COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING & BUILDING

Initial Study – Environmental Checklist

PLN-2039
04/2019

Project Title & No. Coglitore Minor Use Permit N-DRC2025-00024 ED25-0270

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.

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

DETERMINATION:

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

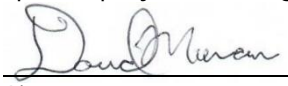
☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ 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.

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

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

☐ 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.

David Moran			3/16/2026
Prepared by (Print)	Signature		Date
		Environmental Coordinator	3/31/2026
Eric Hughes			
Reviewed by (Print)	Signature		Date

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Project Environmental Analysis

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

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

A. Project

DESCRIPTION: A request by **Coglitore Bypass Holdings, LLC**, for a Minor Use Permit (MUP) to authorize the phased implementation of a temporary events program in accordance with LUO Section 22.30.610 that will include indoor and outdoor events along with amplified sound in selected locations. The MUP would authorize up to 90 temporary events per year over a period of 25 years in three locations with up to 30 events per year at each location (a total of 90 per year) and a maximum of 250 guests per event. No new buildings are proposed; however, modifications to existing structures will be necessary to provide ADA compliant restrooms for indoor events and to satisfy current building and fire codes. Minor improvements are also required to existing ranch roads to meet access standards for emergency vehicles. The project site consists of four contiguous lots of record with a total area of 137.2 acres located about 2.5 miles south of the City of San Luis Obispo within the South County Inland Planning area and within the San Luis Obispo South sub-area. The project site is within the Agriculture land use category.

Water and sanitary facilities for outdoor events will be provided by temporary restrooms and water sources. Indoor events will utilize an ADA compliant restroom constructed within the existing barn, and water will be supplied by existing wells.

Three secondary access roads are proposed (Figure 4) to ensure guests may safely exit the site in the event of an emergency. All emergency access roads will be improved to CalFire standards with an all-weather surface capable of supporting apparatus that weighs 75,000 pounds and must be a minimum 20 feet in width with a 4 foot shoulder. One route will travel north from the Villa outdoor event area (Area 3) on an existing unpaved ranch road, then southwest adjacent to East Corral de Piedra Creek to an existing equestrian area where it will turn south to the parking and staging area. A second emergency access will be travel southeast from the easterly terminus of Greengate Road on an unpaved ranch road within an easement associated with APN 044-233-009, then turn south to Corbett Canyon Road along an easement affecting two adjacent parcels associated with the Greengate Ranch and Vineyard. A third emergency access will be established that travels southeast along the westerly boundary of APN 044-161-007 to an existing unimproved ranch road that crosses APN 044-233-009 to the access easement along the property line shared with the Greengate Ranch site. A new driveway will be constructed at Corbett Canyon Road to serve the emergency access.

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Assuming 400 square feet per vehicle, 2.5 guests per vehicle, and a maximum of 250 guests per event, a parking area of one-acre is required. The plans show a three-acre parking/staging area located north of the easterly terminus of Greengate Road between an existing equestrian area and Event Area 1; parking can be provided for about 320 vehicles in this area.

The temporary events program will be implemented in two phases as summarized in Table 1 for each phase. Phase I will consist of outdoor events, only, in Areas 1, 2 and 3. Phase II will result in improvements to the existing barn and Tree House located in Area 1 to allow for commercial occupancy.

The regional location of the project site is shown in Figure 1; aerial views of the project site and vicinity are provided in Figures 2, 3.

Table 1 – Summary of Project Components and Phasing

Phase	Project Components (Figure 3)	Use	Maximum No. Of Events Per Year	Maximum No. Of Guests Per Event	New Construction	Amplified Speech or Music?	Area (acres)
I	Area 1 -- Lawn and Pond	Outdoor Events	30	250	None	Yes	0.79
	Area 2 -- Vineyard House	Outdoor Events	30	100	None	Yes	0.52
	Area 3 -- Villa	Outdoor Events	30	150	None	No	0.92
	Parking and Staging Area	Temporary event parking and staging area for about 320 vehicles	n/a	n/a	None	No	3.0
	Improvements to existing ranch roads to meet emergency access requirements.	Emergency access	n/a	n/a	Grading and resurfacing as needed to meet CalFire standards.	n/a	+/- 0.2
II	Area 1 – Existing Barn	Indoor Events	(Included With Area 1 Total)	+/- 50 (Determined by Building/ Fire Code)	Improvements to barn necessary to satisfy codes for commercial occupancy.	Yes	0.15
	Area 1 – Existing 'Tree House' Balcony Area	Outdoor Events		100	Improvements to existing balcony/deck necessary to satisfy codes for commercial occupancy.	No	0.02
	Area 1 – Existing Shade Structure	Outdoor Events		100	None	No	0.09

Source: Project application materials, 2025

Baseline Conditions

The project site is located in the Edna Valley about 2.5 miles south of the City of San Luis Obispo and northeast of the intersection of SR 227 and Price Canyon Road (Figures 1 and 2). This portion of the Edna Valley supports extensive agricultural operations on large lots devoted mostly to the cultivation of wine grapes and row crops. Grazing has been established on the less productive soils associated with upland areas.

The topography of the project site consists of flat lowlands on the valley floor that transition to gently to moderately sloping hills. The upland areas support scattered oak trees and annual grasses. The level areas of the project site support a variety of irrigated crop production that includes vineyards, pastures, and ornamental flowers (lavender) as illustrated by Figure 3.

Surface water features include East Corral de Piedra Creek, a tributary of Pismo Creek, which flows north to south along the northern boundary of APNs 044-161-014 and 044-161-015. Two ag reservoirs have been established to capture surface water from an ephemeral drainage. There is also a small pond located on APN 044-161-014 adjacent to the existing dwelling.

The four parcels associated with the project have been developed with a variety of ag related and visitor serving improvements that include equestrian facilities, four single family residences with associated lawns, two swimming pools, ornamental landscaping and walkways. Three of the residences are currently permitted as vacation rentals. Other improvements include unpaved ranch roads, ag accessory structures, equestrian facilities, seven wells, water storage, septic systems, and fencing.

Vehicular access is provided by Greengate Road, a paved county-maintained rural collector, that extends northeast from Edna Road (SR 227), a State Highway. The County does not have current traffic counts for Greengate Road. Traffic counts taken by Caltrans for SR 227 at Corbett Canyon Road indicate that this portion of the highway carries 4,200 average daily trips (ADT) with 560 afternoon peak hour trips.

The project site is not within a mapped Fire Hazard Area; according to CalFire data, the project site has not been affected by a wildfire since at least 1950.

A portion of the project site adjacent to East Corral de Piedra Creek is subject the Flood Hazard Combining Designation which denotes areas subject to flooding during a 100-year storm event. In addition, the northerly portion of the project site lies within the Airport Review Combining Designation area; however the project site lies outside the safety zones associated with the San Luis Obispo County Regional Airport Land Use Plan.

The project site currently hosts up to five temporary events for non-profit organizations each year as allowed by LUO Section 22.30.610.A.1. These events will be terminated in conjunction with this MUP. The adjacent parcel to the south, Greengate Ranch and Vineyard, is authorized under MUP DRC2012-00078 to conduct temporary events in accordance with LUO 22.30.610 as follows:

- 25 events with up to 500 people
- 50 events with up to 300 people
- 50 activities with up to 200 people

These events share vehicular access with the project site (Greengate Road) and would total 125 events per year. Outdoor amplified sound is allowed at certain locations with these events.

Ordinance Modifications. No ordinance modifications have been requested for this project.

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ASSESSOR PARCEL NUMBERS: 044-161-014, 044-161-015, 044-161-007, 044-231-009

Latitude: 35.20657° N **Longitude:** 120.59927° W **SUPERVISORIAL DISTRICT #** 3

B. Existing Setting

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

Land Use Category: Agriculture

Combining Designation: Flood Hazard, Airport Review Area

Parcel Size: 137.2 acres

Topography: Nearly level to gently sloping

Vegetation: Agriculture Grasses

Existing Uses: Agricultural uses

Surrounding Land Use Categories and Uses:

North: Agriculture; undeveloped ***East:*** Agriculture; agricultural uses

South: Agriculture; agricultural uses temporary events ***West:*** Agriculture; agricultural uses

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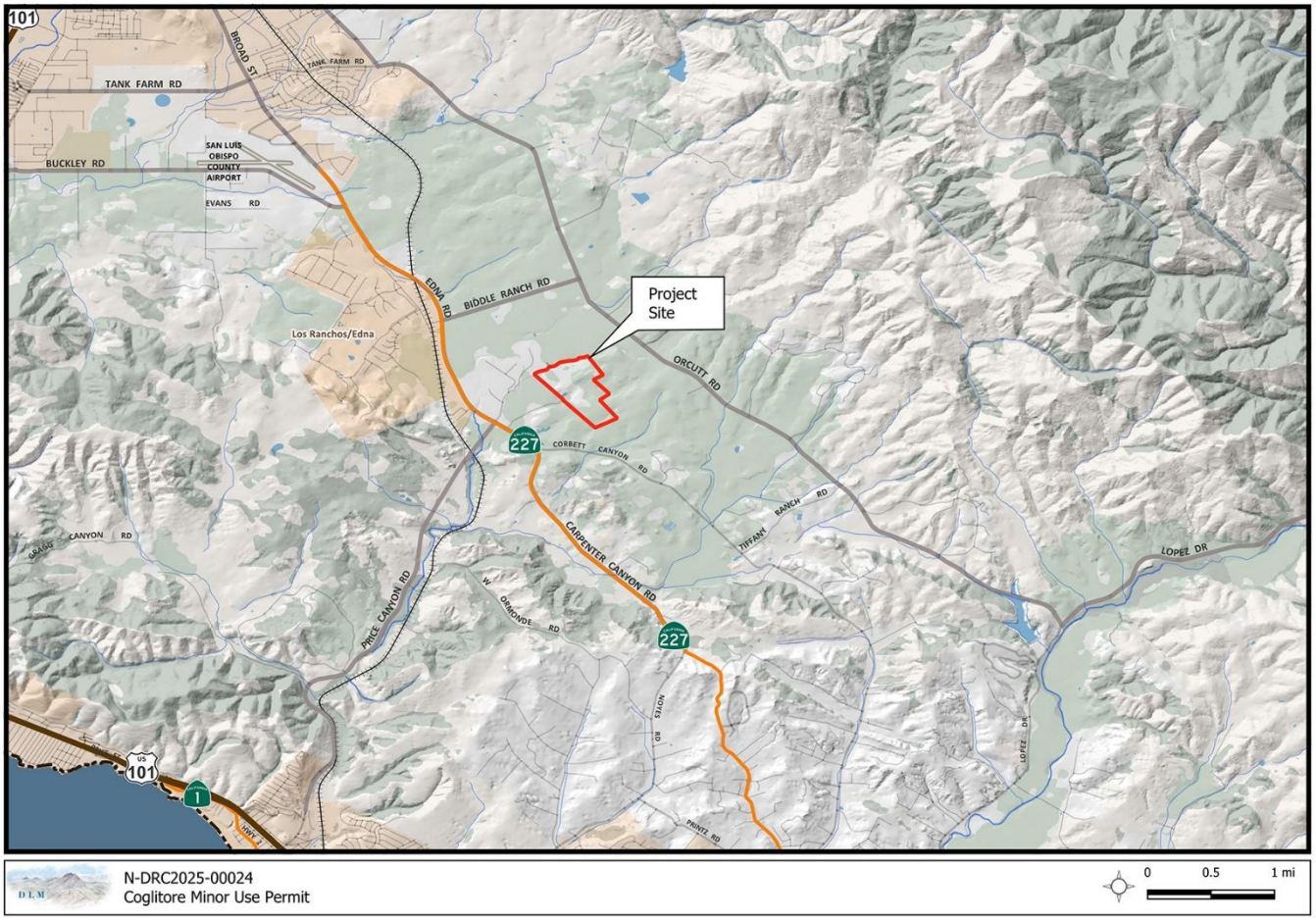

Figure 1 -- Project Location

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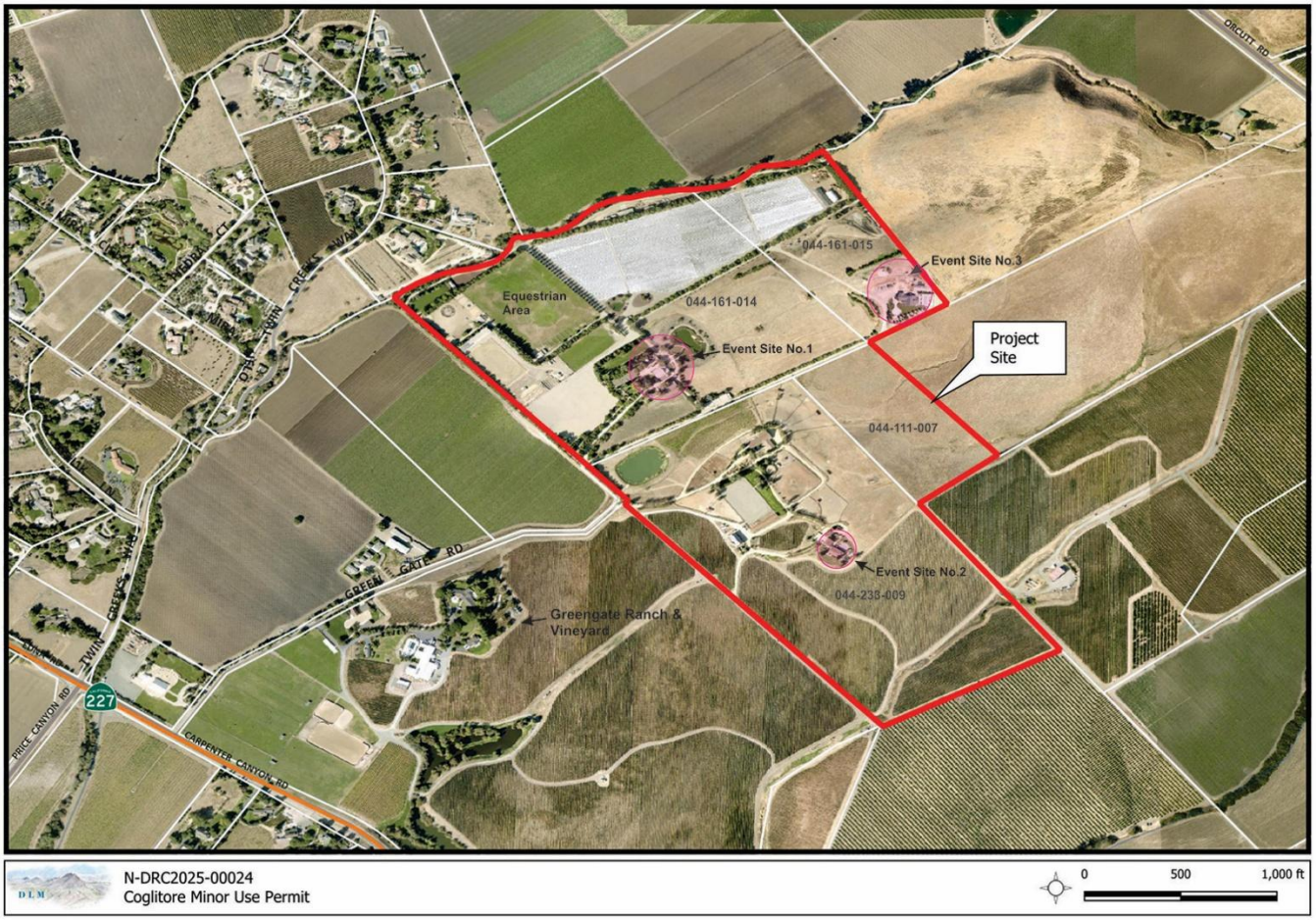

Figure 2 – Aerial View of Existing Conditions and Approx. Location of Temporary Events

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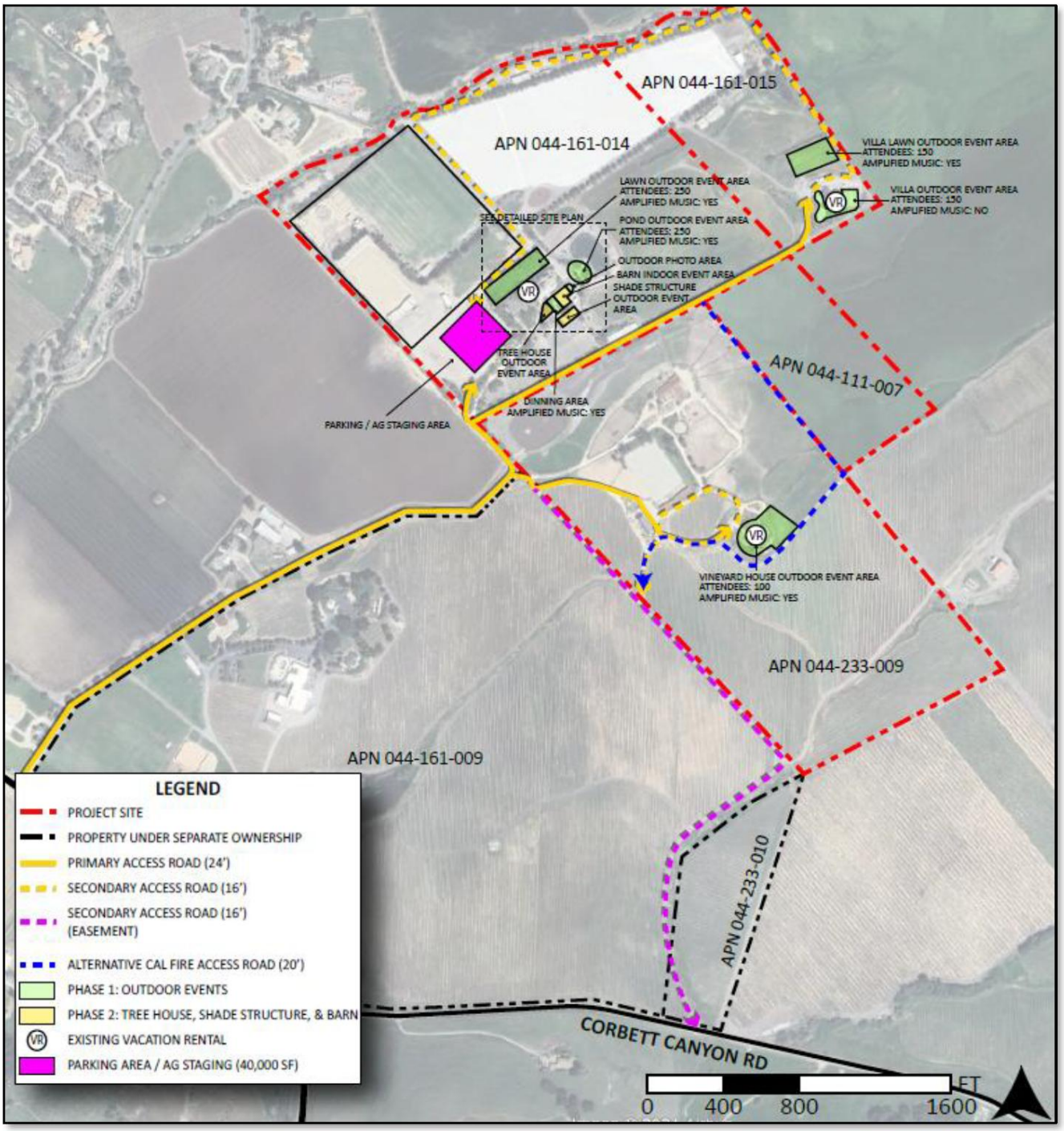

Figure 3 – Overall Site Plan

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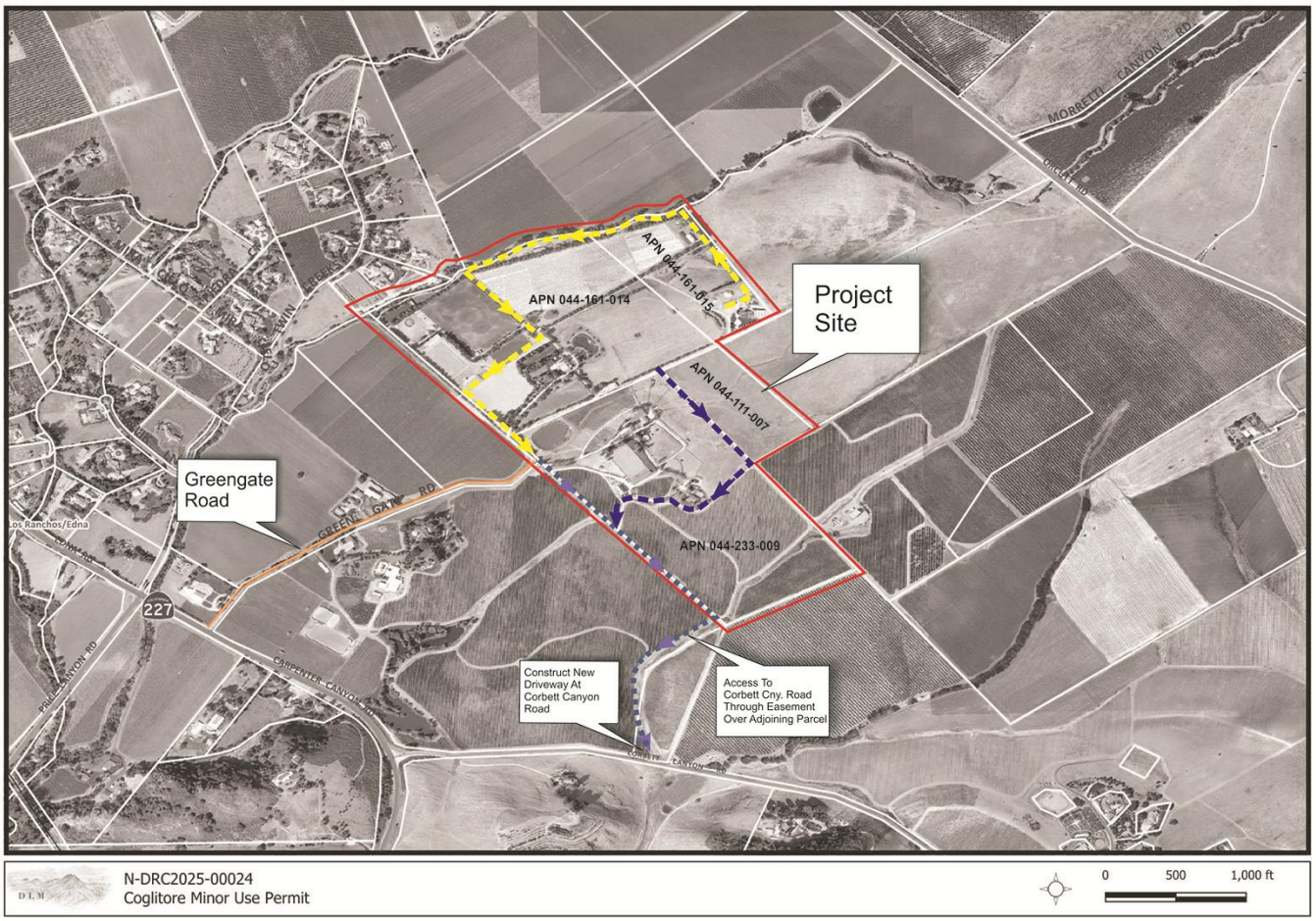

Figure 4 – Emergency Access Routes

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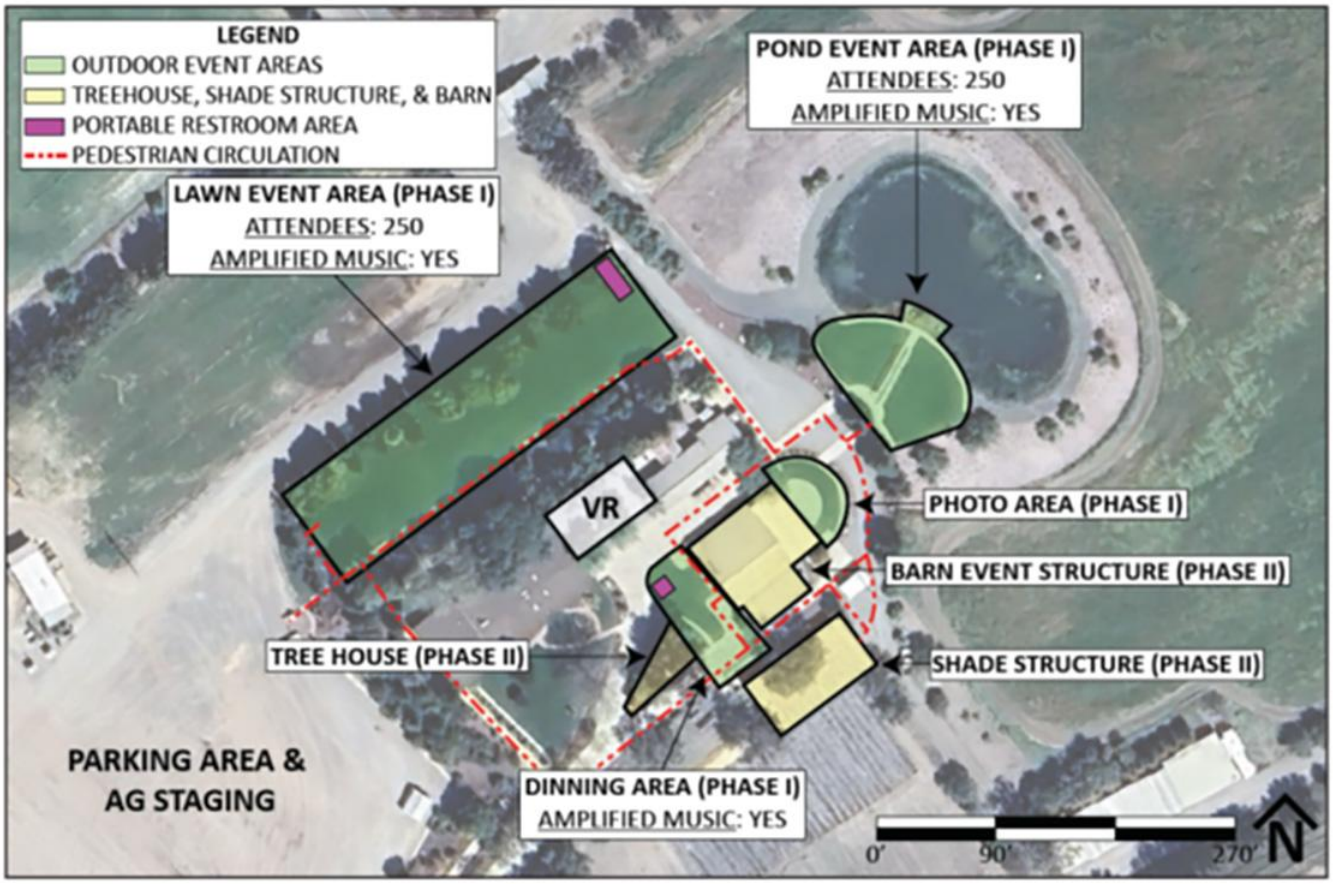

