

Initial Study/Mitigated Negative
Declaration for the Paso Robles
Landfill Annexation and Organics
Processing Facility, Paso Robles,
San Luis Obispo County, California

FEBRUARY 2026

PREPARED FOR
City of Paso Robles

PREPARED BY
SWCA Environmental Consultants

**INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
FOR THE PASO ROBLES LANDFILL ANNEXATION AND
ORGANICS PROCESSING FACILITY, PASO ROBLES, SAN
LUIS OBISPO COUNTY, CALIFORNIA**

Prepared for

City of Paso Robles
1000 Spring Street
Paso Robles, CA 93446
Attn: Adam Spaulding

Prepared by

SWCA Environmental Consultants
4111 Broad Street, Suite 210
San Luis Obispo, CA 93401
(805) 543-7095
www.swca.com

SWCA Project No. 84130

February 2026

CONTENTS

1	Introduction	1
1.1	Project Location	1
1.2	Environmental Setting and Baseline	1
1.3	Project Description	5
1.4	Required Discretionary Approvals	11
1.5	Intended Uses of this Document.....	11
2	Environmental Checklist and Environmental Evaluation.....	12
I.	Aesthetics	13
II.	Agriculture and Forestry Resources	17
III.	Air Quality.....	21
IV.	Biological Resources	30
V.	Cultural Resources	41
VI.	Energy	43
VII.	Geology and Soils	47
VIII.	Greenhouse Gas Emissions	54
IX.	Hazards and Hazardous Materials	57
X.	Hydrology and Water Quality	62
XI.	Land Use and Planning.....	68
XII.	Mineral Resources	74
XIII.	Noise.....	75
XIV.	Population and Housing	79
XV.	Public Services	81
XVI.	Recreation.....	82
XVII.	Transportation	84
XVIII.	Tribal Cultural Resources.....	87
XIX.	Utilities and Service Systems	88
XX.	Wildfire	91
XXI.	Mandatory Findings of Significance	95
3	References	97

Figures

Figure 1. Project Vicinity and Location.....	2
Figure 2. Annexation Area Aerial.....	3
Figure 3. City Limits and Sphere of Influence.....	4
Figure 4. Organics Processing Facility Project Site Aerial.....	7

Tables

Table 1. SLOAPCD Thresholds of Significance for Construction Activities.....	23
Table 2. Screening Emission Rates for Construction Activities	23
Table 3. Project Consistency with City Land Use Plans, Policies, and Regulations Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect.....	69
Table 4. Project Consistency with LAFCO Policies and Procedures	73
Table 5. Noise Standards for Locally Regulated (Non-Transportation) Noise Sources	76
Table 6. Construction Equipment Noise Emission Levels.....	77

1 INTRODUCTION

The City of Paso Robles (City) owns and operates a municipal landfill at an 80-acre site located at 9000 California State Route 46 East (SR 46E), approximately nine miles east of U.S. Highway 101 (US 101). The Paso Robles Landfill is a relatively small operation, receiving an average of approximately 200 tons of waste per day. The City owns 133 acres of unincorporated vacant land immediately south of the active landfill, fronting SR 46E, as shown in Figure 1 and Figure 2 (annexation area). The City purchased this land in 2005 to create a buffer between the active landfill and any future development in the vicinity. This land and all of the adjacent parcels currently have a County of San Luis Obispo (County) land use designation of Agriculture, with a Renewable Energy combining designation (overlay).

The City now proposes to annex the 133 acres of vacant land and build an organics processing facility (OPF) on an approximate 20-acre site within the annexed area (OPF project site). Based on the potential environmental impacts associated with annexation of the annexation area and construction and operation of the OPF, preparation of an IS/MND is considered to be the appropriate level of review for this project pursuant to Section 15162 of the State California Environmental Quality Act (CEQA) Guidelines. This IS/MND evaluates the potential environmental impacts associated with the proposed annexation of the 133-acre area, construction and operation of an OPF, and the addition of landfill improvements, hereafter referred to as the proposed project.

1.1 Project Location

The city has an area of approximately 20 square miles and is located in San Luis Obispo County, approximately mid-way between Los Angeles and San Francisco. The annexation area and OPF project site are located approximately 4.25 miles east of the city limits and is within the City's sphere of influence (SOI)¹, as shown in Figure 3. The annexation area and OPF project site are located along the north side of SR 46E at the intersection of Union Road, south of the landfill, approximately 9.2 miles east of downtown Paso Robles, south of the Estrella River, and east of the community of Whitely Gardens.

The annexation area includes five parcels—Assessor's Parcel Numbers (APNs) 015-043-005, 015-043-006, 015-043-007, 015-043-008, and 015-043-009—which total approximately 133 acres and are bounded on the south by SR 46E right-of-way.

1.2 Environmental Setting and Baseline

Surrounding land uses include the Paso Robles Landfill, open space, rural residential, and agricultural uses to the north; open space, single family residences, and Estrella Road to the east; wineries, single family residences, and SR 46E to the south; and wineries and vineyards to the west.

The annexation area consists of undeveloped land and is gently sloped downward from north to south. A portion of the annexation area burned in a vegetation fire in 2021. Vegetation on the site can be characterized as mostly non-native annual grassland habitat, with scattered valley and blue oak trees located along the eastern and northern edges. The Estrella River is located approximately 1 mile to the north and two unnamed blue-line drainages cross the northeast and southwest corners of parcel 015-043-009 (Figure 2).

¹ A sphere of influence is a planning boundary outside of an agency's legal boundary (such as the city limit line) that designates the agency's probable future boundary and service area. Factors considered in a sphere of influence review focus on the current and future land use, the current and future need and capacity for service, and any relevant communities of interest (California Association of Local Agency Formation Commissions 2022).

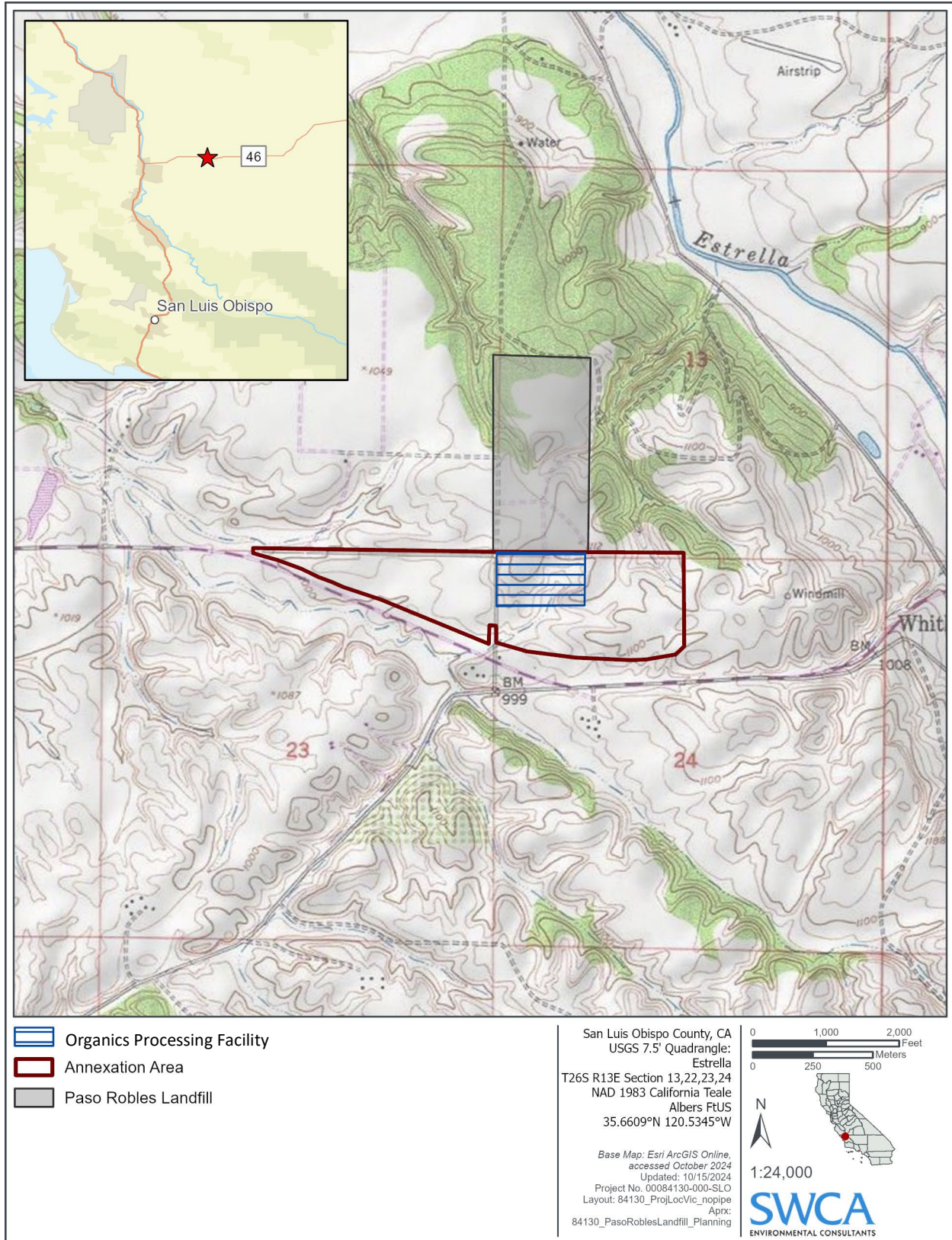


Figure 1. Project Vicinity and Location

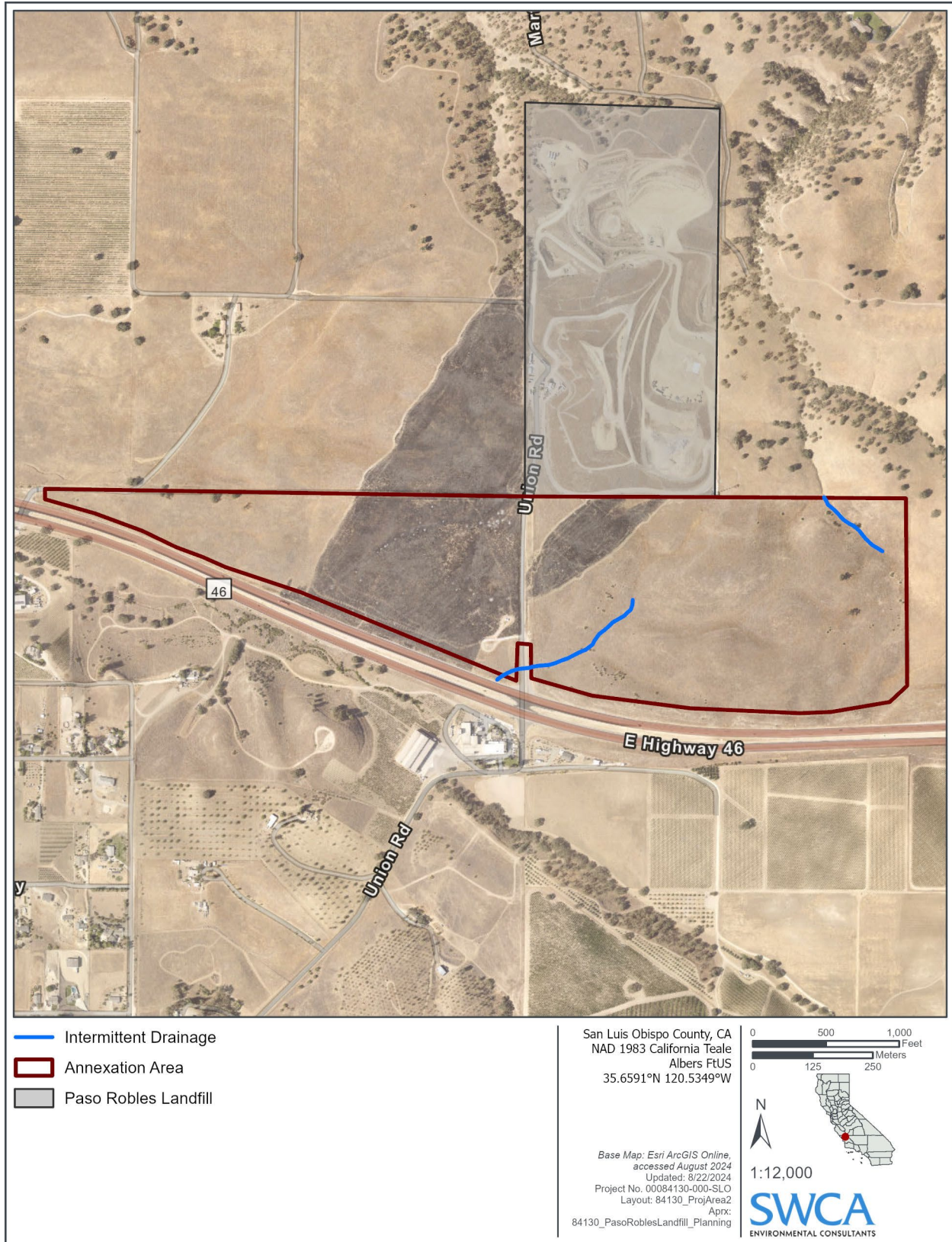


Figure 2. Annexation Area Aerial

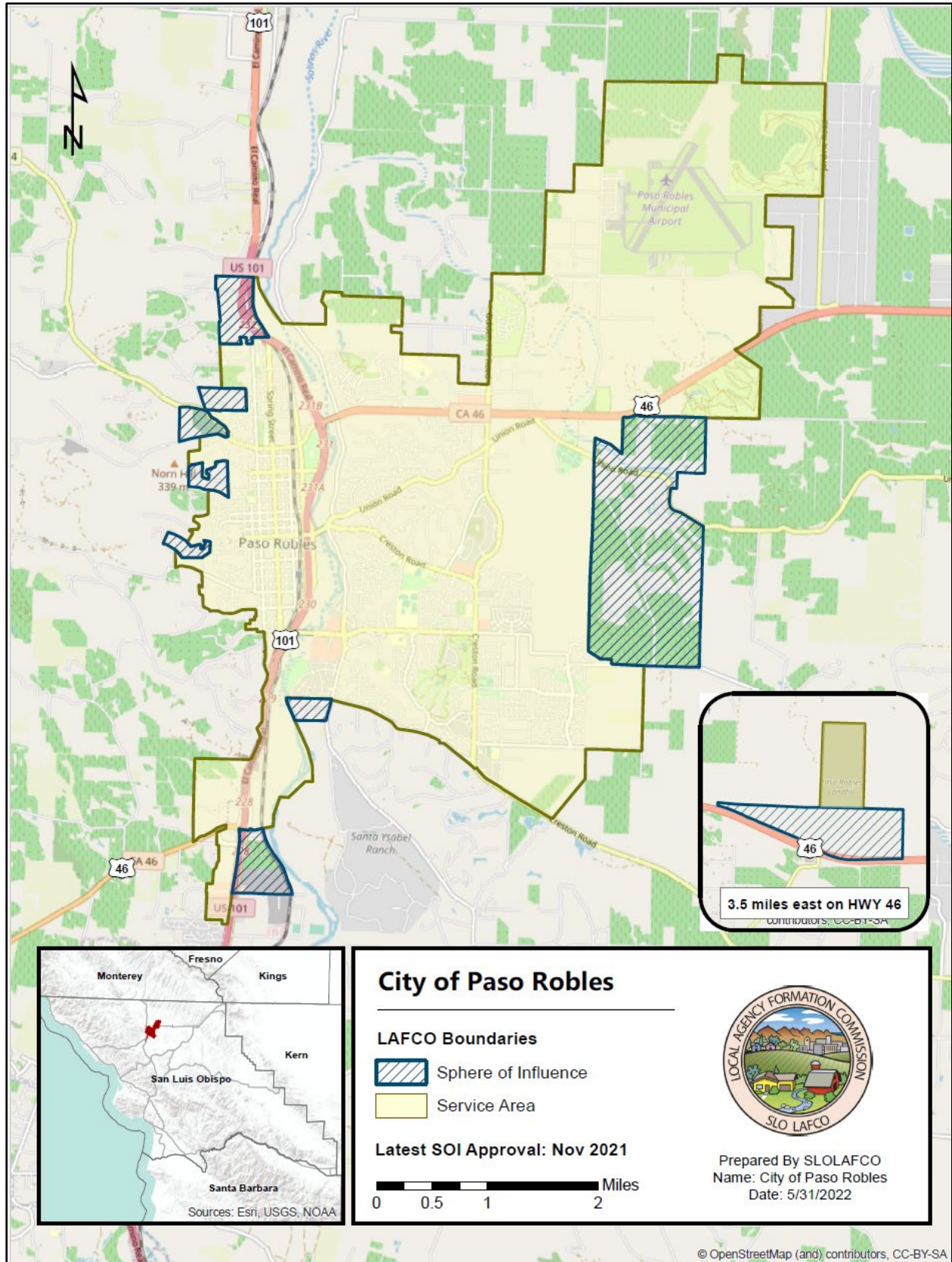


Figure 3. City Limits and Sphere of Influence.

The project site for the OPF is an approximately 20-acre site in the northwest corner of the eastern-most parcel (APN 015-043-009), south of the existing Paso Robles Landfill (Figure 4). This area consists of undeveloped land that primarily consists of non-native grassland. No trees or drainages are located within this area. Existing access roads for the landfill are located along the western and northern boundaries of the project site.

The area of landfill improvements include an approximately 10-acre area in the north portion of parcel APN 015-043-008 and an approximately 10-acre area in the north portion of parcel of the eastern-most parcel (APN 015-043-009). This area consists of undeveloped land that primarily consists of non-native grassland. No trees or drainages are located within this area.

The current land use designation for all five parcels in the County's General Plan is Agriculture, and all parcels are within the Renewable Energy Combining Designation, which provides a ministerial permit and level of review for a range of renewable energy facility types.

1.3 Project Description

ANNEXATION

The City is seeking to annex into the boundaries of the city approximately 133 acres of land that is currently owned by the City and under the jurisdiction of the County. The annexation area is located approximately 4.25 miles east of the incorporated city limits, immediately adjacent to and south of the City's landfill parcel (which is an incorporated island). The annexation area is within the City's (SOI).

To accomplish the annexation, the City would apply to the San Luis Obispo Local Agency Formation Commission (LAFCO). Annexed lands would be given a pre-zoning designation of Agriculture, with approximately 30 acres designated as Public Facilities for future public facilities uses, including construction and operation of the OPF (discussed below).

For the portion of the annexation area that will be given a pre-zoning designation of Agriculture, the City's General Plan Agriculture land use designation is generally consistent with the County's General Plan Agriculture land use designation. As such, for this area, the proposed annexation would not allow for any intensification of existing or planned land uses beyond what already would be allowed under existing conditions pursuant to the County's General Plan and Land Use Ordinance. Additionally, the proposed project would not authorize or permit any new development within this area, as all future development would be required to comply with the City's zoning ordinance (which implements the City's General Plan land use designations) and may be subject to applications for discretionary permits that would separately require their own review and analysis for compliance with CEQA.

GENERAL PLAN AMENDMENT AND PRE-ZONING

The project will include a General Plan Land Use Amendment, designating 113 acres as Agriculture and 20 acres as Public Facilities. The project will include a corresponding pre-zoning designation of 113 acres as A (Agriculture) and 20 acres as PF (Public Facilities).the City's General Plan Agriculture land use designation is generally consistent with the County's General Plan Agriculture land use designation. As such, for this area, the proposed annexation would not allow for any intensification of existing or planned land uses beyond what already would be allowed under existing conditions pursuant to the County's General Plan and Land Use Ordinance. Additionally, the proposed project would not authorize or permit any new development within this area, as all future development would be required to comply with the City's zoning ordinance (which implements the City's General Plan land use designations) and may be subject to applications for discretionary permits that would separately require their own review and analysis for compliance with CEQA.

For the portion of the annexation area that will be given a pre-zoning designation of Public Facilities, the City proposes to construct and operate an OPF as part of the existing landfill operations, as discussed below.

ORGANICS PROCESSING FACILITY

After annexation, the City proposes the construction and operation of an OPF on a portion of the annexed property with the pre-zoning designation of Public Facilities. The OPF would be established on approximately 20 acres of the 133 acres to be annexed by the City (project site) within the northwest portion of parcel APN 015-043-009 (Figure 4). The exact location of the OPF within the project site is not yet determined, but is anticipated to encompass approximately 2.5 acres, inclusive of access and truck delivery aprons. The OPF will likely be sized to receive between 40,000 and 200,000 wet tons of regional organic waste per year.

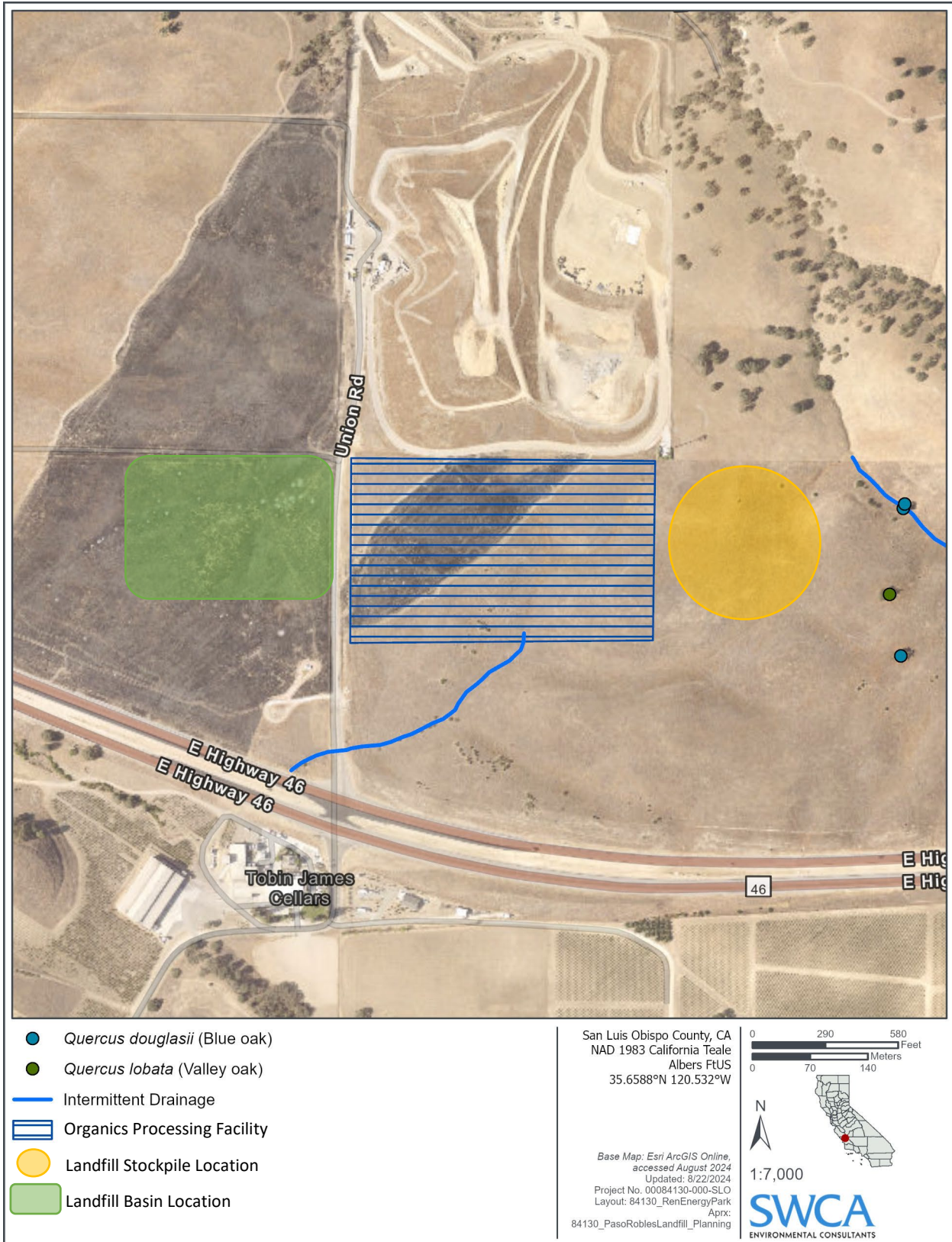


Figure 4. Organics Processing Facility Project Site Aerial.

Background

Senate Bill 1383

Senate Bill (SB) 1383 was signed into law in 2016 and aims to reduce the state’s greenhouse gas emissions by reducing methane emissions. SB 1383 requires local agencies to divert organic waste streams from landfills and procure organic waste products such as mulch, compost, or renewable natural gas or energy derived from organic material diverted from a landfill.

Biosolids and Polyfluorinated Alkyl Substances

Biosolids are nutrient-rich organic materials derived from the treatment of the solid waste generated during the treatment of wastewater. Wastewater solid waste undergoes a treatment process to remove pathogens and reduce its volume, resulting in a stabilized product known as biosolids. These materials contain organic matter, nitrogen, phosphorus, and other nutrients, making them valuable for soil amendment and agricultural purposes. Biosolids can be applied to land as fertilizer to improve soil quality, enhance crop growth, and provide a sustainable means of recycling organic waste. Biosolids also contain pollutants and are closely regulated by the State of California and U.S. Environmental Protection Agency (USEPA).

All government agencies with responsibility to collect and treat wastewater generate biosolids and have a similar need to properly dispose of biosolids. The County has a moratorium on land application of biosolids. Due to a lack of local disposal options, most government agencies in San Luis Obispo County haul their biosolids to facilities in Santa Maria (Santa Barbara County) or Kern County, where it is mixed with other organic waste streams, composted, then applied to land.

Polyfluorinated alkyl substances (PFAS) are a group of man-made chemicals that have historically been used in industrial and consumer products due to their unique ability to resist water, heat, and oil. The State of California recently required most local government agencies to test their biosolids for PFAS, which are commonly referred to as “forever chemicals” due to their resistance to degradation in the environment. In general, all local governmental agencies have some level of PFAS species in their biosolids.

