and from the central portion of the county for work (CCTC 2022). The 2019 SLOCOG RTP considered multiple future land use scenarios with different development patterns. Future Year 2035 Scenario 3, which was adopted as the preferred growth scenario by the SLOCOG Board, seeks to improve the jobs-to-housing imbalance by increasing jobs in the northern portion of the county. The project would potentially add employment opportunities to the north county from both project construction and operation, which would increase the jobs-to-housing ratio for the north county.

The project would improve the north county's jobs-to-housing balance, consistent with the RTP's adopted preferred growth scenario. The 2019 SLOCOG RTP identifies SR 46E as a priority regional corridor and references Caltrans' SR 46 East Comprehensive Corridor Study and SR 46 Corridor System Management Plan as the basis for recommendations for the corridor (CCTC 2022). The project would be required to pay Development Impact Fees that in part will be used to contribute its fair share toward improvements recommended in the RTP.

The project is consistent with relevant transportation plans and policies, so impacts would be *less than significant*.

The operation of off-site utilities would not by itself generate trips or induce VMT. *No impact* would occur with respect to this aspect of the project.

b. Conflicts or Inconsistencies with CEQA Guidelines § 15064.3, subdivision (b). *Less Than Significant Impact.* State CEQA Guidelines 15064.3(b) establishes criteria for analyzing transportation impacts in a CEQA document, replacing the traditional LOS-based approach in favor of an approach based on vehicle miles traveled (VMT), consistent with SB 743. On December 28, 2018, the California Natural Resources Agency adopted revised State CEQA Guidelines. Among the changes to the guidelines was the removal of vehicle delay and LOS from consideration for transportation impacts under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled.

According to the updated State CEQA Guidelines, vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. The following SB 743 Assessment to address VMT impacts is summarized from the CCTC Traffic Impact Analysis. (Source: 24)

SB 743 VMT Assessment
Vehicle miles traveled (VMT) and safety were analyzed consistent with recently mandated changes to the California Environmental Quality Act (CEQA) and state Office of Planning and Research (OPR) guidance. The City's 2022 Transportation Impact Analysis (TIA) Guidelines Supplement provides VMT and safety thresholds consistent with OPR guidance. The Supplement notes that projects resulting in a net decrease in regional VMT would have a less than significant impact, and that retail and hotel projects may have a significant impact if they cause a net increase in regional VMT.

Projects may have a significant impact if they exacerbate an existing high-priority or similar safety location, introduce a design feature that substantially increases hazards, or propose features that do not meet City design standards.

Caltrans relies on VMT and safety to evaluate transportation impacts and published a VMT Focused TIS Guide in May 2020 which replaced the prior guide reliant on LOS. The TIS Guide notes that lead agencies have the discretion to choose VMT thresholds and methods and generally conforms to OPR guidance.

The hotel and employment-based uses are evaluated separately below since they have different thresholds. Table 13 presents total regional VMT with and without the proposed hotel.

Table 13. Daily Regional Vehicle Miles Traveled

Daily Regional Vehicle Miles Traveled	
Scenario	**Regional VMT**
Baseline No Project	8,797,565
Baseline Plus Hotel/Retail	8,801,720
Change	*4,155*
Source: SLOCOG Travel Demand Model, CCTC, 2024	

The addition of the hotel results in a net increase in regional VMT of 4,155 miles.

It is also considered a significant impact if the project's VMT per employee ratio would exceed 85% of the Countywide average, which in this case would be 10.09 VMT/employee (see Table 14). Table 14 presents the commute VMT per employee calculations for employees at the project site. This reflects the home-based-work trips per employee to the project.

Table 14. Employment Vehicle Miles Traveled

Employment Vehicle Miles Traveled	
VMT/Employee	
Countywide Average	11.88
Threshold (85% of Avg)	10.09
Project Employment VMT	8.08
Impact?	*No*
Source: SLOCOG Travel Demand Model, CCTC, 2024	

The project's commute VMT per employee levels are 8.08 work VMT per employee, below the 10.09 work VMT per employee threshold, indicating a *less than significant* impact for this project component.

When analyzed independently, the hotel portion of the project would result in a net increase in regional VMT of 4,155 miles. The commute VMT per employee is less than 85 percent of the regional average. The full project would generate 43,428 VMT before accounting for the mix of uses on the site and provision of golf carts for guests. The interaction between hotel visitors and project amenities such as recreation facilities, restaurants, and spas will reduce the demand for external trips beyond the project boundaries. The commercial "mixed use" nature of the project, combining hotel and other visitor-serving amenities would reduce the VMT for such uses to below the Employment VMT Threshold, as shown in Table 14. A 9.6 percent (4,155/43,428) reduction in VMT would result in a *less than significant* VMT impact.

NCHRP Report 684, *Enhancing Internal Trip Capture Estimation for Mixed-Use Developments* was applied to estimate the interactions between land uses on the site. This method yields an estimated internal capture percentage of 15%, which would reduce the hotel VMT to a less-than-significant level. Additional VMT reductions would be expected due to the project's proximity to the planned Mill Road Class 1 trail, which is planned as a part of the Mill Road connection to Union Road. The project will be required to make a fair share contribution towards this multi-modal facility.

The City's TIS Guidelines Supplement includes guidance from CAPCOA for VMT reductions associated with various project features. Suburban sites with Neighborhood Electric Vehicles (NEVs, proposed as golf carts by the project) can achieve reductions up to 15 percent for accommodation of NEVs, provision of bicycle and pedestrian infrastructure, and a mix of land uses. This supports the finding that these measures would reduce VMT by more than the minimum 9.6% needed to result in a *less than significant* finding.

The County of San Luis Obispo also developed a VMT Estimation tool that applies the same thresholds as the City for hotel uses. This tool was tested for the hotel land use on a parcel adjacent to the proposed project, which is located at the City/County boundary. The County tool indicates a less-than-significant impact to VMT.

The employment-based uses proposed on the site would generate work VMT per employee below the City's threshold. The hotel uses would result in an increase in regional VMT before accounting for the mix of uses, pedestrian and bicycle facilities, and provision of electric golf carts on the site. Once those project features are included, the hotel VMT would be less-than-significant. The County's VMT tool also indicates a *less than significant* VMT impact. Therefore, the project would have a *less than significant* impact related to VMT.

c. Transportation Hazards Related to Design Features. *Less Than Significant Impact.* The project would not include features that contribute to potentially hazardous transportation conditions. The following analysis considers potential safety impacts related to collisions and site access. Based on this evaluation, impacts related to transportation hazards would be *less than significant*.

Collision Evaluation
Traffic collision data for the study intersections was obtained from the Caltrans Traffic Accident Surveillance and Analysis System (TASAS) and the Statewide Integrated Traffic Records System (SWITRS). Three collisions occurred within 250 feet of the Hunter Ranch driveway between October 2017 and September 2022 as shown in Table 15.

Table 15. SR 46E/Hunter Ranch Collision History

Collision History SR 46E (MP 33.529) at Hunter Ranch/Sensorio Driveway							
Date	Time	Secondary Road	Distance	Injury Degree[1]	Primary Collision Factor	Collision Type	Alcohol Involved
3/9/2018	12:08	MP 33.50	310' East	Property Damage Only	Auto DUI	Hit Object	Yes
2/8/2019	13:51	RT 46 4041	0'	Fatality (Motorcycle)	Auto ROW	Broadside	Yes
11/10/2019	12:01	JARDINE	6072' West	Complaint of Pain	Auto ROW	Broadside	No
Source: Statewide Integrated Traffic Records System (SWITRS) database. October 2017 through September 2022.							

Two of the three collisions occurred with a vehicle exiting the driveway failing to yield when making a left turn on to SR 46E, one resulted in a fatality with alcohol involved. The other occurred when an eastbound driver under the influence ran off the road. Five collisions occurred within 250' of the intersection of Mill Road/SR 46E (#2) between October 2017 and September 2022 as shown in Table 16.

Table 16. SR 46E/Mill Road Collision History

Collision History SR 46E (MP 32.650) at Mill Road							
Date	Time	Secondary Road	Distance	Injury Degree[1]	Primary Collision Factor	Collision Type	Alcohol Involved
11/17/2018	20:16	MILL	60' North	Severe Injury	Auto ROW	Broadside	No
9/21/2019	23:10	MILL	0'	Complaint of Pain	Auto ROW	Broadside	Yes
11/3/2019	16:17	MILL	0'	Severe Injury	Auto DUI	Broadside	Yes
9/5/2021	22:37	MILL	0	Complaint of Pain	Auto ROW	Broadside	No
10/15/2021	22:50	MILL	0	Complaint of Pain	Auto ROW	Broadside	Yes
Source: Statewide Integrated Traffic Records System (SWITRS) database. October 2017 through September 2022.							