Figure 5 – Event Area 1

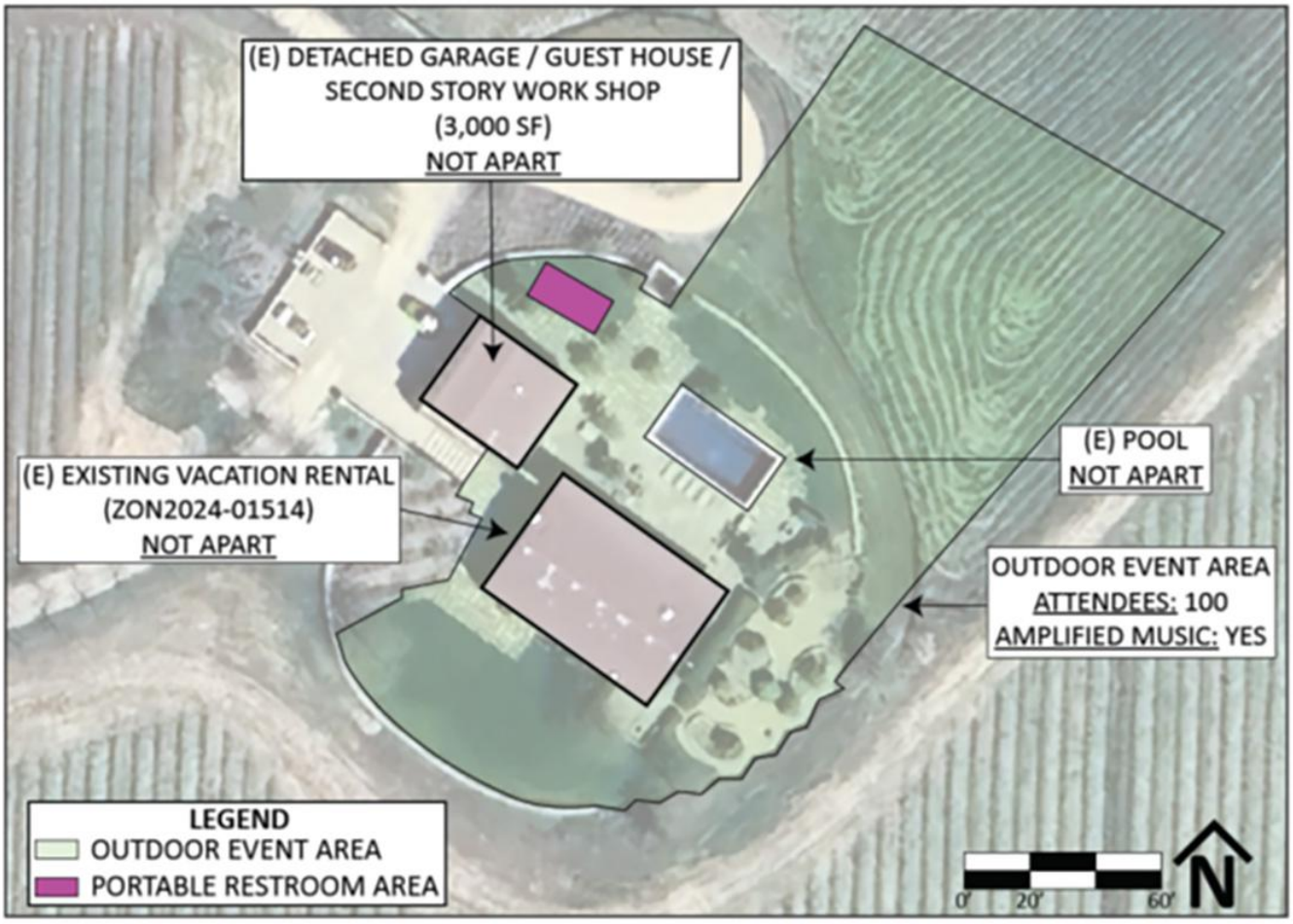

Figure 6 – Event Area 2

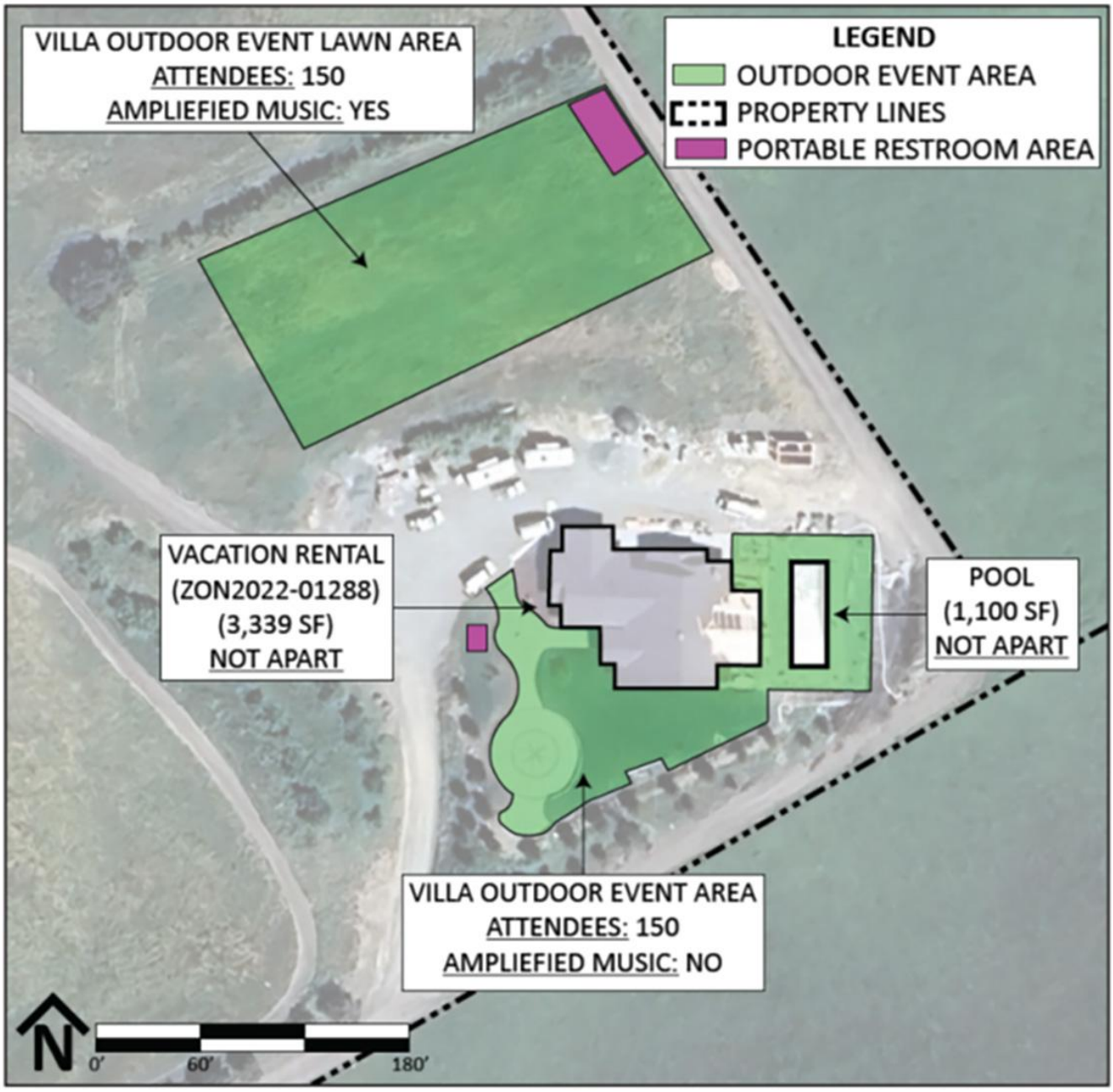

Figure 7 – Event Area 3

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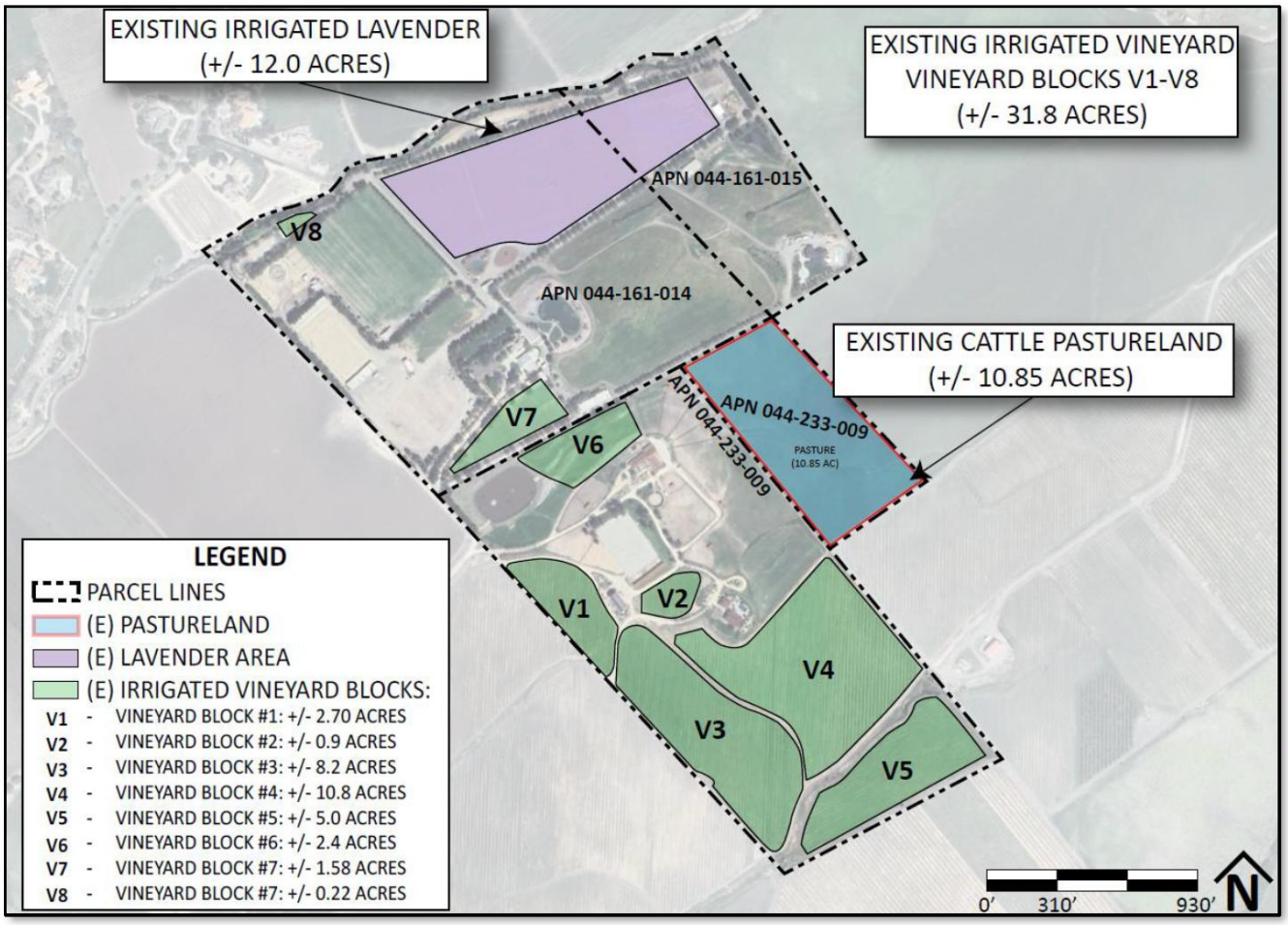

Figure 8 -- Existing Crop Production

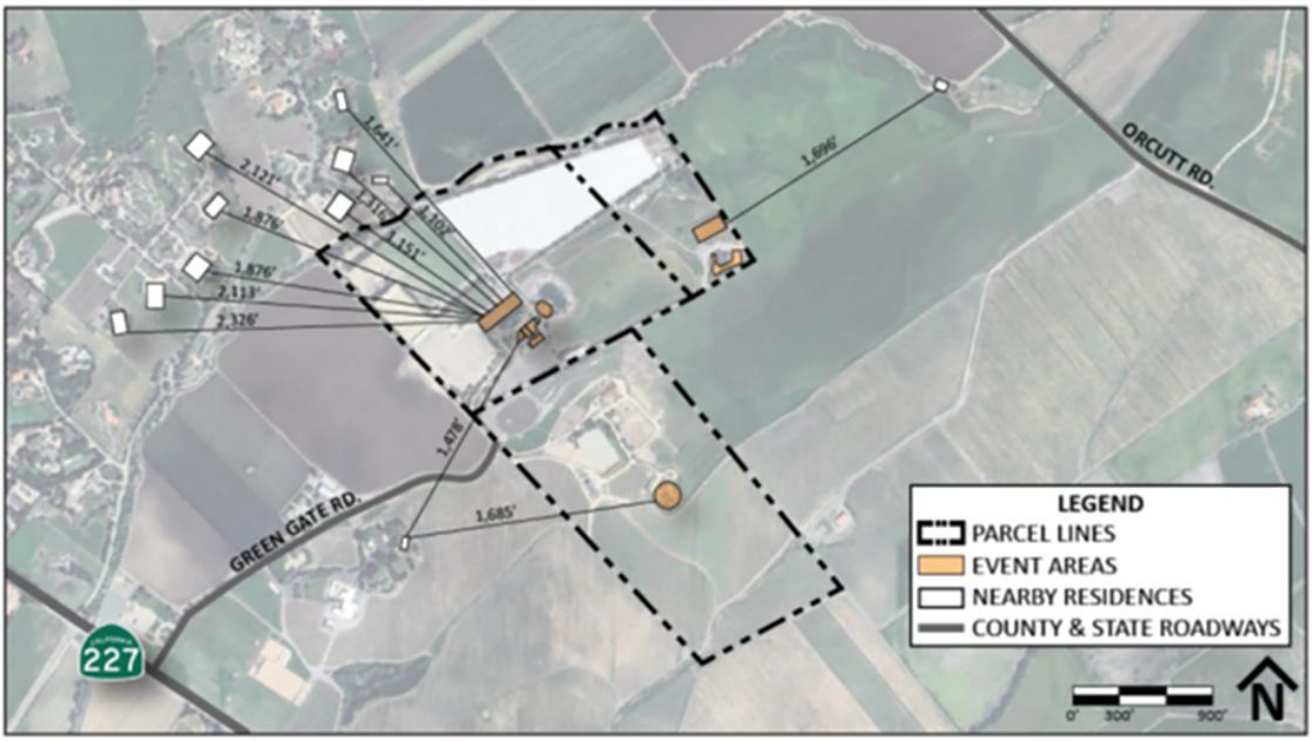

Figure 9 – Distance to Nearest Offsite Residences

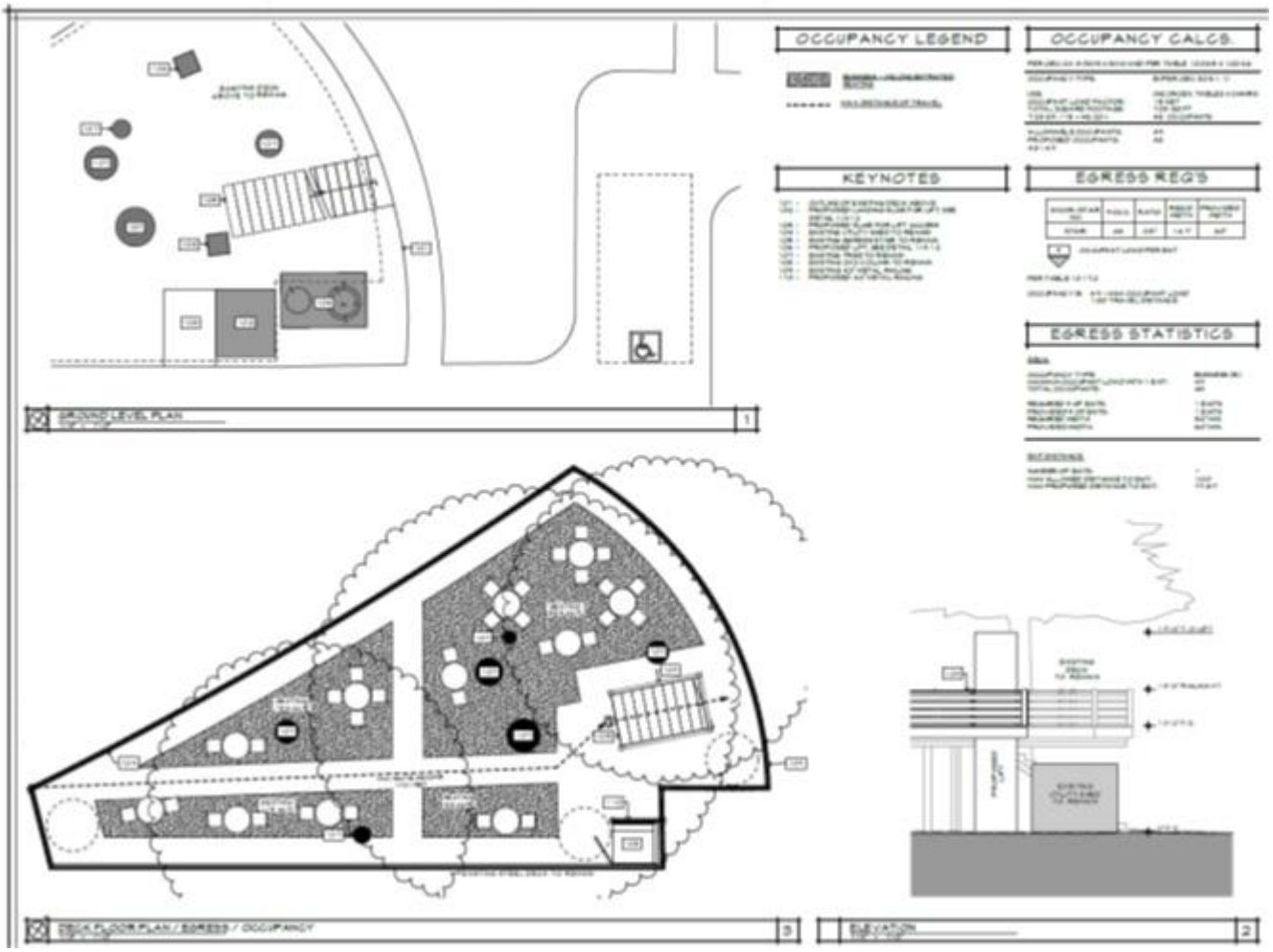

Figure 10 – Improvements to the Existing 'Tree House' Deck Area

C. Environmental Analysis

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

I. AESTHETICS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:					
(a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
(b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
(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?	☐	☐	☐	☒
(d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Setting

Based on the project description and Baseline Conditions, the visual qualities of the project site and surrounding area are considered moderately high. The primary vantage for public views of the project site and surrounding area is provided by State Route 227 (Edna Road) which is a State Highway that connects the City of San Luis Obispo with the Edna Valley and the communities of Pismo Beach and Arroyo Grande to the south. SR 227 follows a generally linear course through the western portion of Edna Valley through vineyards and row crops; moderate to dense stands of oak trees and annual grasses cover the hills that form the visual backdrop. As discussed in the baseline conditions, traffic counts taken by Caltrans for SR 227 at Corbett Canyon Road indicate that this portion of the highway carries 4,200 average daily trips (ADT) with 560 afternoon peak hour trips.

Conservation and Open Space Element. The Conservation and Open Space Element (COSE) identifies several goals for visual resources in rural parts of the county:

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

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

Countywide Design Guidelines. The Countywide Design Guidelines identify objectives for both urban and rural development. Rural area guidelines applicable to the project include the following:

- Objective RU-5: Fences and screening should reflect an area's rural quality.
- Objective RU-7: Landscaping should be consistent with the type of plants naturally occurring in the County and should limit the need for irrigation.

Inland Land Use Ordinance. The Land Use Ordinance sets forth standards for exterior lighting (LUO Section 22.10.060). In accordance with these standards, exterior lighting must be shielded and directed onto the source parcel and away from roadways and adjacent parcels. In addition, LUO Section 22.10.095 sets forth highway corridor design standards that apply to new development along portions of Highway 41 and Highway 101. Lastly, Section 22.14 establishes a combining designation for visual resources; the project lies outside the areas where these regulations apply.

Scenic Highways and Combining Designations. The only Officially Designated State Scenic Highway in San Luis Obispo County is Highway 1. The project site is not visible from Highway 1. SR 227 and Greengate Road are not subject to the Sensitive Resource Combining Designation nor the Highway Corridor design standards set forth in LUO Section 22.10.095. However, SR 227 between Price Canyon and the Arroyo Grande city limits is identified as a suggested scenic corridor by Table VR-2 of the Conservation and Open Space Element.

Discussion

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

For purposes 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. If the project would substantially degrade the scenic landscape as viewed from public roads, designated scenic routes, or from other public or recreation areas, this would be considered a potentially significant impact on the scenic vista.

While the project vicinity has a moderate-to-high scenic value and an appealing rural and agricultural character, it is not considered a scenic vista as it is not officially or unofficially designated as such. Therefore, the project would not result in a substantial adverse effect on a scenic vista, and *no impacts* would occur.

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

The project site is not located along, nor visible from, a designated state scenic highway or eligible state scenic highway (Caltrans 2025) and does not provide expansive views of a highly valued landscape for the benefit of the general public. It does not lie within the areas subject to the Highway Corridor Design standards set forth in LUO Section 22.10.095 nor is it subject to the Combining Designation for visual resources. Overall, the project would not result in substantial damage to scenic resources within a state scenic highway, and *no impacts* would occur.

(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?

No new buildings are proposed; however, modifications to existing structures will be necessary to provide ADA compliant restrooms for indoor events and to satisfy current building and fire codes. Minor improvements are also required to existing ranch roads to meet access standards for emergency vehicles. No trees are proposed for removal. Accordingly, the project is not expected to change the visual and aesthetic character of the project site.

Therefore, the project will have *no impacts* associated with the potential degradation of the existing visual character or quality of public views.

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

The project would result in a significant impact if it subjects public viewing locations to a substantial amount of point-source lighting visible at night, or if project illumination results in a noticeable spillover effect into the nighttime sky, increasing the ambient light over the region. The placement of lighting, source of illumination, and fixture types combined with viewer locations, adjacent reflective elements, and atmospheric conditions can affect the degree of change to nighttime views. If the project results in direct visibility of a substantial number of lighting sources, or allows a substantial amount of light to project toward the sky, significant impacts on nighttime views and aesthetic character would result.

The project is located in an area with low existing levels of light pollution except for light associated with surrounding rural residences and temporary events conducted on the Greengate Ranch and Vineyards (Darksitefinder.com 2025). Temporary events may introduce new sources of light to the project site if the events occur after sundown. The project will be conditioned to comply with county standards for exterior lighting which require light to be confined to the site of the source. Therefore, potential impacts associated with the creation of a new source of substantial light would be *less than significant.*

Conclusion

The project is not located within view of a scenic vista or State Scenic Highway and would not result in a substantial change to scenic resources in the area. The project is consistent with existing policies and standards in the County LUO and COSE related to the protection of scenic resources. New sources of light will be subject to compliance with the County's exterior lighting standards as prescribed in LUO Section 22.10.060. Impacts to aesthetic resources would be *less than significant*.

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Mitigation

None are required.

Sources

Provided in Exhibit A.

II. AGRICULTURE AND FORESTRY RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
(a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
(b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
(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))?	☐	☐	☐	☒
(d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
(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?	☐	☐	☒	☐

Setting

The level areas of the project site support a variety of irrigated crop production that includes vineyards, pastures, and ornamental flowers (lavender) as illustrated by Figure 3 and summarized in Table 2.

Table 2 -- Existing Agricultural Uses

Use	Approx. Acreage In 2026	Irrigated?
Irrigated Nursery Crop (lavender)	12.00	Yes
Pasture	10.85	No
Vineyards	31.80	Yes
Total:	54.65	--
Total Irrigated:	43.80	--

The California Department of Conservation (CDOC) Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data used for analyzing impacts to California's agricultural resources. Agricultural land is rated according to soil quality as well as current and previous land use. For purposes of CEQA compliance, the FMMP categories of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land are used to characterize "agricultural land." Non-agricultural designations include Urban and Built-up Land, Other Land, and Water.

Chapter 6 of the County Conservation and Open Space Element (COSE) identifies resource management goals, policies, and strategies to protect agricultural soils from conversion to urban and residential uses. Important Agricultural Soils within the County are identified in Table SL-2 of the COSE and Policy SL 3.1 states that the conversion of agricultural lands to non-agricultural uses shall be evaluated using the applicable policies in the COSE and Agricultural Element.

Soils of the project site where temporary events are proposed are described in detail below. The acreage and corresponding farmland classifications are provided in Tables 3 and 4.

Map Unit: 130—Diablo and Cibo clays, 9 to 15 percent slopes

Diablo: 50 percent

The Diablo component makes up 50 percent of the map unit. Slopes are 9 to 15 percent. This component is on hills. The parent material consists of residuum weathered from mudstone, sandstone and/or shale. Depth to a root restrictive layer, bedrock, paralithic, is 45 to 58 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately low. Available water to a depth of 60 inches (or restricted depth) is high. Shrink-swell potential is high. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 3 percent. This component is in the R015XD001CA Clayey ecological site. Nonirrigated land capability classification is 3e. Irrigated land capability classification is 3e. This soil does not meet hydric criteria. The calcium carbonate equivalent within 40 inches, typically, does not exceed 3 percent.

Cibo: 45 percent

The Cibo component makes up 45 percent of the map unit. Slopes are 9 to 15 percent. This component is on hills. The parent material consists of residuum weathered from metasedimentary rock. Depth to a root restrictive layer, bedrock, lithic, is 20 to 40 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is very low. Available water to a depth of 60 inches (or restricted depth) is moderate. Shrink-swell potential is high. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 2 percent. This component is in the R015XD001CA Clayey ecological site. Nonirrigated land capability classification is 3e. Irrigated land capability classification is 3e. This soil does not meet hydric criteria.

Map Unit: 197—Salinas silty clay loam, 0 to 2 percent slopes, MLRA 14

Salinas: 85 percent

The Salinas component makes up 85 percent of the map unit. Slopes are 0 to 2 percent. This component is on alluvial fans, alluvial plains. The parent material consists of alluvium derived from sedimentary rock. Depth to a root restrictive layer is greater than 60 inches. The natural drainage class is well drained. Water movement in the most restrictive layer is moderately low. Available water to a depth of 60 inches (or restricted depth) is high. Shrink-swell potential is moderate. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 3 percent. This component is in the R014XD109CA Fine Loamy Bottom ecological site. Nonirrigated land capability classification is 3c. Irrigated land capability classification is 1 This soil does not meet hydric criteria. The calcium carbonate equivalent within 40 inches, typically, does not exceed 3 percent. There are no saline horizons within 30 inches of the soil surface.

Map Unit: 217—Tierra loam, 9 to 15 percent slopes, MLRA 14

Tierra: 85 percent

The Tierra component makes up 85 percent of the map unit. Slopes are 9 to 15 percent. This component is on fluvial terraces, uplands. The parent material consists of alluvium derived from sedimentary rock. Depth to a root restrictive layer, abrupt textural change, is 10 to 26 inches. The natural drainage class is moderately well drained. Water movement in the most restrictive layer is low. Available water to a depth of 60 inches (or restricted depth) is moderate. Shrink-swell potential is moderate. This soil is not flooded. It is not ponded. There is no zone of water saturation within a depth of 72 inches. Organic matter content in the surface horizon is about 3 percent. This component is in the R015XD115CA Claypan, Loamy Claypan ecological site. Nonirrigated land capability classification is 4e. Irrigated land capability classification is 4e. This soil does not meet hydric criteria. There are no saline horizons within 30 inches of the soil surface.

Millsholm: 5 percent

Generated brief soil descriptions are created for major soil components. The Millsholm soil is a minor component.

As shown in Table 3, one of the soils affected by the temporary events area is classified as prime farmland by the COSE and on soil is classified as Farmland of Statewide importance.

Table 3 – Farmland Classifications of the COSE and Corresponding Acreages

Soil	COES Classification	Acres
Tierra Loam, 9 to 15% slope	Other Productive Soils	47.2
Diablo and Cibo clays, 9 to 15% slope	Farmland of Statewide Importance	50.0
Salinas Silty Clay Loam, 0 to 2 % slope	Prime Farmland	40.0
	Total:	**137.2**

Source: Classifications based on Table SL-2 of the County General Plan's Conservation/Open Space Element

Table 4 provides a summary of farmland classifications for soils on the project site as determined by the FMMP.

Table 4 – Farmland Classifications of the FMMP and Corresponding Acreages

FMMP Classification	Acres
Grazing	23.9
Farmland of Local Importance	39.8
Farmland of Local Potential	19.2
Farmland of Statewide Importance	8.6
Unique Farmland	23.3
Other Land	23.3
Total:	**137.2**

Source: Department of Conservation Farmland Mapping and Monitoring Program, 2023

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 because they are based upon farming and open space uses as opposed to full market value. All four parcels associated with the project are within the Edna Valley Agricultural Preserve and none of the subject parcels are subject to an active Williamson Act contract.

According to California Public Resources Code (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.

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

The project will have *no impact* relating to the conversion of important farmland because:

- All of the areas proposed for temporary events are in areas that have been developed with equestrian related facilities, single family residences (three of which are permitted as vacation rentals) and associated outdoor spaces with ornamental landscaping.
- The events will be temporary and will not result in the permanent conversion of farmland to a non-agricultural use.
- Ongoing agricultural uses of the site will continue and will be unaffected by temporary events.

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

None of the parcels associated with the project are subject to an active Williamson Act Contract. Therefore, as conditioned, the project would not result in a conflict with existing zoning for agricultural uses or a Williamson Act contract and *no impacts* would occur.

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

The project site does not include land use designations or zoning for forest land or timberland as defined by the Public Resources Code; *no impacts* would occur.

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

The areas proposed for temporary events do not contain stands of oak trees that meet the definition of "forest land" as prescribed in Public Resources Code Section 12220(g). Therefore, the project will result in *no impact* relating to the conversion of forest land to a non-forest use.

(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?

The project site is generally surrounded by parcels that are used for crop production (vineyards) and temporary events that are subordinate to ongoing agricultural operations. Surrounding agricultural uses may be temporarily affected by noise and dust generated by temporary events conducted on the 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.

Therefore, potential impacts would be *less than significant.*

Conclusion

The project would result in less than significant impacts relating to the conversion of farmland, forest land, or timber land to non-agricultural uses or non-forest uses and would not conflict with agricultural zoning or otherwise adversely affect agricultural resources or uses. Potential impacts to agricultural resources would be *less than significant* and *less than cumulatively considerable* and no mitigation measures are necessary.

Mitigation

None are necessary.

Sources

Provided in Exhibit A.

III. AIR QUALITY

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
(a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
(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?	☐	☐	☒	☐
(c)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
(d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Setting

San Luis Obispo County Clean Air Plan

The San Luis Obispo County Air Pollution Control District (SLOAPCD) San Luis Obispo County 2001 Clean Air Plan (CAP) is a comprehensive planning document intended to evaluate long-term air pollutant emissions and cumulative effects and provide guidance to the SLOAPCD and other local agencies on how to attain and maintain the state standards for ozone and particulate matter 10 micrometers or less in diameter (PM_{10}). The CAP presents a detailed description of the sources and pollutants that impact the jurisdiction's attainment of state standards, future air quality impacts to be expected under current growth trends, and an appropriate control strategy for reducing ozone precursor emissions, thereby improving air quality. Project consistency with the CAP is determined by considering whether the project incorporates the relevant land use planning and transportation control measures and strategies outlined in the CAP.

The County is currently designated as a non-attainment area for ozone and PM_{10} under state ambient air quality standards. Construction and operation of the project would result in emissions of ozone precursors including reactive organic gasses (ROG) and nitrous oxides (NO_X) as well as fugitive dust emissions (PM_{10}) and exhaust particulates.

SLOAPCD Criteria Pollutant Thresholds

The SLOAPCD has developed a CEQA Air Quality Handbook (most recently updated with a November 2017 Clarification Memorandum) to help local agencies determine the significance of project-specific air quality impacts and to determine whether mitigation measures are needed. To assist in this task, the Handbook includes screening criteria to determine the significance of project impacts. For example, according to the Handbook, a project with grading in excess of 4.0 acres and moving 1,200 cubic yards of earth per day can exceed the construction threshold for respirable particulate matter (PM_{10}).

The 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. Combustion emissions, such as nitrogen oxides (NOx), reactive organic gases (ROG), greenhouse gases (GHG), and diesel particulate matter (DPM), are most significant when using large, diesel-fueled scrapers, loaders, bulldozers, haul trucks, compressors, generators, and other heavy equipment. The SLOAPCD has established thresholds of significance for each of these contaminants.

Operational impacts are focused primarily on the indirect emissions (i.e., motor vehicles) associated with residential, commercial, and industrial development. Certain types of projects can also include components that generate direct emissions, such as power plants, gasoline stations, dry cleaners, and refineries (referred to as stationary source emissions). Table 1-1 of the APCD's CEQA Handbook provides screening criteria based on the size of different types of projects that would normally generate sufficient motor vehicle trips that would cause an exceedance of the operational thresholds for ozone precursors. A project consisting of 99 single family residences generating 970 average daily vehicle trips would be expected to exceed the 25 lbs/day operational threshold for ozone precursors.

The APCD has also estimated the number of vehicular round trips on an unpaved roadway necessary to exceed the 25 lbs/day threshold of significance for the emission of particulate matter (PM10). According to the APCD estimates, an unpaved roadway of one mile in length carrying 6.0 round trips would likely exceed the 25 lbs/day PM10 threshold.

The prevailing winds in the project vicinity are from the north and west.

Sensitive Receptors

Sensitive receptors are people with an increased sensitivity to air pollution or environmental contaminants, such as the elderly, children, people with asthma or other respiratory illnesses, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. Some land uses are considered more sensitive to changes in air quality than others, due to the population that occupies the uses and the activities involved. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residences. The nearest sensitive receptors are single-family residences located to the west and south of the areas proposed for temporary events.

Naturally Occurring Asbestos

Naturally Occurring Asbestos (NOA) is identified as a toxic air contaminant by the California Air Resources Board (CARB). Serpentine and other ultramafic rocks are fairly common throughout San Luis Obispo County and may contain NOA. If these areas are disturbed during construction, NOA-containing particles can be released into the air and have an adverse impact on local air quality and human health. Based on SLOAPCD's NOA Screening Map, the project site is not located in an area identified as having the potential for soils containing NOA.

Developmental Burning

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

Discussion

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

To be considered consistent with the 2001 San Luis Obispo County CAP, a project must be consistent with the CAP's land use planning and transportation control measures and strategies (SLOAPCD 2012). These strategies include, but are not limited to, planning compact communities with higher densities, providing for mixed land use, and balancing jobs and housing.

The project does not include the development of retail or commercial uses that would be open to the public (except for vacation rentals), therefore, land use planning strategies such as mixed-use development and planning compact communities are generally not applicable. The project would result in up to 90 total events per year with up to 250 attendees. Therefore, the project would not generate a significant number of permanent on-site employees and would not significantly affect the local area's jobs/housing balance.

Adopted transportation control measures include, but are not limited to, a voluntary commute options program, local and regional transit system improvements, bikeway enhancements, and telecommuting programs. The voluntary commute options program targets employers in the county with more than 20 full time employees. Given the remote location of the site, it is likely that a sizeable percentage of guests and vendors would carpool or shuttle to the site. Therefore, the project would not conflict with regional plans for transit system or bikeway improvements.

Overall, the project would not conflict with or obstruct implementation of the CAP; therefore, impacts would be *less than significant.*

(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The County is currently designated as a non-attainment area for ozone and PM_{10} under state ambient air quality standards.