Composting does not break down PFAS, because very high temperatures (greater than 1900°F) are required to break the strong carbon-fluorine bonds in PFAS. Consequently, most traditionally derived compost created from biosolids contains PFAS and microplastics. New technologies are available, such as high-temperature pyrolysis, that can eliminate PFAS in biosolids and convert the biosolids into valuable products such as biochar. These technologies are currently very expensive for any of the individual local agencies in San Luis Obispo County to install and operate but may be cost-effective if multiple wastewater agencies in the region pool their biosolids waste streams and process it at one regional facility. In 2023, sixteen local government agencies in the area between San Miguel and Santa Barbara decided to form a regional cooperative with the purpose of establishing a local regional facility capable of advanced processing of biosolids. A Memorandum of Understanding between these agencies was signed in November of 2023.

Testing required by the State of California recently revealed that the City’s landfill leachate² contains high concentrations of PFAS. Previously, the City had either spread leachate on the top of the landfill soil cover to control dust and support vegetation growth, but now only recirculates it back into the top of the landfill. The City would like to stop recirculating leachate and instead treat it to remove PFAS and other pollutants. Granular activated carbon (GAC) is commonly used to treat water for such pollutants. The City’s landfill operator has pilot-tested GAC and found it to be effective at removing PFAS from the

² Leachate is liquid waste that leaches out of solid waste.

leachate. Biochar, which is structurally similar to GAC, is produced by heating organic waste (including biosolids) in the absence of oxygen through pyrolysis. Following anaerobic digestion or the dewatering of biosolids additional efforts can be made on site to produce this useful byproduct for leachate treatment and for land application.

Construction

While an OPF has not yet been designed for this project, the City anticipates its construction would be similar to other facilities, including the Hitachi Zosen Inova USA, LLC Kompogas® high solids anaerobic digestion facility in San Luis Obispo. The following information is largely based on this San Luis Obispo facility and reasonable assumptions by the City. Once the City selects an OPF operator and the OPF is designed, the City would be required to determine whether the proposal has been adequately evaluated in this IS/MND, or whether additional environmental review is required.

For the purposes of this environmental analysis, it is assumed that the OPF would include an approximately 75,000 square foot building (approximately 250 feet by 300 feet), an approximately 5,000 square foot digester, an approximately 3,500 square foot presswater tank, an approximately 7,500 square foot biofilter, a potential combined heat and power (CHP) unit with flare approximately 1,059 kilowatts (kW), site grading, parking, a vehicle weighbridge, and stormwater facilities.

Most of the OPF would likely be enclosed within the 75,000 square foot building to control odors and minimize aesthetic concerns. The processing equipment would likely be sealed and the methane generated by the anaerobic digestion would be collected, upgraded, and used to produce electricity or renewable natural gas that can be used beneficially off-site. Building spaces containing odorous materials would likely have negative pressure systems to contain foul air and route it to filters.

Construction of the OPF is anticipated to result in the disturbance of approximately 2.5 acres somewhere within the 20-acre project site. Earthwork quantities are unknown at this time but would include construction of a 6-foot-tall earthen berm either near SR 46E or along the south side of the OPF building pad. Construction is anticipated to begin in 2026, with the goal of commissioning the facility by late 2028.

Concurrent with construction of the OPF, the City intends to decommission and replace an existing groundwater well that serves the landfill. The new well would continue to serve the existing landfill, and would also be used to serve to OPF.

Operation

As noted above, an OPF has not yet been designed for this project. However, the City anticipates it will operate similar to other REPs, including the Hitachi Zosen Inova USA, LLC Kompogas® high solids anaerobic digestion facility in San Luis Obispo. The following operational information is largely based on operations of the San Luis Obispo facility and reasonable assumptions by the City. Once the City selects an OPF operator and the OPF is designed, the City would be required to determine whether the proposal has been adequately evaluated in this IS/MND, or whether additional environmental review is required.

The OPF would receive organic waste (feedstock) from a number of existing waste streams, including: spoiled packaged food waste from grocery stores and food distributors, regional municipal biosolids (~20,000 to 30,000 wet tons per year), green waste combined with food waste collected from populated areas by waste haulers (~10,000 tons per year from Paso Robles and Atascadero), winery waste including pomace and lees, brewery waste including spent grains and trub, liquid fats, oils, and grease, and animal waste.

A transportation analysis was completed in conjunction with the anticipated operations of the OPF. The OPF is expected to generate up to 49 new weekday employee trips as the facility would be staffed five days a week in a single shift, with occasional inspections, stand-by, or emergency operations on weekends. The OPF is projected to reduce overall truck trip lengths by diverting existing waste truck routes from more distant locations. Green waste truck trips serving the North County currently unload at the Waste Connections facility on Santa Fe Road south of the City of San Luis Obispo and would divert to the proposed project site. In addition, the project could also divert 250 to 750 annual waste trucks bound for the Kettleman Hills Hazardous Waste Facility. No additional truck trips are anticipated, and site access would be provided via the established intersection at SR 46E/Union Road. Site access is adequate as proposed (Central Coast Transportation Consulting 2025).

The incoming bulky feedstock would likely consist of approximately 80% organic green waste, 10% biosolids, and 10% food waste and would be delivered to the OPF and deposited in a reception hall. The reception hall would be a closed and ventilated room with automatic roll doors that would allow trucks to enter the facility and close immediately upon entry. From the reception hall, the material would be fed into the processing area. The material would be pre-processed through a screen that would remove contaminants such as plastic, paper, and other non-organic items, be shredded and screened to pieces of approximately 2-inch in size, and then be transported to an intermediate storage bunker. A dosing unit would monitor and feed the material in batches from the storage bunker to the digester.

Additional tanks would also be on site to manage liquid waste streams, fats, oils, grease, etc. These materials would also be combined with the bulky material and metered as they are added to the digester.

As feedstock is fed into the digester, the unit would be heated, and microbial activity breaks it down. The digester would be continuously fed and it would take approximately 14 days for feedstock to process. The digested material would be removed from the digester and dewatered, separating the digested substrate (compost) from liquid digestate. Biogas is also produced during the anaerobic digestion process and would be extracted from the digester via pipes.

The digested substrate would be fed into a pyrolysis process, or other technology capable of eliminating PFAS present in municipal biosolids. During high-temperature pyrolysis, the digested substrate (potentially mixed with dry feedstock such as crop waste) would be heated to high temperatures and thermally decompose into biochar. The biochar would primarily be used by the City to treat PFAS and pollutants in landfill leachate. Excess biochar could be sold to market for a variety of uses, including as soil amendment to improve water retention and sequester carbon in soil; pigmentation (carbon black); environmental remediation applications; and as a substitute for aggregate to produce carbon-negative concrete.

The liquid digestate would be piped to a storage tank outside the main building where it would be treated and used for dust mitigation (reducing the groundwater pumping needs of the landfill) or utilized for additional benefit in the future.

The solid organic waste would be converted into renewable natural gas (RNG), which would be combined with the biogas and the methane gas currently generated by decomposing waste at the landfill. The RNG may be used to fuel the collection trucks currently operating out of the Paso Robles Landfill, and potentially be exported and sold to other users. The project could include a “virtual pipeline,” which would consist of a small fleet of portable roll-off RNG tanks that are refilled at the facility and delivered directly to large RNG customers, such as Paso Waste & Recycle. In lieu of the RNG being used as fuel, the City may choose to convert the RNG into electricity using the CHP. The electricity would be used onsite and excess electricity could be fed back into the grid.

The OPF would be manned five days a week in a single-shift. All maintenance and service tasks will be carried out during this time. Brief inspections will be made on weekends and during emergency and

stand-by times. The actual digestion process takes place automatically around-the-clock without maintenance. Biogas production and utilization would also take place around-the-clock.

LANDFILL IMPROVEMENTS

This MND evaluates two improvements to the existing landfill which would be located on a portion of the annexed property with the pre-zoning designation of Public Facilities. A stormwater basin, which would handle stormwater runoff from the existing landfill, would be established on approximately 10 acres of the 133 acres to be annexed by the City within the north portion of parcel APN 015-043-008 (Figure 4). The stormwater basin would be sized to accommodate approximately 15.3 acre-feet of water (5,000,000 gallons). Exact earthwork quantities are unknown at this time but would include approximately 5,000 cubic yards of fill on the western side of the basin, and 5 to 15 feet of cut on the eastern side.

The second landfill improvement would include establishment of an area to stockpile soil from the landfill site. The stockpile would be established on approximately 10 acres of the 133 acres to be annexed by the City within the north portion of parcel APN 015-043-009, east of the OPF project site (Figure 4). The City anticipates stockpiling up to 100,000 cubic yards of soil at any time, depending on landfill needs. No earthwork outside of the stockpiling activities would be needed for this area.

1.4 Required Discretionary Approvals

- Annexation to the City of Paso Robles (LAFCO and County of San Luis Obispo)
- General Plan Amendment (City of Paso Robles)
- Pre-Zoning (City of Paso Robles)
- Encroachment Permit for any improvements effecting Caltrans right-of-way on SR 46E (Caltrans)

1.5 Intended Uses of this Document

The City, as the CEQA lead agency, is responsible for administering the preparation of this IS/MND and will be responsible for certifying the Final IS/MND. Lead agency decision makers (i.e., the City Planning Commission and City Council) will use the IS/MND as an informational document to assist in the decision-making process, ultimately resulting in the approval, denial, or assignment of conditions to the project. The City Community Development Department will be responsible for ensuring compliance with the mitigation measures certified in the Final IS/MND.

2 ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

Environmental Factors Potentially Affected

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

- | | | |
|-------------------------------------------------------------|-----------------------------------------------------------|------------------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Transportation |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities and Service Systems |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology and Soils | <input type="checkbox"/> Population and Housing | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

Environmental Determination

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 project proponent. 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 measure 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 or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date:

02/02/2026

Signed:



I. Aesthetics

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

Setting

The California Environmental Quality Act (CEQA) establishes that it is the policy of the state to take all action necessary to provide people of the state “with . . . enjoyment of aesthetic, natural, scenic and historic environmental qualities” (California Public Resources Code [PRC] Section 21001(b)). A scenic vista is generally defined as a high-quality view displaying good aesthetic and compositional values that can be seen from public viewpoints. Some scenic vistas are officially or informally designated by public agencies or other organizations. A substantial adverse effect on a scenic vista would occur if the project would significantly degrade the scenic landscape as viewed from public roads or other public areas. A proposed project’s potential effect on a scenic vista is largely dependent on the degree to which it would complement or contrast with the natural setting, the degree to which it would be noticeable in the existing environment, and whether it detracts from or complements the scenic vista.

The California Scenic Highway Program was created by the State Legislature in 1963 with the intention of protecting and enhancing the natural scenic beauty of California highways and adjacent corridors. A highway may be designated scenic depending on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler’s enjoyment of the view. According to the California Department of Transportation (Caltrans) California State Scenic Highway System Map, the portion of SR 46E located south of the project site is an eligible scenic highway (Caltrans 2024).

The *City of El Paso de Robles General Plan 2003 Conservation Element* identifies goals, policies, and action items to enhance and upgrade the city’s visual resources. Policies include identifying important visual resources and establishing and implementing site design to enhance and protect those visual resources (City of El Paso de Robles 2014a).

The General Plan identifies the following resources as important visual resources:

- SR 46E (between Jardine and Airport Roads)
- U.S. Route 101 (US 101) at North end (between Mustard Creek and Spring Street)

- US 101 at South end (between SR 46 and Spring Street)
- SR 46W (between Arbor Road and US 101)
- Creston Road (beginning east of Beechwood Drive to Charolais Road)
- Spring Street (north of 36th Street and south of 1st Street)
- Airport Road
- Union Road
- Paso Robles Municipal Airport
- Multi-Modal Transportation Center
- US 101 (full length of city)
- Railroad corridor (full length of city)
- Salinas River
- Huer Huero Creek
- Field at north end of Ramada Drive (between railroad and Salinas River)
- Oak-covered hillsides
- East Side creeks/riparian corridors (unnamed creeks #1–5 plus Turtle/Oak Creek)
- View from Barney Schwartz Park southwest toward and into the Chandler Ranch area

The 133-acre site is undeveloped and vegetation on the site can be characterized as mostly non-native annual grassland habitat, with scattered ornamental trees located along the eastern and northern edges. The annexation area and OPF project site are located approximately 4.25 miles east of the City limits and is within the City's SOI. The annexation area and OPF project site are located along the north side of SR 46E at the intersection of Union Road, south of the Paso Robles Landfill. Surrounding land uses include the Paso Robles Landfill, open space, rural residential, and agricultural uses to the north; open space, single family residences, and Estrella Road to the east; wineries, single family residences, and SR 46E to the south; and wineries and vineyards to the west.

Environmental Evaluation

a) Would the project have a substantial adverse effect on a scenic vista?

For the purpose of determining significance under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. The annexation area and OPF project site are located in a rural area accessed from Union Road, which is identified as a visual resource in the City of El Paso de Robles General Plan 2003 Conservation Element between Golden Hill Road and Mill Road, 3.2 miles west of the project site. However, the section adjacent to the annexation area and OPF project site is not designated as a visual resource (City of El Paso de Robles 2014a). Additionally, SR 46E is located immediately south of the annexation area and OPF project site, which is identified as visual resource in the City's Conservation Element from Airport Road to Branch Road, 1.8 miles west of the project site. However, the section adjacent to the annexation area and OPF project site are not designated as a visual resource (City of El Paso de Robles 2014a).

While the annexation area, OPF project site, and landfill improvements are located in an area with an appealing rural and agricultural visual character, it is not located within an identified scenic vista, scenic corridor, a designated scenic sensitive resource area or within a highly valued landscape of which

expansive views are accessible from a public vantage point. Therefore, the project would not have a substantial adverse effect on a scenic vista and *no impacts* would occur.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The boundary of the annexation area, OPF project site, and landfill improvements are directly north of SR 46E, which at this location, is eligible for State Scenic Highway designation, but it is not officially designated (Caltrans 2024). The annexation area includes several mature native oak trees, which would not be impacted by the annexation. The OPF project site does not include any mature native oak trees. Therefore, the project would not damage scenic resources within a state scenic highway, and *no impacts* would occur.

c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The annexation area, OPF project site, and landfill improvements are located in a non-urbanized area characterized by rolling hills with vineyards, wineries, and rural residences intermixed with natural grasslands and oak woodland. Surrounding land uses include the Paso Robles Landfill, open space, rural residential, and agricultural uses to the north; open space, single family residences, and Estrella Road to the east; wineries, single family residences, and SR 46E to the south; and wineries and vineyards to the west. The project site will be most visible to the public from SR 46E.

Annexation

The proposed annexation and pre-zoning of the vacant City-owned parcels would not result in any direct physical impacts and would therefore not have a direct adverse effect on the existing visual character or quality of public views of the site and its surroundings. Therefore, there would be *no impact* related to visual character resulting from annexation.

OPF Project Site Development

Construction of the proposed OPF and any future development OPF project site has the potential to result in both temporary visual impacts associated with construction activities and long-term visual impacts associated with operations. However, the OPF would be visually consistent with the existing Paso Robles Landfill, which is immediately north of the OPF project site. Additionally, the OPF and any future development OPF project site would be located approximately 1,000 feet from SR 46E. SR 46E is situated on relatively flat topography that slopes upward toward the OPF project site. Due to the moderate sloping topography between SR 46E and the OPF project site, the OPF and any future development would be primarily blocked from the viewshed of SR 46E. Additionally, the OPF would include the construction of a 6-foot-tall earthen berm, either on the south side of the OPF building pad or approximately 100 feet from the property line at SR 46E, which would further reduce the visibility of the OPF from viewers along SR 46E..

Short-term construction activities would be visible from surrounding areas during the construction period and would include the presence of construction equipment, vehicles, staging areas, and construction materials. Following the construction period, associated vehicles and equipment would be removed from

the project site; therefore, construction impacts would be temporary in nature and would not substantially degrade the long-term existing character of the immediate or surrounding area.

Although the visual characteristics of the OPF project site would change, the OPF would not substantially degrade the visual character or quality of the site and its surroundings. The OPF would be consistent with the level and scale of the existing Paso Robles landfill and would not result in visually incompatible features. The natural gas conveyance system would be installed below grade. Therefore, the proposed project would not result in the development of new buildings or other aboveground features in previously undeveloped areas that could block existing views or alter the existing character of the project area and impacts would be *less than significant*.

Landfill Improvements

Both the stormwater basin and landfill soil stockpile have the potential to result in both temporary visual impacts associated with construction activities and long-term visual impacts associated with operations. Neither of these improvements would involve construction of structures and both are features that are common in non-urbanized agricultural areas like the unincorporated area around Paso Robles. Short-term construction activities would be visible from surrounding areas during the construction period and would include the presence of construction equipment, vehicles, staging areas, and construction materials. Following the construction period, associated vehicles and equipment would be removed from the project site; therefore, construction impacts would be temporary in nature and would not substantially degrade the long-term existing character of the immediate or surrounding area. Although construction of these improvements would change the existing visual characteristics of the annexation area, they would not substantially degrade the visual character or quality of the site and its surroundings. Impacts would be *less than significant*.

d) **Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

Annexation

The proposed annexation and pre-zoning of the vacant City-owned parcels would not result in any direct physical impacts that would result in a new source of light or glare and there would be *no impact*.

OPR Project Site Development

The City of Paso Robles Land Use Element and Zoning Ordinance contains standards for installation and operation of lighting for new construction projects which require downward shielded lighting, prohibit direct glare, and include requirements to control sky-reflected glare from buildings and light allowed to spill off-site. As the OPF and future development on the OPF project site would be consistent with these established standards, impacts related to night lighting and glare would be *less than significant*.

Landfill Improvements

Neither the stormwater basin or landfill soil stockpile would include lighting sources or materials that could induce glare and there would be *no impact*.

The annexation and construction of the OPF would not substantially affect a scenic vista, damage a scenic resource, conflict with zoning, or create a source of new light or glare; therefore, impacts related to aesthetics would be less than significant, and mitigation is not necessary.

Mitigation Measures

Mitigation is not necessary.

II. Agriculture and Forestry Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i></p>				
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

Farmland Designations

The California Department of Conservation (CDOC) Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data used for analyzing impacts on California's agricultural resources (CDOC 2022). Agricultural land is rated according to soil quality and current land use. For environmental review purposes under CEQA, the FMMP categories of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land are considered "agricultural land." Other non-agricultural designations include Urban and Built-up Land, Other Land, and Water. According to the FMMP, the annexation area and OPF project site are primarily located on land designated as Grazing Land, with a small portion of Farmland of Local Potential near the northern edge of parcel 015-043-009 and the southern edge of parcel 015-043-005 (CDOC 2022).

On-site Soils

According to the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey (NRCS 2023), the annexation area and OPF project site are underlain by the following soil types:

- Arbuckle-Positas complex, 15 to 30 percent slopes (Not Prime Farmland)
- Arbuckle-San Ysidro complex, 2 to 9 percent slopes (Farmland of statewide importance)
- Balcom-Nacimiento association, 9 to 30 percent slopes (Not Prime Farmland)
- Nacimiento-Los Osos complex, 9 to 30 percent slopes (Not Prime Farmland)
- Nacimiento silty clay loam, 9 to 30 percent slopes (Not Prime Farmland)

Williamson Act

The Land Conservation Act of 1965, commonly referred to as the Williamson Act, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agriculture or related open space use. In return, landowners receive property tax assessments that are much lower than normal because they are based on farming and open space uses as opposed to full market value. The annexation area and OPF project site do not include land subject to an active Williamson Act contract, however, parcels 015-043-005 and 015-043-009 are adjacent to active Williamson Act contract land.

Forestland and Timberland

According to PRC Section 12220(g), forest land is defined as land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Timberland is defined as land, other than land owned by the federal government and land designated by the State Board of Forestry and Fire Protection as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. The annexation area and OPF project site do not contain any forest land or timberland.

Paso Robles Purple Belt Action Plan

The Purple Belt Action Plan was created in response to the General Plan policies identified above with the purpose of establishing a permanent agricultural greenbelt (purple belt) around the city in accordance with the City's General Plan. The Purple Belt Action Plan identifies methods and tools for the creation of the Purple Belt and identifies the land surrounding the city as high-, medium-, or moderate-priority areas based on existing and historical agricultural uses, parcel size, and aesthetic value. The project site is identified as a high priority area in the Purple Belt Action Plan.

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

Right to Farm Ordinance

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

Environmental Evaluation

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

The annexation area, OPF project site, and landfill improvements are underlain by land designated as Grazing Land and Farmland of Local Potential by the FMMP (CDOC 2022). Grazing Land is defined as “land on which the existing vegetation is suited to the grazing of livestock.” Farmland of Local Potential within San Luis Obispo County is defined “lands having the potential for farmland, which have Prime or Statewide characteristics and are not cultivated” (CDOC 2024). The annexation area and OPF project site do not consist of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as designated by the FMMP. Therefore, the proposed project would not result in conversion of such important farmland to a non-agricultural use, and *no impacts* would occur.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

According to the County’s General Plan, the annexation area, OPF project site, and landfill improvements are designated under the agriculture (AG) land use, as are all the surrounding parcels with the exception of the existing landfill, which is incorporated into the City and has City land use and zoning designations (County of San Luis Obispo 2023). According to the City’s General Plan, the landfill is zoned as Public Facilities (PF) (City of El Paso de Robles 2014b). The annexation area, OPF project site, and landfill improvements are not subject to a Williamson Act contract. However, there is active Williamson Act contract land to the northwest of parcel 015-043-005 and to the northeast of parcel 015-043-009 (CDOC 2021).

Annexation

The proposed annexation and pre-zoning would convert approximately 40 acres of the annexation area from the County’s AG designation to the City’s PF designation. However, the rest of the 133-acre annexation area would remain zoned as AG under the City’s zoning designation. Therefore, the majority of the annexation area would remain zoned for agricultural uses and would not conflict with existing zoning. The annexation area is not subject to a Williamson Act contract, and the area to be pre-zoned as PF (the OPF project site and land fill improvement areas) would not be adjacent to any Williamson Act contract land. As such, the proposed annexation and pre-zoning would not conflict with a Williamson Act Contract.

OPF Project Site Development

The OPF project site is not subject to a Williamson Act contract and is not adjacent to any Williamson Act contract land. Construction and operation of the OPF or any future development on the OPF project site would be contingent upon the proposed annexation and pre-zoning. As the OPF and any future development on the OPF project site would be located within the portion of the project site that would be pre-zoned as PF, the facility would not conflict with zoning for agricultural use or a Williamson Act Contract. Therefore, the development on the OPF project site would result in *less than significant impacts*.

Landfill Improvements

The stormwater basin and landfill soil stockpile locations are not subject to a Williamson Act contract and are not adjacent to any Williamson Act contract land. Construction and operation of the landfill improvements would be contingent upon the proposed annexation and pre-zoning. As the landfill improvements would be located within the portion of the project site that would be pre-zoned as PF, the facility would not conflict with zoning for agricultural use or a Williamson Act Contract. Therefore, the development on the landfill improvements would result in *less than significant impacts*.

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

The 133-acre annexation area, OPF project site, and landfill improvements are not within forest land, timberland, or timberland production land use or zoning designations. Therefore, the proposed project would not conflict with the zoning, or cause rezoning of, designated forest land, timberland, or timberland production, and *no impacts* would occur.

- d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?**

The 133-acre annexation area, OPF project site, and landfill improvements currently support scattered native and nonnative trees and shrubs. Based on the low density of existing native trees, the annexation area and OPF project site do not meet the definition of forest land. As such, the annexation area and OPF project site do not support forest land or timberland and would not result in the loss or conversion of these lands to non-forest use. Therefore, *no impacts* would occur.

- e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

Annexation

The annexation area is generally surrounded by rural and agricultural land uses. The proposed annexation and pre-zoning would not result in any physical changes to the environment that would result in conversion of Farmland and there would be *no impacts*.

OPF Project Site Development

Surrounding agricultural uses would be temporarily affected by noise and dust generated during the construction of the OPF or future development on the OFP project site. These impacts would be temporary in nature and would not result in the direct impairment or conversion of agricultural land to other uses. Operation of the OPF would be similar to and consistent with operations at the Paso Robles Landfill to the north. Therefore, the project would not involve other changes in the environment that would result in conversion of Farmland to non-agricultural use or forest land to non-forest use, and potential impacts would be *less than significant*.

Landfill Improvements

Surrounding agricultural uses would be temporarily affected by noise and dust generated during the construction of the stormwater basin and stockpiling of soil from the landfill. These impacts would be temporary in nature and would not result in the direct impairment or conversion of agricultural land to other uses. Operation of the stormwater basin and soil stockpile would be similar to and consistent with operations at the Paso Robles Landfill to the north. Therefore, the project would not involve other changes in the environment that would result in conversion of Farmland to non-agricultural use or forest land to non-forest use, and potential impacts would be *less than significant*.

Conclusion

The proposed project would not result in the conversion of Important Farmland or forest land and would not substantially interfere with zoning for agricultural or forest land uses. Therefore, the project would not result in significant impacts related to agriculture and forestry resources.

Mitigation Measures

Mitigation is not necessary.

III. Air Quality

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</i>				
(a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

Regulatory Agencies and Standards

San Luis Obispo County is part of the South Central Coast Air Basin (SCCAB), which also includes Santa Barbara and Ventura Counties. Air quality within the SCCAB is regulated by several jurisdictions including the U.S. Environmental Protection Agency (USEPA), California Air Resources Board (CARB), and the San Luis Obispo County Air Pollution Control District (SLOAPCD). Each of these jurisdictions develops rules, regulations, and policies to attain the goals or directives imposed upon them through legislation. CARB is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the California Clean Air Act (CCAA) of 1988. The California Department of Public Health established California Ambient Air Quality Standards (CAAQS) in 1962 to define the maximum amount of a pollutant (averaged over a specified period of time) that can be present without any harmful effects on people or the environment. CARB adopted the CAAQS developed by the California Department of Public Health in 1969, which had established CAAQS for 10 criteria pollutants: particulate matter 10 microns or less in diameter (PM₁₀) and 2.5 microns or less in diameter (PM_{2.5}), ozone (O₃), nitrogen dioxide (NO₂), sulfate, carbon monoxide (CO), sulfur dioxide (SO₂), visibility-reducing particles, lead (Pb), hydrogen sulfide (H₂S), and vinyl chloride.