Four of the five collisions occurred with a vehicle exiting Mill Road failing to yield when making a left turn on to SR 46E, two resulted in severe injuries and two involved alcohol. The other occurred when a northbound driver making a right turn onto SR 46E failed to yield to eastbound traffic, alcohol was involved. Four of the five collisions occurred after 10:00 PM, and at least two of these occurred when a concert was being held at Vina Robles.

Table 17 summarizes the intersection collision rates for the intersection of SR 46E/Hunter Ranch and SR 46E/Mill Road.

Table 17. SR 46E/Hunter Ranch Collision Rates

Collision Rates									
	Collisions			Actual Rate[1]			State Ave Rate[1]		
Intersection	F	I	All	F	F+I	All	F	F+I	All
1. SR 46E/Driveway	1	1	**3**	0.021	0.04	**0.06**	0.005	0.15	**0.40**
2. SR 46E/Mill Rd	0	5	**5**	0.000	0.10	**0.10**	0.003	0.09	**0.22**
I = Injury(severe, visible and complaint of pain), F = Fatal, MV = million vehicles.									
1. Rates are in units of collisions per million vehicles entering for intersections.									
Source: Caltrans Traffic Accident Surveillance and Analysis System (TASAS). October 2017 to September 2022.									

The overall intersection collision rate at the Hunter Ranch driveway is substantially below the State average rate. However, due to the single fatality that occurred, the fatality rate is higher than the State average rate. No collisions were reported at the driveway since 2019. The overall intersection collision rate at the intersection of SR 46E and Mill Road is substantially below the State average rate. However, due to the high number of injuries, the combined fatality and injury rate is slightly higher than the State average rate.

Site Access
The existing SR 46E/Hunter Ranch/Sensorio driveway (#1) is two-way stop controlled with full access. Three deceleration lanes are provided: 660 feet for eastbound left, 640 feet for eastbound right, and 750 feet for westbound left. Two median acceleration lanes are provided: 640 feet for northbound left and 690 feet for southbound left. The posted speed on SR 46E at the intersection is 65 mph. Per the Highway Design Manual (HDM) Table 405.2B, a length of 530 feet is needed to stop from 60 mph. Therefore, the deceleration lanes are all adequate since there is limited vehicle queuing in these lanes.

Sight distance at SR 46E/Hunter Ranch/Sensorio driveway (#1) was reviewed in the field. Per the HDM for private road intersections, the corner sight distance was evaluated using the value for minimum stopping sight distance. For a design speed of 70 mph, the minimum stopping sight distance is 750 feet. Sight distance is adequate assuming routine mowing of brush along the driveway flares.

The operation of off-site utilities would not by itself generate trips or induce VMT. *No impact* would occur with respect to this aspect of the project.

d. Emergency Access Conflicts. *Less Than Significant Impact.* As described above, site access would be adequate to avoid safety of queueing issues. For that reason, the project would have adequate access for emergency vehicles.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES - Would the project:				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or			X	
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.		X		

On-Site Project Development and Off-Site Utilities Improvements

a. Tribal Cultural Resources. As described in Section V. of this Initial Study (Cultural Resources) and in Appendix C, there are no listed resources or resources eligible for listing in the CRHR or local register of historic resources.

However, as noted in Section V. of this document, cultural resource reports prepared to evaluate the project vicinity identified various cultural resources, as well as the potential to encounter resources not yet uncovered. Impacts would be *less than significant with mitigation*.

In accordance with AB 52, formal notification was provided by the City to the designated contact or tribal representatives of traditionally and culturally affiliated California Native American tribes that have requested notice. Notice pursuant to AB 52 was provided on May 6, 2025. There was one response from Patti Dunton, representative of the Salinan tribe. She stated that after reviewing the cultural resource report associated with the proposed project, the tribe "has no concerns at this time," but requests that they "would like to be part of the cultural training for the construction crew and be notified if any resources are unearthed during the development."

Mitigation Measures

Implement Mitigation Measures CR-1, CR-2 and CR-3, as described in Section V. of this document.

Significance After Mitigation

With the implementation of the mitigation measures described above, impacts would be reduced to *a less than significant* level.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS -Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
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?			X	
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?			X	
e) Comply with federal, state, and local statutes and regulations related to solid waste?			X	

On-Site Project Development and Off-Site Utilities Improvements

a. Utilities Infrastructure: *Less Than Significant Impact.* The project can connect to water, wastewater, electric and communications utility infrastructure, as described below.

Proposed Potable Water System
The Project will provide water main extensions necessary to supply water service. The project will construct a new public water main that will connect to existing water mains in Union Road and in Mill Road. The Project is responsible for securing new City utility easements for the main water installations. The new water mains and easements will be dedicated to the City prior to issuance of building permits. The project shall install a private on-site water booster stations for on-site domestic and fire delivery needs in conformance with City standards, conditions of approval, and State laws. The Project will install private on-site water mains for conveyance of domestic water to components of the project area.

Proposed Recycled Water System
Provisions for on-site recycled water will be included in the proposed project in anticipation of City services in this area being available. At such time, blending of recycled water with existing groundwater sources will be done to provide irrigation to the existing golf course.

Proposed Wastewater System
The project will be served by a new City sewage lift station on Union Road (which will be completed by the City) and a new gravity sewer main extension from the Union Road lift station to the project site, which will be completed by the developer. (Please refer to Off-Site Utilities Improvements below for further discussion.) The sewer main extension shall be installed by the developer at the

same time the water main extension is being constructed and will be dedicated to the City upon completion. If the Union Road sewage lift station is not available for initial phases, the Project will design and install a Cloacina advanced treatment system to recycle the waste generated by the lodging units and used as landscape irrigation in and around each cluster of Casitas buildings and/or combined with private well water or recycled water utilized for golf course irrigation. The project owner shall obtain all required permits from the Regional Water Quality Control Board prior to the installation of an on-site treatment system.

Electric and communications utilities can be extended from Highway 46 and Mill Road.

Off-Site Utilities Improvements. As discussed above, the proposed project includes the extension of offsite water and wastewater utilities to serve the project site. These will be developed by the project to provide water and sewer service to the project site. Impacts of the offsite water and wastewater utilities have been analyzed throughout this Initial Study, which demonstrates that these offsite improvements will have a less than significant impact with mitigation.

b. Water Supplies: *Less Than Significant Impact.* At buildout, total project water demand is estimated to be 30,529 gallons per day (GPD), or about 34.2 acre-feet per year (AFY). The detailed assessment of water demand is included in Appendix F to this Initial Study. If approved, the Project would use potable water from the City's municipal water supply portfolio. Table 18 compares City supply and demand projections, including the project, in 5-year increments between 2025 and anticipated General Plan buildout (2050 or later) for normal and dry climatic years. This table is based on 2020 UWMP tables. On an annual basis, the City has been able to provide sufficient supplies to meet demand during normal, single-dry and multiple-dry year periods. Historical annual pumping has not been greatly affected by drought. (Sources: 13, 25)

Table 18. Citywide Single and Multiple Dry Year Water Supply and Demand Projections (AFY)

AFY	2025	2030	2035	2040	2045	Buildout (2050 or later)
2020 UWMP Demand Totals	6,515	7,102	7,689	8,277	8,863	9,451
2020 UWMP Demand Totals and Project Demand	6,661	7,248	7,835	8,423	9,009	9,597
City Water Supply Availability[2]	15,088	15,088	15,088	15,088	15,088	15,088
City Water Supply Availability with Project Demand[2]	14,942	14,942	14,942	14,942	14,942	14,942
Difference	-146	-146	-146	-146	-146	-146

[1] Water for the project was not explicitly included in the 2020 UWMP projections under the Public Facilities General Plan zoning because water demands have historically been satisfied by on-site private well use. The City has the additional 146 AFY of water supply available but the supply amounts in this table were kept at 2020 UWMP-listed supplies.

[2] Note that supply is based on the historical groundwater pumping amount by the City and does not reflect any limits on the City's groundwater rights or pumping ability.

The City's surface water supplies are not dependent on snowmelt, which is the source most likely to be affected by climate change. However, effects of climate change may also include increased evaporation from Lake Nacimiento and increased evapotranspiration losses, including increased irrigation water demands. The City's contractual entitlement to water from Lake Nacimiento provides a highly reliable supply because it provides priority storage guaranteeing that the City's

share of water entitlement would be the last to be curtailed during time of shortage. The project's effects on the water system through increased irrigation demand will be minimized through water conservation measures and potentially provision of recycle water.