Construction Emissions

No new buildings are proposed; however, modifications to existing structures will be necessary to provide ADA compliant restrooms for indoor events and to satisfy current building and fire codes. Minor improvements are also required to existing ranch roads to meet access standards for emergency vehicles. The scale of construction activities is not expected to exceed APCD construction thresholds. Therefore, there will be *no impacts* associated with construction.

Operation-Related Emissions. The project consists of up to 90 temporary events with up to 250 guests for each event. The project will likely generate about 4 average daily trips which is considerably less than the screening threshold of 99 average daily trips. Accordingly, project-specific and cumulative operational impacts are considered *less than significant* and *less than cumulatively considerable*.

The project main access road (Greengate Road) is paved from SR 227 to the project site. Secondary access routes are proposed that travel on ranch roads to provide emergency access in accordance with CalFire standards. These roads (Figure 4) are unpaved and would be used only in the event of an emergency. Therefore, the project will not result in travel on an unpaved roadway that would exceed the daily threshold for fugitive dust emissions.

Overall, impacts related to the exceedance of federal, state, or SLOAPCD ambient air quality standards due to operational activities would be *less than significant*.

(c) Expose sensitive receptors to substantial pollutant concentrations?

Sensitive receptors are people or other organisms that may have a significantly increased sensitivity to exposure to air pollution by virtue of their age and health (e.g. schools, day care centers, hospitals, nursing homes), regulatory status (e.g. federal or state listing as a sensitive or endangered species), or proximity to the source.

No new buildings are proposed; however, modifications to existing structures will be necessary to provide ADA compliant restrooms for indoor events and to satisfy current building and fire codes. Minor improvements are also required to existing ranch roads to meet access standards for emergency vehicles. Based on the location of proposed road and building improvements and the distance to sensitive receptors, there would be *no impacts* to sensitive receptors.

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

Minor improvements are required to existing ranch roads to meet access standards for emergency vehicles. Construction activities have the potential to emit odors from diesel equipment, paints, solvents, fugitive dust, and adhesives. Any odors generated by construction activities would be intermittent and temporary, and generally would not extend beyond the construction area.

Other than proposed temporary events, the project site will be limited to agricultural uses. However, an existing pasture located on APN 044-233-009 will be used for livestock grazing. As shown in Figure 9, the nearest offsite residences to the grazing area are located about one half mile to the south and west and is not expected to be adversely impacted by long-term adverse odors. Therefore, odors generated by the project would be short-term, intermittent, and *less than significant*.

The project site is not located in an area identified as containing NOA. Therefore, there would be *no impact*.

The project does not propose to burn any onsite vegetative materials and would be subject to SLOAPCD restrictions on developmental burning of vegetative material; therefore, the project would have *no impact* relating to substantial air pollutant emissions from such activities.

Conclusion

The project would be consistent with the SLOAPCD's Clean Air Plan. Construction and operational diesel emissions associated with the project will not exceed APCD thresholds and are not suspected to adversely impact surrounding sensitive receptors. In addition, the project site does not contain NOA. Therefore, potential impacts to air quality would be *less than significant*.

Mitigation

None are required.

Sources

Provided in Exhibit A.

IV. BIOLOGICAL RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
(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?	☐	☒	☐	☐
(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?	☐	☒	☐	☐
(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?	☐	☒	☐	☐
(e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
(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?	☐	☐	☐	☒

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Regulatory Setting

Federal Laws and Regulations

Bald and Golden Eagle Protection Act. The Bald and Golden Eagle Protection Act (BGEPA) prohibits anyone, without a permit issued by the Secretary of the Interior, from taking (pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb) bald or golden eagles, including their parts, nests, or eggs. This includes substantially interfering with normal breeding, feeding, or sheltering behavior. Activities that may result in the take of a bald or golden eagle require permits; the three activities eligible for permits include to remove or relocate an eagle nest; to transport, exhibit, collect, or control eagles or eagle parts, and for incidental take of eagles.

Clean Water Act. The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all waters of the U.S. Permitting is required for filling waters of the U.S. (including wetlands). Permits may be issued on an individual basis or may be covered under approved nationwide permits.

Endangered Species Act. The federal Endangered Species Act (FESA) provides the legal framework for the listing and protection of species (and their habitats) identified as being endangered or threatened with extinction. "Critical Habitat" is a term within the FESA designed to guide actions by federal agencies and is defined as "an area occupied by a species listed as threatened or endangered within which are found physical or geographical features essential to the conservation of the species, or an area not currently occupied by the species which is itself essential to the conservation of the species." Actions that jeopardize endangered or threatened species and/or critical habitat are considered a 'take' under the FESA. "Take" under federal definition means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.

Projects that would result in "take" of any federally listed threatened or endangered species, or critical habitats, are required to obtain permits from the USFWS through either Section 7 (interagency consultation with a federal nexus) or Section 10 (Habitat Conservation Plan) of FESA, depending on the involvement by the federal government in permitting and/or funding of the project. Through Section 10, it is required to prepare a Habitat Conservation Plan (HCP) to be approved by the United States Fish and Wildlife Service (USFWS), which results in the issuance of an Incidental Take Permit (ITP). Through Section 7, which can only occur when a separate federal nexus in a project exists (prompting interagency consultation), a consultation by the various federal agencies involved can take place to determine appropriate actions to mitigate negative effects on endangered and threatened species and their habitat.

Migratory Bird Treaty Act. All migratory, non-game bird species that are native to the U.S. or its territories are protected under the federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13), as amended under the Migratory Bird Treaty Reform Act of 2004. MBTA makes it illegal to purposefully take (pursue, hunt, shoot, wound, kill, trap, capture, or collect) any migratory bird, or the parts, nests, or eggs of such a bird, except under the terms of a valid Federal permit. Migratory non-game native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA).

State Law and Regulations

California Endangered Species Act. The California Endangered Species Act (CESA), similar to FESA, contains a process for listing of species and regulating potential impacts to listed species. State threatened and endangered species include both plants and wildlife, but do not include invertebrates. The designation "rare species" applies only to California native plants. State threatened and endangered plant species are regulated largely under the Native Plant Preservation Act in conjunction with the CESA. State threatened and endangered animal species are legally protected against "take." The CESA authorizes the California Department of Fish and Wildlife (CDFW) to enter into a memorandum of agreement for take of listed species to issue an incidental take permit for a state-listed threatened and endangered species only if specific criteria are met.

Section 2080 of the CESA prohibits the take of species listed as threatened or endangered pursuant to the Act. Section 2081 allows CDFW to authorize take prohibited under Section 2080 provided that: 1) the taking is incidental to an otherwise lawful activity; 2) the taking will be minimized and fully mitigated; 3) the applicant ensures adequate funding for minimization and mitigation; and 4) the authorization will not jeopardize the continued existence of the listed species.

California Environmental Quality Act (CEQA). CEQA defines a "project" as any action undertaken from public or private entity that requires discretionary governmental review (a non-ministerial permittable action). All "projects" are required to undergo some level of environmental review pursuant to CEQA, unless an exemption applies. CEQA's environmental review process includes an assessment of existing resources, broken up by categories (i.e., air quality, aesthetics, etc.), a catalog of potential impacts to those resources caused by the proposed project, and a quantifiable result determining the level of significance an impact would generate. The goal of environmental review under CEQA is to avoid or mitigate impacts that would lead to a "significant effect" on a given resource; section 15382 of the CEQA Guidelines defines a "significant effect" as *a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment, but may be considered in determining whether the physical change is significant.*

California Fish and Game Code (CFGC). The California Fish and Game Code (CFGC) is one of the 29 legal codes that form the general statutory law of California. A myriad of statutes regarding fish and game are specified in the CFGC; the following codes are specifically relevant to the proposed Project:

California Native Plant Protection Act. Sections 1900-1913 of the California Fish and Game Code contain the regulations of the Native Plant Protection Act of 1977. The intent of this act is to help conserve and protect rare and endangered plants in the state. The act allowed the CFGC to designate plants as rare or endangered.

Lake and Streambed Alteration. Section 1602 of the CFGC requires any person, state, or local governmental agency to provide advance written notification to CDFW prior to initiating any activity that would: 1) divert or obstruct the natural flow of, or substantially change or remove material from the bed, channel, or bank of any river, stream, or lake; or 2) result in the disposal or deposition of debris, waste, or other material into any river, stream, or lake. The state definition of "lakes, rivers, and streams" includes all rivers or streams that flow at least periodically or permanently through a well-defined bed or channel with banks that support fish or other aquatic life, and watercourses with surface or subsurface flows that support or have supported riparian vegetation.

Nesting Birds. Sections 3503, 3503.5 and 3513 of CFGC states that it is "unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto," and "unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird" unless authorized.

Regional Water Quality Control Board. The Regional Water Quality Control Board (RWQCB) not only regulates impacts to water quality in federal waters of the U.S. under Section 401 of the Clean Water Act, but also regulates any isolated waters that are impacted under the state Porter Cologne Act utilizing a Waste Discharge Requirement. Discharge of fill material into waters of the State not subject to the jurisdiction of the USACE pursuant to Section 401 of the Clean Water Act may require authorization pursuant to the Porter Cologne Act through application for waste discharge requirements or through waiver of waste discharge requirements.

Special Status Species and Sensitive Habitat Regulations

For the purpose of this analysis, special-status species are those plants and animals listed, or Proposed or Candidates for listing, as Threatened or Endangered by the USFWS or National Marine Fisheries Service (NMFS) under the federal Endangered Species Act (FESA); federal Birds of Conservation Concern (USFWS 2021); those listed as Rare, Threatened or Endangered under the California Endangered Species Act (CESA); animals designated as "Species of Special Concern," "Fully Protected," or "Watch List" by the CDFW; plants considered Endangered or Rare under the California Native Plant Protection Act; and, animals considered Sensitive that do not have a specific listing status but which are recorded in the California Natural Diversity Database (CNDDB; CDFW 2025a) and/or CDFW's (2025b) *Special Animals List*.

California Natural Diversity Database (CNDDB)

"Special Plants" and "Special Animals" are broad terms used to refer to all the plant and animal taxa inventoried by the CNDDB, regardless of their legal or protection status (CNDDB 2020a and 2020b). The Special Plants list includes vascular plants, high priority bryophytes (mosses, liverworts, and hornworts), and lichens. The Special Animals list is also referred to by the California Department of Fish and Wildlife (CDFW) as the list of "species at risk" or "special status species."

According to the CNDDB (2020a, 2020b), Special Plants and Animals lists include: taxa that are officially listed or proposed for listing by California or the Federal Government as Endangered, Threatened, or Rare; taxa which meet the criteria for listing, as described in Section 15380 of CEQA Guidelines; taxa deemed biologically rare, restricted in range, declining in abundance, or otherwise vulnerable; population(s) in California that may be marginal to the taxon's entire range but are threatened with extirpation in California; and/or taxa closely associated with a habitat that is declining in California at a significant rate. Separately, the Special Plants List includes taxa listed in the California Native Plant Society's Inventory of Rare and Endangered Plants of California, as well as taxa determined to be Sensitive Species by the Bureau of Land Management, U.S. Fish and Wildlife Service, or U.S. Forest Service. The Special Animals List distinctively includes taxa considered by the CDFW to be a Species of Special Concern (SSC) and taxa designated as a special status, sensitive, or declining species by other state or federal agencies.

Federal and State Endangered Species Listings

The Federal and California Endangered Species Acts are the regulatory documents that govern the listing and protection of species, and their habitats, identified as being endangered or threatened with extinction (see Sections 1.5.1and 1.5.2). Possible listing status under both Federal and California ESA includes Endangered and Threatened (FE, FT, CE, or CT). Species in the process of being listed are given the status of

either Proposed Federally Endangered/Threatened, Candidate for California Endangered/Threatened (PE, PT, CCE, or CCT). The CESA has one additional status: Rare (CR).

Global and State Ranks

Global and State Ranks reflect an assessment of the condition of the species (or habitats, see 1.6.6 below) across its entire range. Basic ranks assign a numerical value from 1 to 5, respectively for species with highest risk to most secure. Other ranking variations include rank ranges, rank qualifiers, and infraspecific taxon ranks. All Heritage Programs, such as the CNDDB use the same ranking methodology, originally developed by The Nature Conservancy and now maintained and recently revised by NatureServe. Procedurally, state programs such as the CNDDB develop the State ranks. The Global ranks are determined collaboratively among the Heritage Programs for the states/provinces containing the species. Rank definitions, where G represents Global and S represents State, are as follows:

- **G1/S1:** Critically imperiled globally/in state because of extreme rarity (5 or fewer populations).
- **G2/S2:** Imperiled globally/in state because of rarity (6 to 20 populations).
- **G3/S3:** Vulnerable; rare and local throughout range or in a special habitat or narrowly endemic (on the order of 21 to 100 populations).
- **G4/S4:** Apparently secure globally/in state; uncommon but not rare (of no immediate conservation concern).
- **G5/S5:** Secure; common, widespread, and abundant.
- **G#G#/S#S#:** Rank range - numerical range indicating uncertainty in the status of a species, (e.g., G2G3 more certain than G3, but less certain that G2).
- **G/S#?:** Inexact numeric rank
- **Q:** Questionable taxonomy - Taxonomic distinctiveness of this entity is questionable.
- **T#:** Infraspecific taxa (subspecies or varieties) – indicating an infraspecific taxon that has a lower numerical ranking (rarer) than the given global rank of species.

California Rare Plant Rankings

Plant species are considered rare when their distribution is confined to localized areas, their habitat is threatened, they are declining in abundance, or they are threatened in a portion of their range.

The California Rare Plant Rank (CRPR) categories range from species with a low threat (4) to species that are presumed extinct (1A). All but a few species are endemic to California. All of them are judged to be vulnerable under present circumstances, or to have a high potential for becoming vulnerable. Threat ranks are assigned as decimal values to a CRPR to further define the level of threat to a given species. The rare plant ranks and threat levels are defined below.

- **1A:** Plants presumed extirpated in California and either rare or extinct elsewhere.
- **1B:** Plants rare, threatened, or endangered in California and elsewhere.
- **2A:** Plants presumed extirpated in California, but common elsewhere
- **2B:** Plants rare, threatened, or endangered in California, but more common elsewhere
- **4:** Plants of limited distribution - a watch list

- **0.1:** Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)
- **0.2:** Moderately threatened in California (20-80% occurrences threatened/moderate degree and immediacy of threat)
- **0.3:** Not very threatened in California (less than 20% of occurrences threatened/low degree and immediacy of threat or no current threats known)

California Department of Fish and Wildlife Animal Rankings

The California Department of Fish and Wildlife (CDFW) assigns one of three ranks to Special Status Animals: Watch List (WL), Species of Special Concern (SSC), or Fully Protected (FP). Unranked species are referred to by the term Special Animal (SA).

Animals listed as Watch List (WL) are taxa that were previously designated as SSC, but no longer merit that status, or taxa that which do not yet meet SSC criteria, but for which there is concern and a need for additional information to clarify status.

Animals listed as California Species of Special Concern (SSC) may or may not be listed under California or federal Endangered Species Acts. They are considered rare or declining in abundance in California. The Special Concern designation is intended to provide the CDFW biologists, land planners, and managers with lists of species that require special consideration during the planning process to avert continued population declines and potential costly listing under federal and state endangered species laws. For many species of birds, the primary emphasis is on the breeding population in California. For some species that do not breed in California but winter here, emphasis is on wintering range. The SSC designation thus may include a comment regarding the specific protection provided such as nesting or wintering.

Animals listed as Fully Protected (FP) are those species considered by CDFW as rare or faced with possible extinction. Most, but not all, have subsequently been listed under the CESA or FESA. Fully Protected species may not be taken or possessed at any time and no provision of the California Fish and Game code authorizes the issuance of permits or licenses to take any Fully Protected species.

Sensitive Habitats

Sensitive Natural Community is a state-wide designation given by CDFW to specific vegetation associations of ecological importance. Sensitive Natural Communities rarity and ranking involves the knowledge of range and distribution of a given type of vegetation, and the proportion of occurrences that are of good ecological integrity (CDFW 2018a). Evaluation is conducted at both the Global (G) and State (S) levels, resulting in a rank ranging from 1 for very rare and threatened to 5 for demonstrably secure. Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities in California and may need to be addressed in the environmental review processes of CEQA and its equivalents.

Environmental Setting

The areas proposed for temporary events and improvements to existing buildings are developed with equestrian related facilities, and single family residences with ornamental landscaping. No new buildings are proposed; however, modifications to existing structures will be necessary to provide ADA compliant restrooms for indoor events and to satisfy current building and fire codes. Minor improvements are also required to existing ranch roads to meet access standards for emergency vehicles.

The project application materials include a biological resources assessment (BRA) of these areas (Padre Associates, July, 2025) that was used to inform the following discussion of project related impacts. Areas of

the site assessed by the BRA are shown in Figure 11. It should be noted that the BRA study area includes equestrian-related components that are no longer included in the project description. These components include an existing equestrian area, pastures, arena, and boarding and shade structures as shown on Figure 11. The BRA study area also includes portions of several existing access roads (and a five-foot buffer on each side) referred to as the Road Disturbance Area.

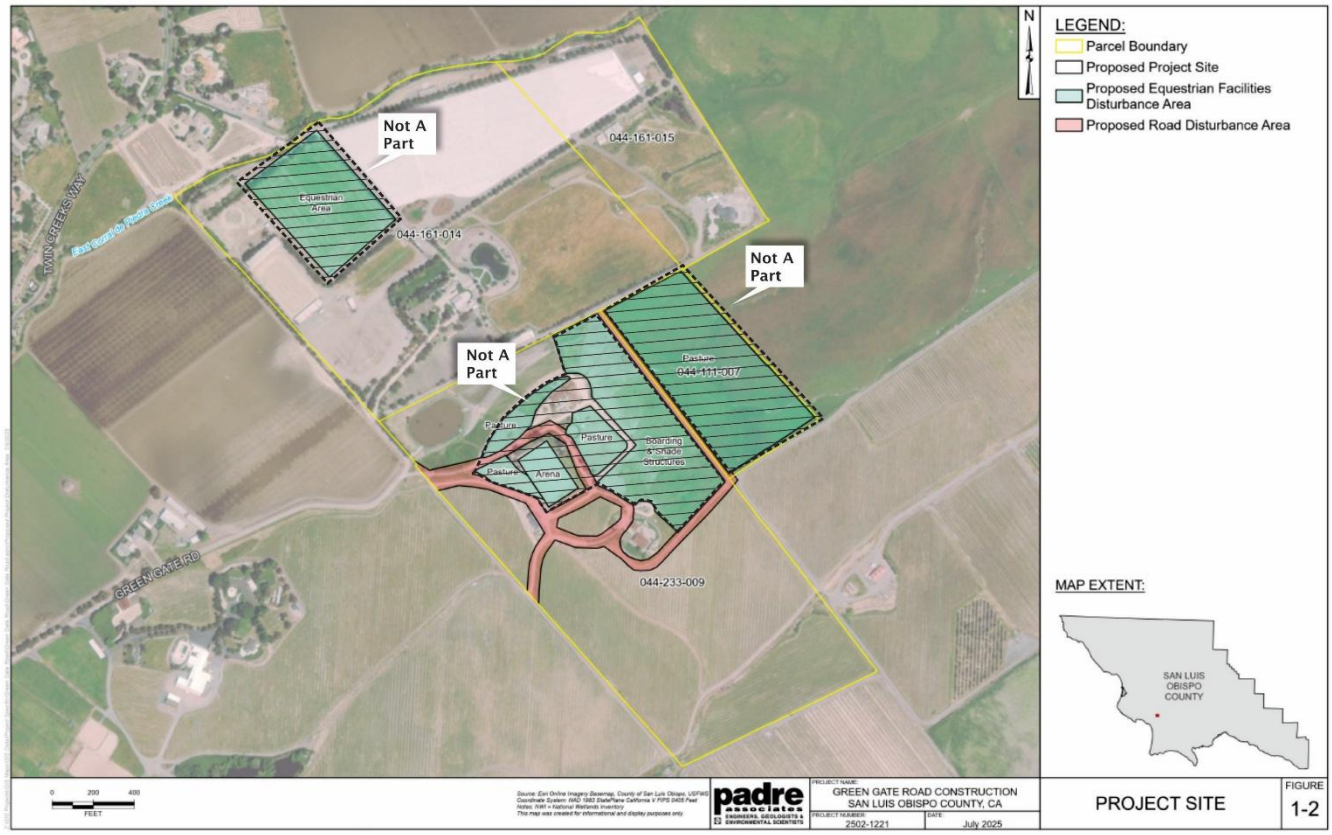

Figure 11 -- BRA Study Areas

Habitats/Vegetative Communities

Vegetation within the BSA was divided and classified into vegetation types based on *A Manual of California Vegetation, Second Edition* (MCV2) (Sawyer, et. al., 2009) or described as site-specific vegetation and/or land use cover types not treated in the MCV2. All identifiable plant species observed within the BSA were documented. Plant specimens that were not positively identified in the field were further examined using appropriate botanical keys, including *The Jepson Manual Vascular Plants of California* (Baldwin et. al., 2012). A list of plant species observed during the May 2025 field survey is provided in Appendix B of the BRA. Vegetation communities and land cover types documented to occur within the BSA are described below and illustrated by Figure 12. As noted in Figure 12, the BRA study area includes portions of the site that are not a part of the project and will not be affected. These areas primarily include the Wild Oats and Brome Grassland alliance as well as portions of the areas identified as Ruderal and Ornamental.

Wild oats and annual brome grassland

Wild oats and annual brome grassland (*Avena* spp. – *Bromus* spp. Herbaceous Semi-Natural Alliance) occurs in all topographic settings in foothills, waste places, rangelands, and openings in woodlands. This alliance is characterized by presence of ripgut grass (*Bromus diandrus*), soft chess brome (*Bromus hordeaceus*) and/or long beak filaree (*Erodium botrys*) as dominant or co-dominant with other non-natives in the herbaceous layer; cover is open to continuous (Sawyer et. al., 2009). As observed during the May 2025 field survey, this alliance occurred within the cattle grazed pasture on the east side of the BSA. Dominant to co-dominant species included soft chess brome, ripgut grass, Italian rye grass (*Festuca perennis*), rose clover (*Trifolium hirtum*) and scattered occurrences of field bindweed (*Convolvulus arvensis*), wild radish (*Raphanus sativus*), Cambria morning glory (*Calystegia subacaulis* ssp. *episcopalis*), and other natives or non-natives in the herbaceous layer. Wild oats and annual brome grassland is not considered sensitive by the CDFW, however individual plants that are found within this community, including Cambria morning glory (CNPS rarity rank 4.2), are considered sensitive by CDFW.

Ruderal

Ruderal is a term used to describe those areas that have been disturbed by current and past land-use practices and/or recent ground disturbance, that generally support sparse to moderate cover of disturbance-adapted plant species. Ruderal vegetation may provide suitable foraging and nesting habitat for fauna. As observed during the May 2025 field survey, ruderal vegetation occurred as sparse to moderate vegetation cover throughout the site in recently disturbed portions of the BSA that were within mowed fields, equestrian facilities, grazed horse pens and pastures, and/or roadsides. Species observed included Italian rye grass, mayweed (*Anthemis cotula*), longstem filaree (*Erodium botrys*), ripgut grass, and bur clover (*Medicago polymorpha*). This vegetation community is not considered sensitive by the CDFW.

Ornamental

Ornamental is a site-specific vegetation classification that primarily consisted of landscape plantings around the residences. Ornamental vegetation (especially trees) may provide suitable foraging and nesting habitat for fauna. As observed during the May 2025 field survey, species included Chinese elm (*Ulmus parviflora*), California sycamore (*Platanus racemosa*), Peruvian peppertree (*Schinus molle*), silverdollar (*Eucalyptus cinerea*), redwood (*Sequoia sempervirens*), and American century plant (*Agave americana*). This vegetation community is not considered sensitive by the CDFW.

Vineyard

Vineyard is a site-specific vegetation classification that primarily consisted of agricultural grape vines maintained in row crops along roadsides on the southern side of the BSA. As observed during the May 2025 field survey, species included cultivated grape (*Vitis vinifera*), mediterranean vetch (*Vicia benghalensis*), scarlet pimpernel (*Lysimachia arvensis*), prickly sow thistle (*Sonchus asper*), and bristly ox-tongue (*Helminthotheca echioides*). This vegetation community is not considered sensitive by the CDFW.

Developed

Developed is a term that describes areas where the land surface has been modified for structures and associated infrastructure such as paved and unpaved roads. Developed lands typically do not support vegetative cover due to the presence of impervious surfaces, however, unpaved areas can support vegetative cover. As observed during the May 2025 field survey, developed areas occurred throughout the BSA and consisted of paved and unpaved driveways and parking areas, barns, horse pens, and several non-residential buildings. This land cover type is not considered sensitive by the CDFW.

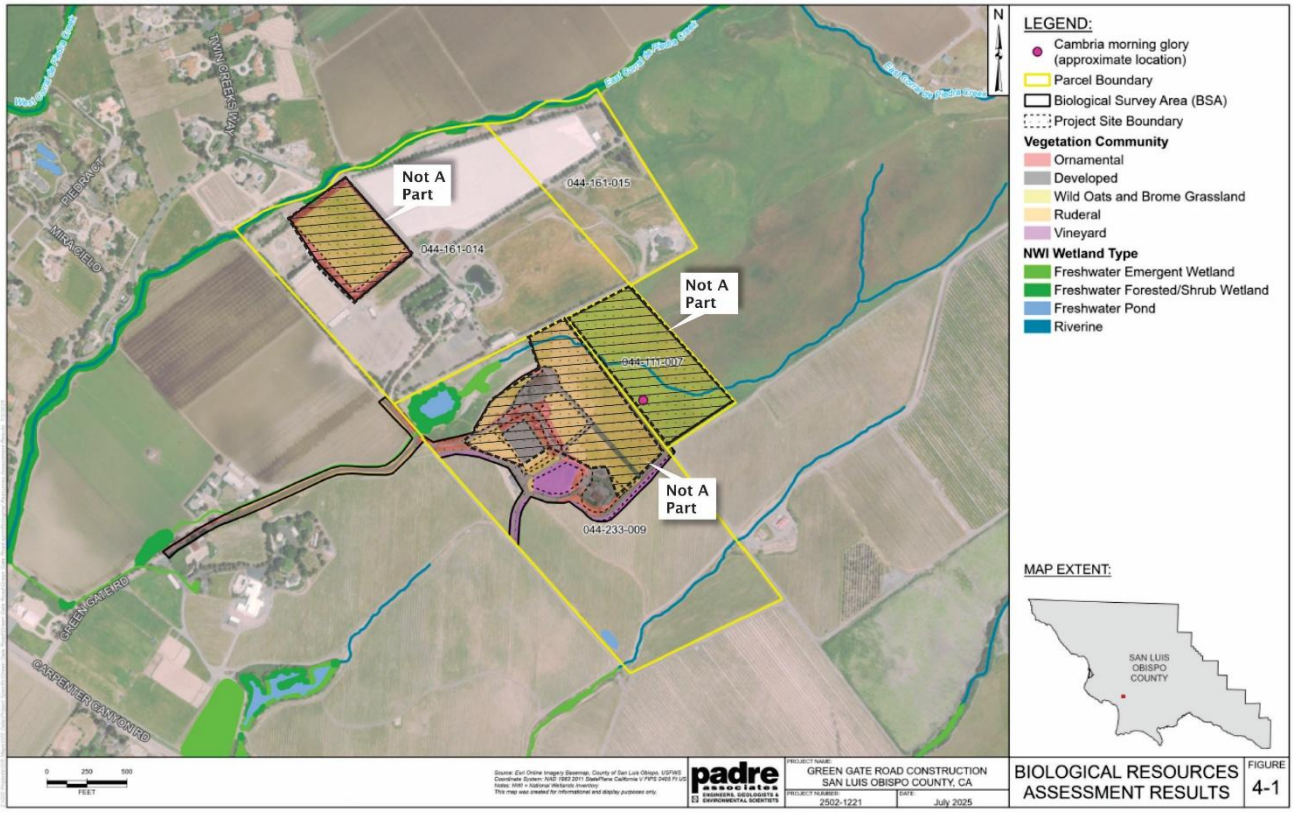

Figure 12 -- Habitat Communities Within the BRA Study Area

Wildlife

Wildlife identified during the survey (through indirect sign and direct observations of individuals) included bumble bees, common reptiles and mammals, and several species of birds. Of note, barn owl (*Tyto alba*), cliff swallow (*Petrochelidon pyrrhonota*), western bluebird (*Sialia Mexicana*), Botta's pocket gopher (*homomys bottae*), and gopher snake (*Pituophis catenifer*) were observed with the Project site. A list of wildlife species observed during the May 2025 field survey is provided in Appendix B of the BRA.

Aquatic Resources

Based on the NWI search results, two aquatic resources were recorded within the BSA and parcels: Riverine features associated with East Corral de Piedra Creek and an unnamed drainage (Unnamed Drainage) with associated Freshwater Emergent Wetland, Freshwater Forested/Shrub Wetland, and Freshwater Pond features (Figure 12). Recorded aquatic features within 0.5 miles of the BSA included three Riverine features including West Corral de Piedra Creek and two unnamed drainages (USFWS, 2025b). The NWI recorded features within the BSA were verified to occur during the May 2025 field survey. East Corral de Piedra Creek runs generally in an east to west direction along the northern boundary of APNs 044-161-014 and 044-161-015, including the northern boundary of an existing equestrian area that is not included in the project. The Unnamed Drainage meanders south to north and east to west through APNs 044-111-007 and 044-233-009.

As observed during the May 2025 field survey, a small section of East Corral de Piedra Creek overlapped the BSA north of an unpaved access road and ornamental vegetation surrounding the existing equestrian area that is not part of the Project site.

The Unnamed Drainage flows east to west through upland pasture land and under an existing unimproved ranch road to an ag pond located near the easterly terminus of Greengate Road. The Drainage occurred as a shallow indistinct swale averaging approximately 10 feet wide and one foot deep, that appeared to convey stormwater flows as evidenced by areas of bare ground and scattered occurrence of a wetland plant species (brown-headed rush [*Juncus phaeocephalus*]) within the feature. No formal wetland delineation survey was conducted and as such, no jurisdictional determination was made for these aquatic resource features. These features, especially when holding water, may provide suitable foraging, migratory, or nesting habitat for fauna.

Critical Habitats and Special Status Natural Communities

USFWS Designated Critical Habitat

No USFWS-Designated Critical Habitat overlaps the BSA. The nearest USFWS Designated Critical Habitat is California red-legged frog (*Rana draytonii*) approximately 4.2 miles north of the BSA (USFWS, 2025a). No sensitive natural communities as defined by CDFW were documented within the BSA. The nearest sensitive natural community was Central Maritime Chaparral community within 2.53 miles west of the BSA (CDFW, 2025a).

Special-status Biological Resources

Special Status Plants

special-status plant species documented within the eight quadrangles encompassing and surrounding the BSA. These results were narrowed down to 31 plant species within five miles of the BSA to focus on those that had greater chance of occurrence based on proximity. These select species were then evaluated to determine the potential for occurrence based on comparison of the habitat preference, soil conditions, and elevation range of the species to the site conditions of the BSA. The results indicated that there were six special-status plant species that had a potential to occur within the BSA based on proximity and presence of suitable habitat (grassland and/or wetland), soil type, elevation, and general site conditions. These species include including Cambria morning glory (*Calystegia subacaulis episcopalis*), Hoover's bent grass (*Agrostis hooveri*), San Luis mariposa-lily (*Calochortus obispoensis*), Hoover's button-celery (*Eryngium aristulatum* var*. hooveri*), Congdon's tarplant (*Centromadia paryii* ssp. *congdonii*), and San Luis Obispo owl'sclover (*Castilleja densiflora* var*. obispoensis*).