The Federal Clean Air Act (FCAA) later required the USEPA to establish National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment, and also set deadlines for their attainment. The USEPA has established NAAQS for six criteria pollutants (all of which are also regulated by the CAAQS): CO, lead, NO₂, ozone, PM₁₀ and PM_{2.5}, and SO₂.

California law continues to mandate compliance with the CAAQS, which are often more stringent than national standards. However, California law does not require that the CAAQS be met by specified dates as is the case with the NAAQS. Rather, it requires incremental progress toward attainment. The SLOAPCD is the agency primarily responsible for ensuring that the NAAQS and CAAQS are not exceeded and that air quality conditions within the county are maintained.

SLOAPCD Thresholds

The SLOAPCD has developed and updated the 2012 *CEQA Air Quality Handbook* (SLOAPCD 2012), which was most recently updated with a 2023 Administrative Update (SLOAPCD 2023a), to help local agencies evaluate project-specific impacts and determine if air quality mitigation measures are needed, or if potentially significant impacts could result.

The SLOAPCD has established thresholds for both short-term construction emissions and long-term operational emissions. Use of heavy equipment and earth-moving operations during project construction can generate fugitive dust and engine combustion emissions that may have substantial temporary impacts on local air quality and climate change. Combustion emissions, such as nitrogen oxides (NO_x), reactive organic gases (ROG), greenhouse gases (GHGs), and diesel particulate matter (diesel PM), are most significant when using large, diesel-fueled scrapers, loaders, bulldozers, haul trucks, compressors, generators and other heavy equipment. SLOAPCD has established thresholds of significance for each of these contaminants.

The SLOAPCD CEQA Handbook provides thresholds of significance for construction related emissions. Table 1 lists the SLOAPCD's general thresholds for determining whether a potentially significant impact could occur as a result of a project's construction activities.

Table 1. SLOAPCD Thresholds of Significance for Construction Activities

Pollutant	Threshold ¹		
	Daily	Quarterly Tier 1	Quarterly Tier 2
Diesel Particulate Matter (Diesel PM)	7 lbs	0.13 tons	0.32 tons
Reactive Organic Gases (ROG) + Nitrogen Oxides (NO _x)	137 lbs	2.5	6.3 tons
Fugitive Particulate Matter (PM ₁₀), Dust ²		2.5 tons ⁽²⁾	

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

² Any project with a grading area greater than 4.0 acres of worked area can exceed the 2.5-ton PM₁₀ quarterly threshold.

The SLOAPCD CEQA Handbook also provides preliminary screening construction emission rates based on the proposed volume of soil to be moved and the anticipated area of disturbance. Table 2 lists the SLOAPCD’s screening emission rates that would be generated based on the amount of material to be moved. The SLOAPCD CEQA Handbook also clarifies that any project that would require grading of 4 acres or more can exceed the 2.5-ton PM₁₀ quarterly threshold (see Table 1).

Table 2. Screening Emission Rates for Construction Activities

Pollutant	Grams/Cubic Yard of Material Moved	Pounds/Cubic Yard of Material Moved
Diesel Particulate Matter (Diesel PM)	2.2	0.0049
Reactive Organic Gases (ROG)	9.2	0.0203
Nitrogen Oxides (NO _x)	42.4	0.0935
Fugitive Particulate Matter (PM ₁₀)	0.75 tons/acre/month of construction activity (assuming 22 days of construction per month)	

Operational impacts are focused primarily on the indirect emissions (i.e., motor vehicles) associated with residential, commercial, and industrial development. Certain types of projects can also include components that generate direct emissions, such as power plants, gasoline stations, dry cleaners, and refineries (source emissions).

General screening criteria are used by the SLOAPCD to determine the type and scope of air quality assessment required for a particular project (Table 1-1 in the SLOAPCD CEQA Handbook). These criteria are based on project size in an urban setting and designed to identify those projects with the potential to exceed the SLOAPCD’s significance thresholds. A more refined analysis of air quality impacts specific to a given project is necessary for projects that exceed the screening criteria below or are within 10% of exceeding the screening criteria.

Air Quality Monitoring

The county’s air quality is measured by a total of 10 ambient air quality monitoring stations, and pollutant levels are measured continuously and averaged each hour, 24 hours a day. The significance of a given pollutant can be evaluated by comparing its atmospheric concentration to federal and state air quality

standards. These standards represent allowable atmospheric containment concentrations at which the public health and welfare are protected and include a factor of safety. The SLOAPCD prepares an Annual Air Quality Report detailing information on air quality monitoring and pollutant trends in the county. The most recent Annual Air Quality Report was released in 2024 (SLOAPCD 2024).

In San Luis Obispo County, ozone and fine particulates (particulate matter of 10 microns in diameter or smaller; PM₁₀) are the pollutants of main concern, since exceedances of state health-based standards for these pollutants are experienced in some areas of the county. Under federal standards, the county has non-attainment status for ozone in eastern San Luis Obispo County.

2001 Clean Air Plan San Luis Obispo County

The SLOAPCD's *2001 Clean Air Plan San Luis Obispo County* (2001 CAP) is a comprehensive planning document intended to evaluate long-term air pollutant emissions and cumulative effects and provide guidance to the SLOAPCD and other local agencies on how to attain and maintain the state standards for ozone and PM₁₀ (SLOAPCD 2001). The CAP presents a detailed description of the sources and pollutants which impact the jurisdiction's attainment of state standards, future air quality impacts to be expected under current growth trends, and an appropriate control strategy for reducing ozone precursor emissions, thereby improving air quality.

Naturally Occurring Asbestos

Naturally Occurring Asbestos (NOA) is identified as a toxic air contaminant by CARB. Serpentine and other ultramafic rocks are fairly common throughout the county and may contain NOA. If these areas are disturbed during construction, NOA-containing particles can be released into the air and have an adverse impact on local air quality and human health. The annexation area and OPF project site are not located in an area with potential for NOA (SLOAPCD 2023b).

Sensitive Receptors

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants, such as the elderly, children, people with asthma or other respiratory illnesses, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. Some land uses are considered more sensitive to changes in air quality than others, due to the population that occupies the use and the activities involved. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residences. The nearest sensitive receptors to the annexation area and OPF project site include rural single-family residences located approximately 800 feet to the south and 900 feet to the north.

Environmental Evaluation

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

According to SLOAPCD's CEQA Air Quality Handbook, a consistency analysis with the Clean Air Plan (CAP) is required for environmental review, depending on the project being considered. Evaluation of consistency is based on a comparison of the proposed project with the land use and transportation control measures and strategies outlined in the CAP. If the project is consistent with these measures, the project is considered consistent with the CAP. Additionally, projects that exceed SLOAPCD's recommended significance thresholds would also be considered to potentially conflict with regional air quality planning efforts, including the control measures and strategies identified in the CAP.

Annexation

The proposed annexation and pre-zoning would not directly result in any physical changes that could obstruct implementation of an air quality plan. Therefore, there would be *no impacts*.

OPF Project Site Development

As noted above, in order to be considered consistent with the 2001 San Luis Obispo County CAP, a project must be consistent with the land use planning and transportation control measures and strategies outlined in the CAP (SLOAPCD 2023). Adopted land use planning strategies include, but are not limited to, planning compact communities with higher densities, providing for mixed land use, and balancing jobs and housing. The OPF and future development on the OPF project site have the potential to generate limited construction and long-term employment opportunities; however, the project would not include new residences or other infrastructure that could result in substantial population growth within the county. For this reason, adopted land use strategies relating to planning compact communities with higher densities, providing for mixed land use, and balancing jobs and housing do not apply. As discussed in detail in Impact (b), below, construction and operation of the OPF would not result in an increase in criteria air pollutants above SLOAPCD significance thresholds. The OPF would be consistent with the land use planning and transportation control measures and strategies outlined in the CAP; therefore, impacts would be *less than significant*.

Landfill Improvements

As noted above, in order to be considered consistent with the 2001 San Luis Obispo County CAP, a project must be consistent with the land use planning and transportation control measures and strategies outlined in the CAP (SLOAPCD 2023). Adopted land use planning strategies include, but are not limited to, planning compact communities with higher densities, providing for mixed land use, and balancing jobs and housing. The stormwater basin and soil stockpile are accessory uses to the existing landfill and would not generate new residences or other infrastructure that could result in population growth within the county. For this reason, adopted land use strategies relating to planning compact communities with higher densities, providing for mixed land use, and balancing jobs and housing do not apply. As discussed in detail in Impact (b), below, construction and operation of the stormwater basin and stockpile would not result in an increase in criteria air pollutants above SLOAPCD significance thresholds; therefore, impacts would be *less than significant*.

- b) Would the project 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?**

Annexation

The proposed annexation and pre-zoning would not directly result in any physical changes that could result in criteria pollutant emissions. Therefore, there would be *no impacts*.

OPF Project Site Development and Landfill Improvements

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. The construction of the proposed OPF, the stormwater basin, and movement of landfill soil to the stockpile would result in the temporary generation of emissions associated with site grading and motor vehicle exhaust associated with construction equipment and worker trips, as well as the movement of construction equipment on unpaved surfaces.

According to the SLOAPCD CEQA Air Quality Handbook, construction of a project could result in adverse air quality effects if temporary, short-term construction-related emissions of criteria air pollutants or precursors would exceed the thresholds of significance established by the SLOAPCD (see Table 1 above).

Such emissions (especially fugitive dust emissions, ROG, or NOX) have the potential to represent an impact with respect to air quality. Fugitive dust emissions are primarily associated with site preparation during construction and vary as a function of such parameters as soil silt content, soil moisture, wind speed, acreage of disturbance area, and miles traveled by construction vehicles on- and off-site. ROG and NOX are ozone precursor emissions and are primarily associated with mobile equipment exhaust. Construction of the OPF, stormwater basin, and movement of landfill soil to the stockpile would result in the temporary generation of ROG, NOX, PM10, and PM2.5 emissions.

While specific details regarding grading and construction activities are unknown at this time, construction of the OPF would result in up to 2.5 acres of site disturbance, which is below the SLOACD's 2.5-ton PM10 quarterly threshold of grading 4 acres or more per day over a 3-month period (quarter). Construction of the stormwater basin or placement of soils on the stockpile may exceed 4 acres of more of grading per day, either separately or in conjunction with OPF construction.

In order to exceed the SLOAPCD's daily thresholds for DPM and ROG+NOX, the OPF project and/or landfill improvements would have to move 1,428 and 1,203 cubic yards of earth per day, respectively. To exceed the SLOAPCD's quarterly (Tier 1) thresholds for DPM and ROG+NOX, the OPF project and/or landfill improvements would have to move 53,061 and 43,936 cubic yards of earth over a three-month period. While it is not anticipated that construction of the OPF would require this amount of earthwork, overlapping construction with the stormwater basin or soil stockpiling may exceed these amounts. Mitigation Measures AQ-1 through AQ-4 have been included to mitigate exceedances of the daily and quarterly thresholds. With implementation of Mitigation Measures AQ-1 through AQ-4, impacts would be *less than significant with mitigation*.

Operation-generated emissions from the OPF would primarily be associated with vehicle trips. The OPF would reduce the regional VMT by reducing the need for trucks to transport bio-waste to processing plants outside of the County. Operation of the OPF would not exceed SLOAPCD-identified thresholds for operational emissions and impacts would be *less than significant*.

Project impacts related to criteria pollutants would be *less than significant with mitigation*.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

According to the SLOAPCD *CEQA Air Quality Handbook*, projects that occur within 1,000 feet of sensitive receptors have the potential to result in adverse impacts involving construction emissions (SLOAPCD 2023). Surrounding sensitive receptors within 1,000 feet of the project include single-family residential dwellings located approximately 800 feet to the south and 900 feet to the north of the annexation area and OPF project site.

Annexation

The proposed annexation and pre-zoning would not directly result in any physical changes that could result in pollutant emissions. Therefore, there would be *no impacts*.

OPR Project Site Development and Landfill Improvements

Land uses such as schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because infants, the elderly, and people with health afflictions, especially respiratory ailments, are more susceptible to respiratory infections and other air quality related health problems than the general public. Residential areas are also considered to be sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present.

Due to the proximity of sensitive receptors to the OPF project site and landfill improvements, there is potential to expose sensitive receptors to substantial pollutant concentrations. However, with implementation of Mitigation Measures AQ-1 through AQ-4, impacts would be *less than significant with mitigation*.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Annexation

The proposed annexation and pre-zoning would not directly result in any physical changes that could result in odor or other emissions. Therefore, there would be *no impacts*.

OPF Project Site Development

Organics processing facilities have the potential to result in odor emissions that could affect a substantial number of people. The proposed OPF is not located near a substantial number of people, and is anticipated to have automatic roll doors will allow trucks to enter the facility and close immediately after entry, minimizing odor leakage. Additionally, it is anticipated, based on other similar facilities, that the OPF will be kept at negative pressure, so outside air will be pulled in when the doors open, preventing inside air and odors from escaping. Therefore, operation of the OPF would not result in significant odors affecting surrounding populations and impacts would be *less than significant*.

Landfill Improvements

The stormwater basin and soil stockpile are not uses that typically result in odor or other emissions and impacts would be *less than significant*.

Conclusion

Implementation of the project would result in mitigable impacts during construction activities, including generation of air emissions, including DPM and fugitive dust, potentially affecting sensitive receptors. Implementation of standard SLOAPCD mitigation measures would reduce these impacts to less than significant.

Mitigation Measures

MM AQ-1 Fugitive Dust. Projects with grading areas that are greater than 4-acres or are within 1,000 feet of any sensitive receptor shall implement the following mitigation measures to minimize nuisance impacts and to significantly reduce fugitive dust emissions: The following mitigation measures shall be implemented to reduce construction-generated fugitive dust and shall be shown on grading and building plans:

1. Reduce the amount of disturbed areas where possible.

2. Use water trucks or sprinkler systems, San Luis Obispo County Air Pollution Control District (SLOAPCD)-approved dust suppressants (see Section 4.3 in the CEQA Air Quality Handbook), in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the SLOAPCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency would be required whenever wind speeds exceed 15 miles per hour. Reclaimed (non-potable) water should be used whenever possible. Please note that since water use is a concern due to drought conditions, the contractor or builder shall consider the use of a SLOAPCD-approved dust suppressant where possible to reduce the amount of water used for dust control.
3. All dirt stockpile areas shall be sprayed daily.
4. 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.
5. 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.
6. Exposed ground areas that are planned to be reworked at dates greater than 1 month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established.
7. 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.
8. Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site.
9. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard (minimum vertical distance between the top of load and top of trailer) in accordance with California Vehicle Code Section 23114.
10. "Track-Out" is defined as sand or soil that adheres to and/or agglomerates on the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto any highway or street as described in California Vehicle Code Section 23113 and California Water Code 13304. To prevent track-out, designate access points and require all employees, subcontractors, and others to use them. Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can be any device or combination of devices that are effective at preventing track out, located at the point of intersection of an unpaved area and a paved road. Rumble strips or steel plate devices need periodic cleaning to be effective. If paved roadways accumulate tracked out soils, the track-out prevention device may need to be modified.
11. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where possible. Roads shall be pre-wetted prior to sweeping when possible.
12. The burning of vegetative material shall be prohibited. Effective February 25, 2000, the SLOAPCD prohibited developmental burning of vegetative material within San Luis Obispo County. If you have any questions regarding these

requirements, contact the SLOAPCD Engineering and Compliance Division at (805) 781-5912.

13. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20% opacity, and to prevent the transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Engineering and Compliance Division prior to the start of any grading, earthwork, or demolition.

MM AQ-2 Standard Mitigation Measures for Construction Equipment. The standard mitigation measures for reducing nitrogen oxides (NO_x), reactive organic gases (ROG), and diesel particulate matter (DPM) emissions from construction equipment are listed below:

1. Maintain all construction equipment in proper tune according to manufacturer's specifications;
2. Fuel all off-road and portable diesel powered equipment with ARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);
3. Use diesel construction equipment meeting ARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State off-Road Regulation;
4. 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;
5. Construction or trucking companies with fleets that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g. captive or NO_x exempt area fleets) may be eligible by proving alternative compliance;
6. All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5 minute idling limit;
7. Diesel idling within 1,000 feet of sensitive receptors is not permitted;
8. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
9. Electrify equipment when feasible;
10. Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and
11. Use alternatively fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel

MM AQ-3 Best Available Control Technology (BACT) for Construction Equipment. If the estimated ozone precursor emissions from the actual fleet for a given construction phase are expected to exceed the SLOAPCD Quarterly Tier 2 construction significance thresholds of 6.3 tons per quarter ROG + NO_x or 0.32 tons per quarter DPM, then BACT shall to be implemented to further reduce these impacts. The BACT measures can include:

1. Further reducing emissions by expanding use of Tier 3 and Tier 4 off-road and 2010 on-road compliant engines;
2. Repowering equipment with the cleanest engines available; and
3. Installing California Verified Diesel Emission Control Strategies. These strategies are listed at: <http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm>

MM AQ-4 Construction Activity Management Plan (CAMP). If the estimated construction emissions from the actual fleet are expected to exceed either of the APCD Quarterly Tier 2 thresholds of 6.3 tons per quarter ROG + NO_x or 0.32 tons per quarter DPM after the standard and BACT measures are factored into the estimation, then an APCD approved CAMP (see Technical Appendix 4.5 for CAMP Guidelines) and off-site mitigation shall be implemented in order to reduce potential air quality impacts to a level of insignificance.

The CAMP should be submitted to the APCD for review and approval prior to the start of construction and should include, but not be limited to, the following elements:

- a. A Dust Control Management Plan that encompasses all, but is not limited to, dust control measures that were listed above in the “dust control measures” section;
- b. Tabulation of on and off-road construction equipment (age, horse-power and miles and/or hours of operation);
- c. Schedule construction truck trips during non-peak hours to reduce peak hour emissions;
- d. Limit the length of the construction work-day period, if necessary; and,
- e. Phase construction activities, if appropriate.

IV. Biological Resources

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

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The Federal Endangered Species Act (FESA) provides legislation to protect federally listed plant and animal species. The California Endangered Species Act (CESA) ensures legal protection for plants listed as rare or endangered and wildlife species formally listed as endangered or threatened and also maintains a list of California Species of Special Concern (SSC). SSC status is assigned to species that have limited distribution, declining populations, diminishing habitat, or unusual scientific, recreational, or educational value. Under state law, the California Department of Fish and Wildlife (CDFW) has the authority to review projects for their potential to impact special-status species and their habitats. The CDFW also maintains a Watch List for species that were previously SSC but no longer merit SSC status, or which do not meet SSC criteria but for which there is concern and a need for additional information to clarify status. Lastly, the CDFW also identifies a Fully Protected classification to identify and provide additional protection for those animals that were rare or faced possible extinction. Fully Protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for scientific research, for relocation of the bird species for the protection of livestock, or if they are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan.

For the purposes of this document, special-status species are those plants and animals listed, proposed for listing, or candidates for listing as threatened or endangered by the U.S. Fish and Wildlife Service (USFWS) under the FESA; those listed or proposed for listing as rare, threatened, or endangered by the CDFW under the CESA; animals designated as “SSC,” “Fully Protected,” or “Watch List” by the CDFW; and plants with a CRPR of 1, 2, 3, or 4. In addition, native oak trees are also afforded some protections through the City’s Oak Tree Preservation Ordinance, so they are also considered a sensitive species.

According to the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB), 28 special status species are known to occur within a 9-quad range of the annexation area and OPF project site. Based on an analysis of known ecological requirements for the special-status plant species reported from the region, and the habitat conditions that were observed in the project site, it was determined that the following special-status plant and animal species have the potential to occur in the annexation area and OPF project site:

- burrowing owl (*Athene cunicularia*): Species of Special Concern (State);
- Crotch’s bumble bee (*Bombus crotchii*): Candidate Endangered (State);
- San Joaquin coachwhip (*Masticophis flagellum ruddocki*): Species of Special Concern (State);

- spreading navarretia (*Navarretia fossalis*): Threatened (Federal);
- American badger (*Taxidea taxus*): Species of Special Concern (State)
- San Joaquin Kit Fox (*Vulpes macrotis mutica*): Endangered (Federal), Threatened (State);
- golden eagle (*Aquila chrysaetos*): Fully Protected (State)

The annexation area and OPF project site do not directly support any significant surface water features. According to the National Wetland Inventory Surface Waters and Wetlands mapper, the Estrella River is located 0.74 mile (3,900 feet) southeast of the annexation area and OPF project site. In addition, there are potential wetland features located within the southern and northeastern portion of the site associated with ephemeral blue line drainages (USFWS 2024; Figure 4). The annexation area supports native oak trees; however, none are present within the OPF project site or landfill improvement areas.

Environmental Evaluation

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

Special-Status Plant Species. Shining navarretia is a CRPR 1B.2 subspecies endemic to California, primarily occurring in central California. It is known to occur in vernal pools, grassland, and cismontane woodland habitats, often on clay and alkaline sites between elevations of 65 and 1,000 meters. It is an annual herb that typically blooms between March and July. No special-status plants, including shining navarretia, were documented within the survey area during surveys that were timed to coincide with the peak blooming and/or fruiting period for special-status plants that occur in the project region and for which suitable or potentially suitable habitat exists on site. As such, potential impacts to candidate, sensitive, or special-status plant species would be *less than significant*.

Special-Status Mammals. Three special-status mammal species—American badger, San Joaquin kit fox, and Salinas pocket mouse—were determined to have potential to occur within the annexation area and OPF project site.

American badger is a California SSC with a widespread range across the state. It is a permanent but uncommon resident in all parts of California, except for forested regions of the far northwestern corner, and is more abundant in dry, open areas of most shrub and forest habitats. The American badger requires friable soil in order to dig burrows for cover and breeding. The main food source for this species is fossorial rodents, mainly ground squirrels and pocket gophers. The breeding season for badgers is in summer and early fall, and females give birth to litters usually in March and April. The closest reported occurrence of the American badger is located in the Camp Roberts area.

San Joaquin kit fox (SJKF) is federally listed as endangered and state listed as threatened. San Joaquin kit fox is primarily nocturnal and typically occurs in annual grassland or mixed shrub/grassland habitats throughout low, rolling hills and in valleys. They need loose sandy soils in order to dig their burrows and a prey population of black-tailed jackrabbit (*Lepus californicus*), rodents, desert cottontail, insects, some birds, reptiles, and vegetation. The most suitable habitat for San Joaquin kit fox has low precipitation, sparse vegetation coverage with high densities of kangaroo rats (*Dipodomys* spp.). For the San Joaquin kit fox to succeed in an area, it needs large expanses of non-fragmented suitable habitat. The annexation area and OPF project site are within contiguous kit fox habitat with the potential to block or degrade an

existing corridor linking populations or isolate a subpopulation. The closest known reported occurrence for kit fox is approximately 2.5 miles south of the annexation area and OPF project site, south of SR 46E.

Salinas pocket mouse is a rare pocket mouse listed as a California SSC (CDFW 2021). The Salinas pocket mouse is nocturnal and spends the day in a burrow with a plugged entrance. During periods of low temperatures, this mouse will enter a period of torpor, emerging occasionally from its burrow if its cache needs to be replenished. Salinas pocket mouse forages on the seeds of grasses and forbs as well as seasonal vegetation.

If American badger, SJKF, or Salinas pocket mouse occur on the OPF project site or landfill improvement areas, there is potential for direct impacts during construction as a result of vehicle strikes or during excavation activities, if nearby dens are occupied. Indirect impacts may occur as a result of deterring these species from utilizing the site during construction. Further, construction may impact or deter use of valuable habitat (e.g., burrows or dens), yielding it unsuitable for special-status mammals. Indirect impacts may also occur as a result of deterring these species from using the project site during construction. The project's location within the County-designated mitigation area requires implementation of mitigation measures pursuant to the *County Guide to San Joaquin Kit Fox Mitigation Procedures under California Environmental Quality Act (CEQA)* (County of San Luis Obispo n.d.). Mitigation is provided for worker environmental awareness training, lighting restrictions, preconstruction surveys, and 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. Implementation of Mitigation Measures BIO-1 through BIO-6 will reduce direct impacts to special status mammal species to less than significant.

Special-status and Reptiles. San Joaquin coachwhip (*Masticophis flagellum ruddocki*; SSC) occurs in dry, treeless areas such as grasslands and saltbush scrub. This species seeks refuge under objects such as rocks, under shrubs, or in rodent burrows. Its range extends from the Sacramento Valley south to Kern County and west to the Inner South Coast Ranges. Suitable habitat lies at elevations ranging from 65 to 3,000 feet (20–900 meters). The coachwhip is dormant during the winter and resumes activity in late spring. This snake is especially tolerant of high temperatures and is active during the day. San Joaquin coachwhip feeds on a variety of animals, including small mammals, bats, lizards, and birds.

Construction activities pose risks for direct and indirect impacts to special-status amphibians and reptiles. Reptiles basking on roadways or other open areas 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 shrub cover for temperature regulation and, further, vegetation provides habitat for the prey species of reptiles and amphibians. San Joaquin coachwhips are most vulnerable on hot days when they are basking in open areas. Mitigation Measures BIO-1 through BIO-4 provide for worker environmental awareness training, lighting restrictions, and preconstruction surveys which will reduce impacts to *less than significant*.

Special-status Invertebrates. Crotch's bumble bee is a short-tongued bumble bee that is native to California and southwestern Nevada and is currently a candidate for listing under CESA. This species is nonmigratory and inhabits grasslands, shrublands, and chaparral. Crotch's bumble bee typically nests underground, often in abandoned rodent burrows, and in areas with heavy leaf litter that provide cover from weather and predators. The typical breeding season for this species is early spring to late fall

(February 1–September 30). Crotch’s bumble bee were not identified during field surveys; however, there is insufficient data to determine whether the species utilizes the project site for foraging or nesting. Mitigation Measure BIO-7 would require that construction activity either avoid take of the species by avoiding removal of suitable habitat between February 1 through September 30 or require the Applicant to obtain coverage from CDFW through an ITP. Additionally, BIO-8 would require implementation of BMPs. Implementation of Mitigation Measures BIO-7 and BIO-8 combined with above-mentioned Mitigation Measure BIO-1 through BIO-3 would reduce potential project-related impacts to Crotch’s bumble bee to *less than significant*.