The City has a diverse water supply portfolio that increases overall City water supply reliability. Although the additional 34.2 AFY of water demand associated with the project was not explicitly accounted for in the 2020 UWMP, the City has this supply available from its water supply portfolio of Nacimiento Lake surface water, groundwater from the Paso Robles Area Subbasin, and surface water from the Salinas River underflow. It is important to note that the UWMP documents projected water demands and identifies supplies that the City plans to use to serve those demands, but it does not identify the total water supply available. Based on an evaluation of current and future water supplies available to the City, the City has sufficient water supply available to serve the project under normal rainfall conditions (Todd Groundwater 2021).

Although customer water use in drought years may increase initially because of increased irrigation, water use in a drought year was assumed to be the same as a normal year because water use restrictions would limit additional water use, especially for landscape irrigation. Similarly, the amount of water supply available in times of drought was deemed to be the same as that available during normal years, and within historical pumping volumes. This is because in drought years, Nacimiento water can be used to augment surface water and improve water supply reliability. Similar to the operation of the recovery well, Nacimiento water can be routed into the Salinas River channel adjacent to the City's river wells. This allows the river wells to operate when native supplies are low (City of Paso Robles 2021a).

Therefore, based on the City's various water supplies and reliability of those supplies, the City has adequate potable water to supply a reliable long-term water supply for the project under normal and drought conditions, and no mitigation is necessary. Impacts would be *less than significant*.

c. Wastewater Treatment: *Less than Significant Impact.* The project's generated wastewater flows would ultimately flow to the City of Paso Robles Wastewater Treatment Plant (WWTP). In 2020 the average daily influent flow to the WWTP was 2.11 MGD and the maximum influent flow was 2.39 MGD in August, which is well below the WWTP design capacity of 4.9 MGD. During recent years (2017–2020), there has been a reduction in daily and annual plan influent flows due to drought, water conservation, and the disconnection of the Templeton Community Services District from the Paso Robles sewer system (City of Paso Robles 2021b). The WWTP has a peak wet weather capacity of 12.7 MGD. The WWTP is currently limited to a permitted discharge of 4.9 MGD (average dry weather design capacity) and 12.7 MGD (peak wet weather capacity) pursuant to WDR Order No. R3-2021-0001 (NPDES Permit No. CA0047953) issued by the Central Coast RWQCB (Central Coast RWQCB 2021). Based on the 2020 UWMP, wastewater flows at buildout are projected to be 0.09 AFY per capita based on an average annual flow of 3.62 MGD and a population of 44,000 at buildout (City of Paso Robles 2021b).

Based on an evaluation conducted by Walsh Engineering, the project would result in an annual wastewater generation rate of 57,180 gallons per day, or approximately 0.057 MGD. With the proposed project, total city wastewater flow projections at buildout would be approximately 3.68 MGD, which is below the WWTP design capacity of 4.9 MGD. Based on an evaluation of the proposed project's wastewater generation rates and available treatment capacity of the City WWTP, the project would be served by a wastewater treatment provider with adequate capacity

to serve the project in addition to the provider's existing commitments. Impacts would be *less than significant*. (Sources: 13, 25)

d. Solid Waste Generation. The City contracts with private service providers for solid waste services in the city. Paso Robles Waste & Recycle provides residential and commercial solid waste collection service, and Pacific Waste Services, Inc. operates the City-owned Paso Robles Landfill. Solid waste generated in the city of Paso Robles, including that collected by Paso Robles Waste & Recycle, is disposed of at the Paso Robles Landfill located on SR 46E and Union Road, 6 miles east of the project site. The landfill is classified by the SWRCB as a Class III waste management unit, approved for discharge of nonhazardous municipal solid waste. Municipal solid waste currently delivered to the Paso Robles Landfill is generated by the residents and businesses of the city of Paso Robles and community of Templeton. The landfill has a maximum permitted capacity of 6,495,000 cubic yards and a maximum permitted throughput of 450 tons of solid waste per day and 75,000 tons per year, through October 1, 2051. As of December 31, 2017, the landfill had a remaining capacity of 4,216,402 cubic yards or approximately 65% of the maximum permitted capacity (CalRecycle 2019).

Solid waste would be picked up and hauled off by Paso Robles Waste Disposal and would be taken to the Paso Robles Landfill, which has sufficient capacity to serve the project.

Based on the estimated solid waste generation for the project components, the project as a whole is anticipated to generate approximately 1,299 pounds (0.65 tons) of solid waste per day during operation (Table 19). Based on the available capacity of the Paso Robles Landfill, the waste generation rates of the project, and required compliance with state waste reduction and diversion policies, the project would not generate waste in excess of state or local standards, or in excess of the capacity of local infrastructure, and impacts would be *less than significant*.

Table 19. Estimated Solid Waste Generation

Project Component	Unit of Measure	Solid Waste Generation Rate	Pounds per Day
Hotel (402 rooms)	lbs/room/day	2	804
Restaurant (17,000 SF)	lbs/SF/day	0.005	85
Conference Center (36,500 SF)	lbs/SF/day	0.007	255
Spa Center (11,400 SF)	lbs/SF/day	0.007	80
Laundry (2,000 SF)	lbs/1,000 SF/day	5	10
Wedding Chapel (1,000 SF)	lbs/SF/day	0.007	7
Commercial Retail (8,000 SF)	lbs/1,000 SF/day	2.5	20
Medical Spa Center (5,370 SF)	lbs/SF/day	0.007	38
Total			**1,299**

Source: CalRecycle Solid Waste Generation Rates webpage, accessed February 2025. No rates are provided for wedding chapel or spa centers, so the "public/institutional" rate is used.

e. Solid Waste Statutes and Regulations: *Less than Significant Impact.* The project would comply with all federal, state, and local regulations and diversion requirements pertaining to solid waste disposal, including those intended for reduction, reuse, and recycling of waste to the extent practicable. Non-recyclable demolition debris and construction waste generated by the project would be disposed of at the Paso Robles Landfill, which had a remaining capacity of 4,216,402 cubic yards, or 65% of the maximum permitted capacity as of 2019. In addition, the project would be required to comply with mandatory waste reduction requirements of the California Integrated Waste Management Act (AB 939) and

the California Solid Waste Reuse and Recycling Act of 1991. In addition, the project will be required to comply with CALGreen Code Section 5.408.1, which addresses construction waste diversion, requiring that at least 65% of non-hazardous construction and demolition waste must be recycled or salvaged, or compliance with local ordinance if more stringent than that standard. Therefore, the project would not increase solid waste generation in a manner that would conflict with federal, state, or local management or reduction statutes, and impacts would be *less than significant*.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – 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?			X	
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?			X	
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?			X	
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?			X	

On-Site Project Development and Off-Site Utilities Improvements

a. through d. Wildfire Risk and Response: *Less than Significant Impact.* Regulations pertaining to wildfires include provisions set forth by the California Fire Code, California Building Code, the City of Paso Robles Safety Element, the City Fire Department, and the City of Paso Robles Local Hazard Mitigation Plan. According to the City's Safety Element, the proposed project site and adjacent offsite utility corridor are not located within an identified High Fire Hazard Area or within an area susceptible to wildfires.

All proposed resort accommodations will meet City fire code requirements, including the installation of smoke alarms and automatic fire sprinkler systems to provide both early warning to occupants and protection against the growth of fires initiating within the buildings. All proposed development components associated with the project would be required to comply with all applicable fire safety rules and regulations including the California Fire Code and Public Resources Code prior to issuance of building permits. Access to the Resort site will be through all-weather roads and pathways, and fully accessible to all emergency personnel vehicles and equipment.

In addition, the project design will help reduce wildland fire risk. About half of the entire project area already includes a developed and fully irrigated golf course. The golf course itself provides significant fire breaks throughout the site. In the event of a wildland fire in the vicinity, the developed nature of the golf course will assist in slowing down fire spread. Moreover, the Casitas will be dispersed over the property in a manner that produces wide distances between buildings (from 10 to 50 feet apart). The separation of the Casitas units would limit the fire exposure hazard each building presents to its neighbor and reduces the chances of an isolated structure fire growing to a multi-building conflagration. This would reduce the risk to the site structures from an attacking wildfire and reduces the chance of an out- of-control structure fire initiating on site and causing an escaping wildfire. Impacts related to wildland fires would be *less than significant*.