Scattered occurrences of Cambria morning glory (CNPS 4.2) were detected within the wild oat and annual brome grassland vegetation community in the eastern portion of the BSA during the May 2025 field survey (Figure 12). While the approximate location was mapped, the exact number or extent of the population of Cambria morning glory present onsite was not documented during the May 2025 field survey. No other special status species were documented within the BSA (CDFW, 2025a, and CNPS, 2025). The field survey was completed during the appropriate blooming season when these special-status plant species would be identifiable if present.

Special Status Wildlife

Based on the CNDDB query completed as part of the desktop review, there were 50 special-status wildlife species documented within the eight quadrangles encompassing and surrounding the BSA. These results were narrowed down to species occurrences within five miles of the BSA to focus on those that had greater

chance of occurrence based on proximity. These select species were then evaluated to determine the potential for occurrence based on comparison of the habitat preference of the species to the habitats and site conditions of the BSA The results indicated that there were 12 special-status wildlife species that had a potential to occur within the BSA based on proximity and presence of suitable habitat (wetland, grassland, trees, and structures) including vernal pool fairy shrimp (*Branchinecta lynchi*), western spadefoot (*Spea hammondii*), tricolored blackbird (*Agelaius tricolor*), prairie falcon (*Falco mexicanus*), California red-legged frog (*Rana draytonii*), southwestern pond turtle (*Actinemys pallida*), northern California legless lizard (*Aniella pulchra*), coast horned lizard (*Phrynosoma blainvillii*), South-Central California Coast Steelhead Distinct Population Segment (*Onhorhychus mykiss irideus*), American badger (*Taxidea taxus*), pallid bat (*Antrozous pallida*), Townsend's bigeared bat (*Corynorhinus townsendii*), and nesting birds.

No special-status wildlife species were documented to occur within the BSA (CDFW, 2025a). The BSA may provide generally suitable habitat to support the special-status wildlife species listed above.

Special-status and common bird species protected under the MBTA could nest onsite in the ornamental trees and a few species could nest on bare ground in Ruderal areas. Raptors protected under California Fish and Game Code as well as other birds could nest in the scattered oak trees that surround the area proposed for temporary events.

Discussion

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

All emergency access roads must be improved to CalFire standards with an all-weather surface capable of supporting apparatus that weighs 75,000 pounds and must be a minimum 20 feet in width with a 4 foot shoulder. Roadwork may adversely impact adjacent and nearby surface water bodies such as East Corral de Piedra Creek or ephemeral drainages. In addition, a new driveway will be constructed at Corbett Canyon Road to serve as emergency access. However, a visual reconnaissance revealed no sensitive biological resources associated with the new driveway.

Special-Status Plants

During the May 2025 field survey, one sensitive plant, Cambria morning glory (CNPS 4.2), was detected within the within the wild oats and annual grassland vegetation community which is outside the areas of disturbance associated with the project (Figure 12). No other sensitive plants were observed during suitably timed surveys. Therefore, potential impacts to special status plants are considered *less than significant*.

Special-Status Wildlife

Construction and/or ground disturbing activities including roadway improvements within, or in the vicinity of, the documented aquatic resources and adjacent uplands have the potential to impact western spadefoot, California redlegged frog, southwestern pond turtle, vernal pool fairy shrimp, and tricolored black bird. Project activities within and around the onsite structures and less disturbed upland grassland vegetation have the potential to impact special-status bats, nesting birds

Invertebrates

The documented wetland features within the BSA may provide suitable habitat for Vernal Pool Fairy Shrimp (VPFS), depending on the hydrology of these features during winter inundation. As the May 2025 field survey was conducted outside of the typical wet season, suitable hydrology or VPFS was not observed within the BSA. Due to potentially suitable habitat and proximity to documented occurrences, it is possible that VPFS could occur within the proposed Project site if ponded water is present. With implementation of Mitigation Measure BIO-10, potential impacts to these species are considered *less than significant with mitigation*.

Amphibians

The NWI riverine features onsite and/or nearby freshwater ponds may provide aquatic habitat suitable for spadefoot. The nearest potentially suitable aquatic breeding habitat is a documented freshwater pond present within APN 044-233-009 just outside of the BSA. Due to presence of suitable habitat, and proximity to offsite habitat, it is possible that western spadefoot could occur within the proposed Project site.

During the May 2025 survey the Project site contained poor to marginal habitat for California red-legged frog. The documented freshwater pond just outside the BSA as well as portions of East Corral de Piedra Creek along the northern edge of the BSA where roadway improvements are contemplated have the potential to support California red-legged frogs which could migrate through the Project site between these two aquatic resources. Additionally, if the Unnamed Drainage mapped within the BSA holds enough water between winter storms, this could be another potential habitat for California red-legged frogs during certain times of the year. No California red legged frog was observed during the May 2025 survey.

With implementation of Mitigation Measure BIO-1, BIO-2, BIO-3, BIO-10, HAZ-1 and HAZ-2 potential impacts to these species are considered *less than significant with mitigation*.

Reptiles

The onsite riverine features could provide habitat for pond turtles during winter inundations. Additionally, the nearby pond and West Corral de Piedra Creek contain suitable habitat for pond turtles. Between these aquatic resources, there is the potential for upland nesting and overwintering sites within the Project site. No southwestern pond turtle was observed during the May 2025 survey, however, there is potential for this special status species to occur within the Project site during future development activities. With implementation of Mitigation Measure BIO-9, potential impacts to these species are considered *less than significant with mitigation*.

Northern California legless lizard, and coast horned lizard are both CDFW SSC that occupy areas of loose, sandy soils in grassland/scrub habitats in the Project region (CDFW, 2024a). Suitable grassland habitat is present throughout the Project site but the soil assessments made during the May 2025 field survey revealed a hard, compact topsoil surface layer. As such, these special-status lizard species are not likely to occur within the Project site during future development activities.

Mammals

The nearest documented occurrence of American badger is within 1.66 miles south of the BSA (CDFW, 2025a). No large burrows or other sign (i.e., scat, tracks, prey remains, etc.) indicative of badger activity were observed in the BSA during the May 2025 field survey; however, due to nearby

occurrences, suitable habitat, and presence of burrowing rodents, this species may occur on or near the Project site.

Pallid bat and Townsend's big-eared bat both occupy a wide range of different habitats and utilize various types of roosts including cliffsides, dead trees, and man-made structures/buildings and are CDFW SSC (CDFW, 2025a). Suitable roosting/foraging habitat for these special-status bats is present in the Project site including the stables and barns. No observations or indirect signs (i.e. guano) of bats were detected during the May 2025 field survey.

Although no roosting bats were observed during the survey, suitable habitat is present and as such, there is a potential for these special-status bat species to occur within the Project site during construction activities.

With implementation of Mitigation Measure BIO-5, BIO-6 and BIO-7, potential impacts to mammals are considered *less than significant with mitigation*.

Birds

The BSA is located within 0.25 miles of a mapped occurrence of tricolored blackbird and within 3.35 miles of a mapped occurrence of prairie falcon (CDFW, 2025a). During the May 2025 field survey, suitable breeding grounds for both prairie falcon and tricolored blackbird were observed in the form of open grassland with abundant small mammals and wetlands with cattails. As such, it is possible both prairie falcon and tricolored blackbird could occur within the proposed Project site and could be disturbed by construction activities.

With implementation of Mitigation Measure BIO-8, potential impacts to these species are considered *less than significant with mitigation*.

Fish

The South-Central California Coast Steelhead Distinct Population Segment (steelhead) is considered a federally threatened species. Steelhead are an anadromous form of rainbow trout that reproduce in freshwater but spend much of their life cycle in the ocean, where increased prey density provides a greater growth rate and size (NMFS, 2000). The nearest documented occurrence is within 0.9 miles west of the BSA in West Corral de Piedra Creek (CDFW, 2025a).

During the May 2025 field survey, suitable habitat for steelhead was not observed within the BSA. Portions of the East Corral de Piedra Creek that run along the northern edge of the BSA may potentially contain suitable habitat during wet periods. The Unnamed Drainage documented within the BSA does have connectivity to the above-mentioned potential steelhead habitat, however during the May 2025 field survey this drainage was not observed to contain suitable habitat for steelhead. Because of the lack of observed habitat within the BSA, it is unlikely that steelhead would be present in the Project site.

The aquatic features observed within the BSA are tributaries to Pismo Creek, which is identified in the *2023 5-Year Review: Summary and Evaluation of South-Central California Coast Steelhead* as under threat of reduced water flow (NOAA, 2023). However, as discussed in Section X. Hydrology and Water Quality, temporary events will have no net increase in water use and will therefore not indirectly affect surface water. Therefore, the Project is not expected to indirectly impact steelhead and potential impacts are considered *less than significant*.

(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?

As observed during the May 2025 field survey, a small section of East Corral de Piedra Creek overlapped the BSA north of the unpaved access road and ornamental vegetation surrounding the existing equestrian area. However, these resources lie outside areas affected by the project.

The Unnamed Drainage flows east to west through upland pasture land and under an existing unimproved ranch road to an ag pond located near the easterly terminus of Greengate Road. As observed during the May 2025 field survey the Unnamed Drainage was a shallow indistinct swale averaging approximately 10 feet wide and one foot deep that appeared to convey stormwater flows as evidenced by areas of bare ground and scattered occurrence of a wetland plant species (brown-headed rush [*Juncus phaeocephalus*]) within the feature. No formal wetland delineation survey was conducted and as such, no jurisdictional determination was made for these aquatic resource features. These features, especially when holding water, may provide suitable foraging, migratory, or nesting habitat for fauna. Potential construction-related impacts associated with road improvements to meet CalFire standards for emergency access may adversely impact regulated aquatic resources.

With implementation of Mitigation Measure BIO-1, BIO-2, BIO-3, BIO-4, HAZ-1 and HAZ-2, potential impacts to these resources are considered *less than significant with mitigation*.

(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?

As discussed under item b., above, potential construction-related impacts associated with road improvements to meet CalFire standards may adversely impact regulated aquatic resources. With implementation of Mitigation Measure BIO-1, BIO-2, BIO-3, BIO-4, HAZ-1 and HAZ-2, potential impacts to these species are considered *less than significant with mitigation*.

(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?

Wildlife Corridors

The areas proposed for temporary events will be located on, and adjacent to, ruderal and disturbed land associated with single family residences and existing equestrian facilities. These areas are subject to the noise and activities associated with these uses but are areas that could be used for the movement of wildlife that are tolerant of a high degree of human activity. There are no designated open space areas nearby, but Corral de Piedra Creek and its adjacent riparian habitat, could be used as a wildlife corridor. The areas surrounding the proposed for temporary events consist of grazing lands to the east and irrigated agricultural operations to the west and south. These areas provide some opportunities for the movement of wildlife.

Migratory Nesting Birds and Sensitive Avian Species
In addition to species protected by the state or federal Endangered Species Acts, all native avian species are protected by state and federal legislation, most notably the Migratory Bird Treaty Act and the CDFW Fish and Game Code. Collectively, these regulations make it unlawful to collect, sell, pursue, hunt, or kill native migratory birds, their eggs, nests, or any parts thereof. Avian species are

expected to occur within and adjacent to the project site during all seasons and throughout construction of the proposed project. The potential to encounter and disrupt these species is generally highest between February 1 and August 31, when nests are likely to be active, when eggs or young are present. The ornamental landscaping and trees associated with the area proposed for temporary events may provide very low quality habitat for nesting, but are subject to the continuous disturbance of home occupancy.

With implementation of Mitigation Measure BIO-8, potential impacts related to interference with the movement of migratory fish or terrestrial wildlife would be *less than significant with mitigation*.

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

The project site lies within the South County Inland Planning Area, in the South San Luis Obispo Sub-area and well outside of the City of San Luis Obispo Urban Reserve Line. There are no combining designations related to biological resources associated with the site. No conflicts of the proposed project were noted within the Agriculture land use category for the South County Area Plan within The Area Plans.

No oak trees are proposed removal. Overall, the project will have *no impact* relating to a conflict with local regulations protecting biological resources such as trees.

(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?

The project site is not located within an area subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with the provisions of an adopted plan and there would be *no impact.*

Conclusion

Potential impacts to biological resources are considered *less than significant with mitigation*.

Mitigation

BIO-1 Site Maintenance and General Operations - The following measures are required to minimize impacts during active construction and ongoing operations. All measures applicable during construction shall be included on project plans. All measures applicable to operation shall be clearly posted on-site in a location(s) visible to workers and anyone visiting the site:

- All work activities shall be completed during daylight hours (between sunrise and sunset) and outside of rain events.
- The Project impact area shall be clearly marked or delineated with stakes, flagging, tape, or signage prior to work. Areas outside of work limits shall be considered environmentally sensitive and shall not be disturbed.
- All equipment and vehicles shall be checked and maintained daily to prevent spills of fuel, oil, and other hazardous materials. A designated staging area shall be established for vehicle/equipment parking and storage of fuel, lubricants, and solvents. All fueling and maintenance activities shall take place in the staging area.

- 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 (e.g., t-posts and yellow rope) and/or flagging. No work or travel shall occur outside these limits.
- Project plans, drawings, and specifications shall show the boundaries of all work areas on site and the location of erosion and sediment controls, limit delineation, and other pertinent measures to ensure the protection of sensitive habitat areas and associated resources.
- Staging of equipment and materials shall occur in designated areas at least 100 feet from aquatic habitat (e.g., swales, drainages, ponds, vernal pools, if identified on site).
- 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. Sandbags and/or absorbent pads and spill control kits shall always be available on site to clean up and contain fuel spills and other contaminants.
- Construction equipment shall be inspected by the operator daily to ensure that equipment is in good working order and no fuel or lubricant leaks are present.
- Plastic monofilament netting (erosion control matting) or similar material will not be used on site due to the potential to entangle special-status wildlife. Acceptable substitutes are coconut coir matting, biodegradable fiber rolls, or tackified hydroseeding compounds.
- The use of pesticides (including rodenticides) and herbicides on the property shall be in compliance with all local, state, and federal regulations to avoid primary and secondary poisoning of sensitive species that may be using the site.
- After completion of the project's construction, all protective fencing/flagging used to delineate sensitive biological resources shall be removed from the project area and disposed of in appropriate waste receptacles or reused.

BIO-2 **Prior to issuance of grading permits**, the applicant shall provide evidence to the County that either no jurisdictional areas will be impacted or that any necessary authorizations from the United States Army Corps of Engineers, State Water Resource Control Board, and/or California Department of Fish and Wildlife have been issued.

BIO-3 **Protection of Jurisdictional Waters.** In addition to BIO-2, HAZ-1 and HAZ-2, the following recommendations are provided to protect drainages and aquatic resources from indirect impacts.

- Project construction shall comply with County Code Title 19.11 Stormwater Management.
- A minimum 50-foot setback from the top of bank or upland edge of any potentially jurisdictional wetland or water shall be maintained during all phases of construction and operation, unless a County-qualified biologist verifies that activities within the setback would not result in impacts to jurisdictional resources. The setback buffer shall be clearly demarcated

in project plans and protected with temporary fencing during construction. No grading, trenching, or equipment staging shall occur within this buffer unless it has been demonstrated, to the satisfaction of the County-qualified biologist, that such activities would not impact jurisdictional resources, or unless agency review and approval has been obtained. If impacts to jurisdictional resources are identified, the applicant shall obtain all applicable resource agency permits (e.g., CDFW, RWQCB, and USACE).

- Construction activity within 100 feet of drainages shall occur only when conditions are dry.
- To prevent erosion and sedimentation into jurisdictional waters during construction, an erosion and sedimentation control plan shall be developed and implemented which shall outline Best Management Practices for temporary stabilization. Acceptable stabilization methods include the use of weed-free, natural fiber (i.e., non-monofilament) rolls, jute or coir netting, and/or other industry standard materials. Erosion control devices shall be installed and maintained for the duration of the project.
- Install protective fencing or similar around the mapped valley needlegrass grassland community to ensure no inadvertent impacts during construction activities such as overland travel, grading, or staging of equipment and materials.

BIO-4 Other Agency Permits. The applicant acknowledges that state or federal permits may be needed from one or more of the following resource agencies: California Department of Fish and Wildlife, U.S. Fish & Wildlife Service, Army Corps of Engineers, for construction activities including grading, road improvement, or maintenance work involving any riparian area or drainage feature. Where required, the Applicant shall obtain a Section 404 Nationwide Permit from USACE, a Section 401 Water Quality Certification from RWQCB, and a Section 1602 Streambed Alteration Agreement from CDFW to authorize project-related impacts in all areas potentially under the jurisdiction of these regulatory agencies and provide satisfactory evidence to the County, as follows:

A. Prior to initiating ground-disturbing activity, the applicant shall provide to the County, for each of these resource agencies, that either a) evidence that a permit was not necessary, or b) a copy of the required permit(s). When such permits are required, the County shall review the permit(s) for consistency with County measures prior to issuance or start of construction. All applicable field requirements of the agency permit(s) shall be shown on applicable construction drawings and adhered to during construction.

B. The following measures would apply where waters of the U.S. or waters of the State cannot be avoided:

1) Based on final site designs, the applicant shall confirm with a qualified biologist, or from the Corps, that a Clean Water Act (CWA) Section 404 permit will not be required for activities within the East Coral de Piedra Creek riparian habitat. Assuming a Corps permit is not required, RWQCB compliance will need to occur via the Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the U.S. Army Corps of Engineers to be Outside of Federal Jurisdiction (Water Quality Order No. 2004-0004-DWQ).

2) If the project design requires fill within waters of the U.S., the applicant shall obtain and implement all the terms and conditions of a Corps Nationwide Permit to the satisfaction of

the Corps. Compliance with Corps regulatory permitting would also include obtaining and CWA 401 Water Quality Certification from the RWQCB that would satisfy approval of work in California waters of the State.

3) The applicant shall obtain Section 1600 regulatory compliance from CDFW, in the form of a Streambed Alteration Agreement or written verification that no agreement is required, for any project-related impacts to jurisdictional streams, riparian habitats, or other regulated waters.

4) Compensatory mitigation may be required to be implemented on-site at a minimum ratio of 3:1 to offset permanent impacts to jurisdictional riparian habitat (note resource agencies may require a higher ratio). A mitigation and monitoring plan shall be prepared by a biologist familiar with restoration and mitigation techniques as part of the permit application packages. The plan shall include, but not be limited to the following components:

- Description of the project/impact site
- Goal(s) of the compensatory mitigation project
- Description of the proposed compensatory mitigation-site
- Implementation plan for the compensatory mitigation-site
- Maintenance activities during the monitoring period
- Monitoring plan for the compensatory mitigation-site
- Success criteria and performance standards
- Reporting requirements
- Contingency measures and funding mechanisms
- Erosion control and landscaping specifications included in the mitigation plan shall allow only natural-fiber, biodegradable meshes and coir rolls, to prevent impacts to the environment and to prevent entrapment of wildlife.

BIO-5 Preconstruction Survey for Roosting Bats. Within seven days prior to the start of work on existing buildings or structures, a County-approved qualified biologist shall survey the building for evidence of roosting bats. Any potentially suitable roost sites shall be monitored by the qualified biologist during the evening to determine whether bats leave for foraging. The roost sites should be monitored from at least one hour before sunset, and viewed with the aid of binoculars. The qualified biologist shall determine whether a maternity roost is present by carefully observing individuals on the roost. If any young are present, construction shall be delayed until they have matured and can fly on their own. When it has been determined that no young are present, the biologist shall monitor the roost in the evening when the bats leave to forage and then install bat exclusion netting or similar material to prevent their return. The netting shall be inspected the following morning to ensure that no bats have become entangled in the netting and that none remain at the roost site. The netting shall remain in place until the trees and shed are removed. The qualified biologist shall monitor the removal of any vegetation in which bat exclusion netting has been placed. If any bats

are found, work shall be halted until measures are taken to effectively relocate the bats or allow them to leave the site on their own volition.

BIO-6. **Bat eviction plan**. If a bat roost is detected during the maternal season, a minimum 50- foot no-disturbance buffer will be maintained. For roosts that require removal during the non-material season, a one-way valve will be placed over the occupied access point to allow bats to safely leave and prohibit reentry.

BIO-7 **Pre-construction survey for American Badger**. A pre-construction survey shall be conducted within thirty days of beginning work on unpaved ranch roads to identify if badgers are using these areas. The results of the survey shall be sent to the project manager and the County of San Luis Obispo. If the pre-construction survey finds potential badger dens, they shall be inspected to determine whether they are occupied. The survey shall cover the entire Study Area and shall examine both old and new dens. If potential badger dens are too long to completely inspect from the entrance, a fiber optic scope shall be used to examine the den to the end. Inactive dens may be excavated by hand with a shovel to prevent reuse of dens during construction. If badgers are found in dens on the Property between February and July, nursing young may be present. To avoid disturbance and the possibility of direct take of adults and nursing young, and to prevent badgers from becoming trapped in burrows during construction activity, no grading shall occur within 100 feet of active badger dens between February and July. Between July 1st and February 1st all potential badger dens shall be inspected to determine if badgers are present. During the winter badgers do not truly hibernate but are inactive and asleep in their dens for several days at a time. Because they can be torpid during the winter, they are vulnerable to disturbances that may collapse their dens before they rouse and emerge. Therefore, surveys shall be conducted for badger dens throughout the year. If badger dens are found within the Study Area during the pre-construction survey, the CDFW wildlife biologist for the area shall be contacted to review current allowable management practices.

Construction activities shall not commence within the exclusion area until the badger has moved of its own accord. A preconstruction survey letter report shall be submitted to the lead agency for review within one week after completion of the survey.

BIO-8 **Preconstruction survey for nesting or migratory birds**. Within one week of ground disturbance activities, if work occurs between March 1 and August 30, nesting bird surveys shall be conducted to determine whether yellow-billed magpie or other bird species protected under the MBTA are nesting within or adjacent to the construction zone. If surveys do not locate nesting birds, construction activities may be conducted. If nesting birds are located, no construction activities shall occur within 100 feet of nests until chicks are fledged. A pre-construction survey report shall be submitted to the lead agency immediately upon completion of the survey. The report shall detail appropriate fencing or flagging of the buffer zone and make recommendations on additional monitoring requirements. A map of the Project site and nest locations shall be included with the report. The Project biologist conducting the nesting survey shall have the authority to reduce or increase the recommended buffer depending upon site conditions.

BIO-9 **Preconstruction Survey and Monitoring for Special-status Reptiles.** A qualified biologist shall conduct a preconstruction survey of roadway work on unpaved ranch roads immediately prior to the start of work within 50 feet of suitable habitat for western pond turtle. The scope of the survey

shall be determined by a qualified biologist and shall be sufficient to determine presence or absence in the project areas. Construction monitoring shall also be conducted by a qualified biologist during all initial ground disturbing and vegetation removal activities (e.g., grading, grubbing, vegetation trimming, or vegetation removal including tree removal) within suitable habitat. With approval from CDFW, if pond turtles are discovered during surveys and monitoring, they will be hand captured and relocated to suitable habitat outside the area of impact. If the focused survey results are negative, a letter report shall be submitted to the County, and no further action shall be required. If legless lizards or pond turtle are found to be present in the proposed work areas the following steps shall be taken:

- Pond turtle shall be captured by hand by the project biologist and relocated to an appropriate location well outside the project areas.
- Construction monitoring shall be required for all new ground-breaking activities located within pond turtle habitat.

BIO-10 Preconstruction Survey and Monitoring for Western Spadefoot Toad, California Red-Legged Frog and Habitat for Vernal Pool Fairy Shrimp. A qualified biologist shall conduct a preconstruction survey immediately prior to the start of work within 50 feet of suitable habitat for western spadefoot toad and CRLF and to determine if suitable habitat exists for vernal pool fairy shrimp. Construction monitoring shall also be conducted by a qualified biologist during all initial ground-disturbing and vegetation removal activities (e.g., grading, grubbing, vegetation trimming, or vegetation removal) within suitable habitat. If western spadefoot toad are discovered during surveys and monitoring, they will be hand captured and relocated to suitable habitat outside the area of impact. If CRLF are detected within the drainage and out of harm's way, a biological monitor shall monitor all initial disturbance activities within 50 feet of suitable habitat. If CRLF or suitable habitat for vernal pool fairy shrimp is found within any of the areas planned for disturbance, work shall cease and the USFWS shall be contacted for guidance on how to proceed. No work shall occur until receipt of authorization to proceed from the USFWS.

Prior to commencement of clearing, grading, construction, or improvement activities, the applicant shall make all efforts to schedule work activities when impacts to CRLF would be minimal. This includes the following:

a. If work must occur in the rainy season (October 15–April 15), no work shall occur during or within 48 hours after rain events of 0.25 inch or greater.

b. A follow-up CRLF survey shall be conducted prior to the start of work following any rain event of 0.25 inch or greater.

c. Avoid nighttime work during all seasons. If nighttime work is deemed necessary, a qualified biologist shall be on-site until it is determined that no potential impacts to CRLF would occur based on conditions and the scope of work.

Sources

Initial Study – Environmental Checklist

Provided in Exhibit A.

V. CULTURAL RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
(b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☐	☒
(c)	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Setting

San Luis Obispo County possesses a rich and diverse cultural heritage and has an abundance of historic and prehistoric cultural resources dating as far back as 9,000 B.C. The County protects and manages cultural resources in accordance with the provisions detailed by CEQA and local ordinances.

As defined by CEQA, a historical resource includes:

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

The COSE identifies and maps anticipated culturally sensitive areas and historic resources within the county and establishes goals, policies, and implementation strategies to identify and protect areas, sites, and buildings having architectural, historical, Native American, or cultural significance.

Discussion

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

The existing single family residences and associated equestrian facilities were constructed over the past 50 years and are not considered eligible for designation as historic resources. The project site is not associated with historic resources or events and is not subject to the Historic Site (H) combining designation. The areas proposed for temporary events do not contain other structures of historic age (50 years or older) that could be potentially significant as a historical resource. Therefore, the project would result in *no impacts* associated with an adverse change in the significance of a historical resources.

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

The project site is not subject to the Archaeology combining designation. The areas proposed for temporary events are developed and no additional grading or construction will take place except for minor roadway improvements along the Greengate Road right of way. These areas do not contain resources typically associated with native peoples.

Therefore, there would be *no impacts* related to a substantial adverse change in the significance of archaeological resources.

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

No new buildings are proposed; however, modifications to existing structures will be necessary to provide ADA compliant restrooms for indoor events and to satisfy current building and fire codes. Minor improvements are also required to existing ranch roads to meet access standards for emergency vehicles. Based on existing conditions, buried human remains are not expected to be present in the area proposed for driveway improvements. In the event of an accidental discovery or recognition of any human remains, California State Health and Safety Code Section 7050.5 and LUO 22.10.040 (Archaeological Resources) require that no further disturbances shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. With adherence to State Health and Safety Code Section 7050.5 and County LUO, impacts related to the unanticipated disturbance of archaeological resources and human remains would be reduced to less than significant; therefore, potential impacts would be *less than significant.*

Conclusion

No historical resources are known or expected to occur within or adjacent to the areas proposed for development. Adherence with County LUO standards and State Health and Safety Code procedures would reduce potential impacts. Accordingly, impacts related to a substantial adverse change in the significance of archaeological resources would be *less than significant*.

Mitigation

None required.

Sources

Provided in Exhibit A.

VI. ENERGY

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

Setting

Local Utilities

The Pacific Gas & Electric Company (PG&E) is the primary electricity provider for urban and rural communities within San Luis Obispo County. Approximately 31% of electricity provided by PG&E is sourced from renewable sources and an additional 43% is sourced from non-renewable GHG-free resources (PG&E 2020).

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

The Southern California Gas Company (SoCalGas) is the primary provider of natural gas for urban and rural communities within San Luis Obispo County. SoCalGas has committed to replacing 20% of its traditional natural gas supply with renewable natural gas by 2030 (Sempra 2019).

Local Energy Plans and Policies

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

State Building Code Requirements

The California Building Code (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 are referred to as the *2025 Building Energy Efficiency Standards*. These standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to the exterior and vice versa), residential and nonresidential ventilation requirements, and non-residential lighting requirements.

Vehicle Fuel Economy Standards

In October 2012, the U.S. Environmental Protection Agency (EPA) and the National Highway Traffic Safety Administration (NHSTA), on behalf of the Department of Transportation, issued final rules to further reduce GHG emissions and improve corporate average fuel economy (CAFE) standards for light duty vehicles for model years 2017 and beyond. NHTSA's CAFE standards have been enacted under the Energy Policy and Conservation Act since 1978. This national program requires automobile manufacturers to build a single light-duty national fleet that meets all requirements under both federal programs and the standards of California and other states. This program would increase fuel economy to the equivalent of 54.5 miles per gallon (mpg) limiting vehicle emissions to 163 grams of carbon dioxide (CO_2) per mile for the fleet of cars and light-duty trucks by the model year 2025.

As part California's overall approach to reducing pollution from all vehicles, the California Air Resources Board (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 Greenhouse Gas (GHG) missions 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, the Advanced Clean Cars II rule, establishes a year-by-year roadmap so that by 2035 100% of new cars and light trucks sold in California will be zero-emission vehicles, including plug-in hybrid electric vehicles. The regulation realizes and codifies the light-duty vehicle goals set forth in Governor Newsom's Executive Order N-79-20.

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 percent fewer global warming gases and 75 percent fewer smog-forming emissions than the statewide fleet in 2016 (CARB 2016).

All self-propelled off-road diesel vehicles 25 horsepower (hp) or greater used in California and most two-engine vehicles (except on-road two-engine sweepers) are subject to the CARB's Regulation for In-Use Off-Road Diesel Fueled Fleets (Off-Road regulation). This includes vehicles that are rented or leased (rental or leased fleets). The overall purpose of the Off-Road regulation is to reduce emissions of oxides of nitrogen

(NO_x) and particulate matter (PM) 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. The California Building Code (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.

Discussion

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

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

Construction Activities

No new buildings are proposed; however, modifications to existing structures will be necessary to provide ADA compliant restrooms for indoor events and to satisfy current building and fire codes. Minor improvements are also required to existing ranch roads to meet access standards for emergency vehicles. Construction related energy use is expected to be *less than significant*.

Project Operations

Electricity and Natural Gas Use. There are four single family residences associated with the project site along with a barn and equestrian facilities. The project's operational electricity needs for temporary events, such as lighting and amplified music or speech, would be met by a connection to PG&E infrastructure. Natural gas is provided by PG&E or on-site propane service. However, food associated with temporary events would be prepared elsewhere and brought to the site or cooked outdoors.

The CBC 2022 Building Energy Efficiency Standards include mandatory energy efficiency standards. However, no new buildings are proposed. Modifications to existing structures will be necessary to provide ADA compliant restrooms for indoor events and to satisfy current building and fire codes. Minor improvements are also required to existing ranch roads to meet access standards for emergency vehicles.

Therefore, project impacts associated with wasteful, inefficient, or unnecessary electricity and natural gas use are considered *less than significant* and *less than cumulatively considerable*.

Fuel Use. Ongoing temporary events would result in fuel use associated with motor vehicle trips to and from the project site. All vehicles used by guests and caterers/vendors would be subject to applicable state and federal fuel economy standards and State-mandated smog inspections.

Based on adherence to applicable state and federal vehicle fuel regulations and the size and scope of proposed activities, project fuel use would not result in a potentially significant environmental impact and would not be wasteful, inefficient, or unnecessary.