Sensitive and Nesting Birds and Raptors. In addition to those species protected by the federal or state government, all native avian species are protected by federal and state legislation, most notably the Migratory Bird Treaty Act (MBTA) and the California 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 September 15, when nests are likely to be active, with eggs and/or young present.

Burrowing owl is a California SSC that occupies abandoned mammal holes in the ground, most notably those of the California ground squirrel (*Otospermophilus beecheyi*). In California, this small, rare owl is a year-round resident in the Carrizo Plain, Central Valley, Imperial Valley, and San Francisco Bay region. The burrowing owl commonly nests in abandoned holes in the ground but is also known to inhabit badger and fox dens and manmade holes, such as pipes and culverts.

Golden eagle is designated a Fully Protected species by the CDFW and is federally protected by the Bald and Golden Eagle Protection Act of 1940. The species is found in broadleaved upland and montane coniferous forests, cismontane, pinon and juniper woodlands, coastal prairie, great basin scrub and great basin, and valley and foothill grassland habitat types.

The project would result in a net loss of potential wintering habitat in the region for these species. Due to the large amount of suitable wintering habitat in the area, this impact is negligible.

Impacts to or take of nesting birds protected under the MBTA or California Fish and Game Code could occur if nests are destroyed by ground or vegetation disturbance activities, including tree removals, or if adults abandon nests due to disruption from construction noise levels or human activity. Migratory non-game native bird species are protected by international treaty under the MBTA. Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all native birds and their active nests, including raptors and other migratory non-game birds (as listed under the federal MBTA).

To reduce potential adverse effects of the proposed project on nesting birds (including golden eagle and burrowing owl), Mitigation Measure BIO-4 would require preconstruction surveys and work zone buffering from active nests. With implementation of this measure, along with Mitigation Measures BIO-1 through BIO-3, impacts to golden eagle, burrowing owl, and other bird species protected under the MBTA or California Fish and Game Code would be *less than significant*.

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

The annexation area, OPF project site, and landfill improvement areas do not support riparian habitat or other sensitive natural communities. Therefore, impacts would be *less than significant*.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No wetlands are located within the OPF project site or landfill improvement areas. Therefore, impacts would be *less than significant*.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Two blue line drainages are present within the annexation area, outside of the OPF project site and landfill improvement areas. However, these drainages are ephemeral and do not support migratory fish movement. The OPF and landfill improvements are not expected to block or restrict movement of wildlife due to their relatively small scale and surrounding large areas of undeveloped open spaces. Additionally, Mitigation Measure BIO-6 would require compensatory mitigation for SJKF habitat loss, which would provide for protection of habitat continuity. Therefore, impacts would be *less than significant*.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impacts to individual oak trees and oak woodland habitat are regulated under California Public Resources Code 21083.4 and the Paso Robles City Oak Tree Preservation Ordinance (No. 835; City of Paso Robles, 2002). Several native oak trees are present within the annexation area, and no oak trees are present within the OPF project site.

No physical impacts or tree removal are proposed for the annexation area, and no oak trees are present within the OPF project site or landfill improvement areas. Impacts would be *less than significant*.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The annexation area is not in an area subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, there would be *no impact*.

Conclusion

Implementation of the project would result in short-term impacts to sensitive habitats, including individual oak trees, and riparian and wetland habitat. Based on the proximity of the project to the Salinas River, potentially significant impacts to special-status animal species including California red-legged frog, western spadefoot toad, southwestern pond turtle, coast horned lizard, Monterey dusky-footed woodrat, least Bell's vireo, and nesting and roosting birds and bats may occur. Implementation of the mitigation measures listed below is recommended to avoid impacts to sensitive habitat and special-status species to the maximum extent feasible and to reduce potential impacts by implementing construction crew training, environmental monitoring, avoidance of sensitive habitats to the maximum extent feasible, and restoration measures.

Mitigation Measures

MM BR-1 Environmental Awareness Training. An environmental awareness training shall be presented to all construction personnel by a qualified biologist prior to start of any construction or grading activities. The training shall include color photographs and a description of the ecology of all special-status species known, or with potential, to occur on site, as well as other sensitive resources requiring avoidance near the project site. 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 and anyone else who may enter the project site.

If new construction personnel join the project after the initial training period, they will receive the environmental awareness training from the qualified biologist before beginning work.

MM BR-2 Lighting. Any permanent lighting introduced for new developments shall be positioned and/or shielded to avoid direct lighting of off-site natural habitat that is suitable for special status species.

MM BR-3 Site Maintenance and General Operations. The following general measures are recommended 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 jurisdictional 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 jurisdictional aquatic resources, including drainages and wetlands. Sandbags and/or absorbent pads and spill control kits shall always be available for use in the case of a spill or leak.
- 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 for entangling special-status small

mammals or reptiles. Acceptable substitutes are coconut coir matting 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 project site.

MM BR-4 Surveys, Avoidance, and Monitoring for Special-Status Wildlife. A qualified biologist shall conduct surveys prior to the start of initial project activities to ensure special-status wildlife species are not present within proposed work areas. If special-status wildlife species are found, they shall be allowed to leave the area on their own volition or be relocated (as permitted) to suitable habitat areas outside the work area(s). If necessary, resource agencies will be contacted for further guidance. Pre-activity surveys and/or monitoring shall be conducted as follows:

1. Preconstruction Survey and Avoidance Measures for American Badger and San Joaquin Kit Fox. A qualified biologist shall conduct a preconstruction survey within 30 days prior to the start of initial project activities to ensure American badgers and SJKFs are not present within proposed work areas. If construction lapses beyond 30 days from the survey, an additional survey will be required. If potential dens are discovered, they shall be monitored with a remote camera or tracking medium for at least 3 days to determine if they are occupied. If the qualified biologist determines that a den may be active, a 50-foot no-entry exclusion buffer shall surround the den and the appropriate resource agencies shall be contacted for further guidance. If potential dens are found during the American badger or SJKF breeding and rearing season, no activity shall occur within 200 feet of the den and the appropriate resource agencies shall be contacted for further guidance. Exclusion buffers shall be prominently flagged and encircle the den. If an exclusion buffer is not feasible, the City will contact the CDFW for further guidance prior to initial project activities. The results of the survey shall be provided to the City prior to initial project activities.
2. Preconstruction Surveys and Monitoring Measures for Special-Status Amphibians and Reptiles. A qualified biologist shall conduct a preconstruction survey within 1 week prior to the start of initial project activities to ensure special-status amphibians and reptiles are not present within proposed work areas. To minimize the potential for impacts to dispersing amphibians, work within 100 feet of drainages and vernal pool habitat areas shall occur during dry conditions. If work within 100 feet of suitable aquatic habitat is scheduled to start during the typical rainy season (i.e., November–May), when western spadefoots are most likely to be dispersing through upland habitat, a qualified biologist shall conduct daily site inspections prior to the start of work each morning. All vehicles, equipment, and materials staged on-site overnight shall be inspected. 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.
3. Preconstruction Survey and Avoidance Measures for Burrowing Owl. If work will occur within 492 feet (150 meters) of burrowing owl habitat, within the breeding or non-breeding seasons, a qualified biologist shall conduct a preconstruction survey for this species within 14 days of the onset of construction. A second survey shall be completed immediately prior to construction (i.e., within the preceding 24 hours). The surveys shall be consistent with the methods outlined in Appendix D of the CDFW 2012 Staff Report on

Burrowing Owl Mitigation (Staff Report). Qualified biologists will walk 20- to 65-foot-wide (7- to 20-meter) transects throughout the BSA and visually scan the entire project area for sign and individuals. These surveys may be completed concurrently with any other pre-construction surveys for special status species.

4. If occupied burrowing owl burrows are identified, the following buffer distances shall be observed by construction, unless otherwise authorized by the CDFW:

Location	Time of Year	Level of Disturbance		
		Low	Medium	High
Nesting Sites	April 1–Aug 15	656 feet	1,640 feet	1,640 feet
Nesting Sites	Aug 16–Oct 15	656 feet	656 feet	1,640 feet
Any Occupied Burrow	Oct 16–Mar 31	164 feet	328 feet	1,640 feet

If avoidance of active burrows is infeasible, the owls can be passively displaced from their burrows according to recommendations made in the Staff Report and in coordination with the CDFW.

5. Preconstruction Survey for Sensitive and Nesting Birds/Raptors. If work is planned to occur between February 1 and August 31, a qualified biologist shall survey the area for nesting birds within 1 week prior to activity beginning on site. If nesting birds are located on or near the proposed project site, they shall be avoided until they have successfully fledged, or the nest is no longer deemed active. A non-disturbance buffer of 50 feet will be placed around non-listed, passerine species, and a 250-foot buffer will be implemented for all raptor species. All activity will remain outside of the buffer until a qualified biologist has determined that the nest is no longer active (e.g., young have fledged, or the nest failed) or that proposed construction activities would not cause adverse impacts to the nest, adults, eggs, or young. 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.

MM BR-5 Standard Mitigation for Impacts to San Joaquin Kit Fox Habitat. In accordance with the County Guide to San Joaquin Kit Fox Mitigation Procedures under California Environmental Quality Act (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:

1. A maximum 25 mile-per-hour speed limit shall be required at the project site during construction activities.
2. All construction activities shall cease at dusk and not start before dawn.
3. 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.
4. Exclusion zone boundaries shall be established around all known and potential SJKF dens.
5. 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.

6. 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 on-site, the material will not be moved until the kit fox has left on its own.
7. All food-related trash shall be removed from the project site at the end of each workday as to not attract SJKF to the project site.
8. Project-related equipment shall be prohibited outside of designated work areas and access routes.
9. Disturbance to burrows shall be avoided to the greatest extent feasible.
10. No rodenticides or herbicides shall be applied in the project area.
11. Permanent fences shall allow for SJKF passage through or underneath (i.e., an approximate 4-inch passage gap shall remain at ground level).

MM BIO-6

The proposed project occurs within a 3:1 San Joaquin kit fox mitigation zone. Prior to issuance of grading and/or construction permits, the applicant shall submit evidence to the City Community Development Department and CDFW, that satisfactorily demonstrates one or a combination of the following three San Joaquin kit fox mitigation measures has been implemented to offset the project's calculated compensatory impacts at 3:1 ratio.

1. **Habitat Set Aside:** Provide for the protection in perpetuity, through acquisition of fee or a conservation easement, the number of acres of required mitigation of suitable habitat in the kit fox corridor area, as determined by CDFW (e.g., within the San Luis Obispo County kit fox habitat area), either on-site or off-site, and provide for a non-wasting endowment to provide for management and monitoring of the property in perpetuity. Lands conserved shall be subject to the review and approval of the CDFW.

This mitigation alternative requires that all aspects of this program must be in place before City permit issuance or initiation of any ground disturbing activities.

2. **In-Lieu Fee:** Deposit funds into an approved in-lieu fee program, which would provide for the protection in perpetuity of suitable habitat in the kit fox corridor area within San Luis Obispo County and provide for a non-wasting endowment for management and monitoring of the property in perpetuity.

Mitigation alternative (2) above, can be completed by providing funds to The Nature Conservancy (TNC) pursuant to the Voluntary Fee-Based Compensatory Mitigation Program (Program). The Program was established in agreement between CDFW and TNC to preserve San Joaquin kit fox habitat, and to provide a voluntary mitigation alternative to project proponents who must mitigate the impacts of projects in accordance with the California Environmental Quality Act (CEQA). This fee is calculated based on the current cost-per-unit of \$2500 per acre of mitigation, which is scheduled to be adjusted to address the increasing cost of property in San Luis Obispo County; the actual cost may increase depending on the timing of payment. This fee shall be paid after the CDFW provides written notification about mitigation options but prior to City permit issuance and initiation of any ground disturbing activities.

3. **Conservation Bank Credit:** Purchase the number of credits required by CDFW in a CDFW-approved conservation bank, which would provide for the protection in perpetuity of suitable habitat within the kit fox corridor area and provide for a

non-wasting endowment for management and monitoring of the property in perpetuity.

Mitigation alternative (c) above, can be completed by purchasing credits from the Palo Prieto Conservation Bank. The Palo Prieto Conservation Bank was established to preserve San Joaquin kit fox habitat, and to provide a voluntary mitigation alternative to project proponents who must mitigate the impacts of projects in accordance with CEQA. This fee is calculated based on the current cost-per-credit of \$2500 per acre of mitigation. The fee is established by the conservation bank owner and may change at any time. The actual cost may increase depending on the timing of payment. Purchase of credits must be completed prior to City permit issuance and initiation of any ground disturbing activities.

MM BIO-7 Implementation of the following measures will facilitate avoiding take of Crotch's bumble bee.

1. Prior to issuance of grading and/or construction permits that authorize ground disturbance, the project biologist shall identify and flag all areas of suitable Crotch's bumble bee habitat.
2. All project staging areas shall be at least 15 feet away from suitable Crotch's bumble bee habitat.
3. Any removal of suitable Crotch's bumble bee habitat shall be restricted to October 1 through January 31.
4. Within 3 weeks of suitable Crotch's bumble bee habitat removal (October 1–January 31), the project biologist shall conduct preconstruction monitoring surveys for Crotch's bumble bee nests. No habitat removal may commence unless the biologist verifies that Crotch's bumble bee nests are not present in the area proposed for disturbance.

If at any time the biologist determines that a project activity cannot be conducted in such a manner that avoids take of Crotch's bumble bee, or that suitable Crotch's bumble bee habitat will be removed between February 1 and September 30, the City or developer shall delay all project activities until they have coordinated with the California Department of Fish and Wildlife (CDFW) regarding the need for an Incidental Take Permit (ITP). If an ITP is determined to be necessary, work should remain on hold until such time as an ITP is issued.

MM BIO-8 The following measures shall be implemented during all construction activities within 500 feet of suitable Crotch's bumble bee habitat:

1. Trash Abatement. A trash abatement program shall be initiated before starting construction activities. Trash and food items shall be contained in animal-proof containers and removed, ideally at daily intervals but at least once a week, to avoid attracting opportunistic predators to Crotch's bumble bee.
2. Erosion Control Materials. The use of erosion control materials potentially harmful to Crotch's bumble bee, such as monofilament netting (erosion control matting) or similar material shall be prohibited. An acceptable substitute is coconut coir matting. To limit introduction of invasive plant species, if erosion control materials include straw, rice straw and/or weed-free straw shall be used and the use of hay shall be avoided.

3. Pesticide Use. Pesticides, including herbicides, insecticides, or rodenticides shall not be used unless there are no other feasible options. If pesticides need to be used, the use of neonicotinoid pesticides and pesticides marked with the U.S. Environmental Protection Agency's bee hazard icon shall be prohibited. Preferentially use chemicals that are rated green/II in UC 1PM Bee Precaution Database. Additionally, mixtures with fungicides and adjuvants, like those that contain alkylphenol ethoxylates, shall be prohibited because these have been shown to increase the risk of pesticide toxicity to bees.
4. Construction Lighting Minimization. If construction activities will occur at night, all construction-related lighting shall be shielded or directed away from Crotch's bumble bee habitat. All construction lighting used shall be yellow or orange lighting.

V. Cultural Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

This section contains setting information and conclusions/recommendations summarized from the *Phase I Archaeological Survey for the City of Paso Robles Landfill Annexation Project, Paso Robles, San Luis Obispo County, California* (SWCA 2024). This report is confidential and is on file with the City. The cultural resources study includes a cultural resources records search, Native American Sacred Lands File search, cultural resources survey of the project area, and the preparation of this cultural resources technical report documenting the results of the inventory and providing management recommendations.

The *City of El Paso de Robles General Plan 2003 Conservation Element* establishes goals, policies, and action items to preserve and restore important historical and archaeological resources. In order to do so, the Conservation Element requires the preparation of archaeological studies for all new development projects that are subject to environmental review (City of El Paso de Robles 2014a).

Environmental Evaluation

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

The annexation area is not associated with any significant event or trend in American history and have not been directly associated with persons significant in our past. The annexation area is not expected to yield important information about prehistory or history. Therefore, the annexation area is not considered a

historic property, as defined in Section 106 of the NRHP, nor does it qualify as a historical resource under CEQA. Therefore, there would be *no impacts*.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Annexation

The proposed annexation and pre-zoning of the vacant City-owned parcels would not result in any direct physical impacts and would therefore not have an effect on important archaeological, historical, or other cultural resources. Therefore, there would be *no impacts* related to changes in the significance of archaeological resources.

OPF Project Site Development and Landfill Improvements

Based on the results of the Phase I study conducted by SWCA, it is unlikely that development on the OPF project site or landfill improvement areas would have an effect on important archaeological, historical, or other cultural resources. No formal cemeteries or other places of human internment are known to exist at these areas.

In the unlikely event that buried archaeological deposits are encountered within the OPF project site or landfill improvement areas, the finds must be evaluated by a qualified archaeologist pursuant to Section 20.04.080 of the City's Zoning Code. Should human remains be encountered, all work within the vicinity of the remains would halt in accordance with Health and Safety Code §7050.5, PRC §5097.5, and §15064.5 of the CEQA Guidelines and the County Coroner would be contacted immediately; if the remains are determined to be Native American, then the Native American Heritage Commission would be contacted as well. Impacts would be *less than significant*, and no mitigation measures are required.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Annexation

The proposed annexation and pre-zoning of the vacant City-owned parcels would not result in any direct physical impacts and would therefore have *no impacts* on human remains.

OPF Project Site Development and Landfill Improvements

There are no known human remains or cemeteries located within or in the immediate vicinity of the OPF project site or landfill improvement areas and the area is considered to have low sensitivity for the presence of unidentified human resources. The OPF, landfill improvements, and construction of any future development on the OPF project site would be required to comply with State of California Health and Safety Code Section 7050.5, which identifies the proper protocol in the event human remains are discovered. The California Health and Safety Code requires that no further disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains shall occur until the County of San Luis Obispo (County) Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours. Compliance with the California Health and Safety Code would ensure development on the OPF project site would not result in significant adverse effects to human remains; therefore, impacts would be *less than significant* with mandatory regulatory compliance.

Conclusion

Based on the impact discussion above, potential impacts to cultural resources would be *less than significant*; therefore, no mitigation is required.

Mitigation Measures

Mitigation is not necessary.

VI. Energy

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

Setting

Local Utilities

The energy provider for the City is Central Coast Community Energy (3CE). 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). Participation in 3CE as an electricity provider is voluntary, customers are automatically opted in to 3CE but can voluntarily opt out and continue service solely with Pacific Gas & Electric Company (PG&E) if desired. Approximately 38% of electricity provided by PG&E is sourced from renewable resources and an additional 57% is sourced from greenhouse gas-free resources (PG&E 2024). The Southern California Gas Company (SoCalGas) is the primary provider of natural gas for urban and rural communities within San Luis Obispo County. SoCalGas has committed to replacing 20% of its traditional natural gas supply with renewable natural gas by 2030 (SoCalGas 2024).

Local Energy Plans and Policies

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 County LUO includes a Renewable Energy Area combining designation to encourage and support the development of local renewable energy resources, conserving energy resources and decreasing reliance on environmentally costly energy sources. This designation is intended to identify areas of the county where renewable energy production is favorable and establish procedures to streamline the environmental

review and processing of land use permits for solar electric facilities (SEFs). The County LUO establishes criteria for project eligibility, required application content for SEFs proposed within this designation, permit requirements, and development standards (LUO Section 22.14.100). The annexation area is located within the Renewable Energy Area combining designation.

State Building Code Requirements

The CBC contains standards that regulate the method of use, properties, performance, or types of materials used in the construction, alteration, improvement, repair, or rehabilitation of a building or other improvement to real property. The CBC includes mandatory green building standards for residential and nonresidential structures, the most recent version of which is referred to as the *2023 Building Energy Efficiency Standards*. These standards focus on four key areas: smart residential PV systems, updated thermal envelope standards (preventing heat transfer from the interior to the exterior and vice versa), residential and nonresidential ventilation requirements, and nonresidential lighting requirements. While the CBC has strict energy and green building standards, U-occupancy structures (such as greenhouses used for cultivation activities) are typically not regulated by these standards.

Vehicle Fuel Economy Standards

In October 2012, the USEPA and the National Highway Traffic Safety Administration (NHTSA), on behalf of the U.S. Department of Transportation (USDOT), issued final rules to further reduce GHG emissions and improve corporate average fuel economy (CAFE) standards for light-duty vehicles for model years 2017 and beyond. NHTSA's CAFE standards have been enacted under the Energy Policy and Conservation Act since 1978. This national program requires automobile manufacturers to build a single light-duty national fleet that meets all requirements under both federal programs and the standards of California and other states. This program would increase fuel economy to the equivalent of 54.5 miles per gallon (mpg), limiting vehicle emissions to 163 grams of carbon dioxide (CO₂) per mile for the fleet of cars and light-duty trucks by the model year 2025.

In January 2017, USEPA Administrator Gina McCarthy signed a Final Determination to maintain the current GHG emissions standards for the model year 2022–2025 vehicles. However, on March 15, 2017, USEPA Administrator Scott Pruitt and USDOT Secretary Elaine Chao announced that the USEPA intends to reconsider the Final Determination. On April 2, 2018, USEPA Administrator Pruitt officially withdrew the January 2017 Final Determination, citing information that suggests that these current standards may be too stringent due to changes in key assumptions since the January 2017 Determination. According to the USEPA, these key assumptions include gasoline prices and overly optimistic consumer acceptance of advanced technology vehicles. The April 2nd notice is not USEPA's final agency action, and the USEPA intends to initiate rulemaking to adopt new standards. Until that rulemaking has been completed, the current standards remain in effect.

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

In January 2012, CARB approved the Advanced Clean Cars Program, which combines the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of zero-emission vehicles, into a single package of standards for vehicle model years 2017 through 2025. The new rules strengthen the GHG standard for 2017 models and beyond. This will be achieved through existing technologies, the use of stronger and lighter materials, and more efficient drivetrains and engines. The program's zero-emission vehicle regulation requires a battery, fuel cell, and/or plug-in hybrid electric vehicles to account for up to 15% of California's new vehicle sales by 2025. The program also includes a

clean fuels outlet regulation designed to support the commercialization of zero-emission hydrogen fuel cell vehicles planned by vehicle manufacturers by 2015 by requiring increased numbers of hydrogen fueling stations throughout the state. The number of stations will grow as vehicle manufacturers sell more fuel cell vehicles. By 2025, when the rules will be fully implemented, the statewide fleet of new cars and light trucks will emit 34% fewer global warming gases and 75% fewer smog-forming emissions than the statewide fleet in 2016 (CARB 2022).

All self-propelled off-road diesel vehicles 25 horsepower (hp) or greater used in California and most two-engine vehicles (except on-road two-engine sweepers) are subject to CARB's Regulation for In-Use Off-Road Diesel Fueled Fleets (Off-Road regulation). This includes vehicles that are rented or leased (rental or leased fleets). The overall purpose of the Off-Road regulation is to reduce emissions of NO_x and particulate matter from off-road diesel vehicles operating within California through the implementation of standards including, but not limited to, limits on idling, reporting and labeling of off-road vehicles, limitations on use of old engines, and performance requirements.

In August 2024, NHTSA updated fuel economy standards for vehicles. For passenger cars, the standards will rise by 2% annually from 2027 to 2031. Light trucks will see no increase from 2027 to 2028, but then standards will go up by 2% each year from 2029 to 2031. For heavy-duty pickups and vans, fuel efficiency requirements will increase by 10% per year for model years 2030 to 2032, and by 8% per year for model years 2033 to 2035 (National Highway Traffic Safety Administration [NHTSA] 2024).

Environmental Evaluation

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

Annexation

The proposed annexation and pre-zoning would not directly result in any construction or operation which would consume energy resources and therefore would result in *no impacts* related to wasteful, inefficient, or unnecessary consumption of energy resources.

OPF Project Site Development

During construction activities, fossil fuels, electricity, and natural gas would be used by construction vehicles and equipment. The energy consumed during construction would be temporary in nature and would be typical of other similar construction activities in the county. Federal and state regulations in place require fuel-efficient equipment and vehicles and prohibit wasteful activities, such as diesel idling. Construction contractors, in an effort to ensure cost efficiency, would not be expected to engage in wasteful or unnecessary energy and fuel practices. Energy consumption during construction would not conflict with a state or local plan for renewable energy and would not be wasteful, unnecessary, or inefficient, and therefore would be *less than significant*.

The OPF would receive organic waste (feedstock) from a number of existing waste streams, including: spoiled packaged food waste from grocery stores and food distributors, regional municipal biosolids (~20,000 to 30,000 wet tons per year), green waste combined with food waste collected from populated areas by waste haulers (~10,000 tons per year from Paso Robles and Atascadero), winery waste including pomace and lees, brewery waste including spent grains and trub, liquid fats, oils, and grease, and animal waste. The solid organic waste would be converted into RNG which would be combined with the biogas and the methane gas currently generated by decomposing waste at the landfill. The OPF would include a "virtual pipeline," which would consist of a small fleet of portable roll-off RNG tanks that are refilled at

the facility and delivered directly to large RNG customers, such as Paso Waste & Recycle. Waste haulers who enter long-term commitments to deliver their organic waste streams to the OPF would be given preference for purchase of the RNG. In lieu of the RNG being used as fuel, the City may choose to convert the RNG into electricity using the CHP. The electricity would be used onsite and excess electricity could be fed back into the grid.

Ongoing operation of the OPF would result in fuel use associated with employee motor vehicle trips and deliveries. The OPF would likely employ approximately 10 employees and is anticipated to result in the generation of a total of 49 average daily employee trips (CCTC 2025). All vehicles used by employees and deliveries during operation would be subject to applicable state and federal fuel economy standards and State-mandated smog inspections.