Mitigation Measures

Although impacts would be less than significant, the following precautionary mitigation measure is recommended to be included as a condition of approval:

Mitigation Measure W-1. Emergency Information Notices. Provide in-room notices for hotel guests that provide information on how to secure emergency information regarding wildfires, and recommended evacuation routes depending on the specifics of a wildfire occurrence.

Significance After Mitigation

Impacts would be less than significant, even without recommended mitigation.

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

a. Environmental Degradation: *Less Than Significant With Mitigation Incorporated.* All potentially significant adverse impacts identified in this assessment are readily and feasibly offset by standard City practices, regulatory requirements, conditions of approval, and/or mitigation measures that will reduce each impact to a less than significant level.

Impacts related to Aesthetics, Energy, Greenhouse Gas Emissions, Mineral Resources, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire were determined to be less than significant. Potential impacts related to Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, Land Use and Planning, and Noise were less than significant with mitigation. Standard conditions of approval would also apply. There are no important examples of major period of California history or prehistory that will be impacted by this project.

b. Cumulative Impacts: *Less Than Significant With Mitigation Incorporated.* The proposed project is being developed according to the City's General Plan and is an allowed use under the site's existing land use designation. Any significant impacts are fully mitigated individually, and also address any potential cumulative impacts. The project would be consistent with local and regional plans, and the project's operational air quality emissions would not exceed established thresholds of significance. Additionally, the proposed project would not cause a substantial increase in ambient noise levels. The project adheres to all other land use plans and policies with jurisdiction in the project area and would not cause a substantial increase in traffic volumes within the project area. Therefore, the proposed project would not have impacts that are cumulatively considerable, and impacts would be less than significant with mitigation incorporated.

c. Impacts to Humans: *Less Than Significant With Mitigation Incorporated.* Effects on human beings were evaluated as part of this analysis of this Initial Study under the aesthetics, air quality, cultural resources as it relates to human remains, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, tribal cultural resources, and utilities and services systems thresholds. Based on the analysis and conclusions in this Initial Study, impacts for these topics were considered to have no impact, less than significant impact, or less than

significant with mitigation incorporated. Therefore, potential direct and indirect impacts on human beings that result from the proposed project would be considered less than significant with mitigation incorporated.

Table 20. Summary of Mitigation Measures

Air Quality

Mitigation Measure AQ-1. Fugitive Dust Mitigation. The following mitigation measures shall be implemented to reduce construction generated fugitive dust. These measures shall be shown on grading and building plans.

n. Reduce the amount of disturbed area where possible.
o. Use water trucks, SLOAPCD-approved dust suppressants (see Section 4.3 in the CEQA Air Quality Handbook), or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the District's limit of 20 percent opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water should be used whenever possible. Please note that since water use is a concern due to drought conditions, the contractor or builder shall consider the use of an APCD-approved dust suppressant where possible to reduce the amount of water used for dust control. For a list of suppressants, see Section 4.3 of the CEQA Air Quality Handbook.
p. All dirt stockpile areas should be sprayed daily or covered with tarps or other dust barriers as needed.
q. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
r. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between the top of load and top of trailer) in accordance with California Vehicle Code (CVC) Section 23114.
s. "Track-Out" is defined as sand or soil that adheres to and/or agglomerates on the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto any highway or street as described in CVC Section 23113 and California Water Code 13304. To prevent 'track out', designate access points and require all employees, subcontractors, and others to use them. Install and operate a 'track-out prevention device' where vehicles enter and exit unpaved roads onto paved streets. The 'track-out prevention device' can be any device or combination of devices that are effective at preventing track out, located at the point of intersection of an unpaved area and a paved road. Rumble strips or steel plate devices need periodic cleaning to be effective. If paved roadways accumulate tracked out soils, the track-out prevention device may need to be modified.
t. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil disturbing activities.
u. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established.
v. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD.
w. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.
x. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where possible. Roads shall be pre-wetted prior to sweeping when possible.
y. The burning of vegetative material shall be prohibited. Effective February 25, 2000, SLOAPCD prohibited developmental burning of vegetative material within San Luis Obispo County. If you have any questions regarding these requirements, contact the SLOAPCD Engineering & Compliance Division at (805) 781-5912.
z. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20 percent opacity, and to prevent the transport of dust off-site. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Compliance Division prior to the start of any grading, earthwork or demolition.

Mitigation Measure AQ-2. Construction Emissions. The following measures shall be implemented to reduce construction emissions from on and off-road construction equipment (NOx, ROG, and DPM) and area sources. These measures shall be shown on grading and building plans:

a. Maintain all construction equipment in proper tune according to manufacturer's specifications.

Table 20. Summary of Mitigation Measures

b. Fuel all off-road and portable diesel-powered equipment with ARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road).
c. Heavy-duty (50 horsepower or greater) diesel-fueled construction equipment shall meet, at a minimum, ARB's Tier 3 certified engines, or cleaner, off-road heavy-duty diesel engines; be fitted with diesel exhaust particulate filters in accordance with manufacturer recommendations; and, comply with the State Off-Road Regulation. Heavy-duty equipment with Tier 4 engines shall be used to the extent locally available. Where Tier 3, or cleaner, equipment is not available, incorporate diesel emission control strategies/retrofits, such that emission reductions achieved equal or exceed that of a Tier 3 engine. Installing California Verified Diesel Emission Control Strategies. Verified diesel emissions control strategies can be found at: arb.ca.gov/diesel/verdev/vt/cvt.htm.
d. When applicable, portable equipment, 50 horsepower (hp) or greater, used during construction activities shall be registered with the California statewide portable equipment registration program (issued by the California Air Resources Board) or be permitted by the APCD. Such equipment may include power screens, conveyors, internal combustion engines, crushers, portable generators, tub grinders, trammel screens, and portable plants (e.g, aggregate plant, asphalt plant, concrete plant).
e. Use on-road heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on- road heavy-duty diesel engines, and comply with the State On-Road Regulation.
f. All on and off-road diesel equipment shall not idle when not in use. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5-minute idling limit.
g. Construction equipment staging areas shall be located at the furthest distance possible from nearby noise-sensitive land uses.
h. To the extent locally available, electrified or alternatively powered construction equipment shall be used.
i. Substitute gasoline-powered in place of diesel-powered equipment, where possible; and
j. Use alternative-fueled construction equipment on-site where possible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.
k. Construction of the proposed project shall use low-VOC content paints not exceeding 50 grams per liter.
l. To the extent locally available, use prefinished building materials or materials that do not require the application of architectural coatings.
m. Meet or exceed Cal Green Tier 2 standards for reducing cement use in concrete mix as allowed by local ordinance and conditions.

Mitigation Measure AQ-3. Operational Emissions. The following mitigation measures shall be implemented, to the extent possible, to minimize long- term operational emissions:

a. The project shall provide shade (e.g. through tree planting or built structures) over 50 percent of parking spaces to reduce evaporative emissions from parked vehicles, excluding areas where increased shade would affect the performance of solar PV systems.
b. Implement driveway design standards (e.g., speed bumps, curved driveway) for self-enforcement of reduced speed limits on unpaved driveways.
c. Use a SLOAPCD-approved suppressant on private unpaved roads leading to the site, unpaved driveways and parking areas applied at a rate and frequency that ensures compliance with SLOAPCD Rule 401: Visible Emissions and ensures off-site nuisance impacts do not occur.
d. Work with SLOCOG to create, improve, or expand an onsite or nearby transit/shuttle systems, including (but not limited to) transit stops, mobility hubs, park-and-ride lots.
e. Implement on-site circulation design elements in parking lots to reduce vehicle queuing and improve the pedestrian environment.
f. Provide employee lockers and showers to promote bicycle and pedestrian use. One shower and five lockers for every 25 new employees is recommended.
g. A minimum of 20 percent of on-site fleet vehicles owned by the project proponent shall be zero-emission vehicles.
h. Provide dedicated parking for carpools, vanpools, and/or high-efficiency vehicles to exceed by 20 percent Cal Green Tier 2 for non-residential land uses.
i. Work with SLO Regional Rideshare to educate occupants with alternative transportation and smart commute information (e.g., transportation board, electronic kiosk, new hire packets, web portal, newsletters, social media, etc.).
j. Encourage non-residential land uses to implement and promote programs to reduce employee vehicle miles traveled (e.g. incentives, SLO Regional Rideshare trip reduction program, vanpools, on-site employee housing, alternative schedules (e.g. 9–80s, 4–10s, telecommuting, satellite work sites, etc.).