Therefore, potential impacts associated with potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources and potential conflict with state or local plans regarding renewable energy or energy efficiency would be *less than significant.* and *less than cumulatively considerable.*

Initial Study – Environmental Checklist

Conclusion

The project would not result in a potentially significant energy demand and inefficient energy use during long-term operations that would be considered wasteful, inefficient and unnecessary. Potential impacts related to energy would be *less than significant* and *less than cumulatively considerable*.

Mitigation

None are required.

Sources

Provided in Exhibit A.

Initial Study – Environmental Checklist

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
(ii) Strong seismic ground shaking?	☐	☐	☒	☐
(iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
(iv) Landslides?	☐	☐	☐	☒
(b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
(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?	☐	☐	☐	☒
(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?	☐	☐	☐	☒
(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?	☐	☐	☐	☒

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		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

Setting

The Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) is a California state law that was developed to regulate development near active faults and mitigate the surface fault rupture potential and other hazards. The Alquist-Priolo Act identifies active earthquake fault zones and restricts the construction of habitable structures over known active or potentially active faults. San Luis Obispo County is located in a geologically complex and seismically active region. The Safety Element of the County of San Luis Obispo General Plan identifies three active faults that traverse through the county and are currently zoned under the Alquist-Priolo Act: the San Andreas, the Hosgri-San Simeon, and the Los Osos.

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

Known faults and fault systems within the region that potentially could generate earthquakes affecting the site include the Oceanic-West Huasna, Rinconada, Hosgri-San Simeon, Los Osos and San Andreas faults (USGS 2013). Other unknown faults may exist in the region and movement on any of these faults could affect the proposed development during its design life. The nearest potentially capable fault line is the Lopez Reservoir section of the Los Osos Fault located about 0.5 miles to the west.

The project site is not within an area subject to the Geologic Study Area (GSA) combining designation which identifies areas where geologic and soil conditions could present new developments and/or their occupants with potential hazards to life and property. Based on the Safety Element, the project site is not located in an area subject to landslide risk and has a low potential for liquefaction.

Discussion

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

(a-i) *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

No new buildings are proposed; however, modifications to existing structures will be necessary to provide ADA compliant restrooms for indoor events and to satisfy current building and fire codes. Minor improvements are also required to existing ranch roads to meet access standards for emergency vehicles. However, there are no Alquist-Priolo zones associated with the project site or vicinity. Improvements to existing buildings are required to comply with the most recent version of

the CBC. Therefore, there would be *no impact* associated with potential impacts related to the rupture of a known earthquake fault.

(a-ii) Strong seismic ground shaking?

Groundshaking refers to the motion that occurs in response to local and regional earthquakes. Seismic groundshaking is influenced by the proximity of the site to an earthquake fault, the intensity of the seismic event, and the underlying soil composition.

The majority of temporary events will take place outdoors. Indoor events will occur in a building that will be improved to comply with current building codes, including those relating to seismic safety. Therefore, the project would not expose people or structures to significant increased risks associated with seismic ground shaking and impacts would be *less than significant.*

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

Based on the Safety Element Liquefaction Hazards Map, the project site is located in an area with low potential for liquefaction. However, no new buildings are proposed; modifications to existing structures will be necessary to provide ADA compliant restrooms for indoor events and to satisfy current building and fire codes. Minor improvements are also required to existing ranch roads to meet access standards for emergency vehicles. All of these improvements will be subject to compliance with the CBC. Therefore, there would be *no impact* associated with seismic-related ground failure, including liquefaction.

(a-iv) Landslides?

No new buildings are proposed; however, modifications to existing structures will be necessary to provide ADA compliant restrooms for indoor events and to satisfy current building and fire codes. Minor improvements are also required to existing ranch roads to meet access standards for emergency vehicles. All of these improvements will be subject to compliance with the CBC. Therefore, there would be *no impact* associated with landslides.

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

Road improvements may result in the erosion of surface soils which could produce sedimentation of surrounding surface water bodies.

Section 22.51.120 of the LUO requires any project that would change the runoff volume or velocity leaving any point of the site, resulting in an impervious surface of more than 20,000 square feet, or involve hillside development on slopes steeper than 10 percent to prepare and implement a sedimentation and erosion control plan. LUO Section 22.51.120 includes requirements for specific erosion control materials and states that Best Management Practices (BMPs) shall be employed to control sedimentation and erosion. These mandatory BMPs are set forth in LUO Section 22.52.150 B. and C. Compliance with these mandatory BMPs will ensure water quality is protected from potential impacts associated with the construction and occupancy of the project.

The project will be conditioned to comply with relevant erosion control requirements of the LUO and to provide dust control as needed for events. Mitigation measure BIO-3 requires the project to incorporate measures to protect potential jurisdictional waters from the effects of erosion and sedimentation associated with project construction activities. Lastly, the regulations governing temporary events set forth in LUO section 22.30.610 E. allows the review authority to require the temporary event to post a bond or cash deposit to guarantee site restoration after use.

Upon implementation of BMPs required by the LUO as well as mitigation measure BIO-3, impacts related to soil erosion would be *less than significant with mitigation*.

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

As discussed above under item a-iv, based on the Safety Element Landslide Hazards Map, the project site is located in an area with a low landslide risk. Based on the Safety Element and U.S. Geological Survey (USGS) data, the project is not located in an area of historical or current land subsidence (USGS 2019) and is located in an area with low potential for liquefaction. However, the project does not involve any grading or new construction except for improvements to existing buildings to satisfy current building and fire codes. Therefore, there would be *no impact* associated with an unstable geologic unit.

(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?

No new buildings are proposed; however, modifications to existing structures will be necessary to provide ADA compliant restrooms for indoor events and to satisfy current building and fire codes. Minor improvements are also required to existing ranch roads to meet access standards for emergency vehicles. All of these improvements will be subject to compliance with the CBC. Therefore, there would be *no impact* associated with expansive soils.

(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?

Wastewater will be provided by temporary toilets brought to the site and serviced regularly. Indoor events will be served by new ADA compliant restrooms provided in the existing barn and served by an existing septic system. The project will be conditioned to demonstrate the adequacy of the existing septic system through compliance with the County's Local Agency Management Program (LAMP) as set forth in County Ordinance 19.07.Therefore, there would be *no impact* associated with soils incapable of adequately supporting the use of septic tanks.

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

No new buildings are proposed; however, modifications to existing structures will be necessary to provide ADA compliant restrooms for indoor events and to satisfy current building and fire codes. Minor improvements are also required to existing ranch roads to meet access standards for emergency vehicles. Therefore, there would be *no impact* to paleontological resources would be *less than significant.*

Conclusion

No new buildings are proposed; however, modifications to existing structures will be necessary to provide ADA compliant restrooms for indoor events and to satisfy current building and fire codes. Minor improvements are also required to existing ranch roads to meet access standards for emergency vehicles. With implementation of mitigation measure BIO-3 along with compliance with LUO requirements for erosion and sedimentation control, and compliance with the CBC will impacts associated with geology and geologic hazards would be *less than significant with mitigation*.

Initial Study – Environmental Checklist

Mitigation

Implement mitigation measure BIO-3.

Sources

Provided in Exhibit A.

VIII. GREENHOUSE GAS EMISSIONS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
(b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Setting

Greenhouse gasses (GHGs) are any gases that absorb infrared radiation in the atmosphere. The primary GHGs that are emitted into the atmosphere as a result of human activities are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. These are most commonly emitted through the burning of fossil fuels (oil, natural gas, and coal), agricultural practices, decay of organic waste in landfills, and a variety of other chemical reactions and industrial processes (e.g., the manufacturing of cement). Carbon dioxide (CO_2) is the most abundant GHG and is estimated to represent approximately 80–90% of the principal GHGs that are currently affecting the earth's climate. According to the California Air Resources Board (CARB), transportation (vehicle exhaust) and electricity generation are the main sources of GHGs in the state.

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

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

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

The initial Scoping Plan was first approved by CARB on December 11, 2008, and is updated every 5 years. The first update of the Scoping Plan was approved by the CARB on May 22, 2014, which looked past 2020 to set mid-term goals (2030–2035) toward reaching the 2050 goals. An update to the Scoping Plan was released 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 Final 2022 Scoping Plan Update – Achieving Carbon Neutrality by 2045 lays out a path to achieve targets for carbon neutrality and reduce anthropogenic greenhouse gas emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279.

When assessing the significance of potential impacts for CEQA compliance, an individual project's GHG emissions will generally not result in direct significant impacts because the climate change issue is global in nature. However, an individual project could be found to contribute to a potentially significant cumulative impact. Projects that have GHG emissions above the noted thresholds may be considered cumulatively considerable and require mitigation. Accordingly, in March 2012, the SLOAPCD approved thresholds for GHG impacts which were incorporated into their 2012 CEQA Air Quality Handbook. The Handbook recommended applying a 1,150 $MTCO_2e$ per year Bright Line Threshold for commercial and residential projects and included a list of general land uses and estimated sizes or capacities of uses expected to exceed this threshold. According to the SLOAPCD, this threshold was based on a 'gap analysis' and was used for CEQA compliance evaluations to demonstrate consistency with the state's GHG emission reduction goals associated with AB32 and the 2008 Climate Change Scoping Plan which have a target year of 2020. However, in 2015, the California Supreme Court issued an opinion in the case of *Center for Biological Diversity vs California Department of Fish and Wildlife* ("Newhall Ranch") that determined that AB 32 based thresholds derived from a gap analysis are invalid for projects with a planning horizon beyond 2020. Since the bright-line and service population GHG thresholds in the Handbook are AB 32 based, and project horizons are now beyond 2020, the SLOAPCD no longer recommends the use of these thresholds in CEQA evaluations.

In 2023, the SLOAPCD released an update to these thresholds with their *2023 Administrative Update Version to APCD Board Adopted April 2012 Version*. These updated thresholds were developed by creating updated GHG emissions inventories for 2005 and 2018 for the incorporated cities and unincorporated areas in SLO county to consider whether jurisdictions were on track with the AB 32 GHG reduction target. Then, target GHG emissions for SLO county in 2020, 2030, and 2045 were calculated to be consistent with reduction targets specified in AB 32, SB 32, and AB 1279. Thresholds for the years in between those evaluated were linearly interpolated, and annual GHG efficiency thresholds were adjusted to factor in GHG reductions needed for new development using information from the City of SLO's 2020 qualified Climate Action Plan's Appendix C – CEQA GHG Emissions Thresholds and Guidance. A project's initial operating year should be used to determine which of the updated GHG Bright Line Thresholds for new residential, commercial, and mixed-use development is applicable to the project. For projects with an initial operating year of 2030 or earlier, GHG emissions at or below the applicable threshold for that year are contributing to the state's SB 32 GHG reduction target. For projects with an initial operational year after 2030, GHG emissions at or below the applicable threshold for that year are contributing to the state's AB 1279 target of reaching carbon neutrality by 2045. Table 5 shows the GHG Bright-Line Thresholds for projects with an initial operating year between 2023 and 2030.

Table 5 -- San Luis Obispo County Bright-Line CEQA GHG Thresholds Between 2023 and 2030 for Residential, Commercial, and Mix-use Development Projects

Year	2023	2024	2025	2026	2027	2028	2029	2030
GHG Bright-Line Thresholds (MT/Yr)	980	930	880	830	780	740	690	650

If the lead agency determines that a proposed project's operational phase GHG emissions are below the applicable threshold, then the project's GHG impacts would be deemed less than significant and consistent with state and local GHG reduction goals.

EnergyWise Plan

The County Energy Wise Plan (EWP) identifies changes that could occur in the County as a result of climate change, provides an inventory of GHG emissions in the County, and establishes a GHG emissions forecast and reduction targets for the County. This plan identifies strategies to reduce the county's GHG emissions by 15% below the baseline year of 2006 by the year 2020. This goal is consistent with Assembly Bill 32. The inventory denotes municipal and community-wide emissions caused by a range of activities in 2006, including transportation, waste, agriculture, energy, and aircraft-related activities. The EWP includes an Implementation Program that provides a strategy for action with specific measures and steps to achieve the identified GHG reduction targets including, but not limited to, the following:

- Encourage new development to exceed minimum Cal Green requirements;
- Require a minimum of 75% of nonhazardous construction and demolition debris generated on site to be recycled or salvaged;
- Continue to implement strategic growth strategies that direct the county's future growth into existing communities and to provide complete services to meet local needs;
- Continue to increase the amount of affordable housing in the County, allowing lower-income families to live closer to jobs and activity centers, and providing residents with greater access to transit and alternative modes;
- Reduce potable water use by 20% in all newly constructed buildings by using the performance method provided in the California Green Building Code;
- Require use of energy-efficient equipment in all new development;
- Minimize the use of dark materials on roofs by requiring roofs to achieve a minimum solar reflectivity index of 10 for high-slope roofs and 68 for low-slope roofs; and
- Use light-colored aggregate in new road construction and repaving projects adjacent to existing cities.

In 2016 the County published the EnergyWise Plan 2016 Update, which describes changes and modifications to the EnergyWise plan. These modifications include a summary of the progress made toward implementing measures in the 2011 EWP, overall trends in energy use and emissions since the baseline year of the inventory (2006), and the addition of implementation measures intended to provide a greater understanding of the County's emissions status.

Discussion

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

The project does not involve any new construction except for improvements to existing buildings and ranch roads to satisfy current building and fire codes. Temporary events would result in energy use for electricity and motor vehicle use that would be temporary and limited to 90 total events per year. Greenhouse gas emissions associated with construction and temporary events are expected to fall well below 830 MMTCO2e per year assuming the evnts program is implemented in 2026. Therefore, potential impacts associated with GHG emissions would be *less than significant* and *less than cumulatively considerable*.

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

Energy inefficiency contributes to higher GHG emissions which in turn may conflict with the following state and local plans for energy efficiency. Moreover, no new grading or buildings are proposed. Therefore, there would be *no impact* associated with a conflict with an applicable GHG reduction plan.

Conclusion

GHG emissions would be *less than significant and less than cumulatively considerable* and consistent with plans adopted to reduce GHG emissions.

Mitigation

None are required.

Sources

Provided in Exhibit A.

IX. HAZARDS AND HAZARDOUS MATERIALS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
(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?	☐	☒	☐	☐
(c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
(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?	☐	☐	☐	☒
(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?	☐	☐	☐	☒
(f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
(g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☒	☐	☐

Initial Study – Environmental Checklist

Setting

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

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

The California Health and Safety Code provides regulations pertaining to the abatement of fire-related hazards and requires that local jurisdictions enforce the CBC, which provides standards for fire resistive building and roofing materials, and other fire-related construction methods. The Safety Element of the County of San Luis Obispo General Plan provides a Fire Hazard Zones Map identifies areas of the unincorporated areas in the county within moderate, high, and very high fire hazard severity zones. The project is located within a local fire responsibility area and is not designated with fire hazard severity zone. Based on the Safety Element map of response times, it would take 5 minutes to respond to a call regarding fire or life safety. For more information about fire-related hazards and risk assessment, see Section XX, Wildfire.

The SanLuis Obispo Regional Airport is located about 2.5 miles to the north; although the northerly portion of the project site is located within the area subject to the Airport Review Area Combining Designation, no part of the project site is located within the area governed by the San Luis Obispo County Regional Airport Land Use Plan.

Discussion

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

Construction activities associated improvements to existing buildings and ranch roads may involve the use of oils, fuels, and solvents. In the event of a leak or spill, persons, soil, and vegetation down-slope from the site may be affected. The use, storage, and transport of hazardous materials is regulated by DTSC (22 Cal. Code of Regulations Section 66001, et seq.). The use of hazardous materials on the project site for construction and maintenance is required to be in compliance with local, state, and federal regulations. In addition, compliance with best management practices (BMPs) for the use and storage of hazardous materials would also address impacts. These BMPs may include, but are not limited to, the following:

- Determining whether a product constitutes a hazardous material in accordance with federal and state regulations;
- Properly characterizing the physical properties, reactivity, fire and explosion hazards of the various materials;
- Using storage containers that are appropriate for the quantity and characteristics of the materials;
- Properly labeling of containers and maintaining a complete and up to date inventory;

- Ongoing inspection and maintenance of containers in good condition;
- Proper storage of incompatible, ignitable and/or reactive wastes;

Project operations would involve the intermittent use of small amounts of household hazardous materials such as fertilizer and pesticides that are not expected to be acutely hazardous.

Mitigation measures HAZ-1 and HAZ-2 require the project to comply with all applicable fire protection standards as determined by CAL FIRE, including, but not limited to, preparation of a fire safety plan and the provision of emergency access. All emergency access roads must be improved to CalFire standards with an all-weather surface capable of supporting apparatus that weighs 75,000 pounds and must be a minimum 20 feet in width with a 4 foot shoulder.

Compliance with the Uniform Fire Code and the recommendations of CalFIRE will ensure that potential impacts associated with hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials would be *less than significant with mitigation.*

(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?

The project will require roadway improvements to existing ranch roads and buildings to meet current building codes. Oils, gasoline, lubricants, fuels, and other potentially hazardous substances would be used and temporarily stored onsite during construction activities. A spill or leak of these materials under accident conditions during construction activities could create a potentially significant hazard to the surrounding environment, including the ephemeral drainage that parallels Greengate Road. Mitigation measures HAZ-1 and HAZ-2 have been recommended to reduce potential impacts associated with upset or accident conditions during project construction.

Through required compliance with these standards and mitigation measures, potential operational hazards associated with the use of ethanol onsite would be effectively minimized. Therefore, potential impacts associated with hazards to the public or the environment through reasonably foreseeable upset or accident conditions would be *less than significant with mitigation.*

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

The closest school is located approximately1.5 miles northwest of the project site. Therefore, the project site is not located within 0.25 miles of an existing or proposed school; therefore, *no impacts* would occur.

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

Based on the California DTSC's Envirostor and SWRCB's GeoTracker, the proposed project site is not listed on, nor is it located in close proximity to, a site listed on the Cortese List, which is a list of hazardous materials sites compiled pursuant to CGC Section 65962.5; 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 nearest airstrip in proximity to the project site is the San Luis Obispo Regional Airport located approximately 2.5 miles to the north. Although the northerly portion of the project site is located within the area subject to the Airport Review Area Combining Designation, no part of the project site is located within the area governed by the San Luis Obispo County Regional Airport Land Use Plan. Therefore, the project site is not located within or adjacent to an airport land use plan or within 2 miles of a public airport or private airstrip; therefore, *no impacts* would occur.

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

The project would not impair implementation or physically interfere with County hazard mitigation or emergency plans; therefore, impacts would be *less than significant.*

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

The project site is not located in a Fire Hazard Severity Zone and has not been subject to a wildfire since at least 1950. The project proposes up to 90 total events per year with a maximum of 250 guests per event. Event guests could be subjected to direct and indirect risk associated with a wildfire on the project site, or a fire originating on other properties in the vicinity.

It is expected that event guests and temporary workers would use Greengate Road to access the project site. Three secondary access roads are proposed (Figure 4) to ensure guests may safely exit the site in the event of an emergency. One route will travel north from the Villa outdoor event area on an existing unpaved ranch road (Area 3) then southwest adjacent to East Corral de Piedra Creek to the existing equestrian area where it turns south to the parking and staging area. A second emergency access will be established that travels southeast from the terminus of Greengate Road on an unpaved ranch road within an easement associated with APN 044-233-009, then turns south to Corbett Canyon Road along an easement affecting two adjacent parcels associated with the Greengate Ranch and Vineyard. A third emergency access will be established that travels southeast along the westerly boundary of APN 044-161-007 to an existing unimproved ranch road that crosses APN 044-233-009 to the access easement along the property line shared with the Greengate Ranch and Vineyards site.

Mitigation measure HAZ-3 requires the project to implement all required emergency access improvements as determined by CalFire. More specifically, all emergency access roads must be improved with an all-weather surface capable of supporting apparatus that weighs 75,000 pounds and must be a minimum 20 feet in width with a 4 foot shoulder.

Mitigation Measure HAZ-4 requires the preparation of a traffic management plan which identifies required management strategies aimed at minimizing the number of vehicles travelling to and from an event while ensuring safe traffic flows before, during and after an event and in case of an emergency.

With implementation of mitigation measures HAZ-3 and HAZ-4, potential impacts associated with exposure of people or structures to significant risk involving wildland fires would be *less than significant with mitigation.*

Conclusion

With implementation of mitigation measures HAZ-1 and HAZ-2 impacts associated with the risk of exposure to hazardous materials will be *less than significant with mitigation*. Mitigation measures HAZ-3 and HAZ-4 are recommended to ensure the protection of event guests and workers from wildland fire risk. Mitigation measure HAZ-3 requires the project to implement all required emergency access improvements as determined by CalFire. Mitigation Measure HAZ-4 requires the preparation of a traffic management plan which identifies required management strategies aimed at minimizing the number of vehicles travelling to and from an event while ensuring safe traffic flows before, during and after an event and in the event of an emergency.

Upon implementation of measures HAZ-1, HAZ-2,HAZ-3 and HAZ-4, potential impacts associated with hazards would be *less than significant with mitigation.*

Mitigation

HAZ-1 **Equipment Maintenance and Refueling.** During all construction activities, the cleaning, refueling, and maintenance of equipment and vehicles shall occur only within designated staging areas. The staging areas shall conform to all Best Management Practices applicable to attaining zero discharge of stormwater runoff. At a minimum, all equipment and vehicles shall be checked and maintained on a daily basis to ensure proper operation and to avoid potential leaks or spills.

HAZ-2 **Spill Response Protocol.** During all construction activities, all project-related spills of hazardous materials shall be cleaned up immediately. Appropriate spill prevention and cleanup materials shall be onsite at all times during construction.

HAZ-3 **Fire Protection and Emergency Access.** Prior to final occupancy, the project shall demonstrate compliance with all of the relevant conditions/requirements set forth in the letter of June 12, 2025 from Kevin McLean, CalFire/San Luis Obispo County Fire Department.

HAZ-4 **Traffic Management.** Prior to the initiation of temporary events, the applicant shall submit a Traffic Management Plan (TMP) prepared by a licensed civil engineer or traffic engineer for review and approval by the Department of Planning and Building in consultation with the Public Works Department. The TMP shall include at least the following components:

- During any interim overflow events associated with Green Gate Farms at the subject site, all operations shall comply with the approved TMP for Minor Use Permit DRC2012-00078. All applicable measures are incorporated herein by reference.
- A TMP Coordinator shall be designated by the property owner and their contact information shall be provided to the Department of Planning and Building.
- An encroachment permit shall be required for any traffic control proposed within the public right of way.
- The TMP Coordinator shall be responsible for completing the following tasks:
    - Provide notice to emergency management personnel that the event is scheduled along the expected hours of the event.
    - Encourage guests to carpool and/or ride share.
    - If available, encourage guests to utilize a shuttle bus service to/from the event to reduce the number of vehicles on site and using the roadways.

- Implementation, monitoring and removal of physical measures required to manage traffic flows into and out of the project site.
- Respond to all public agencies and/or public inquiries regarding traffic associated with a temporary event.
- Establish and implement a procedure to request County approval for subsequent amendments to the TMP, along with notification to the County after each event in which TMP changes are requested.
- Establish and implement an enforcement program to ensure compliance with the approved TMP and a records keeping plan to substantiate compliance.

Sources

Provided in Exhibit A.

X. HYDROLOGY AND WATER QUALITY

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☒	☐	☐
(b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
(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;	☐	☒	☐	☐
	(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☐	☒
	(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	☐	☐	☐	☒
	(iv) Impede or redirect flood flows?	☐	☐	☐	☒
(d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
(e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Setting

The project site is served by a total of seven wells. According to well completion reports associated with these wells, each can produce between 50 to 350 gallons per minute. Table 6 provides an estimate of existing water use associated with the project site.

Table 6 -- Estimate of Existing (Baseline) Groundwater Demand

Water Demand Component	Quantity[1]	Units	Water Demand Factor	Total Annual Water Demand (AF/YR)
Nursery Crop (lavender)	12	Acres	2.5 Acre-Feet/Year/Acres[2]	30.0
Pastures	10.85	Acres	4.8 Acre-Feet/Year/Acres[2]	52.08
Wine Grapes	31.8	Acres	1.25 Acre-Feet/Year/Acres[2]	39.75
Single Family Residences with Ornamental Landscaping	4	Dwellings	0.8 Acre-Feet/Year/Dwelling[3]	3.2
Temporary Events	5 events with 500 Attendees	Events	5 gallons per attendee[1]	0.04
Total:				**125.06**

Notes:
1. Source: project description.
2. LUO Section 22.30.204, Table 3. One acre-foot is approximately 325,851 gallons.
3. Carollo Engineers, San Luis Obispo County 2012 Master Water Report, Volume III, Table 8. Water duty factors for inland areas. Indoor water use only.

Surface water features include East Corral de Piedra Creek, a tributary of Pismo Creek, which flows generally east to west along the northern boundary of APNs 044-161-014 and 044-161-015. Two ag reservoirs have been established to capture surface water from an ephemeral drainage that generally parallels East Corral de Piedra Creek. There is also a small pond located on APN 044-161-014 adjacent to the existing dwelling.

The RWQCB's Water Quality Control Plan for the Central Coast Basin (Basin Plan; RWQCB 2017) describes how the quality of surface water and groundwater in the Central Coast Region should be managed to provide the highest water quality reasonably possible. The Basin Plan outlines the beneficial uses of streams, lakes, and other water bodies for humans and other life. There are 24 categories of beneficial uses, including, but not limited to, municipal water supply, water contact recreation, non-water contact recreation, and cold freshwater habitat. Water quality objectives are then established to protect the beneficial uses of those water resources. The RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements to individuals, communities, or businesses whose discharges can affect water quality.

In accordance with the LUO, a project that would change the runoff volume or velocity leaving any point of the site, result in an impervious surface of more than 20,000 square feet, or involve hillside development on slopes steeper than 10 percent is required to prepare a drainage plan for review and approval by the County. A drainage plan is not required where grading is exclusively for an exempt agricultural structure, crop production, or grazing. The LUO also requires the preparation of an erosion and sedimentation control plan for all construction and grading permit projects and site disturbance activities of one-half acre or more in geologically unstable areas, on slopes steeper than 30 percent, on highly erodible soils, or within 100 feet of any watercourse.

The County Department of Public Works is responsible for ensuring that new construction sites implement Best Management Practices (BMPs) during construction, and that site plans incorporate appropriate post-construction stormwater runoff controls. Construction sites that disturb 1 acre or more must obtain

coverage under the SWRCB's Construction General Permit. The Construction General Permit requires the preparation of a SWPPP to minimize on-site sedimentation and erosion. There are several types of projects that are exempt from preparing a SWPPP, including routine maintenance to existing developments, emergency construction activities, and projects exempted by the SWRCB or RWQCB. Projects that disturb less than 1 acre must implement all required elements within the site's erosion and sediment control plan as required by the LUO.

The project lies within the San Luis Obispo Valley Groundwater Basin (PRGB) as defined by the Department of Water Resources (DWR) Bulletin 118. The DWR has designated the Basin as a high priority for compliance with the Sustainable Groundwater Management Act (SGMA) largely because the Edna Valley portion of the Basin, which underlies the project site, is considered to be in a state of overdraft in which the amount of water withdrawn from the Basin exceeds the sustainable recharge. Therefore, a Groundwater Sustainability Plan (GSP) was prepared and adopted by DWR in October, 2021. The GSP sets forth a range of implementation strategies aimed at bringing the use of groundwater into balance with the sustainable yield. As of this date, the agencies associated with the GSP are still in the process of identifying the most cost-effective strategies and associated funding mechanisms to achieve the objectives of the GSP.

Water for outdoor temporary events will be brought to the site from off-site sources. However, indoor events associated with the barn identified in event Area 1 will be improved with new ADA compliant restrooms which will derive water from the existing well systems serving the project site. Since the water supply will serve 25 or more people daily for more than 60 days per year it will be considered a public water system.

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

Discussion

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

Road improvements may result in the erosion of surface soils which could produce sedimentation of surrounding surface water bodies.

As discussed in the setting, above, Section 22.51.120 of the LUO requires any project that would change the runoff volume or velocity leaving any point of the site, resulting in an impervious surface of more than 20,000 square feet, or involve hillside development on slopes steeper than 10 percent to prepare and implement a sedimentation and erosion control plan. LUO Section 22.51.120 includes requirements for specific erosion control materials and states that Best Management Practices (BMPs) shall be employed to control sedimentation and erosion. These mandatory BMPs are set forth in LUO Section 22.52.150 B. and C. Compliance with these mandatory BMPs, along with mitigation measure BIO-3 will ensure water quality is protected from potential impacts associated with the construction and occupancy of the project.

As conditioned, and upon implementation of BMPs required by the LUO and mitigation measure BIO-3, impacts related to soil erosion would be *less than significant with mitigation*.

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

As discussed in the setting, water for temporary outdoor events will be brought to the project site from off-site sources. Determining the precise off-site source of the water, and the impacts associated with the use of this source, is considered speculative within the definition provided in CEQA Guidelines Section 15145. Therefore, the potential impacts to off-site water supplies are not assessed. However, assuming 90 temporary events each with 250 guests, total water demand for each outdoor event is estimated as follows:

90 events x 250 attendees x 5 gallons per attendee per event = 0.34 AFY

This water will be brought to the site from an off-site source which is unidentified.

Table 7 provides an estimate of existing plus future groundwater demand associated with 30 new indoor temporary events in the existing barn located in Event Area 1. It should be noted that the five equestrian events currently held each year will cease in conjunction with this MUP resulting in a decreased annual demand of:

5 events x 500 attendees x 5 gallons per attendee per event = 0.04 AFY

Table 7 -- Estimate of Existing Plus Project Demand From On-site Groundwater Wells

Water Demand Component	Quantity[1]	Units	Water Demand Factor	Total Annual Water Demand (AF/YR)
Temporary Indoor Events (Existing Barn in Event Area 1)	30 events per year with a maximum of 100 attendees[1]	Events	5 gallons per attendee[1]	0.04
Baseline Groundwater Demand:				125.06
Cessation of Equestrian Events:				-0.04
Total Annual Water Demand With Project:				**125.02**

Notes:

1. Source: project description. Assumes water demand associated with the use of new ADA restrooms provided in the existing barn in Event Area 1 to be used for indoor events. All water demand is assumed to be provided by existing wells.
2. One acre-foot is approximately 325,851 gallons.

As shown above, existing plus project annual groundwater demand would be about 125 AFY which results in no net increase in on-site water demand.

As discussed in the setting, the project site is underlain by the Edna Valley portion of the San Luis Obispo Valley groundwater basin and is subject to an adopted GSP. All property owners who derive water from the basin will be required to participate in the implementation of strategies recommended by the GSP to bring water use into balance with the sustainable yield. Compliance with the GSP will ensure project demand does not result in a significant adverse impact to groundwater resources. Therefore, the project will not substantially decrease groundwater supplies and potential impacts would be *less than significant*.

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

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

As discussed in the project description, no new grading or construction will occur except for improvements to existing ranch roads and indoor construction of ADA compliant restrooms and ADA access. The project will be conditioned to comply with relevant erosion control requirements of the LUO and to provide dust control for events as needed. Mitigation measure BIO-3 requires the project to incorporate measures to protect potential jurisdictional waters from the effects of erosion and sedimentation associated with project construction activities.

Upon implementation of BMPs required by the LUO as well as mitigation measure BIO-3, impacts related to soil erosion would be *less than significant with mitigation*.

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

(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?