The OPF would rely on electricity provided by 3CE. 3CE is currently on a pathway to achieving 60% clean and renewable energy by 2025 and 100% clean and renewable energy by 2030, which is 15 years ahead of California's mandate for zero emissions. The OPF would require energy use for operation. By using electricity from 3CE the proposed project would reduce the long-term use of non-renewable energy resources. Proposed building design would be required to adhere to Title 24 of the California Energy Code (CEC) and CBC 2022 Building Energy Efficiency Standards to further reduce operational energy use through implementation of green building and energy efficient building design features. Based on the use of clean energy sources, required compliance with the CEC and CBC, and generation of RNG, operation of the proposed project is not anticipated to result in potentially significant environmental impacts due to wasteful or otherwise inefficient use of energy resources during operation, and impacts related to operation of the OPF would be *less than significant*.

Landfill Improvements

Similar to the OPF, during construction activities, fossil fuels, electricity, and natural gas would be used by construction vehicles and equipment. The energy consumed during construction would be temporary in nature and would be typical of other similar construction activities in the county. Federal and state regulations in place require fuel-efficient equipment and vehicles and prohibit wasteful activities, such as diesel idling. Construction contractors, in an effort to ensure cost efficiency, would not be expected to engage in wasteful or unnecessary energy and fuel practices. Energy consumption during construction would not conflict with a state or local plan for renewable energy and would not be wasteful, unnecessary, or inefficient, and therefore would be *less than significant*.

Neither the stormwater basin or the soil stockpile include components that would require electricity or natural gas. Maintenance of the stormwater basin and stockpile operations would result in fuel use associated with motor vehicle and equipment trips, but these would be consistent with existing landfill operations and therefore would be *less than significant*.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Annexation

The proposed annexation and pre-zoning would not directly result in any construction or operation which would consume energy resources, and therefore would result in *no impacts* related to conflicts with or obstruction of a state or local plan for renewable energy or energy efficiency.

OPF Project Site Development and Landfill Improvements

As evaluated in *Impact Discussion VI(a)*, the energy consumed during construction and operation of the OPF and landfill improvements would not represent a significant or wasteful demand on available

resources, which is consistent with applicable state and local energy efficiency objectives. The 2013 CAP identifies goals and policies to increase the use of renewable and clean energy resources in the City. Construction and operation of the OPF would result in the generation of renewable energy, and would therefore be consistent with the 2013 CAP. Further, the OPF would be limited to a marginal increase in vehicle trips to and from the OPF project site associated with worker vehicles and trucks and would not increase vehicle trips in a manner that would substantially increase the use of fossil fuels. Therefore, the OPF would be consistent with the goals and policies of the 2013 CAP related to the use of renewable and clean energy resources in the City. Impacts would be *less than significant*.

Conclusion

The project would not result in excessive energy use during construction or operation and would be consistent with applicable energy efficiency plans; therefore, impacts related to energy would be less than significant, and mitigation is not necessary.

Mitigation Measures

Mitigation is not necessary.

VII. Geology and Soils

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Setting

According to the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey (NRCS 2023), the annexation area is underlain by the following soil types:

- Arbuckle-Positas complex, 15 to 30 percent slopes (Not Prime Farmland)
- Arbuckle-San Ysidro complex, 2 to 9 percent slopes (Farmland of statewide importance)
- Balcom-Nacimiento association, 9 to 30 percent slopes (Not Prime Farmland)
- Nacimiento-Los Osos complex, 9 to 30 percent slopes (Not Prime Farmland)
- Nacimiento silty clay loam, 9 to 30 percent slopes (Not Prime Farmland)

The OPF project site is underlain by all the above listed soils, with the exception of Arbuckle-Positas complex, 15 to 30 percent slopes.

According to the *County of San Luis Obispo Safety Element*, the annexation area and OPF project site are located in an area with low potential for liquefaction and low to moderate potential for landslide risk (County of San Luis Obispo 2023). The annexation area and OPF project site are located approximately 5.5 miles northeast from the Rinconada fault zone, and 11 miles southwest of the Red Hills fault zone. Neither fault zone is considered an Alquist-Priolo fault by the State of California Alquist-Priolo Earthquake Fault Zone Act (CDOC 2015).

Environmental Evaluation

- a) **Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
- a-i) ***Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.***

The annexation area is not located within an Alquist-Priolo Fault Hazard Zone, and there are no mapped active faults crossing or adjacent to the site (County of San Luis Obispo 2023; CDOC 2015). The nearest mapped potentially capable faults to the annexation area include a fault associated with the Rinconada Fault Zone approximately 5.5 miles west of the annexation area, and a fault associated with the Red Hills Fault Zone approximately 11 miles to the east of the annexation area. The nearest mapped active fault to the annexation area is the San Andreas Fault, approximately 14 miles to the east (CDOC 2015). Therefore, there would be *no impacts* related to the potential for surface ground rupture of known earthquake faults.

a-ii) Strong seismic ground shaking?

The Central Coast is a seismically active region and there is always potential for seismic ground shaking to occur. The nearest mapped potentially capable faults to the annexation area is a fault associated with the Rinconada Fault Zone approximately 5.5 miles west of the annexation area, and a fault associated with the Red Hills Fault Zone approximately 11 miles to the east of the annexation area. The nearest mapped active fault to the annexation area is the San Andreas Fault, approximately 14 miles to the east (CDOC 2015).

Annexation

The proposed annexation and pre-zoning would not directly result in any physical changes that could directly or indirectly cause potential adverse effects related to strong seismic ground shaking. The annexation area may be subject to strong seismic ground shaking, and the portion of the annexation area to be pre-zoned PF would allow for new land uses beyond what is currently allowed under the AG land use designation. However, the PF designation would not allow structures for habitation or other structures that could result in a significant safety risk (e.g., bridges, etc.). Adherence to the CBC and other applicable engineering standards would minimize the risk of loss, injury, or death associated with seismic ground shaking; therefore, impacts would be *less than significant*.

OPF Project Site Development

The OPF and any future occupiable buildings on the OPF project site would be required to be constructed in accordance with seismic design standards included in Section 1613 of the CBC and other engineering standards to adequately withstand earthquake loads and associated risk, including seismic ground shaking. Adherence to the CBC and other applicable engineering standards would minimize the risk of loss, injury, or death associated with seismic ground shaking; therefore, impacts would be *less than significant*.

Landfill Improvements

The stormwater basin and soil stockpile would not include structures that could result in the risk of loss, injury, or death associated with seismic ground shaking; therefore, impacts would be *less than significant*.

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

As described above, the annexation area and OPF project site is located in a seismically active region but is not traversed or located adjacent to any known fault lines. According to the County Safety Element Maps, the annexation area is located in an area with low potential for liquefaction. Typically, sandy, silty, or gravelly soils are most susceptible to liquefaction. Soils at the annexation area and OPF project site consist largely of loam and clay loam; therefore, soils have a low susceptibility to liquefaction.

Annexation

The proposed annexation and pre-zoning would not directly result in any physical impacts that could directly or indirectly cause potential adverse effects related to liquefaction. The portion of the annexation area to be pre-zoned PF would allow for new land uses beyond what is currently allowed under the AG land use designation. However, the PF designation would not allow structures for habitation or other structures that could result in a significant safety risk (e.g., bridges, etc.). Adherence to the CBC and other applicable engineering standards would minimize the risk of loss, injury, and death associated with liquefaction; therefore, impacts would be *less than significant*.

OPF Project Site Development

Proposed construction of the OPF and any future occupiable buildings in the OPF project site would be required to comply with seismic design standards included in Section 1613 of the CBC and other engineering standards to adequately withstand earthquake loads and associated risk, including liquefaction. Adherence to the CBC and other applicable engineering standards would minimize the risk of loss, injury, and death associated with liquefaction; therefore, impacts would be *less than significant*.

Landfill Improvements

The stormwater basin and soil stockpile would not include structures that could result in the risk of loss, injury, or death associated with seismic liquefaction. Any earthwork would be required to comply with seismic design standards included in Section 1613 of the CBC and other engineering standards to adequately withstand earthquake loads and associated risk, including liquefaction; therefore, impacts would be *less than significant*.

a-iv) Landslides?

Landslides typically occur in areas with steep slopes. According to the County Safety Element maps, the majority of the annexation area is located in an area with low potential for landslides, however, portions of the annexation area are designated as area with moderate potential for landslides. The annexation area to be pre-zoned as PF, including the OPF project site, would be located within areas with low to moderate potential for landslides.

Annexation

The proposed annexation and pre-zoning would not directly result in any physical impacts that could directly or indirectly cause potential adverse effects related to landslides. The portion of the annexation area to be pre-zoned PF would allow for new land uses beyond what is currently allowed under the AG land use designation. However, the PF designation would not allow structures for habitation or other structures that could result in a significant safety risk (e.g., bridges, etc.). Future development would be evaluated on a case-by-case basis to evaluate whether grading would create or exacerbate adverse impacts related to landslides and would be required to comply with the most recent CBC and applicable engineering standards and practices to adequately withstand and minimize risk associated with landslides. Therefore, impacts would be *less than significant*.

OPF Project Site Development

Construction of the OPF would occur over approximately 2.5 acres of the 20 acre OPF project site and is not anticipated to result in deep cuts to existing slopes, substantial changes to the existing topography, or otherwise exacerbate the potential for landslides to occur on- or off-site. In addition, the OPF does not propose habitable structures that would put people at risk in the event of a landslide. The proposed OPF and any future development on the OPF project site would be required to comply with the most recent CBC and applicable engineering standards and practices to adequately withstand and minimize risk associated with landslides during construction and operation of the proposed project. Therefore, potential impacts associated with landslides would be *less than significant*.

Landfill Improvements

The stormwater basin and soil stockpile would not include structures that could result in the risk of loss, injury, or death associated with seismic landslides. Any earthwork would be required to comply with seismic design standards included in Section 1613 of the CBC and other engineering to adequately withstand and minimize risk associated with landslides; therefore, impacts would be *less than significant*.

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

Annexation

The proposed annexation and pre-zoning would not directly result in any construction that could result in substantial soil erosion or loss of topsoil. Therefore, there would be *no impacts* related to soil erosion or loss of topsoil.

OPF Project Site Development and Landfill Improvements

Construction of the OPF and landfill improvements would disturb more than 1 acre of soils and would be required to comply with Regional Water Quality Control Board (RWQCB) general construction permit requirements, including preparation and implementation of a SWPPP with BMPs to reduce erosive runoff during project construction. The plan would be prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. Additionally, according to the City's Municipal Code (20.20.010), an Erosion and Sedimentation Control Plan (ESCP) is required for all construction and grading projects to minimize potential short- and long-term impacts related to erosion and sedimentation, and includes requirements for specific erosion control materials, setbacks from creeks, and siltation prevention. Based on required compliance with the RWQCB and City's Municipal Code (20.20.010), potential impacts associated with substantial soil erosion or loss of topsoil would be *less than significant*.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

According to the County Safety Element maps, the majority of the annexation area is located in an area with low potential for landslides, however, portions in the eastern annexation area are designated as area with moderate potential for landslides. The OPF project site is within the area with both low and moderate potential for landslides. The stormwater basin area is located in an area of low landslide risk and the soil stockpile area is within the area with both low and moderate potential for landslides. Additionally, the annexation area, OPF project site, and landfill improvements are located in an area with known land subsidence (USGS 2022).

Annexation

The proposed annexation and pre-zoning would not directly result in any physical activities located on geologically unstable soil units. Therefore, there would be *no impacts*.

OPF Project Site Development

The OPF and any future occupiable structures would be required to be constructed in accordance with the most recent CBC to adequately withstand and minimize risk associated with potential ground-failure events; therefore, potential impacts related to ground failure would be *less than significant*.

Landfill Improvements

The landfill improvements would be required to be constructed in accordance with the most recent CBC to adequately withstand and minimize risk associated with potential ground-failure events; therefore, potential impacts related to ground failure would be *less than significant*.

- d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

Annexation

The proposed annexation and pre-zoning would not directly result in any physical activities located on expansive soils. Therefore, there would be *no impacts* related to soil expansion.

OPF Project Site Development and Landfill Improvements

Soils at the annexation area contain clay components and have potential for soil expansion to occur. Construction of the landfill improvements, OPF, or any future development on the OPF project site would be required to comply with Section 18 of the most recent CBC, which requires geotechnical investigations to be conducted by a qualified engineer prior to development to determine soil conditions at the site and provide design recommendations to be implemented in final design and construction plans. Based on required compliance with the CBC, the development of the OPF would not result in the risk to life or property as a result of development on expansive soils; therefore, impacts would be *less than significant*.

- e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

Annexation and Landfill Improvements

The proposed annexation and pre-zoning and landfill improvements would not directly result in any physical development that would require septic tanks for alternative waste water disposal systems and there would be *no impacts*.

OPF Project Site Development

The OPF would result in a minor amount of wastewater flows that would be treated by the installation of a new septic system. The new septic system would be required to comply with CBC and County Environmental Health standards to ensure that septic systems are designed and installed in a manner to adequately handle wastewater. Therefore, impacts would be *less than significant*.

- f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

Paleontological resources are fossilized remains of ancient environments, including fossilized bone, shell, and plant parts; impressions of plant, insect, or animal parts preserved in stone; and preserved tracks of insects and animals. The annexation area is primarily underlain by Pleistocene to late Pliocene age (3.6 – 2.6 Ma) Paso Robles Formation (Qtp) and quaternary alluvial gravel and sand and clay deposits of valley areas (Qa) from the Holocene era (USGS 2004). Qa has a low paleontological sensitivity because it is typically too young to yield scientifically significant paleontological resources, however due to the age of Qtp, there is potential for paleontological resources to be present within the bedrock.

Annexation

The proposed annexation and pre-zoning would not directly result in any physical activities that could result in impacts to paleontological resources or geologic features, and therefore there would be *no impacts*.

OPF Project Site Development and Landfill Improvements

Grading details for the OPF and stormwater basin are unknown at this time. Ground-disturbing activities, including trenching and grading, for the OPF, stormwater basin, or for future structures on the OPF project site may impact geologic units of high paleontological sensitivity, such as Paso Robles Formation. Should fossils be encountered, they would be at risk of damage or destruction from earthwork activities. Mitigation Measure GEO-1 would require the City (or future developer) to retain a qualified paleontologist to administer worker awareness training to educate project's construction personnel on inadvertent resource discovery. Mitigation Measure GEO-2 requires a monitoring plan to be implemented for all earthwork in Paso Robles Formation and work greater than 5 feet in depth. Therefore, with implementation mitigation measures, impacts to paleontological resources or sites would be *less than significant with mitigation*.

Conclusion

Based on required compliance with the CBC, the project would not result in the risk associated with seismic-related or ground-failure events. Based on required compliance with SWRCB and City requirements, implementation of the proposed project would not result in substantial soil erosion or the loss of topsoil. The project does not include the installation of septic tanks or alternative wastewater disposal systems. Grading and subsurface construction activity would disturb native geological formations that are known to have high paleontological sensitivity and could therefore destroy paleontological resources. However, impacts related to geology and soils would be less than significant with the incorporation of Mitigation Measures GEO-1 and GEO-2.

Mitigation Measures

- MM GEO-1 A City of Paso Robles (City)-approved paleontologist that meets the qualifications of a Qualified Professional Paleontologist as defined by the Society of Vertebrate Paleontology shall be retained 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.
- MM GEO-2 The City of Paso Robles (City)-approved paleontologist shall develop and submit a Paleontological Resources Management Plan (PRMP) to the City for review and approval. The approved PRMP shall be implemented during all construction activities. The PRMP shall include provisions for documenting the site according to the standards developed by the National Research Council (1987) and shall include, at a minimum:
1. All ground disturbances greater than or equal to 5 feet below ground surface, or that impact older alluvium or Paso Robles Formation regardless of depth, shall be monitored by the City-approved paleontologist;
 2. A map, based on final grading plans, showing the areas where monitoring shall occur;
 3. Processes and procedures for paleontological monitoring, fossil salvaging, reporting, and curation;

4. In the event paleontological resources are identified during construction, all work within 50 feet of the discovery shall immediately cease so that the City-approved paleontologist can evaluate the significance of the discovery;
5. Preservation of significant fossils found during construction by prompt removal and/or stabilization whenever feasible; and
6. Cataloguing and curation of all artifacts and records detailing the results of the investigations at a recognized, nonprofit paleontological specimen repository with permanent curator, such as a museum or university, or at the discretion of the paleontologist, at a City-approved facility.

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

VIII. Greenhouse Gas Emissions

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

Setting

GHGs are any gases that absorb infrared radiation in the atmosphere. The primary GHGs that are emitted into the atmosphere as a result of human activities are carbon dioxide (CO₂), methane (CH₄), NO_x, and fluorinated gases. These are most commonly emitted through the burning of fossil fuels (oil, natural gas, and coal), agricultural practices, decay of organic waste in landfills, and a variety of other chemical reactions and industrial processes (e.g., the manufacturing of cement). CO₂ is the most abundant GHG and is estimated to represent approximately 80% to 90% of the principal GHGs that are currently affecting the earth's climate. According to the CARB, transportation (vehicle exhaust) and electricity generation are the main sources of GHGs in the state.

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

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

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

The initial Scoping Plan was first approved by the CARB on December 11, 2008, and is updated every 5 years. The first update of the Scoping Plan was approved by the CARB on May 22, 2014, which looked past 2020 to set mid-term goals (2030–2035) toward reaching the 2050 goals. The CARB released the 2017 Climate Change Scoping Plan in November 2017. The 2017 Climate Change Scoping Plan incorporates strategies for achieving the 2030 GHG-reduction target established in SB 32 and EO S-3-05. The CARB’s most recent update is the 2022 Scoping Plan for Achieving Carbon Neutrality, dated November 16, 2022, which identifies a plan to reach carbon neutrality by 2045 or earlier. The 2022 Scoping Plan is the first plan that adds carbon neutrality as a science-based guide beyond established emission reduction targets. It identifies a feasible path to achieve carbon neutrality by 2045, or earlier, while also assessing the progress the state is making toward reducing its GHG emissions by at least 40% below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Climate Change Scoping Plan. Specifically, this plan:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40% below 1990 emissions by 2030.
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 or earlier.
- Focuses on strategies for reducing California’s dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrates equity and protecting California’s most impacted communities as a driving principle throughout the document.
- Incorporates the contribution of natural and working lands to the state’s GHG emissions, as well as its role in achieving carbon neutrality.
- Relies on the most up to date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration as well as direct air capture.
- Evaluates multiple options for achieving our GHG and carbon neutrality targets, as well as the public health benefits and economic impacts associated with each.

When assessing the significance of potential impacts for CEQA compliance, an individual project’s GHG emissions will generally not result in direct significant impacts because the climate change issue is global in nature. However, an individual project could be found to contribute to a potentially significant cumulative impact. Projects that have GHG emissions above the noted thresholds may be considered cumulatively considerable and require mitigation.

In accordance with SLOAPCD recommendations, a 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 CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

Environmental Evaluation

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Annexation

The proposed annexation and pre-zoning would not directly result in any activities that could result in greenhouse gas emissions, and therefore there would be *no impacts*.

OPF Project Site Development

During construction, fossil fuels and natural gas would be used by construction vehicles and equipment. Federal and state regulations in place require fuel-efficient equipment and vehicles and prohibit wasteful activities, such as diesel idling. Construction contractors, in an effort to ensure cost efficiency, would not be expected to engage in wasteful or unnecessary energy and fuel practices. In addition, the development on the OPF project site would implement Mitigation Measures AQ-1 through AQ-4, which would further reduce diesel idling emissions during construction activities.

Operational emissions would come primarily from vehicle trips to and from the OPF project site and nominal energy use related to operations. The OPF would likely employ approximately 10 employees and is anticipated to result in the generation of a total of 49 average daily employee trips (CCTC 2025). All vehicles used by employees and deliveries during operation would be subject to applicable state and federal fuel economy standards and State-mandated smog inspections.

The OPF would rely on electricity provided by 3CE. 3CE is currently on a pathway to achieving 60% clean and renewable energy by 2025 and 100% clean and renewable energy by 2030, which is 15 years ahead of California's mandate for zero emissions. The OPF would require energy use for operation. By using electricity from 3CE the proposed project would reduce the long-term use of non-renewable energy resources. Proposed building design would be required to adhere to Title 24 of the California Energy Code (CEC) and CBC 2022 Building Energy Efficiency Standards to further reduce operational energy use through implementation of green building and energy efficient building design features.

Development on the OPF project site is not expected to generate GHG emissions that would exceed existing thresholds and Mitigation Measures AQ-1 through AQ-4 would further reduce construction-related GHG emissions; therefore, impacts would be *less than significant*.

Landfill Improvements

During construction, fossil fuels and natural gas would be used by construction vehicles and equipment. Federal and state regulations in place require fuel-efficient equipment and vehicles and prohibit wasteful activities, such as diesel idling. Construction contractors, in an effort to ensure cost efficiency, would not be expected to engage in wasteful or unnecessary energy and fuel practices. In addition, the development on the OPF project site would implement Mitigation Measures AQ-1 through AQ-4, which would further reduce diesel idling emissions during construction activities.

Operational emissions would come primarily from vehicle and equipment trips to the stormwater basin for maintenance activities, and for soil transport to and from the stockpile site. These activities would be consistent with existing landfill operations and are not expected to generate GHG emissions that would

exceed existing thresholds and Mitigation Measures AQ-1 through AQ-4 would further reduce construction-related GHG emissions; therefore, impacts would be *less than significant*.

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Annexation

The proposed annexation and pre-zoning would not directly result in any activities that could result in conflicts with greenhouse gas emission reduction plans, and therefore there would be *no impacts*.

OPF Project Site Development and Landfill Improvements

The OPF, landfill improvements, and future development on the OPF project site would be required to comply with existing state regulations to achieve the overall GHG emissions reduction goals identified in SB 32 and EO S-3-05. The OPF would not conflict with the control measures identified in the 2001 Clean Air Plan or other state and local regulations related to GHG emissions and renewable energy. The OPF would be consistent with the existing landfill operations and would be designed to comply with the California Green Building Code standards. Therefore, the OPF and landfill improvements would be consistent with applicable plans and programs designed to reduce GHG emissions and potential impacts would be *less than significant*.

Conclusion

The project would not result in excessive greenhouse gas emissions during construction or operation and would be consistent with applicable greenhouse gas reduction plans. Therefore, impacts related to greenhouse gas emissions would be less than significant.

Mitigation Measures

Mitigation is not necessary.

IX. Hazards and Hazardous Materials

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

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

The Hazardous Waste and Substances Site (Cortese) List is a planning document used by state and local government agencies and developers to comply with CEQA requirements related to the disclosure of information about the location of hazardous materials release sites. Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop an updated Cortese List at least annually. Various state and local government agencies are required to track and document hazardous material release information for the Cortese List. The California Department of Toxic Substance Control's (DTSC's) EnviroStor database tracks DTSC cleanup, permitting, enforcement and investigation efforts at hazardous waste facilities and sites with known contamination, such as federal superfund sites, state response sites, voluntary cleanup sites, school cleanup sites, school investigation sites, and military evaluation sites. The SWRCB's GeoTracker database contains records for sites that impact, or have the potential to impact, water in California, such as Leaking Underground Storage Tank (LUST) sites, Department of Defense sites, and Cleanup Program Sites. The remaining data regarding facilities or sites identified as meeting the "Cortese List" requirements is available on the CalEPA (CalEPA 2024).

The California Health and Safety Code provides regulations pertaining to the abatement of fire-related hazards and requires that local jurisdictions enforce the CBC, which provides standards for fire-resistant building and roofing materials and other fire-related construction methods. The County Safety Element provides a Fire Hazard Zones Map that indicates unincorporated areas in the county within moderate, high, and very high fire hazard severity zones (FHSZ). According to the California Department of Forestry and Fire Protection (CAL FIRE) FHSZ viewer, the annexation area and OPF project site are located within an SRA and are designated as high FHSZ (CAL FIRE 2022). According to the County's Land Use View, the annexation area and OPF project site have an estimated response time of approximately 10 to 15 minutes. For more information about fire-related hazards and risk assessment, see Section XX, *Wildfire*.

The City's Local Hazard Mitigation Plan identifies the City's hazards analysis process which includes identifying, screening, and profiling each hazard, and describes the City's Hazard Profile for hazardous materials. The County also has adopted general emergency plans for multiple potential natural disasters, including the Local Hazard Mitigation Plan, County Emergency Operations Plan, Earthquake Plan, Dam

and Levee Failure Plan, Hazardous Materials Response Plan, County Recovery Plan, and Tsunami Response Plan.

CalRecycle also regulates anaerobic digestion facilities as either compost facilities or transfer and processing facilities, depending upon whether the feedstock is compostable. CalRecycle implements and oversees the regulatory requirements in California Code of Regulations Title 14, along with its designated local enforcement agencies (LEAs). CalRecycle also included permit tiers for digestion operations and facilities that are based upon the amount of material processed.

Environmental Evaluation

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

Annexation and Landfill Improvements

The proposed annexation and pre-zoning and construction of landfill improvements would not directly result in any physical activities that would require the transport, use, or disposal of hazardous materials. The pre-zoning of the 40-acre portion of the annexation area to PF would allow for new land uses beyond what are currently allowed with the AG designation. However, any PF uses would be conducted in accordance with relevant federal and state environmental and workplace safety laws for the handling, transport, and storage of hazardous materials, and would undergo separate environmental review if and when such uses are proposed. Therefore, impacts associated with the routine transport, use, or disposal of hazardous materials would be *less than significant*.

OPF Project Site Development

Construction of the OPF would require limited quantities of hazardous substances, including gasoline, diesel fuel, hydraulic fluid, solvents, oils, paints, etc. during construction, which has the potential to result in an accidental spill or release. Construction contractors would be required to comply with applicable federal and state environmental and workplace safety laws for the handling, transport, and storage of hazardous materials, including 22 CCR Division 4.5.