Table 20. Summary of Mitigation Measures

k. Exceed CALGreen Tier 2 standards at the time of development for building energy efficiency.
l. CALGreen Tier 2 compliant electric vehicle (EV) charging stations shall be "EV Ready" as opposed to "EV Capable".
m. Implement a "No Idling" vehicle program which includes signage enforcement, etc.
n. Exceed CALGreen Tier 2 building standards at the time of development for utilizing recycled content materials.
o. Exceed CALGreen building standards at the time of development for water conservation (e.g., use of low flow water fixtures, water efficient water irrigation systems, and drought tolerant landscaping).
p. Exceed 2022 CALGreen standards for the use of greywater, rainwater, or recycled water where applicable/available.
q. Exceed 2022 CALGreen standards for using shading, trees, plants, cool roofs, etc. to reduce "heat island" effect.
r. To the extent allowed by the building code at the time of development, incorporate natural lighting in buildings to minimize daytime lighting demand.
s. Outdoor lighting shall be designed to minimize electrical demand, such as the use of solar-powered lighting and lighting controlled by motion sensors.
t. All built-in appliances shall be Energy Star certified or equivalent.
u. Utilize on-site renewable energy systems (e.g. solar, wind, geothermal, biomass and/or biogas) sufficient to exceed applicable building standards at the time of development with a goal of achieving zero net energy (ZNE) buildings.
v. Design roof trusses to handle dead weight loads of standard solar-heated water and PV panels.
w. Encourage the use of low-VOC content cleaning products that are certified as meeting U.S. EPA's Safer Product Standards.
x. Hotel rooms shall include the installation of occupancy sensors to minimize electricity use with the rooms not occupied.
y. Encourage hotel participation in SLO Car Free. SLO Car Free is a cooperative partnership initiated and led by SLOAPCD to promote travel to and from the County via alternative means of transportation (e.g., AMTRAK).
z. The proposed hotel shall offer shuttle service for onsite guests that provides service (at a minimum) to and from the North County Transit Station, which is located at 800 Pine Street, Paso Robles, CA.

Biological Resources

Mitigation Measure BIO-1. Environmental Awareness Training. An environmental awareness training shall be presented to all construction personnel by a qualified biologist prior to the start of any project activities. The training shall include color photographs and a description of the ecology of all special-status species known or with potential to occur, as well as other sensitive resources requiring avoidance during construction. The training shall also include a description of protection measures required by discretionary permits, an overview of the Federal and State Endangered Species Acts, and implications of noncompliance with these regulations. This will include an overview of the required avoidance, minimization, and mitigation measures. A sign-in sheet with the name and signature of the qualified biologist who presented the training, and the names and signatures of the environmental awareness trainees will be kept. A fact sheet conveying the information provided in the environmental awareness training will be provided to all project personnel.

Mitigation Measure BIO-2. Site Maintenance and General Operations. The following general shall be implmeneted to minimize impacts during active construction:

- The use of heavy equipment and vehicles shall be limited to the proposed project limits and defined staging areas/access points. The boundaries of each work area shall be clearly defined and marked with high visibility fencing. No work shall occur outside these limits.
- Project plans, drawings, and specifications shall show the boundaries of all sensitive resource areas and the location of erosion and sediment controls, delineation of construction limits, and other pertinent measures to ensure the protection of sensitive habitats and resources.
- Staging of equipment and materials shall occur in designated areas with appropriate demarcation and perimeter controls. No staging areas shall be located within 100 feet of sensitive habitat or aquatic resources.
- Secondary containment, such as drip pans, shall be used to prevent leaks and spills of potential contaminants.

Table 20. Summary of Mitigation Measures

- Washing of concrete, paint, or equipment, and refueling and maintenance of equipment shall occur only in designated staging areas. These activities will occur at a minimum of 100 feet from sensitive habitat or aquatic resources, including drainages. Sandbags and/or absorbent pads and spill control kits shall always be available on site to clean up and contain fuel spills and other contaminants.
- Construction equipment shall be inspected by the operator daily to ensure that equipment is in good working order and no fuel or lubricant leaks are present.
- Plastic monofilament netting (erosion control matting) or similar material will not be used on site due to the potential to entangle special-status wildlife. Acceptable substitutes are coconut coir matting, biodegradable fiber rolls, or tackified hydroseeding compounds.
- The use of pesticides (including rodenticides) and herbicides on the property shall be in compliance with all local, state, and federal regulations to avoid primary and secondary poisoning of sensitive species that may be using the site.
- After completion of the project's construction, all protective fencing/flagging used to delineate sensitive biological resources shall be removed from the project area and disposed of in appropriate waste receptacles or reused.

Mitigation Measure BIO-3. Lighting. Any permanent lighting introduced for new developments shall be positioned and/or shielded to reduce light spill and glare and to avoid direct lighting of off-site natural habitat features suitable for special-status species (i.e., adjacent grassland and oak woodland)

Mitigation Measure BIO-4. Oak Tree Avoidance and Protection. To the maximum extent feasible, impacts to oak trees shall be avoided and minimized. The following avoidance and minimization measures shall be implemented to address potential impacts to or removal of oak trees:

- The canopy edge and trunk location of oak trees located within 50 feet of proposed construction shall be surveyed and placed on all plan sets. The tree map shall be used to identify impacts and will inform the mitigation plan, if required.
- Impacts to oak tree canopy or sensitive root zone should be avoided to the extent feasible.
- Prior to ground-breaking, tree protection fencing shall be installed as close to the outer limit of the sensitive root zone as practicable for construction operations to protect trees located within 50 feet of construction that will be preserved. The fencing shall be in place throughout the duration of construction. Demarcation such as t-posts and a minimum of two strands of yellow rope are adequate.
- No grading or staging shall occur within the fenced areas around protected trees.
- A certified arborist will be hired for removal of existing roots and branch trimming per International Society of Arboriculture (ISA) standards. Any roots exposed during construction shall be covered with a layer of soil to match existing topography.
- An oak tree survey shall be completed once development plans are finalized; if direct or indirect impacts will occur, they shall be assessed by a licensed arborist or qualified botanist prior to final inspection and reported to the City.

Mitigation Measure BIO-5. Oak Tree Mitigation. In the event of oak tree removals or impacts during project implementation, the owner shall provide mitigation (on-site if feasible) per the City's guidelines, typically 4:1 for removals and 2:1 for impacted trees. A mitigation plan shall be prepared that details the methods and requirements for oak tree mitigation. The plan shall be provided to the City for approval prior to project implementation. At a minimum, the plan shall:

- Include a detailed inventory of the species and quantity of all oak trees to be removed or impacted.
- Discuss the proposed construction methods, construction schedule, and the implementation schedule of activities proposed as part of the plan.
- Quantify and describe the anticipated impacts to individual oak trees and/or oak woodland habitat, as applicable.
- Identify all appropriate methods for fulfillment of required mitigation (e.g., on-site plantings, conservation easement, or in-lieu fee).
- Describe detailed planting methods, as appropriate.
- Identify suitable areas for establishment of new oak trees and/or protection of existing oak woodland habitat, as appropriate.

Table 20. Summary of Mitigation Measures

- Describe short-term and long-term monitoring protocols and/or vegetative growth performance criteria for mitigation success.
- The plan shall be prepared by a qualified botanist or arborist and be submitted to the City for approval prior to the start of construction.

Mitigation Measure BIO-6. Jurisdictional Waters. In addition to **Mitigation Measure BIO-2**, the following recommendations have been provided to protect drainages and aquatic resources on site:

- Prior to project impact of these areas, all applicable agency permits with jurisdiction over the project area (i.e., CDFW, RWQCB, and/or Corps) shall be obtained. Additional mitigation measures may be required by these agencies and shall be implemented as necessary throughout the project.
- To prevent erosion and sedimentation into drainages during construction, an erosion and sedimentation control plan shall be developed and implemented. It shall outline Best Management Practices (BMPs) for short-term, temporary stabilization. Acceptable stabilization methods include the use of weed-free, natural fiber (i.e., non-monofilament) rolls, jute or coir netting, and/or other industry standards. Erosion control devices shall be installed and maintained for the duration of the project. BMPs shall be installed and maintained for the duration of the project.
- Construction activity within 100 feet of drainages shall only occur when appropriate BMPs are in place to protect aquatic features from indirect impacts.

Mitigation Measure BIO-7. Pre-construction Survey for American Badger and San Joaquin Kit Fox. A qualified biologist shall conduct a pre-construction survey within 30 days prior to the start of initial project activities to ensure American badger and SJKF are not present within proposed work areas. If potential dens are discovered, they shall be monitored with a remote camera or tracking medium for at least three days to determine if they are occupied. If the qualified biologist determines that a den may be active, a no-entry exclusion buffer shall be established within 50 feet of the den and the appropriate resource agencies shall be contacted for further guidance. If active dens are found during the breeding and rearing season, no activity shall occur within 200 feet (American badger) or 500 feet (SJKF) of the den without agency guidance and approval. Exclusion buffers shall be prominently flagged and encircle the den. If an exclusion buffer is not feasible, the applicant will contact the City for further guidance prior to initial project activities. The results of the survey shall be provided to the City prior to initial project activities. If construction lapses beyond 30 days from the survey, an additional survey will be required.