Based on the project description, the project will not result in the construction of substantial new areas of impervious surfaces that will result in offsite flooding or generate substantial runoff. Therefore, there would be *no impact* associated with increased surface runoff resulting in flooding on- or off-site.

(c-iv) Impede or redirect flood flows?

Based on the County Flood Hazard Map, the areas proposed for temporary events are not located within a mapped 100-year flood zone. Based on the project description, the project will not involve any new grading or the construction of new structures that would impede or redirect flood flows. Therefore, *no impacts* would occur.

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

Portions of the existing equestrian area adjacent to East Corral de Piedra Creek are subject to the 100-Year Flood Hazard Combining Designation. However, based on the Safety Element Flood Hazard Map, the areas proposed for temporary events are not located within a mapped 100-year flood zone (County of San Luis Obispo 2013). Based on the San Luis Obispo County Tsunami Inundation Maps, these areas are not located in an area with potential for inundation by a tsunami (CDOC 2021). The temporary events areas are not located within close proximity to a standing body of water with the potential for a seiche to occur. Therefore, the project site has no potential to release pollutants due to project inundation and *no impacts* would occur.

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

As discussed in the setting, the project site lies within the San Luis Obispo Valley groundwater basin and is subject to the requirements of an adopted GSP. As discussed above under item b), water demand from groundwater sources is small will be offset by the cessation of temporary equestrian events. In addition, the project site will be required to participate in the implementation of the GSP. Therefore, there would be *no impact* associated with a conflict or obstruction of a water quality control plan or sustainable groundwater management plan.

Conclusion

The project will result in *less than significant impacts* associated with water supply, water quality and hydrology. With implementation of BMPs required by the LUO, along with mitigation measure BIO-3, potential impacts to surface water quality will be less than significant with mitigation.

Mitigation

Implement BIO-3.

Sources

See Exhibit A.

XI. LAND USE AND PLANNING

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Physically divide an established community?	☐	☐	☒	☐
(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?	☐	☒	☐	☐

Setting

The LUO was established to guide and manage the future growth in the county in accordance with the County of San Luis Obispo General Plan; regulate land use in a manner that will encourage and support orderly development and beneficial use of lands; minimize adverse effects on the public resulting from inappropriate creation, location, use, or design of buildings or land uses; and protect and enhance significant natural, historic, archeological, and scenic resources within the county. The LUO is the primary tool used by the County to carry out the goals, objectives, and policies of the General Plan.

The Land Use Element (LUE) of the County of San Luis Obispo General Plan provides policies and standards for the management of growth and development in each unincorporated community and rural areas of the county and serves as a reference point and guide for future land use planning studies throughout the county. The LUE identifies strategic growth principles to define and focus the County's proactive planning approach and balance environmental, economic, and social equity concerns. Each strategic growth principle correlates with a set of policies and implementation strategies that define how land will be used and resources protected. The LUE also defines each of the 14 land use designations and identifies standards for land uses based on the designation they are located within. The project site and adjacent properties are all within the Agriculture land use designation.

The inland LUE also contains the area plans of each of the four inland planning areas: Carrizo, North County, San Luis Obispo, and South County. The area plans establish policies and programs for land use, circulation, public facilities, services, and resources that apply "areawide," in rural areas, and in unincorporated urban areas within each planning area. Part three of the LUE contains each of the 13 inland community and village plans, which contain goals, policies, programs, and related background information for the County's unincorporated inland urban and village areas.

The project site is located within the South County Inland Planning Area and the South San Luis Obispo Sub-Area and is subject to the Flood Hazard and Airport Review combining designations. The project was referred to the City of San Luis Obispo. Their response of June 27, 20265 did not identify any concerns.

Discussion

(a) Physically divide an established community?

Based on the project description, the project will not involve any new grading or the construction of structures that would physically divide an established community and *no impacts* would occur.

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

The temporary events program is consistent with the site's land use designation as well as relevant provisions of LUO Section 22.30.610. The project, as it may be conditioned and with implementation of recommended mitigation measures, was found to be consistent with standards and policies set forth in the County of San Luis Obispo General Plan, the San Luis Obispo Area Plan, the SLOAPCD Clean Air Plan, and other land use policies for this area. The project would be required to be consistent with standards set forth by County Fire/CAL FIRE and the County Public Works Department.

Lastly, the project was referred to the Agriculture Department for review and comment regarding project consistency with relevant goals and policies of the Agriculture Element. More specifically, Policy 6 of the Ag Element provides the following guidance with respect to the establishment of visitor-serving and retail uses on productive agricultural lands:

AGP6: Visitor Serving and Retail Commercial Use and Facilities.

a. Allow limited visitor serving and incidental retail use and facilities in agricultural areas that are beneficial to the agricultural industry and farm operators and are compatible with long-term agricultural use of the land. Such uses shall be clearly incidental and secondary to the primary agricultural use of the site and shall comply with the performance standards in the LUO.

b. Locate the visitor serving and incidental retail use off of productive agricultural lands unless there are no other feasible locations. Locate new structures where land use compatibility, circulation, and infrastructure capacity exist or can be developed compatible with agricultural uses.

As stated in part a., visitor serving uses must be "…*clearly incidental and secondary*…" to the agricultural use. To help determine whether a visitor-serving use is "clearly subordinate" the Agriculture Department relies on guidance provided in September, 2009, by the Agriculture Liaison Advisory Board (ALAB). Specifically, for visitor uses that are not associated with a processing use (such as the temporary events associated with the project), the Department considers the visitor use to be incidental to the agricultural use when:

a. It does not exceed five (5) percent of the area devoted to the agricultural use, to a maximum visitor use area of five (5) acres. Or,

b. The visitor serving use may be up to ten (10) percent of the crop area for a site of less than ten (10) acres in size that is established with an intensive agricultural use (greenhouse, nursery, permanent irrigated crops).

As shown in Table 1 of the Project Description, the project proposes about 5.5 acres of the site devoted to temporary events, inclusive of the parking area which will be used as a staging area for agricultural operations. Table 2 of Section II. Agriculture and Forestry Resources, indicates that the project site currently supports about 43.8 acres of irrigated crops. Since the project site is greater than 10 acres, criteria a. is applied. Therefore, the maximum allowable area for temporary events

using this interpretation would be: 5% of 43.8 = 2.19 acres. Accordingly, the response letter from the Agriculture Department dated September 5, 2025 recommends the following:

- Temporary event and equestrian facility areas should be reduced to meet the Department's incidental visitor use determination. [It should be noted that equestrian events have been removed from the project description.]
- Incorporate fencing and/or signage discouraging visitors from leaving event and equestrian areas, which will limit the potential for trespass onto adjoining lands in agricultural production.
- Provide disclosure to all visitors utilizing the equestrian facilities of proximity to ongoing agricultural activities, including the potential for pesticide use, dust, and noise. [As noted above, equestrian events have been removed from the project description.]
- Future structures associated with the equestrian facility should be located off prime soils, if feasible.

However, in 2009 the Board of Supervisors adopted a formal interpretation to clarify how to evaluate temporary events with respect to the criteria set forth in LUO Section 22.30.610. Notwithstanding the recommendations of the ALAB, the Board interpretation states the following:

> *"…the applicable Review Authority shall continue to make a determination of what constitutes primary agricultural use and allowable secondary and incidental uses on a case by case basis in consultation with the Agriculture Department pursuant to existing Agriculture and Open Space Policy 6."*

Therefore, the determination of project consistency with Policy 6 will be determined by the Review Authority.

With implementation of mitigation measures HAZ-1, HAZ-2, HAZ-3, HAZ-4, N-1 and T-1, project impacts associated with a conflict with policies or regulations adopted for the purpose of avoiding or mitigating environmental effects are considered *less than significant with mitigation*.

Conclusion

With mitigation measures HAZ-1, HAZ-2, HAZ-3, HAZ-4, N-1 and T-1 the project would be consistent with local and regional land use designations, plans, and policies and would not divide an established community. Potential impacts related to land use and planning are considered *less than significant with mitigation*.

Mitigation

Implement mitigation measures HAZ-1, HAZ-2, HAZ-3, HAZ-4, N-1 and T-1.

Sources

Provided in Exhibit A.

XII. MINERAL RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
(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?	☐	☐	☐	☒

Setting

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

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

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

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

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

The purpose of this combining designation is to protect significant resource extraction and energy production areas identified by the County LUE from encroachment by incompatible land uses that could hinder resource extraction or energy production operations, or land uses that would be adversely affected by extraction or energy production.

Initial Study – Environmental Checklist

Discussion

(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?

Based on the California Geological Survey (CGS) Information Warehouse for Mineral Land Classification, the project site is not located within an area that has been evaluated for mineral resources and is not in close proximity to an active mine (CGS 2021).

In addition, based on Chapter 6 of the County of San Luis Obispo General Plan Conservation and Open Space Element – Mineral Resources, the project site is not located within an extractive resource area or an energy and extractive resource area. The project is not located within a designated mineral resource zone area or within an Extractive Resource Area combining designation. There are no known mineral resources in the project area; therefore, there would be *no impact* to mineral resources.

(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?

The project is not located within a designated mineral resource zone or within an Extractive Resource Area combining designation. There are no known mineral resources in the project area; therefore, there would be *no impact* to mineral resources.

Conclusion

No impacts to mineral resources would occur and no mitigation measures are necessary.

Mitigation

None necessary.

Sources

Provided in Exhibit A.

Initial Study – Environmental Checklist

XIII. NOISE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:					
(a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
(b)	Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
(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?	☐	☐	☐	☒

Setting

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

- Residential development, except temporary dwellings
- Schools (preschool to secondary, college and university, and specialized education and training)
- Health care services (e.g., hospitals, clinics, etc.)
- Nursing and personal care
- Churches
- Public assembly and entertainment
- Libraries and museums
- Hotels and motels
- Bed and breakfast facilities

- Outdoor sports and recreation
- Offices

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

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

Table 8 -- Maximum allowable exterior noise level standards[1]

Sound Levels	Daytime 7 a.m. to 10 p.m.	Nighttime [2]
Hourly Equivalent Sound Level (L_{eq}, dB)	50	45
Maximum level, dB	70	65

[1] When the receiving noise-sensitive land use is outdoor sports and recreation, the noise level standards are increased by 10 db.

[2] Applies only to uses that operate or are occupied during nighttime hours.

The existing ambient noise environment is characterized by rural traffic on Greengate Road and SR 227 as well as noise associated with ongoing agricultural operations. The property to the south (Greengate Ranch and Vineyard) is authorized to host temporary events with amplified sound in certain locations. The nearest sensitive receptors are offsite residences located about 0.75 miles from the areas proposed for temporary events.

Discussion

(a) *Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Construction Impacts. No new buildings are proposed; however, modifications to existing structures will be necessary to provide ADA compliant restrooms for indoor events and to satisfy current building and fire codes. Minor improvements are also required to existing ranch roads to meet access standards for emergency vehicles. The nearest sensitive receptors for noise are offsite residences located about 0.75 miles from proposed construction activities (Figure 9), well beyond where interior construction noise could be heard. Therefore there will be *no impacts* associated with construction activities.

Operational Impacts. Operational noise sources will be associated with motor vehicle traffic from employees, deliveries, temporary events, and agricultural operations, as well as amplified speech and music.

Traffic Noise

The trip generation study prepared for the project (Orosz Engineering Group, 2025) (discussed in Section XVII, Transportation) concludes that a maximum of 100 trips per event associated with temporary events which will have a negligible affect on local roadways and the associated vehicle-related noise levels. Traffic noise associated with temporary events will be infrequent (up to 95 times

per year) and primarily on weekends during non-peak traffic hours. Therefore, noise impacts associated with motor vehicle traffic is considered *less than significant*.

Temporary Events

The application requests up to 90 temporary events at which up to 250 guests may attend a given event. As discussed in the project description, the applicant has requested that amplified speech and music be allowed for temporary events. The locations where amplified sound could be produced are shown on Figure 3. Temporary events are subject to the provisions of LUO Section 22.30.610 which does not provide any limitations on the hours during which amplified sound may occur. Instead, the governing limits are those prescribed in the General Plan Noise Element as outlined above in Table 8. As shown in Table 8, noise not associated with construction activities ,is limited to 50 dBA Leq (h) at the property lines during the hours of 7AM to 10PM.

The application materials include a noise impact analysis (45dB Acoustics, LLC, March 30, 2025) which is incorporated by reference and available for review in its entirety at the Department of Planning and Building, 976 Osos Street, San Luis Obispo. The following is a summary of the findings and recommendations of that study.

Existing Conditions

Long-term sound was measured near the site at the locations shown in Figure 13 for a 24-hour period on December 18-19, 2024. The quietest daytime hourly Leq at location LT2 (closest to the property lines near the event areas) was 45 dBA at 3pm.

Because of the low existing ambient noise levels and in consideration of potentially quieter hours in the evenings and during weekends, all predicted sound levels at the property lines due to the proposed amplified events are directly compared to the County Noise Standards. Traffic is (conservatively) omitted from the existing noise environment, such that the event noise levels are the primary/dominant source of sound for the study.

Figure 13 -- Noise Monitoring and Noise Prediction Locations

Methodology

Noise generation was modeled using SoundPLAN®, a 3-dimensional sound propagation modeling software package that calculates sound levels while taking into account the air and ground attenuation, terrain variation and built environment, road pavement types, and other relevant factors. Where applicable, traffic counts for local roads are input to the model to establish an ambient existing noise environment for comparison with, and potential adjustment by, the calculated noise levels due to the Project's proposed noise-generating sources. All sound levels are presented in units of A-weighted decibels, dBA, for direct comparison to the County's regulations.

An initial setting was used for each of the event sources (i.e., loudspeakers) to represent typical amplified music for events in the proposed event areas. A particular change, either increase or decrease, of a noise source will result in the same decibel change at a receiver location for a given geometrical setup, including terrain, buildings, etc., assuming other noises can be neglected. Once the resulting levels at the property line are determined, conclusions may be drawn about the compliance of the levels occurring *at the event* and adjusted upward or downward in order to determine levels that should not be exceeded *at the event* in order to remain compliant with the County's limits *at the specified property lines.*

For each outdoor event area, a source with average sound pressure level (Leq) of 95 dBA, as measured at a distance of 10 feet (3 meters), was initially included in the model to represent a very high-energy, amplified music group performance/concert, where having a conversation nearby is very difficult or impossible, and a significantly raised voice or even yelling may be required to converse.

Loudspeakers are conservatively placed at a height of 6 feet (1.8 meters) and 20 feet apart in our model; each represents the center of the loudspeaker/PA system at each side of the stage. Lmax levels (generally an "instantaneous" 1-second Leq) can be approximately 20 dB higher than the average sound levels.

Noise Associated With Temporary Events

Terrain/elevation data imported from Google Maps and traffic data were input into the SoundPLAN model along with buildings and residences in the vicinity.

Outdoor event configurations were then added to the model within the designated event area and evaluated individually to determine the ideal configurations and source/loudspeaker levels to ensure compliance with the County's Exterior Noise Standards. Loudspeakers were positioned according to a best estimate of the stage locations and orientations, along with feedback from the applicant. For some event areas, multiple configurations were identified.

Higher source levels were initially input into the model and subsequently lowered to levels that are predicted to comply at the nearest sensitive property lines.

The modeled results show that, with source/loudspeaker levels having an Leq of 95 dBA (as measured at 10 feet from the stage or loudspeaker), events held during daytime hours (between 7am and 10pm) at all outdoor event areas and configurations would result in noise levels at the nearest property lines that would exceed County standards., The analysis shows that, to comply with County standards, noise levels for all outdoor events must be reduced by approximately 10 to 20 dB, depending on location/configuration as summarized in Table 9.

Table 9 – Maximum Allowable Sound Levels and Stage Configurations for Each Event Site To Meet County Standards At the Nearest Property Lines

Outdoor Event Site		Maximum Allowable Sound[1]
Event Area 1	Lawn -- Configuration A	85
	Lawn – Configuration B	80
	Pond	85
	Dining	80
Event Area 2 Vineyard House	Configuration A	75
	Configuration B	80
	Configuration C	85
	Configuration D	85 with a 12 ft. wall
Event Area 3 The Villa	Configuration A	75
	Configuration B	85 with a 10 ft. wall

Source: 45dB Acoustics, 2025

Notes:

1. Maximum allowed average event sound level (Leq) as measured at 10-ft from stage.

As described in the study, 85 dBA is representative of a typical amplified wedding or dinner dance band. A sound level of 75 dBA (at 10 feet from the stage) would be similar to a sound level during a cocktail hour where people are able to converse in close proximity without raising their voices much.

Alternatively, a quieter music group such as an acoustic band without amplification can be an option for any location within all of the event areas, as long as levels do not exceed 65 dBA (as measured 10 feet in any direction from the source – particularly in the directions of the nearest property lines). This would be a level such that one could have a conversation without having to raise one's voice to have a comfortable conversation.

Mitigation measure N-1 is recommended which identifies maximum sound limits and stage configurations to meet County standards, based on the modeling results summarized in Table 9, above. With mitigation N-1, noise impacts associated with temporary events are considered *less than significant with mitigation*.

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

Based on the project description, no new grading or construction activities are proposed with this project except for minor improvements to existing buildings which is not expected to require construction techniques that result in groundborne vibration. Therefore, there would be *no impact* related to exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels.

(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 airstrip in proximity to the project site is the San Luis Obispo County Regional Airport located approximately 2.5 miles to the north. Although the northerly portion of the project site is located within the area subject to the Airport Review Area Combining Designation, no part of the project site is located within the area governed by the San Luis Obispo County Regional Airport Land Use Plan. Therefore, the project site is not located within or adjacent to an airport land use plan or within 2 miles of a public airport or private airstrip; therefore, *no impact* would occur.

Conclusion

Based on the project description, there would be no short-term construction-related noise impacts. Operational noise levels could exceed the standards set forth in the LUO if the source noise exceeds the levels listed in Table 9 within 10 feet from the source. This impact is considered *less than significant with mitigation*. No other potentially significant impacts were identified.

Mitigation

Initial Study – Environmental Checklist

N-1 Outdoor events with amplified music or speech.

A. For outdoor events with amplified music or speech occurring between 7:00am and 10:00pm, the following event limits and general configurations shall be observed:

Event Area 1 -- Lawn Area (shown below)

Configuration A – with stage located at the southwest end of the lawn and loudspeakers facing northeast – source levels must be no greater than 85 dBA (as measured 10 feet in front of the stage). Or,

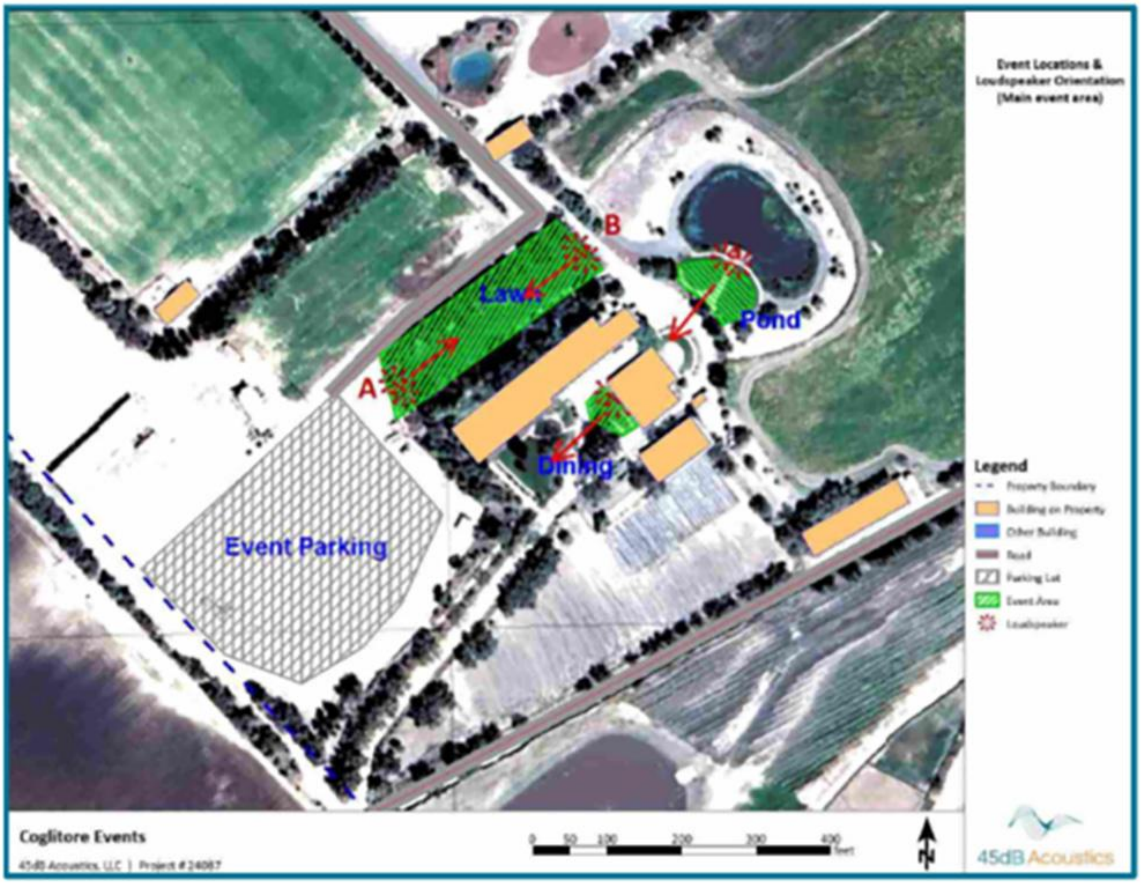
Configuration B – with stage located at the northeast end of the lawn and loudspeakers facing southwest – source levels must be no greater than 80 dBA (as measured 10 feet in front of the stage).

Event Area 1 -- Pond Area

With the stage located at the pier with loudspeakers facing southwest – source levels must be no greater than 85 dBA (as measured 10 feet in front of the stage).

Event Area 1 -- Dining Area

With the stage located on the west side of the barn with loudspeakers facing south – source levels must be no greater than 85 dBA (as measured 10 feet in front of the stage).



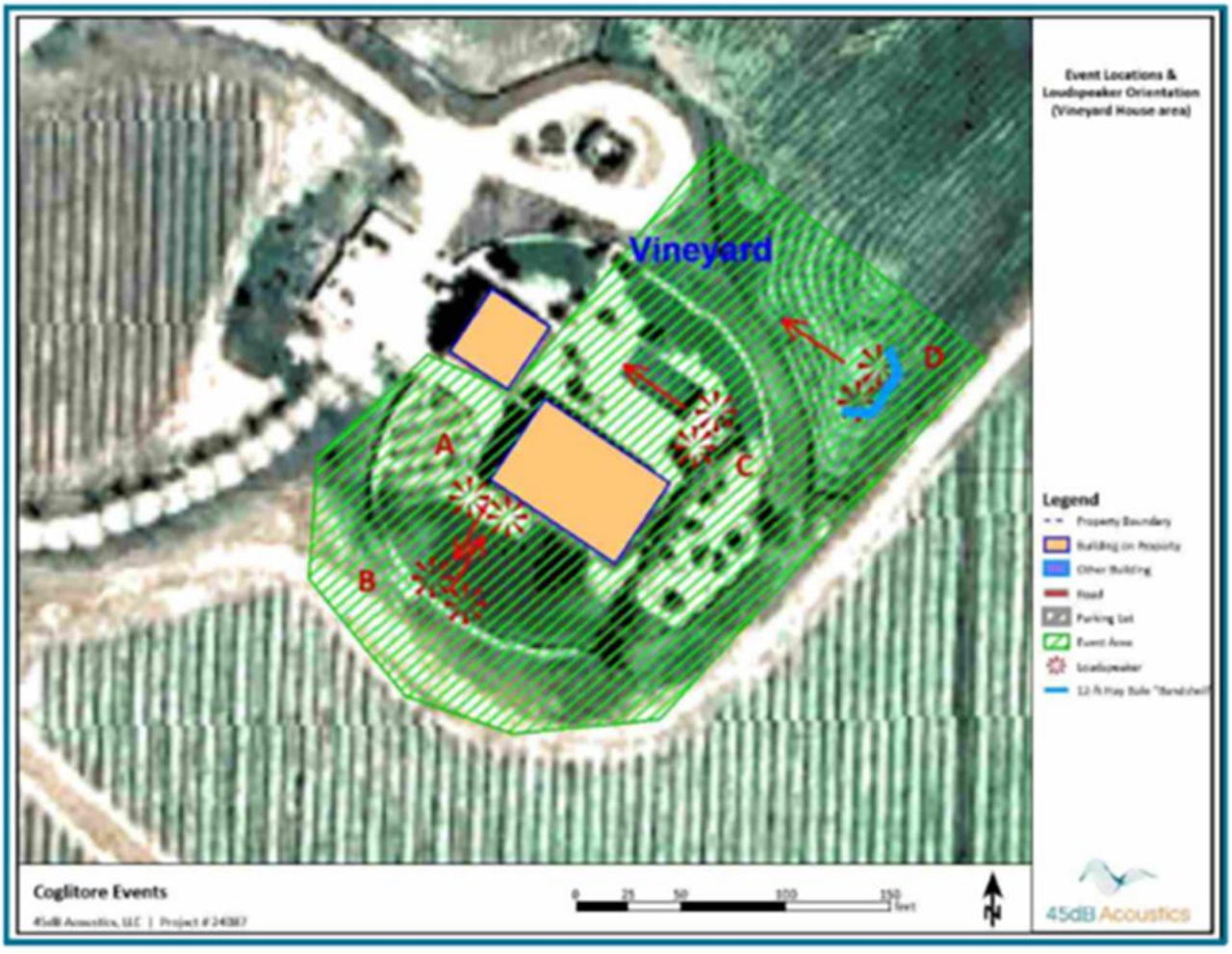
Event Area 2 -- Vineyard House Area

Configuration A – With the stage located on the southwest side of the building and loudspeakers facing southwest – source levels must be no greater than 75 dBA (as measured 10 feet in front of the stage). Or,

Configuration B – With the stage located at the southwest side of the lawn and loudspeakers facing northeast towards the building – source levels must be no greater than 80 dBA (as measured 10 feet in front of the stage). Or,

Configuration C – With the stage located at the east end of the pool and loudspeakers facing northwest – source levels must be no greater than 85 dBA (as measured 10 feet in front of the stage). Or,

Configuration D – With the stage located at the northeast end of the event space and loudspeakers facing northwest – with a 12-ft tall hay bale "bandshell" behind the stage, source levels must be no greater than 85 dBA (as measured 10 feet in front of the stage).



Event Area 3 – Villa Area

Configuration A – With the stage located north of the Villa house and at least 65 ft from the property line and loudspeakers facing west – source levels must be no greater than 75 dBA (as measured 10 feet in front of the stage). Or,

Configuration B – With the stage located north of the Villa house and at least 65 ft from the property line and loudspeakers facing west – with a 12-ft tall hay bale "bandshell" behind the stage, source levels must be no greater than 85 dBA (as measured 10 feet in front of the stage).

B. For non-amplified music or speech, noise levels must be no greater than 65 dBA as measured 10-ft from the event source.

C. For any nighttime event held after 10pm, the maximum sound level measured 10 feet from the source shall be reduced by at least 5dB from the limits listed in item A., above, for each event area and configuration.

Sources

Provided in Exhibit A.

XIV. POPULATION AND HOUSING

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

Setting

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

In its efforts to provide for affordable housing, the County currently administers the Home Investment Partnerships (HOME) Program and the Community Development Block Grant (CDBG) program, which provide limited financing to projects relating to affordable housing throughout the county.

The project site is currently developed with a single-family residence and equestrian facilities.

Discussion

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

Based on the project description, the project will not accommodate any population growth either directly or indirectly. Employees associated with temporary events would not require new or additional housing as a result of the proposed project. The project does not include the extension or establishment of new public roads, utilities, or other infrastructure to the site that would induce development and population growth in new areas. Therefore, the project would not directly or indirectly induce substantial growth and there would be *no impacts.*

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

The project would not displace existing housing or necessitate the construction of replacement housing elsewhere; therefore, there would be *no impact*.

Initial Study – Environmental Checklist

Conclusion

No impacts to population and housing would occur and no mitigation measures are necessary.

Mitigation

None are required.

Sources

Provided in Exhibit A.

XV. PUBLIC SERVICES

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

Setting

Fire protection services in unincorporated San Luis Obispo County are provided by CAL FIRE, which has been under contract with the County to provide full-service fire protection since 1930. Approximately 180 full-time state employees operate the County Fire Department, supplemented by as many as 100 state seasonal fire fighters, 300 County paid-call and reserve fire fighters, and 120 state inmate fire fighters. CAL FIRE responds to emergencies and other requests for assistance, plans for and takes action to prevent emergencies and reduce their impact, coordinates regional emergency response efforts, and provides public education and training in local communities. CAL FIRE has 24 fire stations located throughout the county, and the project would likely be served by County Fire Station #21 located at the San Luis Obispo Regional Airport approximately 2.5 miles to the north. Emergency personnel would be able to reach the site in more than 5-10 minutes of receiving a call.

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

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

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

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

Discussion

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

Fire protection?

The project will be conditioned to implement all requirements identified by the County Fire Department/CAL FIRE for the project including items to be completed prior to final inspection/operation. Based on the project description, the project will not create a significant new demand for fire services. Therefore, impacts would be *less than significant*. Additional information regarding wildfire hazard impacts is discussed in Section IX, Hazards and Hazardous Materials, and Section XX, Wildfire.

Police protection?

The project may be subject to public facility fees to offset the project's cumulative contribution to demand on law enforcement services. However, impacts related to police services would be *less than significant.*

Schools?

As discussed in Section XIV, Population/Housing, the project would not induce any population growth and would not result in the need for additional school services or facilities. Therefore, there would be *no impact*.

Parks?

As discussed in Section XIV, Population and Housing, the project would not induce any increase in population growth and would not result in the need for additional parks or recreational services or facilities to serve new populations; therefore, there would be *no impact*.

Other public facilities?

As discussed above, the proposed project may be subject to applicable fees to offset negligible increased demands on public facilities; therefore, there would be *no impacts* related to other public facilities.

Initial Study – Environmental Checklist

Conclusion

The project does not propose any new grading or construction that would increase demands on public services and would induce no population growth. The project may be subject to payment of development impact fees to reduce the project's negligible contribution to increased demands on public services and facilities. Therefore, potential impacts related to public services would be less than significant and no mitigation measures are necessary.

Mitigation

None are required.

Sources

Provided in Exhibit A.

XVI. RECREATION

		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?	☐	☐	☐	☒
(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?	☐	☐	☐	☒

Setting

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

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

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

Discussion

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

Based on the project description, the project will not induce any new population to the area. The project is not proposed in a location that would affect any existing trail, park, recreational facility, coastal access, and/or natural area. Based on the project description, the project would not result in any growth within the area and would not increase demand on any proximate existing

neighborhood or regional park or other recreational facilities. Therefore, there would be *no impact* relating to the demand for local or regional parks or recreation facilities.

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

The project does not include the construction of new recreational facilities and would not result in a substantial increase in demand or use of parks and recreational facilities. Implementation of the project would not require the construction or expansion of recreational facilities; therefore, impacts would be *no impact*.

Conclusion

The project would not result in the significant increase in use, construction, or expansion of parks or recreational facilities. Therefore, there would be *no impact* related to recreation no mitigation measures are necessary.

Mitigation

None necessary.

Sources

Provided in Exhibit A.