The OPF would operate be manned five days a week in a single-shift and may generate up to 49 new weekday daily employee trips. Additional truck trips are not anticipated with the proposed facility. Currently, all municipal biosolids generated by the City are trucked to the Paso Robles Landfill for composting. Other contaminated biosolids are currently trucked to an industrial composting facility in Kern County. The proposed project would result in these waste streams being diverted to the OPF, thereby shortening the distance that the contaminated biosolids are transported. Operation of the OPF and associated truck trips would be conducted in accordance with relevant federal and state environmental and workplace safety laws for the handling, transport, and storage of hazardous materials. Therefore, impacts associated with the routine transport, use, or disposal of hazardous materials would be *less than significant*.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Annexation and Landfill Improvements

The proposed annexation and pre-zoning and landfill improvements would not directly result in any physical activities that could result in the release of hazardous materials into the environment. The pre-zoning of the 40-acre portion of the annexation area to PF would allow for new land uses beyond what are currently allowed with the AG designation. However, any PF uses would be conducted in accordance with relevant federal and state environmental and workplace safety laws for the handling, transport, and storage of hazardous materials, and would undergo separate environmental review if and when such uses are proposed. Additionally, the annexation area is not located in an area with the potential for NOA to occur and does not contain any existing structures that would require demolition that could potentially release ACM or lead-based paint (SLOAPCD 2018). Therefore, impacts associated with the reasonably foreseeable upset and accidental release of hazardous materials would be *less than significant*.

OPF Project Site Development

As previously discussed, temporary construction activities associated with the OPF would include the use of construction equipment, vehicles, and commonly used hazardous substances, including, but not limited to, paint, solvents, oils, fuel, and gasoline. Commonly used hazardous substances within the OPF project site would be transported, stored, and used according to regulatory requirements and existing procedures for the handling of hazardous materials.

Construction of the OPF would not require ground-disturbing activities within any heavily traveled roadways (e.g., highways, freeways, etc.); therefore, the project is not expected to disturb aerially deposited lead (ADL). The OPF project site is not located in an area with the potential for NOA to occur and would not require the demolition of existing on-site structures that could release ACM or lead-based paint if present within the building materials (SLOAPCD 2018). Operation of the OPF would include approximately 49 vehicle trips per workday while no new truck trips are expected. Trips for worker travel and to haul biosolids and other materials to the OPF would be conducted in accordance with relevant federal and state environmental and workplace safety laws for the handling, transport, and storage of hazardous materials. Based on required compliance with CCR Title 22, the project would not create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment; therefore, impacts would be *less than significant*.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The nearest school, Pleasant Valley Elementary School, is located 5.8 miles to the northwest of the annexation area. Therefore, the project does not have the potential to emit or handle hazardous materials within 0.25 mile of a school. Therefore, *no impacts* would occur.

- d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

Based on a search of the DTSC EnviroStor database, the SWRCB GeoTracker database, and CalEPA Cortese List website, there are no hazardous waste cleanup sites within or adjacent to the annexation area (DTSC 2024; SWRCB 2024; CalEPA 2024). Therefore, *no impacts* would occur.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

The annexation area is not located within an airport land use plan, or within two miles of an airport. Therefore, *no impacts* would occur.

- f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

The City has adopted the Safety Element, Circulation Element, and Local Hazard Mitigation Plan (LHMP), which identify goals, policies, and objectives for emergency access, accessible evacuation routes, and mitigation of potential hazards (City of El Paso de Robles 2019a). Neither the County nor the City have adopted emergency response or evacuation plans.

Annexation

The proposed annexation and pre-zoning would not directly result in any physical activities that would interfere with an adopted emergency response plan or emergency evacuation plan. The pre-zoning of the 40-acre portion of the annexation area to PF would allow for new land uses beyond what are currently allowed with the AG designation. However, any PF uses would not include habitable structures and would not be anticipated to involve activities that would interfere with SR 46E. Therefore, impacts resulting from the annexation would be *less than significant*.

OPF Project Site Development and Landfill Improvements

Construction of the OPF, landfill improvements, and any future structures would be required to comply with Paso Robles Fire Department specifications and the California Fire Code, which would ensure that the project does not interfere with emergency response or evacuation procedures. Construction of the OPF and landfill improvements would not require improvements to SR 46E that could disrupt evacuation or emergency response. Additionally, operation of the OPF would be similar to the existing landfill and would not include activities that would hinder emergency response to or evacuation from the landfill (the only other use accessible from beyond the OPF project site). Therefore, the project would result in *less than significant* impacts.

- g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zones (FHSZ) Viewer, the annexation area is located in a high Fire Hazard Severity Zone (FHSZ) (CAL FIRE 2023). Further, the existing landfill is located in a Local Responsibility Area (LRA) while the annexation area and OPF project site and the surrounding area are located in a State Responsibility Area

(SRA). The annexation area and OPF project site would likely be reclassified as an LRA following annexation.

Annexation and Landfill Improvements

The proposed annexation and pre-zoning and landfill improvements would not directly result in any physical activities that would directly expose people to risk involving wildfire. The pre-zoning of the 40-acre portion of the annexation area to PF would allow for new land uses beyond what are currently allowed with the AG designation. However, any new PF uses would not include habitable structures that could increase the number of permanent people in the annexation area. The new PF uses could introduce new employees and visitors to the 40-acre PF portion of the annexation area. However, these uses are anticipated to be uses that would support the existing landfill, and that could otherwise currently be accommodated by the existing landfill. Therefore, it is not anticipated that annexation would significantly increase the amount of human activity in the area to the extent that wildfire risk would be exacerbated, and impacts would be *less than significant*.

OPF Project Site Development

OPF construction and operation would introduce new structures and additional human activity in this area which would create additional sources and risk of fire. However, the OPF would be constructed in accordance with California Fire Code (CFC) and CBC requirements to reduce risk associated with fire ignition and wildfire risk. Based on required compliance with existing state and local regulations, the project is not anticipated to result in the risk of loss, injury, or death as a result of wildfire. Therefore, the project would result in *less than significant* impacts.

Conclusion

Based on required compliance with the CCR, the project would not result in significant hazards related to the routine transport, use, or disposal of hazardous materials. The project is not located within 0.25 mile of a school, within 2 miles of an airport, or within or adjacent to a previously recorded hazardous materials site. The project would not impair implementation of an adopted emergency response plan or emergency evacuation plan and would not expose people or structures to a significant risk involving wildfires. Therefore, impacts related to hazards and hazardous materials would be less than significant, and mitigation is not necessary.

Mitigation Measures

Mitigation is not necessary.

X. Hydrology and Water Quality

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Setting

The City’s municipal water supply is composed of groundwater from the Paso Robles Groundwater Basin, an allocation of the Salinas River underflow, and a surface water allocation from the Nacimiento Lake pipeline project. The City established a groundwater stewardship policy to not expand dependency on the Paso Robles Groundwater Basin (“the basin”) over historic use levels/pumping from the City’s peak year of 2007. The City augmented water supply and treatment capacity by procuring surface water from Lake Nacimiento and construction of delivery facilities to the City. Additionally, the City assigns “duty” factors that anticipate the amount of water supply necessary to serve various types of land uses.

The City of Paso Robles is located in the Salinas Valley Groundwater Basin (Paso Robles Subbasin), which is identified as Basin No. 3-004.06 by the Department of Water Resources (DWR). The Salinas Valley Groundwater Basin is under the jurisdiction of the City of Paso Robles Groundwater Sustainability Agency (GSA), which has adopted the Paso Robles Subbasin Groundwater Sustainability Plan (GSP) (City of El Paso de Robles 2019c) and Paso Robles Groundwater Basin Management Plan (City of El Paso de Robles 2011).

The City’s Recycled Water Master Plan identified the potential to provide approximately 1,520 acre-feet per year (AFY) of recycled water to customers within City boundaries. Approximately 428 AFY of this supply would offset potable uses that are currently served by the City, while the remaining recycled water use in City limits would replace private well pumping for irrigation. These estimates account for blending recycled water with lower salinity water and/or groundwater to the extent needed to make it suitable for agricultural and golf course irrigation. The recycled water pipeline portions of the proposed project are consistent with the Recycled Water Master Plan (City of El Paso de Robles 2014d).

The City of Paso Robles is enrolled in the Phase II Municipal Storm Water Program as required by the State Water Resources Control Board. The program requires the City to develop and implement a Storm Water Management Plan (SWMP) in order to reduce or eliminate pollutants in Storm water runoff and non-storm water discharges. In July 2013, the City of Paso Robles developed a Storm Water Program Guidance Document and submitted to the State Water Resources Control Board. Under this program, the City educates the community in storm water pollution prevention, regulates storm water run-off from construction sites, investigates non-storm water discharges and reduces non-storm water run-off from municipal operations.

The annexation area consists of a 133-acre parcel located approximately 4.25 miles east of the incorporated city limits, immediately adjacent to and south of the Paso Robles Landfill. The annexation area does not directly support any significant surface water features. According to the National Wetland Inventory Surface Waters and Wetlands mapper, the Estrella River is located 0.74 mile (3,900 feet) southeast of the annexation area. In addition, there are potential wetland features located within the southern and northeastern portions of the annexation area (USFWS 2024; Figure 4).

For planning purposes, the 100-year flood event is most often used to delineate areas subject to flooding. The Paso Robles Safety Element establishes policies to reduce flood hazards and reduce flood damage, including, but not limited to, prohibition of development in areas of high flood hazard potential, discouragement of single-road access into remote areas that could be closed during floods, and review of plans for construction in low-lying areas. According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) 06079C0425G (effective date 11/15/2012), the annexation area and OPF project site are located within Zone X, an area with minimal flood hazard (FEMA 2024).

Environmental Evaluation

- a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

Annexation

The proposed annexation and pre-zoning would not directly result in any physical activities that would violate water quality standards or waste discharge requirements or otherwise degrade surface or groundwater quality. Therefore, there would be *no impacts*.

OPF Project Site Development

Construction of the OPF would result in approximately 2.5 acres of ground disturbance within the 20-acre annexation area to be pre-zoned as PF. Construction of the OPF would disturb more than 1 acre of soil and would be required to comply with the City's Storm Water Control Ordinance (City Code Chapter 14.20), which requires implementation of best management practices (BMPs) during project construction, preparation of an erosion and sediment control plan (ESCP), and implementation of post-construction stormwater control measures. Construction of the OPF would also be required to comply with Central Coast RWQCB General Construction Permit requirements to further address stormwater at the project site. In addition, construction contractors would be required to comply with applicable federal and state environmental and workplace safety laws for the handling, transport, and storage of hazardous materials, which would reduce the potential for accidental spill of hazardous substances to occur. Based on the required compliance with City and RWQCB requirements, implementation of the proposed project would not violate any water quality standards, and impacts would be *less than significant*.

Landfill Improvements

Construction of the stormwater basin and establishment of the stockpile are would likely disturb more than 1 acre of soil and would be required to comply with the City's Storm Water Control Ordinance (City Code Chapter 14.20), which requires implementation of best management practices (BMPs) during project construction, preparation of an erosion and sediment control plan (ESCP), and implementation of post-construction stormwater control measures. Construction of the stormwater basin would also be required to comply with Central Coast RWQCB General Construction Permit requirements to further address stormwater at the project site. Based on the required compliance with City and RWQCB requirements, implementation of the proposed project would not violate any water quality standards, and impacts would be *less than significant*.

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

Annexation and Landfill Improvements

The proposed annexation and pre-zoning and landfill improvements would not directly result in any physical activities that would decrease groundwater supplies or interfere with groundwater recharge or management of the basin. Therefore, there would be *no impacts*.

OPF Project Site Development

Construction of the OPF would result in the installation of new impervious surfaces up to 2.5 acres of the 20-acre OPF project site. The OPF would be required to comply with the City's Storm Water Control Ordinance (City Code Chapter 14.20) and the City's Standard Details and Specifications to ensure proper drainage at the OPF project site, which would maintain drainage conditions and stormwater flows in the project area. Although the OPF would convert a small area of the annexation area and OPF project site to a new impervious surface, the annexation area and OPF project site would primarily remain pervious. Therefore, impacts to groundwater recharge would be *less than significant*.

During construction, water may be used for dust suppression. The OPF would require minor water use for operational activities, primarily for facility start-up, cleaning, and fire suppression, which would be provided by a new well that would be drilled to replace an existing well that serves the landfill. Once the OPF is operational, it is anticipated that most of the water needs of the system would be fulfilled from the in-system presswater tank. The OPF would result in a nominal increase in groundwater demand over the existing landfill operations. Therefore, the project would not decrease groundwater supply or interfere with groundwater recharge, and impacts would be *less than significant*.

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

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

Annexation

The proposed annexation and pre-zoning would not directly result in any physical activities that would result in erosion or siltation. Therefore, there would be *no impacts*.

OPF Project Site Development and Landfill Improvements

Construction of the OPF and landfill improvements would not result in direct alteration of any drainages or surface water features. The OPF and landfill improvements would require ground-disturbing activities during project construction, which has the potential to result in an increase in erosion that could run off from the site to surrounding areas. Construction of the OPF and landfill improvements would be required to comply with the City's Storm Water Control Ordinance (City Code Chapter 14.20), which requires implementation of BMPs during project construction and preparation of an ESCP. The project would also be required to comply with Central Coast RWQCB General Construction Permit requirements. Following OPF construction, the OPF project site would be predominately covered with hardscapes, which would reduce the potential for long-term erosion to occur at the project site. Based on required compliance with RWQCB and City requirements, the project would not result in substantial erosion or siltation, and impacts would be *less than significant*.

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

Annexation

The proposed annexation and pre-zoning and landfill improvements would not directly result in any physical activities that would result in increased surface runoff. Therefore, there would be *no impacts*.

OPF Project Site

Construction of the proposed OPF would result in the installation of up to 2.5-acres of new impervious surfaces, which could result in an increase in surface flows. The project would be required to comply with the City's Storm Water Control Ordinance (City Code Chapter 14.20) and the City's Standard Details and Specifications, which requires implementation of post-construction stormwater control measures to address long-term drainage conditions at the project site. Based on required compliance with City requirements, the project would not increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, and impacts would be *less than significant*.

c-iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Annexation

There are no stormwater drainage systems in the annexation area, existing or planned. The proposed annexation and pre-zoning would not directly result in any physical activities that would result in additional potential for polluted runoff water. Therefore, there would be *no impacts*.

OPF Project Site Development

Construction of the OPF would result in the installation of new impervious surfaces and ground-disturbance over approximately 2.5 acres of ground disturbance within the 20-acre annexation area to be pre-zoned as PF. The OPF would be required to comply with the City's Storm Water Control Ordinance (City Code Chapter 14.20), which requires implementation of best management practices (BMPs) during project construction, preparation of an ESCP, and implementation of post-construction stormwater control measures. The OPF would also be required to comply with Central Coast RWQCB General Construction Permit requirements to further address pollution runoff at the OPF project site. Compliance with City and RWQCB requirements would reduce the potential for short- and long-term pollutants to occur at the OPF

project site that could runoff into surrounding areas. Based on required compliance with RWQCB and City requirements, the project would not 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, and impacts would be *less than significant*.

c-iv) Impede or redirect flood flows?

According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) 06079C0425G (effective date 11/15/2012), the annexation area is located within Zone X, an area with minimal flood hazard (FEMA 2024). Construction of the OPF and landfill improvements would not result in direct alteration of any drainages or surface water features that could directly impede or redirect flood flows. Further, the project would be required to comply with the City's Storm Water Control Ordinance (City Code Chapter 14.20) and the City's Standard Details and Specifications, which requires implementation of post-construction stormwater control measures to address drainage conditions at the project site. Based on existing site conditions and required compliance with City requirements, the project would not impede or redirect flood flows, and impacts would be *less than significant*.

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

According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) 06079C0425G (effective date 11/15/2012), the annexation area and OPF project site are located within Zone X, an area with minimal flood hazard (FEMA 2024). Additionally, the annexation area and OPF project site are not located in an area that would be subject to tsunami risk and is not located in proximity to any impounded body of water that would be subject to seiche. The project is not within a flood hazard, tsunami, or seiche zone and would not risk release of pollutants due to project inundation, and *no impacts* would occur.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Annexation

The proposed annexation and pre-zoning would not result in any activities that could obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, there would be *no impacts*.

OPF Project Site Development and Landfill Improvements

As evaluated in *Impact Discussion X(b)*, the OPF and landfill improvements would not substantially decrease groundwater supply or interfere with groundwater recharge in a manner that would impede sustainable management of the groundwater basin, which is consistent with sustainable management goals of the Paso Robles Subbasin GSP, including increasing recharge and reducing groundwater pumping.

The annexation area is under the jurisdiction of the Central Coast RWQCB and would be subject to the Water Quality Control Plan for the Central Coast Region and development is required to comply with the Central Coast RWQCB General Construction Permit requirements, which are codified in the City's Storm Water Control Ordinance (City Code Chapter 14.20) to address pollutant control and stormwater runoff (RWQCB 2019). Based on the required compliance with City and RWQCB requirements, the project would be consistent with sustainable management of the Salinas Valley Groundwater Basin-Paso Robles Subbasin and the Water Quality Control Plan, and impacts would be *less than significant*.

Conclusion

The project would not result in adverse impacts related to water quality, groundwater quality, or stormwater runoff. The project would not be located in an area that would be subject to inundation. The project would be consistent with sustainable management of the Salinas Valley Groundwater Basin and the Water Quality Control Plan for the Central Coast Region. Therefore, impacts related to hydrology and water quality would be less than significant, and mitigation is not necessary.

Mitigation Measures

Mitigation is not necessary.

XI. Land Use and Planning

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

The City of Paso Robles encompasses approximately 19.9 square miles in northern San Luis Obispo County. The city is located on the Salinas River, approximately 25 miles north of the city of San Luis Obispo and approximately 91 miles southeast of the city of Salinas. The unincorporated community of Templeton is located approximately 5 miles to the south, and the unincorporated community of San Miguel is located approximately 8 miles to the north.

The purpose of the City of El Paso de Robles Zoning Ordinance is to promote the growth of the city in an orderly manner and to protect the public health, safety, comfort, and general welfare. The zoning ordinance defines 25 zoning districts and overlays in the city, each of which establishes the general use, density, and type of development allowed in that area. All buildings, land use, or any type of physical development must comply with the regulations for each zoning district.

The *City of El Paso de Robles General Plan* is the City's fundamental land use policy document to guide decisions through the year 2025 relative to the physical form and development of the city. The General Plan contains eight elements: Land Use, Circulation, Housing, Open Space, Conservation, Parks and Recreation, Noise, and Safety. The physical changes envisioned by the General Plan are described primarily in the Land Use and Circulation Elements. The Housing, Open Space, Conservation, Parks and Recreation, Noise, and Safety Elements do not involve physical changes to the city, except to the extent that the policies of these elements are carried forward through the LUE. The LUE establishes a planned land use pattern and long-range policies to guide growth within the city limits and SOI.

The *City of El Paso de Robles General Plan 2003 Land Use Element* provides for the opportunity for infill development within the City's limits and expansion of the City limits to incorporate potential annexation areas. The project site is currently zoned AG, which provides a land use category for

agricultural uses. The project includes a request for a land use designation change to public facilities (PF) and a zoning change to PF, which provides for facilities owned and operated by public agencies (City of El Paso de Robles 2014b).

Environmental Evaluation

a) Would the project physically divide an established community?

The annexation area is currently located in the unincorporated area of the County of San Luis Obispo and are bound by SR 46E on the south. Surrounding land uses include the Paso Robles Landfill, open space, rural residential, and agricultural uses to the north; open space, single family residences, and Estrella Road to the east; wineries, single family residences, and SR 46E to the south; and wineries and vineyards to the west.

The project includes the annexation and pre-zoning of 133-acre of vacant City owned land, as well as the construction and operation of a OPF in an approximately 20-acre area in the northern portion of the annexation area. The entire annexation area is within the City’s SOI (Figure 3). Annexation and development of the OPF and landfill improvements would not physically divide any established communities, and would not result in the removal or blockage of existing public roadways or other circulation paths. Therefore, there would be *no impact*.

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

The requirements of the City’s zoning ordinance, which implement the City’s General Plan, do not currently apply to the annexation area because it is currently outside of the incorporated City. However, future development would be subject to city regulations after annexation. The OPF would be situated within approximately 20-acres proposed to pre-zoned as PF, which provides for facilities owned and operated by public agencies, and would be consistent with the proposed pre-zoning. Therefore, the project would not conflict with any existing zoning standards. Table 3 describes the project’s preliminary consistency with applicable policies of the General Plan.

Table 3. Project Consistency with City Land Use Plans, Policies, and Regulations Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect

Policy	Policy Text	Preliminary Statement of Consistency/Conflict
<i>City of El Paso de Robles General Plan 2003</i>		
Land Use Element		
Policy LU-2E	“Purple Belt” (Open Space/Conservation Areas Around the City). Create a distinct “Purple Belt” surrounding the City by taking actions to retain the rural, open space, and agricultural areas.	Consistent. As discussed in <i>Section II, Agriculture and Forestry Resources</i> , the proposed annexation and pre-zoning would convert approximately 40 acres of the annexation area from the County’s AG designation to the City’s PF designation. However, the rest of the 133-acre site would remain zoned as AG under the City’s zoning designation, which is generally consistent with the intent of the County’s AG designation. Therefore, the majority of the project site will remain zoned for agricultural uses and would not conflict with existing land use regulations. Furthermore, development, including construction of the OPF, would be required to comply with standard SLOAPCD dust control measures detailed in <i>Section III, Air Quality</i> , which would reduce potential

Policy	Policy Text	Preliminary Statement of Consistency/Conflict
		impacts on surrounding agricultural operations. Development within the annexation area would also be required to comply with the City's right to farm ordinance, to reduce conflicts with nearby agricultural operations.
Policy LU-2K	Support environmental responsibility. Manage the natural landscape to preserve the natural beauty and rural identity of the community, which enhances ecological functions and maintains environmental and public health.	Consistent. Development in the OPF project site would be required to preserve healthy, existing vegetation onsite where possible. Construction of the OPF would not remove any oak trees as there are no oak trees within the OPF project site.
Policy LU-4A	Service Levels. Strive to ensure that City services and facilities are maintained at current levels and/or adopted standards and are funded as revenues become available.	Consistent. The City's LUE calls for a service ratio of 1.4 to 1.6 sworn police personnel per 1,000 residents and a ratio of 0.8 to 1.3 firefighters per 1,000 residents. As discussed in <i>Section 4.12, Public Services and Recreation</i> , the O would not induce a substantial permanent population growth within the city that would increase demand for public services.
Circulation Element		
Policy CE-1A	Circulation Master Plan. Revise/update the City's Circulation Master Plan to address mobility needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, users of public transportation, and seniors as follows: Improve the circulation network on a prioritized basis; Provide adequate access for emergency vehicles and evacuation; Improve mobility through and access to Downtown Paso Robles by implementing City Council adopted Town center and Uptown Plans; Establish safe pedestrian and bicycle paths, for children and their parents to schools and other major destinations such as downtown, retail, and job centers; Maintain mobility for all modes by encouraging flexible and off-set working hours, transit improvements; pedestrian and bikeway improvements; and public outreach as to the availability and benefit of alternative modes of travel; Require new development to mitigate its impact on the transportation network.	Consistent. Access to the project would be provided via Union Road from SR 46E. Emergency access would remain available to the OPF project site and landfill during construction and operation.
Policy CE-1B	Reduce Vehicle Miles Traveled (VMT). The City shall strive to reduce VMT generated per household per weekday by making efficient use of existing transportation facilities and by providing direct routes for pedestrians and bicyclists through the implementation of sustainable planning principles.	Consistent. As evaluated in <i>Section XVII, Transportation</i> , the OPF would reduce the regional VMT by reducing the need for trucks to transport bio-waste to processing plants outside of the County.
Conservation Element		
Policy C-1D	Solid Waste. Ensure that the City's landfill maintains sufficient capacity to serve the needs of the City through the year 2025.	Consistent. As described in <i>Section XIX, Utilities and Service Systems and Section VI, Energy</i> , the OPF would not generate a substantial amount of solid waste and would assist in diverting green waste from the City's landfill. Therefore, the project would not generate waste in excess of state or local standards, or in excess of the capacity of local infrastructure.
Policy C-2B	VMT Reduction. Implement programs to reduce the number of vehicle miles traveled (VMT), especially by single occupant vehicles, including providing opportunities for mixed-use projects. (Note: The Circulation Element also addresses	Consistent. As evaluated in <i>Section XVII, Transportation</i> , the OPF would reduce the regional VMT by reducing the need for trucks to transport bio-waste to processing plants outside of the County.