Mitigation Measure BIO-8. County Standard Mitigation of Impacts to San Joaquin Kit Fox Habitat. In accordance with the County Guide to SJKF Mitigation Procedures under CEQA, the project shall adopt the Standard Kit Fox CEQA Mitigation Measures and shall include these measures on development plans. The following summarizes those that are applicable to this project:

- The applicant shall mitigate for the loss of SJKF habitat either by:
    1. Establishing a conservation easement on-site or off-site in a suitable San Luis Obispo County location and provide a non-wasting endowment for management and monitoring of the property in perpetuity;
    2. Depositing funds into an approved in-lieu fee program; or
    3. Purchasing credits in an approved conservation bank in San Luis Obispo County.

- A maximum 25 mile-per-hour speed limit shall be required at the project site during construction activities.
- All construction activities shall cease at dusk and not start before dawn.
- A qualified biologist shall be on-site immediately prior to initiation of project activities to inspect for any large burrows (e.g., known and potential dens) and to ensure no wildlife are injured during project activities. If dens are encountered, they should be avoided as discussed below.
- Exclusion zone boundaries shall be established around all known and potential SJKF dens.
- All excavations deeper than 2 feet shall be completely covered at the end of each working day or provided with one or more escape ramps constructed of earth fill or wooden planks every 200 feet.
- All pipes, culverts, or similar structures with a diameter of four inches or greater, stored overnight at the project site shall be inspected for SJKF and other wildlife before burying, capping, or moving. If a kit

fox is found within material stored onsite, the material will not be moved until the kit fox has left on its own.

- All food-related trash shall be removed from the site at the end of each workday as to not attract SJKF fox to the project site.
- Project-related equipment shall be prohibited outside of designated work areas and access routes.
- Disturbance to burrows shall be avoided to the greatest extent feasible.
- No rodenticides or herbicides shall be applied in the project area.
- No firearms shall be allowed on the project site.
- No pets, such as dogs or cats, shall be permitted on the project site to prevent harassment, mortality of kit foxes, or destruction of dens.
- Permanent fences shall allow for SJKF passage through or underneath (i.e., an approximate four-inch passage gap shall remain at ground level).

In the event that it can be determined that the existing Hunter Ranch Golf Course can be considered Urban/Disturbed as determined by the project Biologist, the California Department of Fish and Wildlife, and the City, Mitigation Measure Bio-8 may not need to be implemented.

Mitigation Measure BIO-9. Surveys and Monitoring for Special-status Amphibians and Reptiles. A qualified biologist shall conduct a pre-construction survey immediately prior to the start of work to ensure special-status amphibians and reptiles are not present within proposed work areas. During the survey, the biologist shall gently disturb or rake the scrub understory and upper layers of oak tree duff to uncover or rouse northern California legless lizards. Construction monitoring shall be conducted by a qualified biologist during all initial ground disturbing and vegetation removal activities (e.g., grading, grubbing, vegetation trimming) within suitable habitat. If these species are found during pre-construction surveys or monitoring, they shall be allowed to leave the work area on their own volition or be hand captured and relocated to suitable habitat outside of the area of impact, if permitted. To minimize the potential for impacts to dispersing amphibians, work within 100 feet of hydrologic features shall occur during dry conditions, as feasible. If work within 100 feet of drainages or the pond is scheduled to start during the typical rainy season (October through April), when western spadefoot toads and CRLF are most likely to be dispersing through upland habitat, a follow up survey shall be conducted following any rain event of 0.25 inch or greater. All vehicles, equipment, and materials staged on site overnight shall be inspected by a designated member of the construction crew. If special- status wildlife is found within the work area, it shall be allowed to leave on its own volition and, as appropriate, the resource agencies shall be contacted.

Mitigation Measure BIO-10. Vernal Pool Fairy Shrimp Critical Habitat. The boundaries of potential VPFS habitat areas on site and associated watersheds shall be included on all project plans. The limits of all workspaces, access routes, and staging areas shall also be included on project plans and clearly delineated in the field with brightly colored flagging and/or fencing. In addition, a biologist familiar with vernal pool characteristics and associated watersheds shall conduct occasional site inspections to document compliance with species and permit protection measures, including maintenance of workspace delineation fencing. Weekly biological monitoring reports shall be submitted to the City. If compliance deficiencies are identified during monitoring, the deficiency shall be documented, and follow-up actions will be required under the direction of the City representative to alleviate the compliance concern. In addition to the protection measures identified in Measures 1 and 2 above, these measures provide protection for VPFS by ensuring that no unanticipated impacts occur within suitable habitat for this species.

Approximately 0.01 acre of vernal pool habitat will be permanently impacted as a result of development. These impacts will need to be mitigated for in accordance with the project's permit conditions.

Mitigation Measure BIO-11. Pre-construction Survey and Avoidance Measures for Nesting Birds. To protect nesting birds, if work is planned to occur between February 1 and August 31, a qualified biologist shall survey the area for nesting birds within one week prior to activity beginning on site. In addition, if work is planned to occur as early as January 1, a qualified biologist shall complete a focused survey for nesting golden eagles within one-quarter mile of the project site, as feasible based on access. Surveys for raptors shall be conducted within a 250-foot radius of the project site. If any active non-listed raptor nests are observed, these nests and nest trees shall be protected, and a no-work buffer of 250 feet shall be established until the young have fledged and are no longer reliant on the nest tree or parental care, or the nest is no longer active. Surveys for other non-listed avian species shall be conducted within a 50-foot radius of the project site. If any active nests are observed, these nests and nest trees shall be protected with a 50-foot no-work buffer. All activity will remain

outside of the designated buffers until a qualified biologist has determined that the young have fledged or that proposed construction activities would not cause adverse impacts to the nest, adults, eggs, or young. If work activities are deemed to not be a threat to a given nest within a buffer zone, a qualified biologist may monitor the nest during work to ensure that the nesting birds are not disturbed (e.g., showing signs of stress or changes in behavior as a result of work activity). If special-status avian species are identified and nesting within the work area, no work will begin until an appropriate buffer is determined in consultation with CDFW, and/or the USFWS.

Mitigation Measure BIO-12. San Luis Obispo Owls-Clover Management. San Luis Obispo owl's clover was observed in one area of the Hunter Ranch Golf Course Property within the site of the proposed new maintenance building, public water main and public sewer main at the southwest corner of the property. The specific area of observation is outlined on the map of the approximate location where San Luis Obispo owl's clover was observed on the property in the May 16, 2023 survey report by Ed Mercurio.

The following mitigation measures shall be implemented to ensure less than significant impacts to the San Luis Obispo owl's clover:

1. The area where this species has been observed growing is approximately 4225 square feet in size. Please see map of the approximate location where San Luis Obispo owl's clover was observed on the property in this survey report. As much of this area as possible should be left as natural as possible, without additional plantings or supplemental watering.
2. Where development will take place within the area where this species has been observed growing, the superficial soil layer, which contains the seeds, should be scraped off of areas that will be completely altered or covered, and the soil then deposited and leveled to a thin layer by raking in the closest areas to where the development is that have similar environmental conditions. This should be done during times when the population is seeds and not actively growing plants, which is between mid-summer and fall. The area where the soil is deposited should be an area of at least 4225 square feet where no development will take place.
3. San Luis Obispo owl's clover is described as possibly being somewhat tolerant of disturbance. It is, however, a soft annual plant that is not very tolerant of mechanical injury once growing. Its white flowers are quite visible, however, and mark where the plants are well, so impacts to them can be easily avoided during their blooming period which is typically from March to June.
4. Two monitoring inspections shall be conducted within three months of completion of each of the developments and one in the following year between April 15 and May 15.