XVII. TRANSPORTATION

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

Setting

Existing Conditions and Relevant Project Components

The project site is currently developed with four single family residences as well as equestrian facilities that generate a very low volume of traffic. Vehicular access is provided by Greengate Road, a paved county-maintained rural collector, that extends northeast from Edna Road (SR 227), a State Highway. The County does not have current traffic counts for Greengate Road. Traffic counts taken by Caltrans for SR 227 at Corbett Canyon Road indicate that this portion of the highway carries 4,200 average daily trips (ADT) with 560 afternoon peak hour trips.

The project site currently hosts up to five temporary events for non-profit organizations each year as allowed by LUO Section 22.30.610.A.1. These events can host up to 1,000 guests but typically accommodate 50 – 500 attendees. These events, and the associated traffic, will cease upon approval of this MUP.

On any given day of the year, the maximum number of attendees at a proposed temporary event on-site would not exceed 250 people total.

Three secondary access roads are proposed (Figure 4) to ensure guests may safely exit the site in the event of an emergency. One route will travel north from the Villa outdoor event area on an existing unpaved ranch road (Area 3) then southwest adjacent to East Corral de Piedra Creek to the existing equestrian area where it turns south to the parking and staging area. A second emergency access will be established that travels southeast from the terminus of Greengate Road on an unpaved ranch road within an easement associated with APN 044-233-009, then turns south to Corbett Canyon Road along an easement affecting two adjacent parcels associated with the Greengate Ranch and Vineyard. A third emergency access will be established that travels southeast along the westerly boundary of APN 044-161-007 to an existing unimproved ranch

road that crosses APN 044-233-009 to the access easement along the property line shared with the Greengate Ranch and Vineyards site.

Assuming 400 square feet per vehicle, 2.5 guests per vehicle, and a maximum of 250 guests per event, a parking area of one-acre is required. The plans show a three-acre parking/staging area located north of the terminus of Greengate Road between the existing equestrian area and Event Area 1; parking can be provided for about 320 vehicles in this area.

Previous Approvals

The adjacent parcel to the south is occupied by Greengate Ranch and Vineyard which is authorized under MUP DRC2012-00078 to conduct temporary events in accordance with LUO 22.30.610. According to the approved plans, the MUP authorizes a temporary events program that may include 25 events per year with up to 500 people; 50 events with up to 300 people and 50 activities with up to 200 people. Events, including outdoor amplified music, may be conducted between the hours of 10AM and 10PM. Condition No. 9 of the approved MUP requires the project to make certain roadway improvements that include (but are not limited to):

- Widen State Route 227 at its intersection with Greengate Road to provide standard left-turn channelization in accordance with Caltrans California Highway Design Manual, Chapter 400, within necessary dedicated right-of-way.
- Widen Greengate Road from State Route 227 to the northerly-most event access driveway to an A-1b rural road section.

The traffic impact analysis prepared for the MUP assumed that an event with 300 guests would generate 280 vehicle trips.

Regulatory Setting

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

The County has established Level of Service (LOS) “C” or better for rural roadways.

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

Initial Study – Environmental Checklist

The County's Framework for Planning (Inland), includes the Land Use and Circulation Elements of the County of San Luis Obispo General Plan. The Framework establishes goals and strategies to meet pedestrian circulation needs by providing usable and attractive sidewalks, pathways, and trails to establish maximum access and connectivity between land use designations. There are no pedestrian, bicycle, or public transit facilities serving the project site.

The 2023 Regional Transportation Plan (RTP) is the region's long-range (2023-2045) plan and Sustainable Communities Strategy (SCS). RTP provides a collective vision for the region's future balancing transportation and housing needs with social, economic, and environmental goals. The Plan identified and tested growth scenarios to accommodate the coming 42,000 new people, 18,000 new homes, and 18,000 new jobs. The plan helps guide future planning efforts and policy decisions that affect transportation, including its relationship with housing and land use that will reduce greenhouse gas emissions in the region.

A Trip Generation, Roadway Capacity and Roadway Safety Analysis (RSA) was prepared for the project (Orosz Engineering Group, July 29, 2025). That study is incorporated by reference and is available for review in its entirety at the Department of Planning and Building, 976 Osos Street, San Luis Obispo. The analysis that follows is a summary of the findings and recommendations of that study.

For roadway improvements, the RSA is required to study the roadway characteristics for a distance of 0.5 miles from the entrance toward the nearest intersection if the project has 1-10 general public PM peak hour trips or between 1 and 100 temporary event peak hour trips. As the project is expected to generate no general public weekday peak hour trips and up to 100 (maximum capacity event) temporary event peak hour trips, the RSA is required to identify, but does require the construction of improvements that may be needed to meet the roadway standard within 0.5 miles closest to the primary site access.

The County of San Luis Obispo lists daily and peak hour traffic volumes for County maintained roadways. However, due to the low traffic volumes along Green Gate Road, the county does not have historic data. A traffic study for an event program at Green Gate Ranch (Green Gate Road at SR 227 in 2014) noted the daily traffic volume of 250 vehicles just north of SR-227. Since there has been little development along Green Gate Road in the past 10 years, this traffic volume is still a reasonable value. Based on these traffic volumes, the county standard roadway would be for a rural local roadway A-1b standard, that includes 20' of paved roadway (20' travel lanes and 3' graded/road base shoulders).

Discussion

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

Construction Related Traffic

Construction activities will require temporary construction trips to and from the site for improvements to existing buildings and for improvements to existing ranch roads. The project is not likely to generate foot or bicycle traffic or generate public transit demand and would have a less than significant impact on levels of service/conditions for these facilities.

Operational Impacts

Trip Generation

According to the traffic study, an event with 250 guests is expected to add a total of 100 temporary trips to Greengate Road and SR 227, and zero peak hour trips and zero general public trips. This is

considered a worst-case scenario for trip generation because of the likelihood that shuttle service and carpooling will be implemented, and many events will accommodate fewer than 250 guests.

For normal roadway peak hour traffic impacts, the project would not contribute any of these temporary event peak hour trips if the temporary events will not start or end during the 4:00 PM to 6:00 PM weekday peak period. Based on the expected small increase in average daily trips and the absence of peak hour trips, the project is not expected to result in any long-term changes in traffic or circulation or reduce the Level of Service below LOS "C". The project would be consistent with the County Framework for Planning (Inland) and consistent with the projected level of growth and development identified in the 2023 RTP.

Roadway Capacity and Roadway Width Evaluation

The traffic engineers conducted a site visit to document the existing roadway width for Green Gate Road to determine the available capacity to accommodate the additional traffic that may be associated with this project. The existing paved roadway widths along Green Gate Road are shown on Figure 14 and summarized as follows:

- State Route 227 north along the Green Gate Farms 18' paved. (blue highlight shown on Figure 14)
- Between the Green Gate Farm and the curve in the roadway near the project site 18 feet paved with about 200 feet of roadway that is 15-18 feet wide. (yellow highlight)
- From this curved area to the site entrance (0.25 miles), 20-22 feet in width. (green highlight)

Figure 14 -- Existing Paved Widths for Greengate Road

In the green area, the road width is varied but is generally 20-22 feet wide and meets the standard. The area in blue is scheduled to be widened by the Green Gate Farm development. Improvement plans have been prepared to widen this section to provide 20' of paved roadway with shoulders. To meet the County minimum standard for 20' in width, the area in yellow would need to be improved. Roadway and shoulder widening of 2'-5' of paved roadway is needed, with 3' graded shoulders per County Roadway Standard A-1b. In the Green Gate Ranch Traffic Study, the county accepted an existing traffic volume of about 250 cars per day (ADT) with a capacity of 2,000 cars per day (ADT) with the widened 20' roadway section. The roadway capacity for the yellow section of Green Gate Road is estimated to be approximately 1,500 ADT. With the project traffic, the existing capacity of Green Gate Road in this yellow section would be adequate for the project traffic.

The project was referred to Caltrans for review and comment. Their referral response letter of August 20,2025 identified the following issues:

- *The length of the proposed left turn pocket from southbound SR 227 onto Green Gate Road will be limited due to proximity with the left turn pocket from northbound SR 227 onto Price Canyon Road. Analysis should be completed to determine if the available space for a left turn pocket will be sufficient for the expected 95th percentile queue during events.*

  Response: Mitigation measure T-1, discussed below, requires left turn lanes to be installed at the Greengate Road/SR 227 intersection to Caltrans standards prior to the initiation of temporary events.

- *The project will increase traffic through the SR 227 and Price Canyon Road intersection. This intersection has had 5 collisions in the most recent 3-year period with 2.*

  Response: A Roadway Safey Analysis was performed for this project and is discussed below.

- *Please provide a full operational traffic impact study that includes vehicle miles traveled (VMT) calculations, queue calculations, and intersection analysis. The study should encompass at minimum Green Gate Road, SR 227, the SR 227 and Price Canyon Road intersection, and any other roadways and intersections taken between the event site and SR 227.*

  Response: A Trip Generation, Roadway Capacity and Roadway Safety Analysis (RSA) was prepared for the project (Orosz Engineering Group, July 29, 2025).

- *The traffic study notes that events will not begin or end between 4 PM and 6 PM on weekdays not to conflict with normal peak hour traffic. In the traffic impact study, use peak hour data to verify whether traffic flow has sufficient capacity if peak hour overlap does occur.*

  Response: Discussed below under cumulative impacts.

- *Please provide a Traffic Management Plan (TMP) to mitigate the effects of trips generated by the proposed events under this permit.*

  Response: Mitigation measure HAZ-4 requires a traffic management plan for this project.

- *Dedicated left turn lanes should be used at both the SR227/Price Canyon and SR227/Greengate Road intersections.*

  Response: Mitigation measure T-1, discussed below, requires left turn lanes to be installed at the Greengate Road/SR 227 intersection to Caltrans standards prior to the initiation of temporary events.

Cumulative Impacts

As discussed in the setting, Greengate Ranch and Vineyards is authorized to host temporary events in accordance with MUP DRC2012-00078. According to the traffic study prepared for the Greengate Ranch and Vineyard project, the existing plus project traffic totaled 954 ADT. Should the project events occur on the same day as those associated with Greengate Ranch and Vineyard total event traffic would be 200 temporary trips and a maximum total of 1,154 ADT. This equates to a volume to capacity ratio of 0.58 which is Level of Service (LOS) A, which is a very good level of service. No significant daily traffic issues would be expected. It should be noted that this analysis is based on the following assumptions:

- Left turn lanes on SR 227 the intersection of Greengate Road as required by MUP DRC2012-00078 are installed prior to the initiation of temporary events; and
- Temporary events associated with project site do not begin or end during the 4:00 PM to 6:00 PM weekday peak period.

Mitigation measure T-1 is recommended to include these restrictions on the subject project as a way to ensure County standards for roadway capacity are maintained. Lastly, as discussed in Section IX. Hazards and Hazardous Materials, mitigation measure HAZ-3 requires implementation of CalFire access and fire safety requirements, and measure HAZ-4 requires the preparation and implementation of a Traffic Management Plan which includes management strategies aimed at minimizing the number of vehicles travelling to and from an event while ensuring safe traffic flows before, during and after an event and in the event of an emergency.

The project does not propose uses that would interfere with, or conflict with, applicable policies related to circulation, transit, roadway, bicycle, or pedestrian systems or facilities, and would not conflict with adopted policies, plans or programs for transportation.

The project was referred to the Public Works Department. In their referral response dated November 21, 2025, the Public Works Department identified the following issues relating to traffic:

- *The project site is located Green Gate Road, a County maintained roadway, which connects to SR 227, a Caltrans maintained roadway. Planned improvements to intersection of SR 227 and Green Gate Road are part of the Green Gate Ranch special events program (DRC2012-00078). Planning staff shall ensure that hours of operation of temporary events for this permit are made a part Project Description; otherwise, Caltrans concerns will need to be addressed for vehicle trips within peak hour trip duration (4pm-6pm).*

  Response: Mitigation measure T-1 restricts the hours of temporary events to avoid peak hour traffic.

With implementation of mitigation measures T-1, HAZ-3 and HAZ-4, potential impacts would be *less than significant with mitigation*.

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

Section 15064.3 of the CEQA Guidelines requires that a CEQA compliance document include an assessment of whether a project would generate potentially significant levels of VMT. To assist in these efforts, the County of San Luis Obispo has developed new Transportation Impact Analysis Guidelines (TIAG) (March 2021) that include thresholds of significance for VMT as well as screening criteria and methodologies for performing VMT analysis.

The TIAG is accompanied by a VMT screening model that compares the current (baseline) per capita VMT in a particular VMT impact zone with future per capita VMT inclusive of the project. As a result, the VMT analysis of a given project is also considered to be a cumulative impact analysis.

Map Based Screening. The TIAG includes two maps that depict areas of the unincorporated county where residential and work-based projects would generate an average VMT that is 15% below (or lower than) the baseline VMT metric (or 85% of the baseline or lower) and would therefore not require a VMT analysis. According to Figure 1 of the TIAG screening maps, the project site is not located within one of these areas. Therefore, the project does not meet this screening criteria. However, if VMT generated by a project is not presumed to be less than significant based on these screening maps, it does not necessarily mean that the project would have a VMT impact, only that a less than significant impact cannot be assumed, and that a VMT analysis would be necessary to make that determination.

Project Size. Small projects that are found to be consistent with the San Luis Obispo Council of Governments Sustainable Communities Strategies (SLOCOG SCS) or San Luis Obispo County General Plan and generate fewer than 110 daily trips are considered to have a less than significant VMT impact. According to the trip generation study prepared for the project (Orosz Engineering Group, 2025) the project would generate no additional peak hour trips. This is well below 110 daily trips and would be considered to have a less than significant impact on VMT. Lastly, the project is consistent with the North County Plan. Therefore, the project is considered to have VMT impacts that are *less than significant and less than cumulatively considerable.*

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

The traffic study includes a Roadway Safety Analysis (RSA) in accordance with County policy 2008-152 and 2017-253. In this case, the project will generate a maximum of 100 temporary event trips, with no weekday general public PM peak hour trips or other peak hour trips. The County RSA policy notes that for projects with 1 - 10 typical general public peak hour trips or between 1 and 100 temporary event trips, the RSA is required to 1) evaluate the collision rate for the primary access roadways within one-half (0.5) mile of the primary site entrance, 2) to Identify improvements to reduce the potential for any collision patterns that are identified, and 3) to identify potential improvements for the 0.5 mile closest to the site access to meet the county roadway standard.

The California Highway Patrol (CHP) has indicated that there have been no reported crashes within the vicinity of the project access (0.5 mile south of the primary site access point toward SR-227) over the past four years. Based on the data provided by the CHP, no significant traffic safety issues or significant patterns were identified at the project access driveway. No safety improvements are required based on the criteria outlined in the RSA policies.

A project referral package was sent to the Public Works Department; their response of November 21, 2025, no other traffic safety related issues were identified.

Lastly, as discussed in Section IX. Hazards and Hazardous Materials, mitigation measure HAZ-3 requires implementation of CalFire access and fire safety requirements, and measure HAZ-4 requires the preparation and implementation of a Traffic Management Plan which includes management strategies aimed at minimizing the number of vehicles travelling to and from an event while ensuring safe traffic flows before, during and after an event and in the event of an emergency.

With implementation of mitigation measures HAZ-3 and HAZ-4, potential impacts would be *less than significant with mitigation.*

(d) Result in inadequate emergency access?

As discussed in Section IX. Hazards and Hazardous Materials, three secondary access roads are proposed (Figure 4) to ensure guests may safely exit the site in the event of an emergency. One route will travel north from the Villa outdoor event area on an existing unpaved ranch road (Area 3) then southwest adjacent to East Corral de Piedra Creek to the existing equestrian area where it turns south to the parking and staging area. A second emergency access will be established that travels southeast from the terminus of Greengate Road on an unpaved ranch road within an easement associated with APN 044-233-009, then turns south to Corbett Canyon Road along an easement affecting two adjacent parcels associated with the Greengate Ranch and Vineyard. A third emergency access will be established that travels southeast along the westerly boundary of APN 044-161-007 to an existing unimproved ranch road that crosses APN 044-233-009 to the access easement along the property line shared with the Greengate Ranch and Vineyards site.

As discussed under item a), above, mitigation measure HAZ-3 requires the project to construct all access improvements consistent with County and CalFire/County Fire standards. The project would not result in road closures during short-term construction activities or long-term operations. Individual access to adjacent properties would be maintained during construction activities and throughout the project area. Project implementation would not affect long-term access through the project area and sufficient alternative access exists to accommodate regional trips. With implementation of mitigation measures HAZ-3 and HAZ-4, project impacts associated with the adequacy of emergency access would be *less than significant with mitigation.*

Conclusion

The project would not alter existing transportation facilities or result in the generation of substantial additional trips or vehicle miles traveled. With implementation of mitigation measures T-1, HAZ-3 and HAZ-4, project related traffic impacts are considered less than significant with mitigation.

Mitigation

Implement mitigation measures HAZ-3 and HAZ-4 as well as the following:

T-1 Timing of temporary events. Temporary events shall be subject to the following limitations:

a. Events shall not begin or end during the weekday hours of 4:00 PM to 6 PM. And,

b. Roadway improvements shall be completed to provide north-bound and south-bound left-turn lanes on SR 227 at the intersection of Greengate Road, to the satisfaction of Caltrans and the Department of Public Works. However, temporary events authorized under Minor Use Permit DRC2012-00078 may occur on this site prior to completion of these improvements, as the subject site may serve as an interim overflow event area for activities approved under DRC2012-00078. At no time shall events occur under both use permits until the road improvements are complete.

Initial Study – Environmental Checklist

Sources

Provided in Exhibit A.

XVIII. TRIBAL CULTURAL RESOURCES

		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	☐	☐	☐	☒
	(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.	☐	☐	☐	☒

Setting

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

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

Initial Study – Environmental Checklist

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

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

Based on the project description, the project will not require any new grading, construction or other ground disturbing activities that may adversely impact tribal resources.

Discussion

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

(a-i) 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)?

Based on the project description, the project will not require any new grading, construction or other ground disturbing activities that may adversely impact tribal resources. Therefore, there would be *no impact* related to a substantial adverse change in the significance of tribal cultural resources.

(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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Based on the project description, the project will not require any new grading, construction or other ground disturbing activities that may adversely impact tribal resources. Therefore, there would be *no impact* related in subdivision (c) of Public Resources Code Section 5024.1..

Conclusion

Cultural resources are not expected to be impacted by the project. In the event unanticipated sensitive resources are discovered during project activities, adherence with LUO standards and State Health and Safety Code procedures would reduce potential impacts to less than significant; therefore, there would be *no impact* to tribal cultural resources.

Mitigation

None are required.

Sources

Provided in Exhibit A.

XIX. UTILITIES AND SERVICE SYSTEMS

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

Setting

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

The Department of Public Works is responsible for ensuring that new construction sites implement BMPs during construction, and that site plans incorporate appropriate post-construction stormwater runoff controls. Construction sites that disturb 1 acre or more must obtain coverage under the SWRCB's

Construction General Permit. PG&E is the primary electricity provider and both PG&E and SoCalGas provide natural gas services for urban and rural communities within the county. Water and wastewater for outdoor temporary events would be provided by offsite vendors. Indoor events would be served by the existing wells. The project's energy needs would be provided by PG&E.

There are three landfills in San Luis Obispo County: Cold Canyon Landfill, located near the city of San Luis Obispo; Chicago Grade Landfill, located near the community of Templeton; and Paso Robles Landfill, located east of the city of Paso Robles. The project's solid waste needs would be served by the Chicago Grade landfill.

Discussion

(a) *Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

As described in the project description, water and wastewater facilities for outdoor temporary events will be brought to the site and will not depend on the existing on-site well and septic systems. Indoor temporary events will be served by new ADA compliant restrooms constructed within the existing barn located in event Area 1. Therefore, there would be *no impacts* associated with the construction of new water or wastewater treatment facilities or expansion of existing facilities.

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

As discussed in Section X, Hydrology and Water Quality, water for outdoor temporary will be brought to the project site from off-site sources and will not depend on the existing on-site well. Determining the precise off-site source of the water, and assessing the potential impacts associated with utilizing these sources, is considered speculative within the definition provided in the CEQA Guidelines Section 15145. Indoor events will derive water from the existing well system and the demand will be offset by the cessation of temporary equestrian evernts. Therefore, impacts associated with the sufficiency of water supplies are considered *less than significant*.

(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?*

As described in the project description, wastewater facilities for temporary events will be brought to the site and will not use existing on-site septic systems. Indoor events will utilize the existing septic system serving the residence in Event Area 1. To ensure the existing septic system provides adequate capacity, the project will be conditioned to demonstrate compliance with the County's Local Agency Management Program (LAMP) as set forth in County Ordinance 19.07. Therefore, *no impacts* would occur.

(d) *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

The nearest landfill to the site is the Cold Canyon Landfill located approximately 4 miles to the south. The landfill has a remaining capacity of approximately 10 million cubic yards. The project will be conditioned to comply with County Code section 8.98.040 that sets forth recycling requirements for all temporary events. The incremental amount of waste generated by the project that is not recycled/reused would be within the service capacity of the landfill. Local landfills have adequate permit capacity to serve the project and the project does not propose to generate solid waste in

excess of State or local standards or otherwise impair the attainment of solid waste reduction goals. Therefore, potential impacts would be *less than significant*.

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

There would be very little construction waste associated with improvements to existing buildings. Therefore, the project would not result in a substantial increase in waste generation during project construction or operation. The project will be conditioned to comply with County Code section 8.98.040 that sets forth recycling requirements for all temporary events. The incremental amount of waste generated by the project that is not recycled/reused would be within the service capacity of the landfill. Therefore, impacts would be *less than significant*.

Conclusion

The project would result in no impact associated with increased demands on water, wastewater or stormwater infrastructure and facilities. No substantial increase in solid waste generation would occur. Therefore, potential impacts to utilities and service systems would be *less than significant.*

Mitigation

None are required.

Sources

Provided in Exhibit A.

XX. WILDFIRE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
(a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
(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?	☐	☒	☐	☐
(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?	☐	☐	☒	☐
(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?	☐	☒	☐	☐

Setting

In central California, the fire season usually extends from roughly May through October; however, recent events indicate that wildfire behavior, frequency, and duration of the fire season are changing in California. Fire Hazard Severity Zones (FHSZ) are defined by CALFIRE based on the presence of fire-prone vegetation, climate, topography, assets at risk (e.g., high population centers), and a fire protection agency's ability to provide service to the area (CAL FIRE 2007). FHSZs throughout the county have been designated as "Very High," "High," or "Moderate." In San Luis Obispo County, most of the area that has been designated as a "Very High Fire Hazard Severity Zone" is located in the Santa Lucia Mountains, which extend parallel to the coast along the entire length of San Luis Obispo County. The project is located within a local fire responsibility area and has not been assigned a fire hazard severity zone, and, based on the County's fire response time map, it would take 5-10 minutes to respond to a call regarding fire or life safety.

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

- Identifies the departments and agencies designated to perform response and recovery activities and specifies tasks they must accomplish;

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

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

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

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

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

According to data provided by CalFire, the project site has not been subject to a wildfire since at least 1950.

Discussion

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

The project does not require any road closures. As discussed in Section IX. Hazards and Hazardous Materials, it is expected that event guests and temporary workers would use Greengate Road to access the project site which is paved from SR 227 to the project site.

The project will be conditioned to demonstrate compliance with the regulations provided in Title 14 of the State Response Area Fire Safety Regulations provided in section 1270.02(b). As conditioned, implementation of the proposed project would have *no impact* relating to any currently adopted emergency response plans or emergency evacuation plans.

Based on the County's Land Use View tool and Dam and Levee Failure Plan, the project is not located within an area that would be inundated in the event of a dam failure. The project would not impair implementation or physically interfere with County hazard mitigation or emergency plans; therefore, *no impacts* related to emergency plans would occur.

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

The temporary events areas area located in lowland areas of the site and surrounded by vineyards and existing equestrian facilities. Winds in the area vary from 6-8 miles per hour and primarily come from the north and west. As described in Section VI. Geology and Soils, the potential for landslides in the temporary events area is low. The project is not proposing any amount of ground disturbance or the construction of new buildings or other structures.

Three secondary access roads are proposed (Figure 4) to ensure guests may safely exit the site in the event of an emergency. One route will travel north from the Villa outdoor event area on an existing unpaved ranch road (Area 3) then southwest adjacent to East Corral de Piedra Creek to the existing equestrian area where it turns south to the parking and staging area. A second emergency access will be established that travels southeast from the terminus of Greengate Road on an unpaved ranch road within an easement associated with APN 044-233-009, then turns south to Corbett Canyon Road along an easement affecting two adjacent parcels associated with the Greengate Ranch and Vineyard. A third emergency access will be established that travels southeast along the westerly boundary of APN 044-161-007 to an existing unimproved ranch road that crosses APN 044-233-009 to the access easement along the property line shared with the Greengate Ranch and Vineyards site.

Lastly, the project will be conditioned to comply with all applicable fire protection standards as determined by CalFire, including, but not limited to, preparation of a fire safety plan and emergency access improvements; the project will be required to comply with the requirements of the plan for the life of the project. With implementation of mitigation measures HAZ-3 and HAZ-4, along with compliance with the Uniform Fire Code and the recommendations of CalFIRE/County Fire in their referral response (Kevin McClean, letter of June 12, 2025), potential impacts associated with slope, prevailing winds, and other factors will be *less than significant with mitigation*.

(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?

As discussed above under item (b), the project would be designed to comply with all fire safety rules and regulations, including the California Fire Code and Public Resources Code. The proposed secondary access routes will use an existing ranch roads and will be used only in an emergency. Therefore, potential impacts would be *less than significant.*

(d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The project is not proposing any grading or new construction or disturbance in areas of steep slopes. Therefore, the project will not expose the guests of temporary events to significant risks such as downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes and project impacts would be *less than significant*.

Conclusion

As conditioned, the project would not expose people or structures to new or exacerbated wildfire risks and would not require the development of new or expanded infrastructure or maintenance to reduce wildfire

risks. Therefore, potential impacts associated with wildfire would be less than significant and no mitigation measures are necessary.

Mitigation

Implement mitigation measures HAZ-3, HAZ-4 and T-1.

Sources

Provided in Exhibit A.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
(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)?	☐	☐	☒	☐
(c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

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

As discussed in each resource section above, with implementation of mitigation measures BIO-1 through BIO-10, the project would not result in significant impacts to biological resources and would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important

examples of the major periods of California history or prehistory. Therefore, impacts would be *less than significant with mitigation.*

(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)?

The State CEQA Guidelines define cumulative impacts as "two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts." Section 15355 of the State CEQA Guidelines further states that individual effects can be various changes related to a single project or the change involved in a number of other closely related past, present, and reasonably foreseeable future projects. The State CEQA Guidelines state that the discussion of cumulative impacts should reflect the severity of the impacts as well as the likelihood of their occurrence. However, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. Furthermore, the discussion should remain practical and reasonable in considering other projects and related cumulatively considerable impacts.

As discussed in the Baseline Conditions, the adjacent parcel to the south is occupied by Greengate Ranch and Vineyard which is authorized under MUP DRC2012-00078 to conduct temporary events in accordance with LUO 22.30.610 as follows:

- 25 events with up to 500 people
- 50 events with up to 300 people
- 50 activities with up to 200 people

These events share vehicular access with the project site (Greengate Road) and would total 125 events per year. Outdoor amplified sound is allowed at certain locations with these events. The Greengate Ranch MUP was subject to separate CEQA compliance through adoption of an MND (ED-125) that included mitigation measures that were subsequently incorporated into the conditions of project approval. The mitigation measures/conditions address a range of impacts associated with biological resources, hazards and hazardous materials, noise and transportation/circulation. The findings for approval of MUP DRC2012-00078 concluded that, with incorporation of the recommended mitigation measures, all project related impacts were considered less than significant and less than cumulatively considerable.

Aesthetics

The analysis provided in Section I., Aesthetics, concludes that the project will result in no impacts to aesthetic and visual resources. Therefore, project impacts, when combined with additional development and activities likely to occur on surrounding properties within the viewshed are considered *less than cumulatively considerable*.

Agriculture and Forestry Resources

The analysis provided in Section II, Agriculture and Forestry Resources, indicates that the project would have no impact to important farmland and would not result in the conversion of surrounding farmland to another use. In addition, no potential impacts to forest land or timberland would occur. The project would not result in a conflict with existing zoning for agricultural use. Therefore, when considered with the potential impacts of other reasonably foreseeable development, the

contribution of the project's potential impacts to agriculture and forestry resources is considered *less than cumulatively considerable*.

Air Quality

The analysis provided in Section III, Air Quality, concludes that the project will have a less than significant impact to air quality. Therefore, operational, and cumulative impacts would be *less than cumulatively considerable*.

Biological Resources

The analysis provided in Section IV, Biological Resources, concludes that the project would have a less-than-significant impact with mitigation on biological resources so long as mitigation measures BIO-1 through BIO-10 are implemented. Therefore, when considered with the potential impacts of other reasonably foreseeable development in the area, project impacts associated with biological resources would be *less than cumulatively considerable with mitigation*.

Cultural Resources

The analysis provided in Section V. Cultural Resources concludes that project development would have no impacts to cultural resources. Therefore, when considered with the potential impacts of other reasonably foreseeable development in the area, project impacts associated with cultural resources would be *less than cumulatively considerable*.

Energy

The analysis provided in Section VI. Energy concludes that the project's contribution to the overall increased demand for electricity and natural gas would not have the potential to result in potentially cumulatively considerable environmental impacts the wasteful, inefficient and unnecessary use of energy. Therefore, the project's impacts associated with energy use would be *less than cumulatively considerable*.

Geology and Soils

As discussed in Section VII. Geology and Soils, the project will not result in any significant ground disturbance or the construction of buildings or other structures. Therefore, project related impacts to soils and geologic resources is considered *less than cumulatively considerable with mitigation*.

Greenhouse Gas Emissions

As discussed in Section VIII, Greenhouse Gas Emissions, the project is estimated to generate less than 830 MMTCO2e GHG and is assumed to have a less than significant adverse impact that is not cumulatively considerable and consistent with the GHG reduction objectives of AB32 and SB32.

Therefore, cumulative impacts associated with GHG emissions would be *less than cumulatively considerable*.

Hazards and Hazardous Materials

As discussed in Section IX. Hazards and Hazardous Materials, the project may expose surface water bodies and other resources to hazardous materials in the event of spill or upset conditions. With implementation of mitigation measures HAZ-1 and HAZ-2, these impacts are considered less than significant and less than cumulatively considerable. In addition, guests of temporary events may be exposed to increased risk of fire hazard. Mitigation measures HAZ-3, HAZ-4 and T-1 have been

identified to reduce potential impacts by implementing a traffic management plan and by compliance with CalFire standards.

Project impacts associated with hazards and hazardous materials would be *less than cumulatively considerable with mitigation.*

Hydrology and Water Quality

Project water demand for outdoor events will be satisfied by bringing water to the site from off-site sources. Indoor events in Event Area 1 will be served by existing wells and the demand will be offset by the cessation of temporary equestrian events. The project will be conditioned to provide evidence of sufficient water supplies for outdoor events and the adequacy of the existing septic system as determined by the Department of Environmental Health and CalFire. Since the water supply will serve 25 or more people daily for more than 60 days per year it will be considered a public water system. With regard to the septic system, the project is subject to the County's Local Agency Management Program (LAMP) as set forth in County Ordinance 19.07.