Policy	Policy Text	Preliminary Statement of Consistency/Conflict
	VMT reduction, but the Conservation Element is the one that specifically calls out the connection to air quality).	
Policy C-2C	Emissions Reduction. Take steps to reduce creation of air contaminant emissions.	Consistent. Mitigation Measures AQ-1 through AQ-4 have been included in <i>Section 4.3, Air Quality and Greenhouse Gas Emissions</i> , to reduce construction-related air contaminant emissions, including particulate matter, DPM, ROG, and NOx.
Policy C-3A	Oak Trees. Preserve existing oak trees and oak woodlands. Promote the planting of new oak trees.	Consistent. As discussed in <i>Section 4.4, Biological Resources</i> , the OPF project site does not contain oak trees and no oak trees would be removed during construction of the OPF.
Policy C-3B	Sensitive Habitat. Incorporate habitats into project design, as feasible, including: oak woodlands, native grasslands, wetlands, and riparian areas.	Consistent. As discussed in <i>Section 4.4, Biological Resources</i> , the OPF project site does not contain oak woodlands, wetlands, or riparian areas.
Policy C-5A	Visual Gateways and Landmarks. Identify important visual resources: gateways, corridors, major arterials, natural/open space areas, as shown in Table C-1 and Figure C-3. Table C-1. Important Visual Resources Gateways to the City [includes SR 46 West at US Highway 101]; May be marked with entrance monument signs Limit range of land uses to preclude those commercial and industrial uses with outside processes and storage; Development shall be designed to make a positive visual impression (in terms of design/architecture and landscaping) and incorporate/preserve natural features; Billboards shall be limited in number, shall be located to preserve views of natural features; Visual Corridors [both SR 46 West and US Highway 101]; Development shall be designed to make a positive visual impression and incorporate/preserve natural features; Billboards shall be limited in number, shall be located to preserve views of natural features; Natural Landmarks and Open Space Viewsheds; Oak-covered hillsides	Consistent. As discussed in <i>Section I, Aesthetic Resources</i> , the project would not substantially degrade the visual character or quality of the site and its surroundings. The OPF would be consistent with the level and scale of the existing Paso Robles landfill and would not result in visually incompatible features. The natural gas conveyance system would be installed below grade. Therefore, the proposed OPF would not result in the development of new buildings or other aboveground features in previously undeveloped areas that could block existing views or alter the existing character of the project area
Policy C-6B	Archaeological Resources: Strive to preserve/protect "unique archaeological resources" as defined by the California Environmental Quality Act.	Consistent. As discussed in <i>Section 4.5, Cultural and Tribal Cultural Resources</i> , the annexation area and OPF project site do not contain any known archaeological resource sites that may be affected by ground-disturbing activities associated with implementation of the project.
Policy C-7A	Conservation Measures. Investigate and implement as feasible, energy conservation measures.	Consistent. As described in <i>Section XIX, Utilities and Service Systems and Section VI, Energy</i> , the RNG may potentially be exported and sold to other users. The project could include a "virtual pipeline," which would consist of a small fleet of portable roll-off RNG tanks that are refilled at the facility and delivered directly to large RNG customers, such as Paso Waste & Recycle. In lieu of the RNG being used as fuel, the City may choose to convert the RNG into electricity using the CHP. The electricity would be used onsite and excess electricity could be fed back into the grid.
Open Space Element		
Policy OS-1A	Open Space/Purple Belt. Develop an open space plan/program for establishing an open space/ purple belt (agricultural preserve area) surrounding the City.	Consistent. As discussed in <i>Section II, Agriculture and Forestry Resources</i> , the proposed annexation and pre-zoning would convert approximately 40 acres of the project site from the County's AG designation to the

Policy	Policy Text	Preliminary Statement of Consistency/Conflict
		<p>City's PF designation. However, the rest of the 133-acre annexation area would remain zoned as AG under the City's zoning designation. Therefore, the majority of the annexation area will remain zoned for agricultural uses, and would not conflict with existing zoning. Furthermore, the OPF would be required to comply with standard SLOAPCD dust control measures detailed in <i>Section III, Air Quality</i>. Development within the OPF project site would also be required to comply with the City's right to farm ordinance, to reduce conflicts with nearby agricultural operations.</p>
Noise Element		
Policy 23	<p>All projects that propose to use heavy construction equipment that has the potential to create vibrations that could cause structural damage to sensitive structures within 100 feet shall be required to submit a pre-construction vibration study prior to the approval of a building permit. Projects shall be required to incorporate specified measures and monitoring identified to reduce impacts. Pile driving or blasting are illustrative of the type of equipment that could be subject to this policy.</p>	<p>Consistent. As discussed in <i>Section XIII, Noise</i>, construction and operation of the proposed OPF would not exceed the minimum recommended criteria for structural damage or human annoyance related to groundborne noise and/or groundborne vibration. Incorporation of mitigation would not be necessary.</p>
Safety Element		
Policy S-1C	<p>Hazardous Exposure Minimization. Minimize hazards to people and property caused by fire, crime, and related services.</p>	<p>Consistent. All proposed development would be required to be designed and constructed in accordance with applicable California Fire Code and local fire code requirements, including, but not limited to, installation of smoke detectors and fire sprinklers, provision of fire hydrants, and providing adequate emergency vehicle access onsite.</p>
Policy S-1D	<p>Structural Safety. Rely on the City's planning and building permit review process to ensure that existing and proposed structures are adequately designed, and to reduce susceptibility to damage from fire, flooding, and geologic hazards.</p>	<p>Consistent. The design of the OPF would be required to comply with standards of the CBC Title 24, which contains specific requirements on building design to reduce damage from seismically induced ground shaking/ground motions during a seismic event and other ground-failure events. Additionally, all proposed development in the OPF project site would be required to be designed and constructed in accordance with applicable California and Fire Code and local fire code requirements to reduce wildfire risk.</p>
Policy S-1E	<p>Hazardous Materials. The City shall comply with Government code requirements regarding the use, storage, and transportation of hazardous materials.</p>	<p>Consistent. As discussed in <i>Section IX, Hazards and Hazardous Materials</i>, the transport, storage, use, or disposal of hazardous materials for the construction and operation of the OPF would be subject to California Highway Patrol, California Department of Toxic Substance Control, and CCR regulations pertaining to hazardous materials.</p>
Policy S-1G	<p>Maintain the structural and operational integrity of essential public facilities during flooding by taking safe guards such as locating new facilities outside of flood zones or areas subject to localized flooding, and audit existing facilities in these areas to determine if building upgrades should be considered to reduce the potential for future flooding.</p>	<p>Consistent. As discussed in <i>Section X, Hydrology and Water Quality</i>, the annexation area and OPF project site are not located within an identified flood hazard zone. Alteration of drainage patterns is not anticipated to result in flooding on- or offsite.</p>

The San Luis Obispo LAFCO is responsible for reviewing and approving proposed jurisdictional boundary changes in San Luis Obispo County, including the City's proposed annexation of the project site from the County. In addition to the requirements of the Cortese-Knox-Hertzberg Act, the San Luis

Obispo LAFCO has adopted local policies that it considers in its review of projects. LAFCO policies applicable to the project pertain to the location of land to be annexed, affordable housing, agricultural resources, and public services. San Luis Obispo LAFCO policies encourage cities to annex unincorporated islands, urban development within cities, and proposals that are supported by a community’s long-range vision for its growth and development. Table 4 discusses the project’s preliminary consistency with applicable LAFCO policies related to City annexations.

Table 4. Project Consistency with LAFCO Policies and Procedures

Policy	Policy Text	Preliminary Statement of Consistency/Conflict
LAFCO Policies and Procedures, 2.2 City Annexations		
1.	The boundaries of a proposed annexation must be definite and certain and must conform to lines of assessment whenever possible.	Consistent. The proposed annexation line is coterminous with the project site boundary. It is adjacent to existing Paso Robles City limit and conforms to tax assessor parcel boundaries.
2.	The boundaries of an area to be annexed will not result in any areas difficult to serve.	Consistent. The annexation area is a contiguous area of 133 acres that is adjacent to the Paso Robles City limits, and is within the City’s SOI. There are no major barriers or limitations that would result in portions of the site being more difficult to serve.
3.	There is demonstrated need for governmental services and controls in the area proposed for annexation.	Consistent. The vacant project site is currently served by County of San Luis Obispo governmental services, and is within the City’s SOI. As addressed in <i>Section XV, Public Services</i> , upon annexation to the city, the Project site would be primarily served by city governmental services.
4.	The municipality has the resources capable of meeting the need for services in the area proposed for annexation and has submitted studies and information documenting its ability to serve.	Consistent. The individual environmental impact sections of this IS/MND provide evidence and analysis of the City’s capability to provide the necessary resources to the project (see <i>Section XV, Public Services, Section XVI Recreation, and Section XIX, Utilities and Service Systems</i>).
5.	There is mutual social and economic community of interest between the residents of the municipality and the proposed territory.	Consistent. There are currently no residents within the proposed territory to be annexed; nonetheless, no issues with the project that would result in a conflict of social or economic interests are known at this time..
6.	The proposed annexation is compatible with the municipality’s general plan. The proposed annexation represents a logical and reasonable expansion of the annexing municipality.	Consistent. No conflicts with the project and the City’s General Plan policies, with the proposed annexation, General Plan amendment, and pre-zoning of the project site have been identified. The annexation area is located adjacent to the Paso Robles City limits (the landfill). All public services and utilities are located adjacent to or in close proximity to the site, avoiding costly long-distance extensions of service lines or boundaries. Therefore, the proposed annexation would provide a logical and reasonable expansion of the City of Paso Robles.

As shown in Tables 4 and 5, the Project would be consistent with all applicable City General Plan policies and LAFCO policies for City annexations. In addition, LAFCO requires demonstration of the availability of an adequate, reliable, and sustainable water supply. As discussed in *Section XIX, Utilities and Service Systems*, the OPF project would receive its water from a new well that would replace an existing well currently serving the landfill. Therefore, the project would not conflict with the applicable land use plans, policies, or regulations of the agencies with jurisdiction over the project, and this impact would be *less than significant*.

Conclusion

The project would not physically divide an established community. The project would also be consistent with the goals and policies in the City’s General Plan, and LAFCO policies related to City annexations. Therefore, impacts related to land use and planning would be less than significant and mitigation is not necessary.

Mitigation Measures

Mitigation is not necessary.

XII. Mineral Resources

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

Setting

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

The three MRZs used in the SMARA classification-designation process in the San Luis Obispo-Santa Barbara Production-Consumption Region are defined below (California Geological Survey [CGS] 2017):

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

The *City of El Paso de Robles General Plan 2003 Conservation Element* identifies goals, policies, and action items for mineral resources within the city. The goals and policies include managing the extraction of mineral resources to protect and conserve Portland cement concrete conglomerate mineral resources classified by the State Geologist as MRZ-2 and to protect other properties and mineral resources from adverse impacts associated with mining operations. In order to protect mineral resources, the City will continue to permit surface mining of sand and gravel as a conditional use within the Salinas River and Huer Huero Creek and review new development projects involving areas within or adjacent to areas

designated as MRZ-2 (City of El Paso de Robles 2014a). The annexation area and OPF project site are not located within or adjacent to an area mapped as MRZ-2 (Busch 2011).

Environmental Evaluation

- a) **Would the project 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?**

The annexation area is not located within or adjacent to an Extractive Resource Area or Energy/Extractive Area. Therefore, *no impacts* would occur.

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

According to Plate 1 of the San Luis Obispo-Santa Barbara Production-Consumption Region, the annexation area is not located within or adjacent to an area mapped as MRZ-2 (CGS 2017). The nearest mining operations are located approximately 7.2 miles west in the Estrella Riverbed (CDOC 2023). The proposed land use and zoning designations for the annexation area (AG and PF) and OPF project site (PF) would not allow for mining activities. There are no known mineral resources within the annexation area or OPF project site. Therefore, *no impacts* would occur.

Conclusion

No impacts to mineral resources would occur as a result of the project, and mitigation is not necessary.

Mitigation Measures

Mitigation is not necessary.

XIII. Noise

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project result in:</i>				
(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

Noise varies with time, geographic location, proximity to the source, and duration of the noise event. The effects of noise are considered in several ways: how a proposed project may increase existing noise levels, how those noise levels would affect surrounding land uses, and how a proposed land use may be affected by noise from existing and surrounding land uses. Certain land uses are considered more sensitive to ambient noise levels than others, due to the amount of noise exposure and the types of activities involved. In general, noise-sensitive land uses typically include but are not limited to:

- Residential development;
- Schools/daycare;
- Public assembly and entertainment;
- Commercial/retail;
- Industrial;
- Restaurants, and eateries; an
- Offices.

The nearest noise-sensitive receptors to the annexation area and OPF project site include rural single-family residences located approximately 800 feet to the south and 900 feet to the north.

The City adopted the City of El Paso de Robles General Plan 2003 Noise Element in 2019, which provides goals, policies, and action items for noise compatible land uses within the city (City of El Paso de Robles 2019c). Noise Element Policy N-1A establishes exterior and interior noise standards for transportation noise sources:

Policy N-1A: Noise Minimization. New development shall be designed to comply with the maximum, allowable Noise Exposures of 65-dB CNEL for outdoor activities (except for parks); and 45-dB CNEL for indoor activities.

The City of Paso Robles has also adopted noise standards for stationary sources. The noise standards are applied at the property line of the receiving land use. The City's noise standards for public facility-related stationary sources are summarized in Table 5.

Table 5. Noise Standards for Locally Regulated (Non-Transportation) Noise Sources

Land Use Category	Period ³	Exterior Areas ¹		Interior Spaces ²	
		Lmax ⁴	Leq ⁵	Lmax ⁴	Leq ⁵
Office/Professional	Day	80	60	60	45
	Evening	75	55	60	45
Commercial/Retail Buildings	Day	80	80	60	50
	Evening	75	75	60	50
Industrial	Day	80	60	60	50
	Evening	75	55	60	50

¹ Noise sensitive areas are defined in the acoustic terminology section.

² Interior noise level standards are applied within noise-sensitive areas of the various land uses, as defined in the acoustic terminology section, with windows and doors closed.

³ Daytime hours = 7:00 a.m. to 7:00 p.m.; evening hours = 7:00 p.m. to 10:00 p.m.; night hours = 10:00 p.m. to 7:00 a.m.

⁴ Lmax = Highest measured sound level occurring during a given interval of time (Typically 1 hour).

⁵ Leq = Average or "Equivalent" noise level during the worst-case hour in which the building is in use.

⁶ Hospitals are often noise-generating uses. The exterior noise level standards for hospitals are applicable only at clearly identified areas designated for outdoor relaxation by either hospital staff or patients.

⁷ Exterior areas of school uses are not typically noise-sensitive. As a result, the standards for schools are focused on the interior office and classroom spaces.

General notes applicable to all noise standards and land uses:

- a. Where the noise source in question consists of speech or music, or is impulsive in nature, or contains a pure tone, the noise standards of this table are reduced by 5 dB.
- b. Where ambient noise levels exceed the noise level standards shown above, the noise standards shall be increased in 5-dBA increments to encompass the ambient.
- c. Reductions in the noise standards for noise sources identified in general note "A" above shall be applied after any increases warranted by elevated ambient conditions prescribed in general note "B", subject to verification through a noise study.

Chapter 21.60 of the Municipal Code establishes general regulations for noise sources within the city. Construction noises are exempt from provisions of the chapter so long as they occur between the hours of 7 a.m. and 7 p.m. Section 21.60.060 of the Municipal Code includes regulations for interior and exterior noise standards, as identified in Table 6, above. In addition, Section 21.21.040-C states that no land use shall increase the ambient noise level as measured at the nearest residentially zoned property line to a level that constitutes a public nuisance.

Environmental Evaluation

- a) **Would the project result in 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?**

Annexation

The proposed annexation and pre-zoning would not directly result in any noise generation, and therefore there would be *no impacts*.

OPF Project Site Development and Landfill Improvements

Existing ambient noise levels in the project area are primarily dominated by activities at the Paso Robles Landfill and vehicle noise along SR 46. During construction of the OPF or future uses on the OPF project site, noise from construction activities may intermittently dominate the noise environment in the immediate project area. Construction of the OPF would require the use of typical construction equipment (e.g., dozers, excavators, etc.) during proposed construction activities. According to the Federal Highway Administration (FHWA), typical noise levels from standard construction equipment generally range from 80 dBA to 85 dBA at 50 feet from the source, as shown in Table 6.

Table 6. Construction Equipment Noise Emission Levels

Equipment Type	Typical Noise Level (dBA) 50 Feet from Source
Concrete Mixer, Dozer, Excavator, Jackhammer, Man Lift, Paver, Scraper	85
Heavy Truck	84
Pneumatic Tools (i.e., pile driving equipment)	85
Concrete Pump	82
Backhoe, Compactor	80

Source: FHWA (2018)

The nearest noise-sensitive receptor is an off-site rural residence located approximately 800 feet south of the OPF project site. Noise attenuates at approximate 6 dB per doubling of distance; therefore, noise levels would be approximately 73 dB at 200 feet from the OPF project site and approximately 67 dB at 400 feet from the OPF project site. Therefore, the maximum noise levels from construction equipment at the nearest noise-sensitive land use located approximately 800 feet away would be approximately 61 dB, which is consistent with the City's noise standards. Further, proposed construction activities would be limited to weekdays during daytime hours (7:00 a.m. through 7:00 p.m.), consistent with the provisions of the Paso Robles Municipal Code. Therefore, OPF construction-related noise would not increase ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, and impacts would be *less than significant*.

Operation of the OPF would contribute to a marginal increase in ambient noise levels in the project area. Surrounding land uses include the Paso Robles Landfill, open space, rural residential, and agricultural uses to the north; open space, single family residences, and Estrella Road to the east; wineries, single family residences, and SR 46E to the south; and wineries and vineyards to the west. The OPF would be consistent with the level and scale of the existing Paso Robles landfill and would not introduce a new incompatible land use that would significantly increase ambient noise levels in the project area. Further, the OPF would result in a marginal increase of approximately 49 daily vehicle trips, including the diversion of approximately 250 to 750 annual waste trucks trips which would otherwise be bypassing the facility on SR 46E to Kettleman City; therefore, the project would not result in a doubling of traffic along SR 46E that could result in a noticeable increase in vehicle noise in the project area. Therefore, impacts related to OPF operational noise would be *less than significant*.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Annexation

The proposed annexation and pre-zoning would not directly result in groundborne noise or vibration. Therefore, there would be *no impact*.

OPF Project Site Development and Landfill Improvements

Construction of the OPF would not require pile driving or other high-impact activities that would generate substantial groundborne noise or vibration during construction. Standard construction equipment would generate some groundborne noise and vibration during proposed ground disturbing activities; however, these activities would be limited in duration and consistent with other standard construction activities. In addition, any groundborne noise or vibration generated by short-term construction activities would be limited to the immediate work area and is not anticipated to disturb surrounding land uses. Operation of the OPF does not include new features that could generate substantial long-term groundborne noise above existing conditions. Therefore, impacts related to exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels would be *less than significant*.

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

The nearest airport is San Luis Obispo County Regional Airport, located approximately 5 miles northwest of the annexation area. As the annexation area and OPF project site are not located within an airport land use plan or within 2 miles of a public airport or private airstrip, *no impacts* would occur.

Conclusion

The project would not generate a substantial increase in temporary or permanent ambient noise levels and would not generate groundborne noise in a manner that would result in disturbance. The annexation area is not located within an airport land use plan or within 2 miles of an airport. Therefore, potential impacts related to noise would be less than significant.

Mitigation Measures

Mitigation is not necessary.

XIV. Population and Housing

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

Setting

The City’s General Plan Land Use Element was adopted in 2003 and established a population planning threshold of 44,000 persons based on the existing dwelling units and the maximum number of potential dwelling units authorized by the LUE and assumption of 2.7 persons per household. The 2012 Land Use Element update projects that the population of the city will be approximately 34,400 persons in 2025, 37,700 persons in 2030, 41,900 persons in 2040, and 42,800 persons in 2045. The General Plan Land Use Element projects the number of dwelling units within the city will be approximately 13,602 in 2025, 14,993 in 2030, 16,586 in 2040, and 16,924 in 2045 (City of El Paso de Robles 2014b).

The LUE provides for the opportunity for infill development within the city limits and expansion of the city limits to incorporate potential annexation areas. The most recent LUE update occurred in 2014 (City of Paso Robles 2014). The 2014 LUE update accounts for the annexation of the Olsen-South Chandler Ranch, Beechwood, and Linne Road (Our Town) properties, which increased the city limits to 19.9 square miles. The LUE consists of goals and policies for development within the city based on population and housing projections.

In accordance with the State Housing Element Statutes, the City submitted its sixth cycle Housing Element to the HCD in August 2020. Prior to submission to the HCD, the City’s Planning Commission and City Council reached out to the public, local stakeholders (developers, service providers, neighboring jurisdictions, and housing advocates), and other interested parties in order to promote public participation and ensure the housing concerns of low- and moderate-income and special needs residents were specifically addressed.

The City adopted the Housing Element in December 2020, for the December 31, 2020, to December 31, 2028, period. The Housing Element is a mandatory General Plan Element that sets forth long-term goals

and policies and defines specific programs to meet the housing needs of all economic segments in the community. The Housing Element update identifies strategies and programs to: (1) encourage the development of a variety of housing opportunities; (2) provide housing opportunities for persons of lower and moderate incomes; (3) preserve the quality of the existing housing stock in Paso Robles; (4) minimize governmental constraints; and (5) promote equal housing opportunities for all residents.

Environmental Evaluation

- a) **Would the project 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)?**

Annexation

The proposed annexation and pre-zoning would not directly result in any physical activities that would induce population growth, and would not result in a change in land use limitations that would allow for increased residential or commercial development. The portion of the annexation area to be pre-zoned PF would allow for new land uses beyond what is currently allowed under the AG land use designation and could require additional employees. New land uses would be expected to be uses that support the existing landfill operations and would not require a significant number of employees. It is anticipated employees would either be existing landfill employees or would be workers from the local employment force and would not require workers to relocate to the project area. Therefore, there would be *no impact* related to substantial unplanned population growth.

OPF Project Site Development and Landfill Improvements

The project does not include the development of new residences, businesses, or other uses that could facilitate direct population growth within the city. Therefore, the project would not generate significant employment opportunities that could increase population growth within the city. Proposed OPF and landfill improvements construction activities have the potential to generate short-term employment opportunities; however, OPF and landfill improvement construction is expected to use workers from the local employment force and would not require workers to relocate to the project area. The OPF would support the existing landfill operations and would not require a significant number of employees. It is anticipated employees would either be existing landfill employees or would be workers from the local employment force and would not require workers to relocate to the project area. Therefore, the project would not result in substantial or unplanned population growth. Therefore, *no impacts* would occur.

- b) **Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

The annexation area does not contain any existing housing; therefore, the project would not require the construction of replacement housing elsewhere. Therefore, *no impacts* would occur.

Conclusion

The project would not induce substantial planned or unplanned population growth and would not necessitate the construction of replacement housing elsewhere. Therefore, impacts related to population and housing would be less than significant, and mitigation is not necessary.

Mitigation Measures

Mitigation is not necessary.

XV. Public Services

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

Setting

The annexation area would be served by the City of Paso Robles Fire Department (PRFD) and the City of Paso Robles Police Department (PRPD). The PRFD and PRPD are located approximately 9 miles southwest at 900 Park Street in downtown Paso Robles. According to the City's website, there are nine public recreational facilities, numerous neighborhood parks, and public trails within the city (City of El Paso de Robles 2021a).

PRFD operates out of three fire stations located throughout the city and provides and receives mutual aid assistance to and from the California Department of Forestry and Fire Protection (CAL FIRE). PRFD Station 3 is located at 2924 Union Road, approximately 8 miles west of the annexation area and OPF project site. CAL FIRE Meridian Station 52 is located approximately 2.6 miles west of the annexation area and OPF project site at 4050 Branch Drive. Emergency response time to the annexation area and OPF project site is approximately 5 minutes (County of San Luis Obispo 2023).

Environmental Evaluation

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

Fire protection, police protection, schools, parks, or other public facilities

Annexation

The proposed annexation and pre-zoning would not allow for the development of new residential land uses that could facilitate direct population growth and substantially increase demand on existing public services that would require additional or expanded public facilities. Therefore, there would be *no impacts*.

OPF Project Site Development and Landfill Improvements

The OPF, landfill improvements, and future development on the OPF project site would require employees to support operations; however, it is anticipated that these developments would result in a limited number of employment opportunities and these positions would be expected to be filled by the local workforce or existing City or landfill staff. Therefore, the project would not facilitate the need for additional or expanded public facilities due to an increased need for public services; therefore, impacts would be *less than significant*.

Conclusion

The project would not increase demand for fire or police protection services, schools, parks, libraries, or other public facilities. Therefore, impacts related to public services would be less than significant, and mitigation is not necessary.

Mitigation Measures

Mitigation is not necessary.

XVI. Recreation

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

Setting

The City provides and maintains nine public recreational facilities, numerous neighborhood parks, and public trails, including the following (City of El Paso de Robles 2021a):

- Barney Schwartz Park
- Centennial Park and Pool
- Downtown City Park
- Larry Moore Park
- Municipal Pool
- Pioneer Park and Skate Park
- Robbins Field
- Sherwood Park and Dog Park
- Uptown Family Park

The annexation area and OPF project site are located approximately 6.5 miles northeast of Barney Schwartz Park.

Environmental Evaluation

- 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?**

Annexation

The proposed annexation and pre-zoning would not allow for the development of new residential land uses that could facilitate direct population growth or land uses that could substantially increase demand on recreational facilities. Therefore, there would be *no impacts*.

OPF Project Site Development

The OPF, landfill improvements, and future development on the OPF project site would require employees to support operations; however, it is anticipated that these developments would result in a limited number of employment opportunities and these positions would be expected to be filled by the local workforce or existing City or landfill staff. The project would not require or otherwise facilitate the need for additional recreational facilities; therefore, impacts would be less than significant.

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

The proposed annexation and pre-zoning would not allow for uses that would include the development of new or expanded recreational facilities; therefore, *no impacts* related to adverse physical effects on the environment as a result of construction or expansion of recreational facilities would occur.

Conclusion

The project would not directly or indirectly increase the use of existing recreational facilities in a manner that would result in substantial physical deterioration of these facilities or require the construction of new or expanded facilities that could result in adverse physical effects on the environment. Therefore, no impacts related to recreation would occur, and mitigation measures are not necessary.

Mitigation Measures

Mitigation is not necessary.

XVII. Transportation

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

Setting

The project site is served by existing roadway facilities, including access at SR 46E/Union Road, and is located within an area planned for continued transportation efficiency and safety. A transportation analysis for the Paso Robles Landfill Annexation was completed in November 2025 to evaluate project-specific transportation impacts in the context of the City's local policies.

City of El Paso de Robles General Plan 2003 Circulation Element

The *City of El Paso de Robles General Plan 2003 Circulation Element* was developed with the goal of providing mobility to people. The Circulation Element supports the development of an efficient system that allows multi-modal travel throughout the city (City of El Paso de Robles 2019a).