Mitigation Measure BIO-13. Herbaceous Riparian Marsh Vegetation Management. Most of the length of the immediate drainage bottom in general proximity to proposed activities near Huer Huero Creek (see Figures 8a and 8b of the April 2025 Biological Resources Assessment) is currently green with herbaceous riparian marsh vegetation. Riparian and wetland vegetations are classified as sensitive habitats that must be protected from impacts during and after development. This can be achieved in the following way:

1. Direct impacts to the herbaceous riparian marsh habitat must be avoided. No development can take place within the entire length and width of the corridor of riparian marsh habitat. Development can take place alongside of the riparian corridor but not within it.
2. Indirect impacts to the herbaceous riparian marsh habitat must be avoided. Plastic sheet barrier fencing (silt/exclusion fencing) will be properly installed prior to the start of any construction that breaks ground between the area of development and the edge of the corridor of riparian marsh habitat.
3. Two monitoring inspections shall be conducted within three months of completion of each of the developments and one in the following year between April 15 and May 15.

Mitigation Measure BIO-14. Roosting Bat Pre-construction Survey and Passive Relocation. Within 30 days before construction, between April and September, the Project biologist shall inspect structures, and trees or snags to be removed or pruned that are greater than 20 inches diameter-at-breast-height for bats. If a bat roost is found, the qualified biologist shall implement passive relocation measures such as installation of one-way valves. For each occupied roost removed, one bat box shall be installed in similar habitat to those which are removed. Bat maternity colonies shall not be disturbed. If a bat roost is detected during the maternal season (April through September), a minimum 50-foot no-disturbance buffer shall be maintained.

Table 20. Summary of Mitigation Measures

Mitigation Measure BIO-15. Habitat Mitigation and Monitoring Plan. To minimize impacts on riparian habitat, prior to commencement of construction activities, prepare and implement a Habitat Mitigation and Monitoring Plan (HMMP). Temporary impacts typically require a minimum 1 to 1 ratio restoration (area of restored habitat to impacted habitat) and permanent impacts to riparian areas typically require a minimum 3 to 1 ratio creation and enhancement (area of created or enhanced habitat to impacted habitat).

Mitigation Measure BIO-16. Agency Coordination. To address potential impacts to Huer Huero Creek and its associated riparian zone, construction of off-site utilities improvements is anticipated to require permits from U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife. The Owner/Applicant shall comply with all state and federal permitting requirements. The Owner/Applicant shall obtain and produce for the city correspondence from applicable state and federal agencies regarding compliance of the proposed development with state and federal laws.

Cultural Resources and Tribal Cultural Resources

Mitigation Measure CR-1. Pre-Construction Awareness Training. At the pre-construction meeting, the field archaeologist will conduct awareness training for the construction crew and supervisors. This will include a description of the types of artifacts that may be encountered and a discussion of why these are of importance to the Native American community as well as for an understanding of our local history. Pertinent laws and regulations protecting archaeological sites will be briefly reviewed and archaeologists monitoring methods will be explained. Also included in the training will be a discussion regarding a discovery by a construction crew member. The crew will be instructed to stop work in the immediate area and advise the archaeological monitor of the discovery so that it can be evaluated in a timely manner.

Mitigation Measure CR-2. Encountering Unknown Resources. If cultural resources, such as prehistoric or historic artifacts, bone, or other cultural materials are encountered during project activities, all work within 50 feet of the discovery should be redirected. The City Environmental Coordinator should be notified so that the extent and location of discovered materials may be evaluated by a qualified archaeologist. The archaeologist will assess the situation, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Upon completion of the assessment, the archaeologist should prepare a report documenting the methods and results of the investigation and provide recommendations for the treatment of the archaeological materials discovered.

Mitigation Measure CR-3. Procedures if Human Remains are Encountered. If human remains (or remains that may be human) are discovered at the project site or within the off-site project improvement areas during ground-disturbing activities, the construction contractors, project archaeologist, and/or designated Native American tribal representative shall immediately stop all activities within 100 feet of the find. The project proponent shall then inform the San Luis Obispo County Coroner and the City of Paso Robles immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).

If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC), which will identify the "Most Likely Descendent" (MLD). Despite the affiliation with any Native American tribal representative(s) at the site, the NAHC's identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of Native American human remains and may recommend to the project proponent means for treatment or disposition, with appropriate dignity of the human remains and any associated grave goods. The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains will be determined in consultation between the project proponent and the MLD. In the event that there is disagreement regarding the disposition of the remains, State law will apply and median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98(e) and 5097.94(k)).

The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The locations will be documented by the consulting archaeologist in conjunction with the various stakeholders and a report of findings will be filed.

Mitigation Measure CR-4. Measures Related to Resource P-40-038417. An Extended Phase I testing program and consultation with the Chumash and Salinan community are required at isolated lithic scatter P-40-038417 within the current project area prior to any ground disturbing activities if the location cannot be avoided. If the

location can be avoided, an Environmental Sensitive Area (ESA) fencing should be placed at the mapped area by a qualified archaeologist prior to construction. The testing program should be conducted to: 1) determine if the project area contains subsurface archaeological deposits; and 2) assess whether these deposits constitute an archaeological site and retains sufficient integrity for the evaluation of eligibility for the CRHR.

Geology and Soils

Mitigation Measure GEO-1. Paleontology Awareness Training. A City of Paso Robles (City)-approved paleontologist shall be retained by the Applicant that meets the qualifications of a Qualified Professional Paleontologist as defined by the Society of Vertebrate Paleontology to develop and conduct a Workers Environmental Awareness Program training for project personnel involved in ground-disturbing activities, such as grading, excavation, trenching, and other earthwork. The training shall describe applicable laws and regulations regarding paleontological resources, types of resources that may be found in the project area, and the required procedures in the event of an inadvertent discovery.

Mitigation Measure GEO-2. Paleontological Resources Management Plan. The City of Paso Robles (City)-approved paleontologist shall develop and submit a Paleontological Resources Management Plan (PRMP) to the City for review and approval. The approved PRMP shall be implemented during all construction activities. The PRMP shall include provisions for documenting the site according to the standards developed by the National Research Council (1987) and shall include, at a minimum:

1. All ground disturbances greater than or equal to 5 feet below ground surface, or that impact older alluvium or Paso Robles Formation regardless of depth, shall be monitored by the City-approved paleontologist;
2. A map, based on final grading plans, showing the areas where monitoring shall occur;
3. Processes and procedures for paleontological monitoring, fossil salvaging, reporting, and curation;
4. In the event paleontological resources are identified during construction, all work within 50 feet of the discovery shall immediately cease so that the City-approved paleontologist can evaluate the significance of the discovery;
5. Preservation of significant fossils found during construction by prompt removal and/or stabilization whenever feasible; and
6. Cataloguing and curation of all artifacts and records detailing the results of the investigations at a recognized, nonprofit paleontological specimen repository with permanent curator, such as a museum or university, or at the discretion of the paleontologist, at a City-approved facility.

At the conclusion of paleontological monitoring, the City-approved paleontologist shall prepare a final Paleontological Resources Monitoring Report that documents the implementation of the PRMP, as well as any paleontological resources discoveries, and submit the final report to the City.

Greenhouse Gas Emissions

Mitigation Measure GHG-1. GHG Reduction Measures. The project shall include the following mitigation measures:

d. CALGreen Tier 2 compliant electric vehicle (EV) charging stations shall be "EV Ready" as opposed to "EV Capable."

e. Install electrically powered appliances and building mechanical equipment in place of natural-gas-fueled equipment. If natural gas equipment is to be installed, the following shall be implemented: (1) Install electrical service to the natural gas equipment location sufficient to allow for the future conversion from natural gas to electrical service; (2) A Greenhouse Gas (GHG) Reduction Plan shall be prepared for the proposed project. The GHG Reduction Plan shall include a menu of all possible onsite GHG reduction measures sufficient to offset operational natural-gas source emissions. In the event that the City of Paso Robles (City) adopts an updated Climate Action Plan or the San Luis Obispo County Air Pollution Control District (SLOAPCD) releases updated recommended GHG significance thresholds that address future-year GHG emissions reductions, the GHG-Reduction Plan may be evaluated in comparison to the GHG thresholds and reduction measures identified in the Climate Action Plan or those identified by the SLOAPCD and adjusted in order for the project to be in compliance with the Climate Action Plan. The GHG Reduction plan shall be approved by the City prior to issuance of building construction permits.

Table 20. Summary of Mitigation Measures

Under California Environmental Quality Act Guidelines Section 15126.4(c)(3) and (c)(4), respectively, a project's GHG emissions may also be reduced by offsite measures, including offsets that are not otherwise required by existing regulations and measures that sequester GHGs. In the event that feasible onsite GHG-reduction measures are insufficient to offset operational natural-gas source GHG emissions, offsite mitigation measures may be included to the extent feasible. Offsite mitigation measures may include "Direct Reduction Activities" located in the City of Paso Robles or the SLOAPCD jurisdictional areas. "Direct Reduction Activities" means undertaking or funding activities that will reduce or sequester GHG emissions. GHG reduction credits shall achieve GHG emission reductions that are real, permanent, quantifiable, verifiable, and enforceable. GHG reduction credits shall be undertaken for the specific purpose of reducing project-generated GHG emissions and shall not include reductions that would otherwise be required by law. All Direct Reduction Activities and associated reduction credits shall be confirmed by an independent, qualified third-party air consultant retained by the Applicant.

f. The project shall provide organic waste pick up and shall provide the appropriate on-site enclosures consistent with the provisions of the City of Paso Robles Development Standards for Solid Waste Services.