As discussed in Section X. Hydrology and Water Quality, indoor are expected to result in no net increase in groundwater demand. Participation in the adopted GSP for the San Luis Obispo Valley Groundwater Basin will ensure the small increase in groundwater demand will be less than significant and less than cumulatively considerable. Therefore, project impacts are considered *less than cumulatively considerable*.

Noise

As discussed in Section XIII, Noise, project related noise associated with outdoor temporary events would be significant unless mitigated with implementation of mitigation measure N-1. Amplified speech and sound occurring on the Greengate Ranch and Vineyard site is subject to noise mitigation required through the conditions of project approval which are designed to ensure compliance with County standards. Therefore, when considered with the potential impacts of other reasonably foreseeable development, the contribution of the subject project to potential noise impacts is considered *less than cumulatively considerable with mitigation*.

Population and Housing

The project will not accommodate any increase in population. Therefore, when considered with the potential impacts of other reasonably foreseeable development in the unincorporated county, the contribution of the subject project to impacts related to housing and population is considered *less than cumulatively considerable*.

Public Services

The project may be subject to adopted public facility (County) and school (CGC Section 65995 et seq.) fee programs to offset impacts to public services. Therefore, when considered with the potential impacts of other reasonably foreseeable projects, the contribution of the subject project to potential public services impacts would be *less than cumulatively considerable*.

Transportation

As discussed in Section XVII, Transportation, the project would not result in a conflict with a plan or policy addressing the circulation system, or increase hazards due to a geometric design feature. The analysis provided in Section XVII includes an assessment of roadway operations and resulting levels of service associated with temporary events on the project site, in addition to peak traffic generated by temporary events occurring on the adjacent Greengate Ranch and Vineyard site. The analysis

concludes that the resulting traffic will not reduce the level of service to affected roadways and intersections so long as the recommended mitigation measures are implemented. With implementation of mitigation measure T-1 along with HAZ-3 and HAZ-4, the project's potential traffic impacts would be *less than cumulatively considerable with mitigation*.

County Fire/CAL FIRE requirements will be enforced as conditions of approval.

Project related VMT is expected to fall below the County's thresholds of significance.

Other Impact Issue Areas

Based on the project's less-than-significant impacts and the discretionary review of all surrounding reasonably foreseeable future development, the project's potential impacts associated with the following issue areas would be *less than cumulatively considerable*:

- Land Use Planning;
- Mineral Resources;
- Recreation;
- Tribal Cultural Resources;
- Utilities and Service Systems; and
- Wildfire.

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

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

Conclusion

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

Sources

Provided in Exhibit A.

Initial Study – Environmental Checklist

Exhibit A - Initial Study References and Agency Contacts

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

Contacted	Agency	Response
☒	County Public Works Department	**In File****
☒	County Environmental Health Services	**In File****
☒	County Agricultural Commissioner's Office	**In File****
☒	County Airport Manager	**None**
☒	Airport Land Use Commission	**In File****
☐	Air Pollution Control District	**Not Applicable**
☐	County Sheriff's Department	**Not Applicable**
☐	Regional Water Quality Control Board	**Not Applicable**
☐	CA Coastal Commission	**Not Applicable**
☐	CA Department of Fish and Wildlife	**Not Applicable**
☐	CA Department of Forestry (Cal Fire)	**Not Applicable**
☒	CA Department of Transportation	**In File****
☐	Community Services District	**In File****
☒	Other Building, City of San Luis Obispo	**In File****
☐	Other AB 52 Tribes	**Not Applicable**

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

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

☒ Project File for the Subject Application

County Documents

☐ Coastal Plan Policies
☒ Framework for Planning (Coastal/Inland)
☒ General Plan (Inland/Coastal), includes all maps/elements; more pertinent elements:
- ☒ Agriculture Element
- ☒ Conservation & Open Space Element
- ☐ Economic Element
- ☒ Housing Element
- ☒ Noise Element
- ☒ Parks & Recreation Element/Project List
- ☒ Safety Element

☒ Land Use Ordinance (Inland/Coastal)
☒ Building and Construction Ordinance
☒ Public Facilities Fee Ordinance
☐ Real Property Division Ordinance
☐ Affordable Housing Fund
☒ San Luis Obispo Airport Land Use Plan
☒ Energy Wise Plan
☒ South County Area Plan/SLO(south) Sub Area
☐ Design Plan
☐ Specific Plan
☐ Annual Resource Summary Report
☐ Circulation Study

Other Documents

☒ Clean Air Plan/APCD Handbook
☒ Regional Transportation Plan
☒ Uniform Fire Code
☒ Water Quality Control Plan (Central Coast Basin – Region 3)
☒ Archaeological Resources Map
☐ Area of Critical Concerns Map
☐ Special Biological Importance Map
☐ CA Natural Species Diversity Database
☒ Fire Hazard Severity Map
☒ Flood Hazard Maps
☒ Natural Resources Conservation Service Soil Survey for SLO County
☒ GIS mapping layers (e.g., habitat, streams, contours, etc.)
☐ Other

Initial Study – Environmental Checklist

The project application materials are incorporated by reference in their entirety and available for review at the Department of Planning and Building, 976 Osos Street, Suite 200, San Luis Obispo. In addition, the following project specific information and/or reference materials have been considered as a part of the Initial Study:

Project-Specific Studies and Supporting Materials

Project application materials

45 dB Acoustics, March 30, 2025, Acoustical Analysis

Padre Associates, July, 2025, Biological Resources Assessment

Well completion reports, various dates

Orosz Engineering Group, July 29, 2025, Trip Generation, Roadway Capacity, and Safety Study

Other County References

Referral response from the Building Division e-mail dated June 20, 2025

Referral response from CalFire/SLO County Fire, June 12, 2025

Referral response from the Environmental Health Department e-mail August 20, 2025

Referral response from the Public Works Department _November 21, 2025

Referral response from Caltrans August 20, 2025

Referral response from Caltrans October 14, 2025

Referral response from the City of San Luis Obispo, June 27, 2025

Referral response from the County Sheriff, June 19, 2025

Other References

California Department of Conservation (CDOC). 2015. CGS Information Warehouse: Regulatory Maps http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps accessed August 2018

San Luis Obispo County.1999.General Plan Safety Element. https://www.slocounty.ca.gov/getattachment/893b6c58-7550-4113-911c-3ef46d22b7c8/Safety-Element.aspx accessed August 2018

Barros, Ana M.G., Jose M.C. Pereira, Max A. Moritz, and Scott L. Stephens. 2013. Spatial Characterization of Wildfire Orientation Patterns in California. Forests 2013, 4; Pp 197-217." 2013.

CalEEMOD version 2022

California Department of Conservation (CDOC). 2015. Fault Activity Map of California. Available at < http://maps.conservation.ca.gov/cgs/fam/>.

_____. 2016. California Important Farmland Finder. Available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>.

_____. 2019. San Luis Obispo County Tsunami Inundation Maps. Available at <https://www.conservation.ca.gov/cgs/tsunami/maps/San-Luis-Obispo>

California Department of Forestry and Fire Protection (CAL FIRE). 2007. "Draft Fire Hazard Severity Zones in Local Responsibility Areas." Available at <http://frap.fire.ca.gov/webdata/maps/san_luis_obispo/fhszl06_1_map.40.pdf>

California Department of Toxic Substances Control (DTSC). 2019. EnviroStor. Available at <https://www.envirostor.dtsc.ca.gov/public/>

California Department of Transportation (Caltrans). 2019. California Scenic Highways Mapping Tool. Available at: < https://www.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=f0259b1ad0fe4093a5604c9b838a486a>.

Carollo Engineers, San Luis Obispo County 2012 Master Water Report, Volume III, Table 8.

California Geological Survey (CGS). 2015. CGS Information Warehouse: Mineral Land Classification. Available at <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>

County of San Luis Obispo. 2016. 2015/2016 County Bikeways Plan. July 6th, 2016.

County of San Luis Obispo Staff. 2019. California Emissions Estimator Model (CalEEMod, 2022) Results.

Diblee, Thomas W., Jr. 2004. Geologic Map of the Creston & Shedd Canyon Quadrangles, San Luis Obispo County, California. National Geologic Map Database. Available at: <https://ngmdb.usgs.gov/Prodesc/proddesc_71748.htm>.

Department of Planning and Building website: https://www.slocounty.ca.gov/Departments/Planning-Building/Department-Services/Agriculture,-Water,-and-Energy/Water-Programs/Programs-and-Services/PRGWB-Area-of-Severe-Decline.aspx

Occupational Health and Safety Administration Technical Manual, Section III, Chapter 5 part II.B.6.

Pacific Gas and Electric (PG&E). 2019. Delivering Low-Emission Energy. Available at: <https://www.pge.com/en_US/about-pge/environment/what-we-are-doing/clean-energy-solutions/clean-energy-solutions.page>.

San Luis Obispo Air Pollution Control District (SLOAPCD). 2012. CEQA Air Quality Handbook. April 2012.

_____. 2017. Clarification Memorandum for the San Luis Obispo County Air Pollution Control District's 2012 CEQA Air Quality Handbook. November 2017.

State Water Resources Control Board (SWRCB). 2015. GeoTracker. Available at <http://geotracker.waterboards.ca.gov/>

_____. 2019. Estella Substation and Paso Robles Area Reinforcement Project Paleontological Resources Technical Report for the Templeton Route Alternatives, San Luis Obispo County, California. Available at: <https://www.cpuc.ca.gov/environment/info/horizonh2o/estrella/docs/Templeton%20Route%20Alts%20PRTR.pdf>.

U.S. Department of Agriculture (USDA). 1983. Soil Survey of San Luis Obispo County, California, Paso Robles Area. U.S. Department of Agriculture, Soil Conservation Service. May 1983. Available at: <https://www.nrcs.usda.gov/Internet/FSE_MANUSCRIPTS/california/sanluisCA1983/sanluisCA1983.pdf>

U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS). 2017. Web Soil Survey. Available at <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx> Accessed April 17, 2019.

United States Geological Survey (USGS). 2019. Areas of Land Subsidence in California. Available at: https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html

University of California, Division of Agriculture and Natural Resources Landscape Water Requirement Calculator, 2022

Exhibit B - Mitigation Summary Table

Per Public Resources Code Section 21081.6, the following measures also constitute the mitigation monitoring and/or reporting program that would reduce potentially significant impacts to less than significant levels. These measures would become conditions of approval (COAs) should the project be approved. The Lead Agency (County) or other Responsible Agencies, as specified in the following measures, are responsible to verify compliance with these COAs.

Biological Resources

BIO-1 Site Maintenance and General Operations - The following measures are required to minimize impacts during active construction and ongoing operations. All measures applicable during construction shall be included on project plans. All measures applicable to operation shall be clearly posted on-site in a location(s) visible to workers and anyone visiting the site:

- All work activities shall be completed during daylight hours (between sunrise and sunset) and outside of rain events.
- The Project impact area shall be clearly marked or delineated with stakes, flagging, tape, or signage prior to work. Areas outside of work limits shall be considered environmentally sensitive and shall not be disturbed.
- All equipment and vehicles shall be checked and maintained daily to prevent spills of fuel, oil, and other hazardous materials. A designated staging area shall be established for vehicle/equipment parking and storage of fuel, lubricants, and solvents. All fueling and maintenance activities shall take place in the staging area.
- 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 (e.g., t-posts and yellow rope) and/or flagging. No work or travel shall occur outside these limits.
- Project plans, drawings, and specifications shall show the boundaries of all work areas on site and the location of erosion and sediment controls, limit delineation, and other pertinent measures to ensure the protection of sensitive habitat areas and associated resources.
- Staging of equipment and materials shall occur in designated areas at least 100 feet from aquatic habitat (e.g., swales, drainages, ponds, vernal pools, if identified on site).
- 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. Sandbags and/or absorbent pads and spill control kits shall always be available on site to clean up and contain fuel spills and other contaminants.
- Construction equipment shall be inspected by the operator daily to ensure that equipment is in good working order and no fuel or lubricant leaks are present.

- Plastic monofilament netting (erosion control matting) or similar material will not be used on site due to the potential to entangle special-status wildlife. Acceptable substitutes are coconut coir matting, biodegradable fiber rolls, or tackified hydroseeding compounds.
- The use of pesticides (including rodenticides) and herbicides on the property shall be in compliance with all local, state, and federal regulations to avoid primary and secondary poisoning of sensitive species that may be using the site.
- After completion of the project's construction, all protective fencing/flagging used to delineate sensitive biological resources shall be removed from the project area and disposed of in appropriate waste receptacles or reused.

BIO-2 **Prior to issuance of grading permits**, the applicant shall provide evidence to the County that either no jurisdictional areas will be impacted or that any necessary authorizations from the United States Army Corps of Engineers, State Water Resource Control Board, and/or California Department of Fish and Wildlife have been issued.

BIO-3 **Protection of Jurisdictional Waters.** In addition to BIO-2, HAZ-1 and HAZ-2, the following recommendations are provided to protect drainages and aquatic resources from indirect impacts.

- Project construction shall comply with County Code Title 19.11 Stormwater Management.
- A minimum 50-foot setback from the top of bank or upland edge of any potentially jurisdictional wetland or water shall be maintained during all phases of construction and operation, unless a County-qualified biologist verifies that activities within the setback would not result in impacts to jurisdictional resources. The setback buffer shall be clearly demarcated in project plans and protected with temporary fencing during construction. No grading, trenching, or equipment staging shall occur within this buffer unless it has been demonstrated, to the satisfaction of the County-qualified biologist, that such activities would not impact jurisdictional resources, or unless agency review and approval has been obtained. If impacts to jurisdictional resources are identified, the applicant shall obtain all applicable resource agency permits (e.g., CDFW, RWQCB, and USACE).
- Construction activity within 100 feet of drainages shall occur only when conditions are dry.
- To prevent erosion and sedimentation into jurisdictional waters during construction, an erosion and sedimentation control plan shall be developed and implemented which shall outline Best Management Practices for temporary stabilization. Acceptable stabilization methods include the use of weed-free, natural fiber (i.e., non-monofilament) rolls, jute or coir netting, and/or other industry standard materials. Erosion control devices shall be installed and maintained for the duration of the project.
- Install protective fencing or similar around the mapped valley needlegrass grassland community to ensure no inadvertent impacts during construction activities such as overland travel, grading, or staging of equipment and materials.

BIO-4 **Other Agency Permits.** The applicant acknowledges that state or federal permits may be needed from one or more of the following resource agencies: California Department of Fish and Wildlife, U.S. Fish & Wildlife Service, Army Corps of Engineers, for construction activities including grading,

road improvement, or maintenance work involving any riparian area or drainage feature. Where required, the Applicant shall obtain a Section 404 Nationwide Permit from USACE, a Section 401 Water Quality Certification from RWQCB, and a Section 1602 Streambed Alteration Agreement from CDFW to authorize project-related impacts in all areas potentially under the jurisdiction of these regulatory agencies and provide satisfactory evidence to the County, as follows:

A. Prior to Prior to initiating ground-disturbing activity, the applicant shall provide documentation to the County demonstrating compliance with applicable resource agency requirements. A County-qualified biologist may determine that no permits are required if there are no impacts to jurisdictional resources, including no impacts within the top of bank; written verification of this determination shall be provided. If impacts are identified, the applicant shall submit, for each applicable agency, either (a) written verification that no permit is required or (b) copies of all required permits. The County shall review any required permits for consistency with County requirements prior to issuance of grading or construction permits, and all permit conditions shall be incorporated into construction drawings and implemented during construction.

B. The following measures would apply where waters of the U.S. or waters of the State cannot be avoided:

5) Based on final site designs, the applicant shall confirm with a qualified biologist, or from the Corps, that a Clean Water Act (CWA) Section 404 permit will not be required for activities within the East Coral de Piedra Creek riparian habitat. Assuming a Corps permit is not required, RWQCB compliance will need to occur via the Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the U.S. Army Corps of Engineers to be Outside of Federal Jurisdiction (Water Quality Order No. 2004-0004-DWQ).

6) If the project design requires fill within waters of the U.S., the applicant shall obtain and implement all the terms and conditions of a Corps Nationwide Permit to the satisfaction of the Corps. Compliance with Corps regulatory permitting would also include obtaining and CWA 401 Water Quality Certification from the RWQCB that would satisfy approval of work in California waters of the State.

7) The applicant shall obtain Section 1600 regulatory compliance from CDFW, in the form of a Streambed Alteration Agreement or written verification that no agreement is required, for any project-related impacts to jurisdictional streams, riparian habitats, or other regulated waters.

8) Compensatory mitigation may be required to be implemented on-site at a minimum ratio of 3:1 to offset permanent impacts to jurisdictional riparian habitat (note resource agencies may require a higher ratio). A mitigation and monitoring plan shall be prepared by a biologist familiar with restoration and mitigation techniques as part of the permit application packages. The plan shall include, but not be limited to the following components:

- Description of the project/impact site
- Goal(s) of the compensatory mitigation project
- Description of the proposed compensatory mitigation-site

- Implementation plan for the compensatory mitigation-site
- Maintenance activities during the monitoring period
- Monitoring plan for the compensatory mitigation-site
- Success criteria and performance standards
- Reporting requirements
- Contingency measures and funding mechanisms
- Erosion control and landscaping specifications included in the mitigation plan shall allow only natural-fiber, biodegradable meshes and coir rolls, to prevent impacts to the environment and to prevent entrapment of wildlife.

BIO-5 **Preconstruction Survey for Roosting Bats.** Within seven days prior to the start of work on existing buildings or structures, a County-approved qualified biologist shall survey the building for evidence of roosting bats. Any potentially suitable roost sites shall be monitored by the qualified biologist during the evening to determine whether bats leave for foraging. The roost sites should be monitored from at least one hour before sunset, and viewed with the aid of binoculars. The qualified biologist shall determine whether a maternity roost is present by carefully observing individuals on the roost. If any young are present, construction shall be delayed until they have matured and can fly on their own. When it has been determined that no young are present, the biologist shall monitor the roost in the evening when the bats leave to forage and then install bat exclusion netting or similar material to prevent their return. The netting shall be inspected the following morning to ensure that no bats have become entangled in the netting and that none remain at the roost site. The netting shall remain in place until the trees and shed are removed. The qualified biologist shall monitor the removal of any vegetation in which bat exclusion netting has been placed. If any bats are found, work shall be halted until measures are taken to effectively relocate the bats or allow them to leave the site on their own volition.

BIO-6. **Bat eviction plan**. If a bat roost is detected during the maternal season, a minimum 50- foot no-disturbance buffer will be maintained. For roosts that require removal during the non-material season, a one-way valve will be placed over the occupied access point to allow bats to safely leave and prohibit reentry.

BIO-7 **Pre-construction survey for American Badger**. A pre-construction survey shall be conducted within thirty days of beginning work on unpaved ranch roads to identify if badgers are using these areas. The results of the survey shall be sent to the project manager and the County of San Luis Obispo. If the pre-construction survey finds potential badger dens, they shall be inspected to determine whether they are occupied. The survey shall cover the entire Study Area and shall examine both old and new dens. If potential badger dens are too long to completely inspect from the entrance, a fiber optic scope shall be used to examine the den to the end. Inactive dens may be excavated by hand with a shovel to prevent reuse of dens during construction. If badgers are found in dens on the Property between February and July, nursing young may be present. To avoid disturbance and the possibility of direct take of adults and nursing young, and to prevent badgers from becoming trapped in burrows during construction activity, no grading shall occur within 100

feet of active badger dens between February and July. Between July 1st and February 1st all potential badger dens shall be inspected to determine if badgers are present. During the winter badgers do not truly hibernate but are inactive and asleep in their dens for several days at a time. Because they can be torpid during the winter, they are vulnerable to disturbances that may collapse their dens before they rouse and emerge. Therefore, surveys shall be conducted for badger dens throughout the year. If badger dens are found within the Study Area during the pre-construction survey, the CDFW wildlife biologist for the area shall be contacted to review current allowable management practices.

Construction activities shall not commence within the exclusion area until the badger has moved of its own accord. A preconstruction survey letter report shall be submitted to the lead agency for review within one week after completion of the survey.

BIO-8 **Preconstruction survey for nesting or migratory birds**. Within one week of ground disturbance activities, if work occurs between March 1 and August 30, nesting bird surveys shall be conducted to determine whether yellow-billed magpie or other bird species protected under the MBTA are nesting within or adjacent to the construction zone. If surveys do not locate nesting birds, construction activities may be conducted. If nesting birds are located, no construction activities shall occur within 100 feet of nests until chicks are fledged. A pre-construction survey report shall be submitted to the lead agency immediately upon completion of the survey. The report shall detail appropriate fencing or flagging of the buffer zone and make recommendations on additional monitoring requirements. A map of the Project site and nest locations shall be included with the report. The Project biologist conducting the nesting survey shall have the authority to reduce or increase the recommended buffer depending upon site conditions.

BIO-9 **Preconstruction Survey and Monitoring for Special-status Reptiles.** A qualified biologist shall conduct a preconstruction survey of roadway work on unpaved ranch roads immediately prior to the start of work within 50 feet of suitable habitat for western pond turtle. The scope of the survey shall be determined by a qualified biologist and shall be sufficient to determine presence or absence in the project areas. Construction monitoring shall also be conducted by a qualified biologist during all initial ground disturbing and vegetation removal activities (e.g., grading, grubbing, vegetation trimming, or vegetation removal including tree removal) within suitable habitat. With approval from CDFW, if pond turtles are discovered during surveys and monitoring, they will be hand captured and relocated to suitable habitat outside the area of impact. If the focused survey results are negative, a letter report shall be submitted to the County, and no further action shall be required. If legless lizards or pond turtle are found to be present in the proposed work areas the following steps shall be taken:

- Pond turtle shall be captured by hand by the project biologist and relocated to an appropriate location well outside the project areas.
- Construction monitoring shall be required for all new ground-breaking activities located within pond turtle habitat.

BIO-10 **Preconstruction Survey and Monitoring for Western Spadefoot Toad, California Red-Legged Frog and Habitat for Vernal Pool Fairy Shrimp.** A qualified biologist shall conduct a preconstruction survey immediately prior to the start of work within 50 feet of suitable habitat for western spadefoot toad and CRLF and to determine if suitable habitat exists for vernal pool fairy

shrimp. Construction monitoring shall also be conducted by a qualified biologist during all initial ground-disturbing and vegetation removal activities (e.g., grading, grubbing, vegetation trimming, or vegetation removal) within suitable habitat. If western spadefoot toad are discovered during surveys and monitoring, they will be hand captured and relocated to suitable habitat outside the area of impact. If CRLF are detected within the drainage and out of harm's way, a biological monitor shall monitor all initial disturbance activities within 50 feet of suitable habitat. If CRLF or suitable habitat for vernal pool fairy shrimp is found within any of the areas planned for disturbance, work shall cease and the USFWS shall be contacted for guidance on how to proceed. No work shall occur until receipt of authorization to proceed from the USFWS.

Prior to commencement of clearing, grading, construction, or improvement activities, the applicant shall make all efforts to schedule work activities when impacts to CRLF would be minimal. This includes the following:

a. If work must occur in the rainy season (October 15–April 15), no work shall occur during or within 48 hours after rain events of 0.25 inch or greater.

b. A follow-up CRLF survey shall be conducted prior to the start of work following any rain event of 0.25 inch or greater.

c. Avoid nighttime work during all seasons. If nighttime work is deemed necessary, a qualified biologist shall be on-site until it is determined that no potential impacts to CRLF would occur based on conditions and the scope of work.

Hazards and Hazardous Materials

HAZ-1 **Equipment Maintenance and Refueling.** During all construction activities, the cleaning, refueling, and maintenance of equipment and vehicles shall occur only within designated staging areas. The staging areas shall conform to all Best Management Practices applicable to attaining zero discharge of stormwater runoff. At a minimum, all equipment and vehicles shall be checked and maintained on a daily basis to ensure proper operation and to avoid potential leaks or spills.

HAZ-2 **Spill Response Protocol.** During all construction activities, all project-related spills of hazardous materials shall be cleaned up immediately. Appropriate spill prevention and cleanup materials shall be onsite at all times during construction.

HAZ-3 **Fire Protection and Emergency Access.** Prior to final occupancy, the project shall demonstrate compliance with all of the relevant conditions/requirements set forth in the letter of June 12, 2025 from Kevin McLean CalFire/San Luis Obispo County Fire Department.

HAZ-4 **Traffic Management.** Prior to the initiation of temporary events, the applicant shall submit a Traffic Management Plan (TMP) prepared by a licensed civil engineer or traffic engineer for review and approval by the Department of Planning and Building in consultation with the Public Works Department. The TMP shall include at least the following components:

- During any interim overflow events associated with Green Gate Farms at the subject site, all operations shall comply with the approved TMP for Minor Use Permit DRC2012-00078. All applicable measures are incorporated herein by reference.
- A TMP Coordinator shall be designated by the property owner and their contact information shall be provided to the Department of Planning and Building.
- An encroachment permit shall be required for any traffic control proposed within the public right of way.
- The TMP Coordinator shall be responsible for completing the following tasks:
    - Provide notice to emergency management personnel that the event is scheduled along the expected hours of the event.
    - Encourage guests to carpool and/or ride share.
    - If available, encourage guests to utilize a shuttle bus service to/from the event to reduce the number of vehicles on site and using the roadways.
    - Implementation, monitoring and removal of physical measures required to manage traffic flows into and out of the project site.
    - Respond to all public agencies and/or public inquiries regarding traffic associated with a temporary event.
    - Establish and implement a procedure to request County approval for subsequent amendments to the TMP, along with notification to the County after each event in which TMP changes are requested.
    - Establish and implement an enforcement program to ensure compliance with the approved TMP and a records keeping plan to substantiate compliance.

Noise

N-1 **Outdoor events with amplified music or speech.**

A. For outdoor events with amplified music or speech occurring between 7:00am and 10:00pm, the following event limits and general configurations shall be observed:

Event Area 1 -- Lawn Area (shown below)

Configuration A – with stage located at the southwest end of the lawn and loudspeakers facing northeast – source levels must be no greater than 85 dBA (as measured 10 feet in front of the stage). Or,

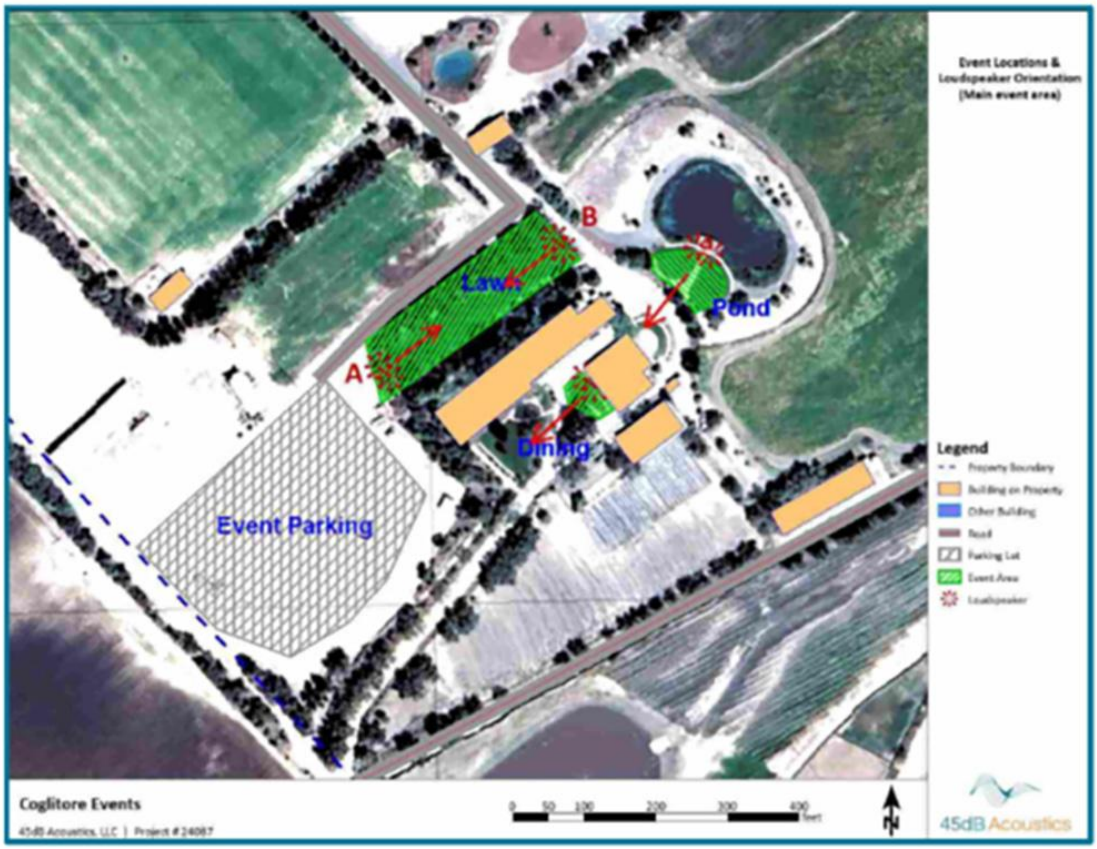
Configuration B – with stage located at the northeast end of the lawn and loudspeakers facing southwest – source levels must be no greater than 80 dBA (as measured 10 feet in front of the stage).

Event Area 1 -- Pond Area

With the stage located at the pier with loudspeakers facing southwest – source levels must be no greater than 85 dBA (as measured 10 feet in front of the stage).

Event Area 1 -- Dining Area

With the stage located on the west side of the barn with loudspeakers facing south – source levels must be no greater than 85 dBA (as measured 10 feet in front of the stage).



Event Area 2 -- Vineyard House Area

Configuration A – With the stage located on the southwest side of the building and loudspeakers facing southwest – source levels must be no greater than 75 dBA (as measured 10 feet in front of the stage). Or,

Configuration B – With the stage located at the southwest side of the lawn and loudspeakers facing northeast towards the building – source levels must be no greater than 80 dBA (as measured 10 feet in front of the stage). Or,

Configuration C – With the stage located at the east end of the pool and loudspeakers facing northwest – source levels must be no greater than 85 dBA (as measured 10 feet in front of the stage). Or,

Configuration D – With the stage located at the northeast end of the event space and loudspeakers facing northwest – with a 12-ft tall hay bale "bandshell" behind the stage, source levels must be no greater than 85 dBA (as measured 10 feet in front of the stage).

Event Area 3 – Villa Area

Configuration A – With the stage located north of the Villa house and at least 65 ft from the property line and loudspeakers facing west – source levels must be no greater than 75 dBA (as measured 10 feet in front of the stage). Or,

Configuration B – With the stage located north of the Villa house and at least 65 ft from the property line and loudspeakers facing west – with a 12-ft tall hay bale "bandshell" behind the stage, source levels must be no greater than 85 dBA (as measured 10 feet in front of the stage).

B. For non-amplified music or speech, noise levels must be no greater than 65 dBA as measured 10-ft from the event source.

C. For any nighttime event held after 10pm, the maximum sound level measured 10 feet from the source shall be reduced by at least 5dB from the limits listed in item A., above, for each event area and configuration.

Transportation

T-1 **Timing of temporary events.** Temporary events shall be subject to the following limitations:

c. Events shall not begin or end during the weekday hours of 4:00 PM to 6 PM. And,

d. Roadway improvements shall be completed to provide north-bound and south-bound left-turn lanes on SR 227 at the intersection of Greengate Road, to the satisfaction of Caltrans and the Department of Public Works. However, temporary events authorized under Minor Use Permit DRC2012-00078 may occur **on this site** prior to completion of these improvements, as the subject site may serve as an interim overflow event area for activities approved under **DRC2012-00078**. **At no time shall events occur under both use permits until the road improvements are complete.**