City of Paso Robles 2013 Transportation Impact Analysis Guidelines and 2022 Supplement

The City's *2013 Transportation Impact Analysis Guidelines* (TIAG) provides project applicants with traffic impact study methodology required to develop traffic studies. The guidance includes intersection level of service and roadway segment capacity utilization metrics. In response to SB 743, the City updated the TIAG to establish new VMT metrics to replace LOS as a metric for determining CEQA impacts of a project. The new metrics include VMT per capita, VMT per employee, and net VMT. (The City still uses LOS and roadway segment capacity utilization to assess non-CEQA transportation facility impacts and needs related to a project.)

City of Paso Robles Bicycle and Pedestrian Master Plan

The *City of Paso Robles Bicycle and Pedestrian Master Plan* was recently updated and approved by City Council in December 2018 (City of Paso Robles 2018). The Bicycle and Pedestrian Master Plan identifies priorities for improving bicycle and pedestrian infrastructure within the city to provide for future growth.

Environmental Evaluation

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

Annexation and Landfill Improvements

The proposed annexation would not require changes to the existing circulation system or introduce new land uses that would conflict with current transit, roadway, bicycle, or pedestrian facilities. The project would generate few new trips and is consistent with city transportation plans and policies. Therefore, impacts would be *less than significant*.

OPF Project Site Development

The OPF would generate up to 49 new weekday trips, which is well below the City's screening threshold for circulation system impacts (CCTC 2025). The project is consistent with the City's General Plan Circulation Element and Transportation Impact Analysis Guidelines, and would not conflict with any program, plan, ordinance, or policy addressing transit, roadway, bicycle, or pedestrian facilities. Therefore, impacts would be *less than significant*.

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

Annexation

The proposed annexation and pre-zoning and construction of landfill improvements would not directly result in any activities that would generate vehicle trips. The pre-zoning of the 40-acre portion of the annexation area to PF would allow for new land uses beyond what are currently allowed with the AG designation. However, any PF uses would likely result in fewer than 100 daily trips, which is below both the City's and County's screening threshold of 110 daily trips for vehicle miles traveled (VMT) under CEQA Guidelines section 15064.3, subdivision (b). Therefore, would be *less than significant*.

OPF Project Site Development

The project would generate up to 49 new weekday trips, which is below both the City's and County's screening threshold of 110 daily trips for VMT under CEQA Guidelines section 15064.3, subdivision (b). In addition, the project could also divert 250 to 750 annual waste trucks bound for the Kettleman Hills Hazardous Waste Facility, reducing those trucks VMT contribution. Therefore, the project would not conflict with or be inconsistent with this guideline, and impacts would be *less than significant*.

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

Annexation

The proposed annexation would not require physical changes to the existing annexation area access or allow new land uses that would be incompatible with the existing access road. Therefore, there would be *no impact*.

OPF Project Site Development

The OPF would use existing site access at SR 46E/Union Road, which includes appropriate turn and acceleration lanes. No changes to roadway geometry or introduction of incompatible uses are proposed. Therefore, the project would not substantially increase hazards due to geometric design features or incompatible uses, and impacts would be *less than significant*.

- d) Would the project result in inadequate emergency access?**

Annexation

The proposed annexation would not require changes to existing emergency access routes or facilities. Access to the site is adequate and would continue to support emergency vehicles. Therefore, impacts to emergency access would be *less than significant*.

OPF Project Site Development

The project would use existing access routes that are adequate for emergency vehicles and does not propose changes that would affect emergency access. Therefore, the project would not result in inadequate emergency access, and impacts would be *less than significant*.

Conclusion

Based on the impact discussion above, potential impacts to the circulation system, including transit, roadway, bicycle, and pedestrian facilities, would be less than significant; therefore, no mitigation is required.

Mitigation Measures

Mitigation is not necessary.

XVIII. Tribal Cultural Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

The *City of El Paso de Robles General Plan 2003 Conservation Element* establishes goals, policies, and action items to preserve and restore important historical and archaeological resources. In order to do so, the Conservation Element requires new development to prepare archaeological studies subject to environmental review (City of El Paso de Robles 2014a).

Environmental Evaluation

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
- a-i) *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)?***

An archaeological survey, Native American Heritage Commission Sacred Lands file search, and records search did not identify tribal cultural resources within the annexation area or OPF project site that are listed or eligible for listing in the CRHR or local register. Therefore, impacts would be *less than significant*.

a-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.

Pursuant to AB 52, the City provided notice to local Native American tribes about the project and provided opportunities for the tribes to consult on the project. No tribes requested consultation or provided information about significant tribal cultural resources. Impacts would be *less than significant*.

Conclusion

Based on the impact discussion above, potential impacts to tribal cultural resources would be less than significant; therefore, no mitigation is required.

Mitigation Measures

Mitigation is not necessary.

XIX. Utilities and Service Systems

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

The City's municipal water supply is composed of groundwater from the Paso Robles Groundwater Basin, an allocation of the Salinas River underflow, and a surface water allocation from the Nacimiento Lake pipeline project. The city of Paso Robles is located in the Salinas Valley Groundwater Basin (Paso Robles Area Subbasin), which is identified as Basin No. 3-004.06 by the DWR. The Paso Robles Subbasin is under the jurisdiction of the City of Paso Robles GSA, which has adopted the Paso Robles Subbasin GSP (City of El Paso de Robles 2019c) and Paso Robles Groundwater Basin Management Plan (City of El Paso de Robles 2011).

The City is enrolled in the Phase II Municipal Stormwater Program, as required by the SWRCB. The program requires the City to develop and implement a SWMP in order to reduce or eliminate pollutants in stormwater runoff and non-stormwater discharges (City of El Paso de Robles 2021b).

The City Wastewater Division owns and operates 126 miles of sewers and 14 lift stations to collect wastewater from the entire city and transport it to the City's Wastewater Treatment Plant (WWTP). The WWTP currently treats and discharges 2.1 million gallons of wastewater to the Salinas River per day (City of El Paso de Robles 2021c).

The city of Paso Robles is serviced by Paso Robles Waste and Recycle and the Paso Robles Landfill. According to the California Department of Resources Recycling and Recovery (CalRecycle), the Paso Robles Landfill has a maximum capacity of 6,495,000 cubic yards of solid waste. As of July 2023, the landfill had approximately 4,208,325 cubic yards of remaining capacity with an expected fill date of October 2051 (CalRecycle 2024).

Environmental Evaluation

- a) **Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

Annexation

The proposed annexation and pre-zoning would not directly result in any physical activities that would require new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities.

OPF Project Site Development

The proposed OPF would require the construction of expanded water, wastewater (septic), drainage, and electrical infrastructure. Proposed utility infrastructure would be constructed and installed within the footprint of the OPF project site. As evaluated throughout this Initial Study, the proposed OPF has the potential to result in adverse impacts related to Air Quality, Biological Resources, and Geology. Mitigation Measures have been included to avoid and/or minimize adverse impacts to less-than-significant levels. Therefore, upon implementation of the identified mitigation measures, installation of utility infrastructure is not anticipated to result in adverse impacts to the environment; therefore, potential impacts would be *less than significant with mitigation*.

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

Annexation

The proposed annexation and pre-zoning would not directly result in any physical activities that would require water. The pre-zoning of the 40-acre portion of the annexation area to PF would allow for new land uses beyond what are currently allowed with the AG designation. These new land uses would generally support the City's existing landfill operations and are not anticipated to be water-intensive uses. The existing landfill is currently served by a well, which would be replaced with a new well concurrently with annexation and construction of the OPF. Therefore, potential impacts would be *less than significant*.

OPF Project Site Development

During construction of the OPF or other development at the OPF project site, water may be used for dust suppression and cleaning. However, any water used during construction would be limited in volume. The OPF would require minor water use for operational activities, primarily for facility start-up, cleaning, and fire suppression, which would be provided by a new well that would be drilled to replace an existing well that serves the landfill. Once the OPF is operational, it is anticipated that most of the water needs of the system would be fulfilled from the in-system presswater tank. Operation of the OPF would result in a nominal increase in groundwater demand over the existing landfill operations. Therefore, the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years, and impacts would be *less than significant*.

- c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

The annexation area is not served by the City's wastewater system. Therefore, there would be *no impacts* related to capacity of the City's wastewater system.

- d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

Annexation

The proposed annexation and pre-zoning would not directly result in any physical activities that would result in the generation of any solid waste. Therefore, there would be *no impacts*.

OPF Project Site Development and Landfill Improvements

Construction of the OPF and landfill improvements would temporarily generate waste associated with construction activities and employees. Solid waste generated during construction would be disposed at the adjacent Paso Robles Landfill. As of July 2023, the landfill had approximately 4,208,325 cubic yards of remaining capacity (CalRecycle 2024). Operation of the OPF is not expected to generate significant amounts of new solid waste and would be generally consistent with waste generated by existing landfill operations; therefore, impacts would be *less than significant*.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Annexation

The proposed annexation and pre-zoning would not directly result in any physical activities that would result in the generation of any solid waste. Therefore, there would be *no impacts*.

OPF Project Site Development and Landfill Improvements

Construction of the OPF and landfill improvements may result in a temporary increase in solid waste, which would be disposed of in accordance with applicable state and local laws and regulations, such as California Green Building Standards Code (CALGreen) Sections 4.408 and 5.408, which require diversion of at least 75% of construction waste. Operational and construction-related solid waste would be disposed of in accordance with applicable federal, state, and local waste requirements, and impacts would be *less than significant*.

Conclusion

Implementation of Mitigation Measures AQ-1 through AQ-4, BIO-1 through BIO-8 and GEO-1 and GEO-2 would reduce potential adverse environmental impacts related to the expansion of utility infrastructure at the OPF project site. There would be adequate water supply and wastewater treatment capacity to serve the project. Further, the proposed project would not generate waste in excess of state or local standards or in excess of the capacity of local infrastructure and would be consistent with applicable federal, state, and local waste requirements. With implementation of the identified mitigation measures, impacts related to utilities and service systems would be less than significant.

Mitigation Measures

Implement Mitigation Measures AQ-1 through AQ-4, BIO-1 through BIO-8, and GEO-1 and GEO-2.

XX. Wildfire

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

Setting

On-Site Conditions and Surrounding Land Uses

The 133-acre annexation area and 20-acre OPF project site consist of undeveloped land and is gently sloped downward from north to south. Vegetation on the annexation area and OPF project site can be characterized as mostly non-native annual grassland habitat, with scattered trees located along the eastern and northern edges of the annexation area. Surrounding land uses include the Paso Robles Landfill, open space, rural residential, and agricultural uses to the north; open space, single family residences, and Estrella Road to the east; wineries, single family residences, and SR 46E to the south; and wineries and vineyards to the west.

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

CAL FIRE Hazard Severity Zones

Fire Hazard Severity Zones (FHSZs) are defined by CAL FIRE based on the presence of fire-prone vegetation, climate, topography, assets at risk (e.g., high population centers), and a fire protection agency's ability to provide service to the area, and are classified as "Very High," "High," or "Moderate." According to the CAL FIRE FHSZ viewer, the annexation area and OPF project site are located within a State Responsibility Area (SRA) within a High FHSZ (CAL FIRE 2022). The Paso Robles Landfill, directly north of the site, is also within the High FHSZ, however it is within a Local Responsibility Area (LRA). Following annexation, it is anticipated that the annexation area and OPF project site would be reclassified as an LRA.

California Fire Code

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

City of Paso Robles Strategic Community Wildfire Protection Plan

The *City of Paso Robles Strategic Community Wildfire Protection Plan (CWPP)* was published in July 2019 and was developed to address fire protection planning efforts occurring in the city in order to minimize wildfire risk to local watershed lands, assets, firefighters, and the public. The CWPP provides a citywide strategic planning framework for hazardous fuel assessment and reduction within the City of Paso Robles so that structures and assets are provided additional protection, reducing the potential of ignitions. The goals of this CWPP include: improving the availability and use of information regarding hazard and risk assessment; providing guidance for land use planning efforts; promoting a shared vision among communities and multiple fire jurisdictions; establishing fire resistance in communities; prioritizing protection of communities and other high-priority watersheds; promoting collaboration between government agencies and a broad representation of stakeholders; improving fire suppression and prevention capabilities; promoting post-fire recovery efforts; and maintaining accountability through performance based monitoring (City of El Paso de Robles 2019b).

Environmental Evaluation

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The annexation area is located within an SRA classified as a High FHSZ. The City has adopted the Safety Element, Circulation Element, and Local Hazard Mitigation Plan (LHMP), which identify goals, policies, and objectives for emergency access, accessible evacuation routes, and mitigation of potential hazards (City of El Paso de Robles 2019a). Neither the County nor the City have adopted emergency response or evacuation plans.

Annexation

The proposed annexation and pre-zoning would not directly result in any physical activities that would interfere with an adopted emergency response plan or emergency evacuation plan. The pre-zoning of the 40-acre portion of the annexation area to PF would allow for new land uses beyond what are currently allowed with the AG designation. However, any PF uses would not include habitable structures and would not be anticipated to involve activities that would interfere with SR 46E and the ability for emergency response to access or evacuate the area. Therefore, impacts resulting from the annexation would be *less than significant*.

OPF Project Site Development

Construction of the OPF would be required to comply with Paso Robles Fire Department specifications and the California Fire Code, which would ensure that the project does not interfere with emergency response or evacuation procedures. Additionally, due to proximity to a major highway (SR 46E), any potential vehicle traffic contributed by the project during emergency evacuations would not be significant enough to impair evacuation of the area. Therefore, potential impacts associated with impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan would be *less than significant*.

b) Due to slope, prevailing winds, and other factors, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Annexation

The proposed annexation and pre-zoning would not directly result in any physical activities that would exacerbate wildfire risk. The pre-zoning of the 40-acre portion of the annexation area to PF would allow for new land uses beyond what are currently allowed with the AG designation. However, any PF uses would not include habitable structures and would not be anticipated to involve activities that would significantly exacerbate wildfire risk beyond activities currently allowed and anticipated with AG uses. Therefore, impacts resulting from the annexation would be *less than significant*.

OPF Project Site Development

Proposed occupiable buildings would be required to comply with CFC and CBC requirements to reduce risk associated with wildfire ignition and exposure of project occupants to wildfire risk. The OPF would be constructed in accordance with CAL FIRE, CFC, and CBC requirements to reduce risk associated with fire ignition and ensure adequate emergency access to the site. Based required compliance with CAL

FIRE, CFC, and CBC requirements, the OPF would not significantly exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; therefore, impacts would be *less than significant*.

- c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?**

Annexation

The proposed annexation and pre-zoning would not directly result in any physical activities that would involve or necessitate infrastructure installation or maintenance. Therefore, impacts resulting from the annexation would be *less than significant*.

OPF Project Site Development

The proposed OPF would result in the construction of access driveways and utility infrastructure. In accordance with CFC requirements, the OPF would be required to implement a 10-foot defensible space buffer around the access driveway to reduce risk of wildfire to travelers along the roadway. Proposed utility expansions would be constructed in accordance with applicable CFC and CBC to reduce wildfire risk associated with installation of utility infrastructure. In addition, proposed utility infrastructure would primarily be installed underground, which would further reduce the risk of accidental wildfire ignition at the project site. Based on required compliance with applicable CFC, CBC, and CAL FIRE requirements, implementation of utility and roadway extensions at the site is not anticipated to exacerbate wildfire risk; therefore, potential impacts would be *less than significant*.

- d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?**

Annexation

The proposed annexation and pre-zoning would not directly result in any physical activities that would exacerbate risk related to flooding, landslides, runoff, or slope instability resulting from wildfire. The pre-zoning of the 40-acre portion of the annexation area to PF would allow for new land uses beyond what are currently allowed with the AG designation. However, any PF uses would not include habitable structures and would not be anticipated to involve activities that would significantly exacerbate wildfire risk beyond activities currently allowed and anticipated with AG uses. Therefore, impacts resulting from the annexation would be *less than significant*.

OPF Project Site Development

According to the San Luis Obispo County Safety Element maps, the OPF project site is located in an area with low and moderate potential for landslides (County of San Luis Obispo 2023). Annexation of the site would not result in exposure of people or structures to significant risks. The proposed project would be required to comply with applicable CBC, CFC, and CAL FIRE requirements to reduce the potential to exacerbate the risk of wildfire occurrence at the site. In addition, proposed occupiable buildings would be

required to comply with the most recent CBC and other applicable engineering standards to reduce the risk associated with potential landslides. The proposed project would not be sited in an area that would expose people or structures to significant risk associated with flooding. Based on required compliance with CBC, CFC, and CAL FIRE requirements for development, the proposed project is not anticipated to expose people or structures to significant risks associated with post-fire ground-failure events; therefore, impacts would be *less than significant*.

Conclusion

The project site is located in an area with high risk of wildfire. However, the proposed project would not exacerbate wildfire or post-wildfire risk, and would be required to comply with applicable CBC, CFC, and CAL FIRE requirements to reduce the potential to exacerbate the risk of wildfire occurrence at the site. Therefore, impacts would be less than significant, and mitigation is not necessary.

Mitigation Measures

Mitigation is not necessary.

XXI. Mandatory Findings of Significance

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

Environmental Evaluation

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

As discussed in the preceding sections, the project has the potential to significantly degrade the quality of the environment, including effects on Biological Resources. During construction, ground disturbing activities such as grading and construction equipment use may affect biological resources, including special-status wildlife species and migratory birds. Mitigation Measures BIO-1 through BIO-8, included in Section IV, Biological Resources, requires preconstruction surveys prior to the start of the construction period, identifies best management practices, and provides for compensatory mitigation, which would reduce potential impacts a less-than-significant level.

- 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)?**

When project impacts are considered along or in combination with other impacts, the project-related impacts may be significant. Construction and operation of the OPF would contribute to cumulative impacts related to Air Quality, Biological Resources, and Geology and Soils. Mitigation measures have been incorporated into the project to reduce project-related impacts to a less-than-significant level. Based on implementation of Mitigation Measures AQ-1 through AQ-4, BIO-1 through BIO-8, and GEO-1 and GEO-2, the cumulative effects of the proposed project would be less than significant.

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

Construction of the OPF and future development on the OPF project site have the potential to result in air emissions, including those near sensitive receptors. Mitigation measures have been identified that would reduce these project-specific impacts to a less-than-significant level. Therefore, the project would not result in substantial, adverse environmental effects on human beings.

3 REFERENCES

- Busch, Lawrence L. and Miller, Russel V. 2011. *Updated Mineral Land Classification Map for the Concrete-Grade Aggregates in the San Luis Obispo-Santa Barbara Production-Consumption Region, California – North Half*.
- California Air Resources Board (CARB). 2022. Advanced Clean Cars Program. Available at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program>. Accessed July 2024.
- California Department of Conservation (CDOC). 2015. Fault Activity Map of California. Available at: <https://maps.conservation.ca.gov/cgs/fam/>. Accessed July 2024.
- . 2021. Williamson Act Status Report. Available at: https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2022%20WA%20Status%20Report.pdf. Accessed July 2024.
- . 2022. California Important Farmland Finder Interactive Viewer. Available at: <https://maps.conservation.ca.gov/dlrp/ciff/>. Accessed July 2024.
- . 2023. Mines Online. Available at: <https://maps.conservation.ca.gov/mol/index.html>. Accessed July 2024.
- . 2024. Important Farmland Categories. Available at: <https://www.conservation.ca.gov/dlrp/fmmp/Pages/Important-Farmland-Categories.aspx>. Accessed July 2024.
- California Department of Forestry and Fire Protection (CAL FIRE). 2023. FHSZ Viewer. Available at: <https://egis.fire.ca.gov/FHSZ/>. Accessed July 2024.
- California Environmental Protection Agency (CalEPA). 2024. Cortese List Data Resources. <https://calepa.ca.gov/sitecleanup/corteselist/>. Accessed August 2024.
- California Geological Survey (CGS). 2017. San Luis Obispo-Santa Barbara Production-Consumption Region. Available at: https://www.conservation.ca.gov/smgb/reports/Documents/Designation_Reports/Designation-Report-15-SLO-SB.pdf.
- California Department of Resources Recycling and Recovery (CalRecycle). 2017. SWIS Facility/Site Activity Details, City Of Paso Robles Landfill (40-AA-0001). Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1506?siteID=3168>. Accessed August, 2024.
- California Department of Toxic Substance Control (DTSC). 2024. EnviroStor. Available at: <https://www.envirostor.dtsc.ca.gov/public/>. Accessed July 2024.
- California Department of Transportation (Caltrans). 2024. California State Scenic Highway System Map. Available at: <https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed June 2024.
- Central Coast Community Energy (3CE). 2021. Understanding Clean Energy. Available at: <https://3cenergy.org/understanding-clean-energy/>. Accessed June 2024.

Central Coast Transportation Consulting (CCTC). 2025. Paso Robles Landfill Annexation and Renewable Energy Park – Transportation Analysis.

City of El Paso de Robles. 2011. *Paso Robles Groundwater Basin Management Plan*. Available at: <https://prcity.com/DocumentCenter/View/14937/Paso-Robles-Groundwater-Basin-Management-Plan-PDF>. Accessed July 2024.

———. 2013. *City of Paso Robles Climate Action Plan*. Available at: <https://www.prcity.com/DocumentCenter/View/14729/Climate-Action-Plan-PDF?bidId=>. Accessed July 2024.

———. 2014a. *City of El Paso de Robles General Plan 2003 Conservation Element*. Available at: <https://prcity.com/313/General-Plan>. Accessed July 2024.

———. 2014b. *City of El Paso de Robles General Plan 2003 Land Use Element*. Available at: <https://prcity.com/313/General-Plan>. Accessed July 2024.

———. 2014c. *City of El Paso de Robles General Plan 2003 Safety Element*. Available at: <https://prcity.com/313/General-Plan>. Accessed July 2024.

———. 2014d. *Recycled Water Master Plan* Available at: <https://www.prcity.com/DocumentCenter/View/15355/Recycled-Water-Master-Plan-PDF?bidId=>. Accessed August 2024.

———. 2018. *City of Paso Robles Bicycle and Pedestrian Master Plan*. Available at: <https://prcity.com/DocumentCenter/View/25508/20181218-CC-adopted---Bike-and-Ped-Plan---Final>. Accessed November 25, 2025.

———. 2019a. *Multi-Jurisdictional Hazard Mitigation Plan*. Available at: <https://www.prcity.com/DocumentCenter/View/15207/2019-Local-Hazard-Mitigation-Plan-PDF?bidId=>. Accessed July 2024.

———. 2019b. *City of Paso Robles Community Wildfire Protection Plan*. Available at: <https://www.prcity.com/DocumentCenter/View/27847/Final-Version-CWPP#:~:text=The%20CWPP%20provides%20a%20citywide,reducing%20the%20potential%20of%20ignitions>. Accessed July 2024.

———. 2019c. *City of El Paso de Robles General Plan 2003 Noise Element*. Available at: <https://prcity.com/DocumentCenter/View/28224/20191105-Adopted-Noise-Element>. Accessed July 2024.

———. 2021a. *Parks*. Available at: <https://www.prcity.com/792/Parks>. Accessed July 2024.

———. 2022. *2022 Transportation Impact Analysis Guidelines Supplement*.

County of San Luis Obispo. 2023. *San Luis Obispo County Land Use View*. Available at: https://gis.slocounty.ca.gov/Html5Viewer/Index.html?configBase=/Geocortex/Essentials/REST/sites/PL_LandUseView/viewers/PL_LandUseView/virtualdirectory/Resources/Config/Default. Accessed July 2024.

Federal Emergency Management Agency (FEMA). 2024. *Flood Map Service Center*. Available at: <https://msc.fema.gov/portal/home>. Accessed July 2024.

- National Highway Traffic Safety Administration (NHTSA). 2024. Federal Register / Vol. 89, No. 121 / Monday, June 24, 2024 / Rules and Regulations. Available at: <https://www.govinfo.gov/content/pkg/FR-2024-06-24/pdf/2024-12864.pdf>. Accessed July 23, 2025.
- Pacific Gas and Electric Company (PG&E). 2024. Clean Energy Solutions – PG&E Energy Sources. Available at: <https://www.pge.com/en/about/corporate-responsibility-and-sustainability/taking-responsibility/clean-energy-solutions.html>. Accessed June 2024.
- Regional Water Quality Control Board (RWQCB). 2019. Water Quality Control Plan for the Central Coast basin. Available at: https://www.waterboards.ca.gov/centralcoast/publications_forms/publications/basin_plan/docs/2019_basin_plan_r3_complete_webaccess.pdf. Accessed August 2024.
- San Luis Obispo Air Pollution Control District (SLOAPCD). 2018. SLOAPCD NOA Screening Buffers. Available at: <https://www.google.com/maps/d/viewer?mid=1YAKjBzVkwilbZ4rQ1p6b2OMyvIM&ll=35.30406964804051%2C-120.8506272161878&z=14>. Accessed August 2024.
- . 2024. Annual Air Quality Report. Available at: <https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/%28B-3%29%202024%20Annual%20Air%20Quality%20Report.pdf>. Accessed August 2025.
- Southern California Gas Company (SoCalGas). 2024. 2023 Corporate Sustainability Report. Available at: [https://newsroom.socalgas.com/press-release/socalgas-releases-2023-corporate-sustainability-report#:~:text=In%20support%20of%20that%20mission,gas%20\(RNG\)%20by%202030](https://newsroom.socalgas.com/press-release/socalgas-releases-2023-corporate-sustainability-report#:~:text=In%20support%20of%20that%20mission,gas%20(RNG)%20by%202030). Accessed August 2024.
- State Water Resources Control Board (SWRCB). 2024. GeoTracker. Available at: <https://geotracker.waterboards.ca.gov/>. Accessed July 2024.
- U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS). 2023. Web Soil Survey. Available at: <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>. Accessed July 2024.
- U.S. Fish and Wildlife Service (USFWS). 2024. National Wetland Inventory Surface Waters and Wetlands. Available at: <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>. Accessed August, 2024.
- U.S. Geological Survey (USGS). 2004. Geologic map of the Estrella & Shandon quadrangles, San Luis Obispo County, California. Available at: https://ngmdb.usgs.gov/Prodesc/proddesc_71740.htm. Accessed August 2024.
- . 2022. Areas of Land Subsidence in California. Available at: https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed August 2024.

This page intentionally left blank.