Mitigation Measures AQ-2 and AQ-3 are also required to address Greenhouse Gas Emissions impacts.

Hydrology and Water Quality

Mitigation Measure HYD-1. Storm Water Pollution Prevention Plan. Prior to the issuance of grading permits or building permits, the Applicant shall prepare and submit a Stormwater Pollution Prevention Plan (SWPPP) according to General Permit Order 2009-0009 for approval by the City of Paso Robles (City) Public Works Department and the Central Coast Regional Water Quality Control Board (RWQCB). The SWPPP shall include best management practices (BMPs) to reduce erosive and polluted runoff during all phases of project construction. BMPs shall be approved by the City and Central Coast RWQCB along with the SWPPP. BMPs may include, but are not limited to, erosion and sediment controls and vehicle and equipment monitoring and maintenance, as identified below:

1. Erosion and sediment controls, including silt fences, straw wattles, berms, sediment basins, runoff diversions, or other erosion control measures approved by the Central Coast RWQCB shall be installed properly to increase effectiveness of the SWPPP and shall be maintained regularly during the project's construction.
2. Construction equipment and vehicles shall be checked and maintained daily by the construction contractors to prevent spills of fuel, oil, and other hazardous materials. A designated staging area shall be established on the project site for construction vehicle and equipment parking and storage of fuel, lubricants, and solvents. Any staging areas for the offsite improvements that cannot be accommodated onsite shall be located a minimum of 50-feet from Huer Huero Creek. All fueling and maintenance activities shall take place in the designated staging area(s).

Compliance with the SWPPP during project construction shall be monitored by the City's Public Works Department during all construction phases.

Mitigation Measures BIO-15 and BIO-16 are also required to address Hydrology and Water Quality impacts.

Noise

Mitigation Measure N-1. Construction Noise Reduction. The following measures shall be implemented to reduce short-term construction-related noise impacts:

a. Noise sources associated with construction shall be limited to between 7 a.m. and 7 p.m. on weekdays. Construction activities shall be prohibited on Sundays and federal holidays.
b. Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.
c. When not in use, off-road equipment shall be turned off and shall not be allowed to idle.

Table 20. Summary of Mitigation Measures
Mitigation Measure N-2. Operational Noise Reduction. The following mitigation measures shall be implemented to reduce operational noise levels associated with the proposed maintenance building: a. Mechanical equipment (e.g., air compressors) shall be located within the interior of the proposed maintenance building. b. Bay doors on the maintenance building shall be closed to the extent possible. c. Doors and windows shall not be installed along the southern façade of the proposed maintenance building. d. The operation of maintenance building mechanical equipment and power tools (e.g., air compressors, pneumatic tools, grinders) shall be limited to the hours of 7:00 a.m. to 7:00 p.m.
Wildfire
Mitigation Measure W-1. Emergency Information Notices. Provide in-room notices for hotel guests that provide information on how to secure emergency information regarding wildfires, and recommended evacuation routes depending on the specifics of a wildfire occurrence. *[Recommended mitigation measure, not required. Can instead be implemented as a Condition of Approval.]*

REFERENCES AND SOURCES

Specific sources referenced in the analysis are listed below:

1. City of Paso Robles General Plan Elements, 2003-2020
2. Arborist Report, Greenvale Tree Company, January 27, 2023 and February 15, 2023
3. Paso Robles Zoning Code, October 31, 2024
4. State of California, Important Farmland Mapping Program. https://www.conservation.ca.gov/dlrp/fmmp/Pages/county_info.aspx
5. Air Quality and Greenhouse Gas Assessment for the Hunter Ranch Project, Ambient, August 2023, rev. September 2024
6. Biological Resources Assessment, Terra Verde Environmental Consulting, January 2022
7. Kit Fox Habitat Evaluation, Terra Verde Environmental Consulting, December 2021
8. Archaeological Inventory Survey for the Hunter Ranch Improvement Project, 4041 SR-46 East, Paso Robles, San Luis Obispo County, California, Nancy Farrell, Cultural Resource Management Services, September 2021
9. Archaeological Inventory Survey for the Hunter Ranch Improvement Project, 4041 SR-46 East, Paso Robles, San Luis Obispo County, California, Nancy Farrell, Cultural Resource Management Services Addendum to Report D/September 2021, Nancy Farrell, Cultural Resource Management Services, April 2023
10. Soils Engineering Report, Hunter Ranch Lodge, 4041 Highway 46 East, Hunter Ranch Golf Course, Paso Robles, California, prepared by Earth Systems Pacific, October 28, 2008.
11. Geotechnical Engineering Report, Proposed Driving Range Cover, prepared by Mid-Coast Geotechnical Inc., July 1, 2021
12. Geotechnical Engineering Report, Proposed Master Plan, prepared by Mid-Coast Geotechnical Inc., September 20, 2022
13. Draft EIR for the Landing Paso Robles Project, prepared by SWCA, June 2023
14. California Department of Conservation, Data Viewer. https://maps.conservation.ca.gov/geologichazards/#dataviewer
15. Survey for the presence of sensitive plant species in areas of proposed new developments as shown on the Overall Utility Plan of April 18, 2023 for the Hunter Ranch Golf Course, Paso Robles, San Luis Obispo County, California. Prepared by Ed Mercurio, Biological Consultant, May 16, 2023.
16. Geotechnical Engineering Report, Proposed Maintenance Shops and Future Casitas, prepared by Mid-Coast Geotechnical Inc., January 12, 2023
17. San Luis Obispo County Airport Land Use Plan for the Paso Robles Municipal Airport, 2007, amended February 19, 2025
18. Local Hazard Mitigation Plan, City of Paso Robles, 2019.
19. Wildfire Hazards Analysis, Watson Planning Consultants, June 2023
20. Preliminary Storm Water Control Plan, Walsh Engineering, March 11, 2024, rev. October 22, 2024
21. FEMA FIRM Maps 06079CO425G (dated 11/16/2012) and 06079CO394H (dated 6/6/2024)
22. Noise & Groundborne Vibration Impact Analysis for the Hunter Ranch Hotel & Resort Project, Paso Robles, CA, prepared by Ambient, November 2023
23. Paso Robles Fire and Emergency Services 2022 Annual Report, City of Paso Robles, 2022
24. Hunter Ranch Resort –Transportation Impact Analysis, Central Coast Transportation Consulting, July 17, 2024.

25. Water Demand and Wastewater Generation Estimate, Walsh Engineering, March 19, 2024
26. CalRecycle, Estimated Solid Waste Generation Rates webpage. https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates
27. Biological Constraints Map for the Mill Road Extension & Utilidor Project, Althouse & Meade, July 28, 2023
28. Survey for the presence of sensitive plant species, Ed Mercurio, Biological Consultant, May 16, 2023.
29. Cultural Resources Survey of the Mill Road Area Circulation Network Project, Central Coast Archaeological Research Consultants, June 2023. (RE: Mill Road Extension & Utilidor)
30. Updated CA Dept of Forestry and Fire Protection Fire-hazard Severity Map 2025
31. Fire and Domestic Water Capacity-Sizing Report, Walsh Engineering, May 31, 2023
32. Vesting Tentative Parcel Map – Improvement Plans, Walsh Engineering, October 22, 2024
33. Architect and Civils Plans Hunter Ranch Resort, October 31, 2024
34. Flood Plain Clearance Letter, Walsh Engineering, April 28, 2022
35. Fire Protection Considerations, PTrutner Fire Protection Engineering, Inc., September 22, 2022
36. Biological Resources Assessment for Mill Road Circulation and Annexation, Althouse & Meade, April 2025.

Appendix A

Air Quality and Greenhouse Gas Assessment

Appendix B

Biological Resources Assessment and Kit Fox Habitat Evaluation

Appendix C

Archaeological Inventory Survey

Appendix D

Noise & Groundborne Vibration Impact Analysis

Appendix E

Transportation Impact Analysis

Appendix F

Water Demand and Wastewater Generation Estimate

Appendix G

Technical Design Report for Offsite Improvements