



Addendum to the Initial Study/Mitigated Negative Declaration for the Bridge Street Affordable Housing Project (ER#0286-2014)

1. Project Title:

Bridge Street Affordable Housing Project

2. Lead Agency Name and Address:

City of San Luis Obispo
990 Palm Street
San Luis Obispo, CA 93401

3. Contact Person and Phone Number:

Kyle Bell, Associate Planner
805-781-7524

4. Project Location:

279 Bridge Street
San Luis Obispo, CA 93401

5. Project Applicant and Representative Name and Address:

Housing Authority of San Luis Obispo
Scott Smith, Executative Director
487 Leff Street
San Luis Obispo, CA 93401

6. General Plan Designation:

Services & Manufacturing

7. Zoning:

Manufacturing (M)

8. Description of the Project:

The previously approved Bridge Street Mixed-Use project consisted of three buildings including: Building A (8,636-square foot [sf] manufacturing shell with mezzanine);

Building B (31,726 sf mixed-use building including 7,200 sf of commercial shell on the ground level with 16 loft-style, two-bedroom residential units above); and Building C (6,850-sf mixed-use building including 3,421-sf of commercial shell on the ground level with two residential units above) with associated parking and site improvements (ARCH-0255-2019/USE-0526-2019).

The proposed Bridge Street Mixed-Use project consists of 94 residential units dedicated to affordable housing, and 924 square feet of commercial space. The project proposes podium style buildings with parking below two stories of residential units for a total of three stories; Building 1A (37,230-sf, 32 units), Building 1B (924-sf), Building 2 (30,204-sf, 32 units), and Building 3 (36,135-sf, 30 units). The project includes a request for a 24% density bonus with an affordable housing concession regarding the Edge Conditions standards for the orientation of open space areas and window placement for properties that are adjacent to low density zoning (ARCH-0587-2020/USE-0412-2021/AFFH-0413-2021).

9. Project Entitlements Requested:

Design Review - Major
Minor Use Permit
Affordable Housing Incentive Request

10. Setting and Surrounding Land Uses:

The project site is a 2.73-acre flag lot with the flagpole portion of the lot accessing Bridge Street. The northern “flag” portion of the site is developed with a drive aisle and ten parking spaces that serve an existing building on an adjacent property. The property is an existing legal parcel with access provided by a bridge over Meadow Creek. The project site is bordered to the north by the Meadow Creek riparian corridor, existing commercial and industrial uses to the north (M and C-S-PD), live/work units to the west (M-PD), and residential development to the south and east (R-2-PD and R-2-S). The South Hills Open Space area is located further to the south.

11. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):

Air Pollution Control District

12. Previous Environmental Review

On June 1, 2015, the Architectural Review Commission adopted a Mitigated Negative Declaration for the previous project, which included approval of construction of the existing access bridge over Meadow Creek, three manufacturing shell buildings (including caretaker’s quarters), tree removals, and site improvements. Aside from the bridge over Meadow Creek and tree removals, the project was not constructed. A copy of the adopted Mitigated Negative Declaration is attached (Attachment 1). On September 25, 2019, the

Planning Commission adopted an Addendum to the Mitigated Negative Declaration, which evaluated a modified project that was not constructed. A copy of the adopted Addendum is attached (Attachment 2).

Section 15164 of the State *CEQA Guidelines* allows a lead agency to prepare an addendum to an IS/MND when “minor technical changes or additions” have occurred in the project description since the IS/MND was adopted. In addition, the lead agency is required to explain its decision not to prepare a subsequent EIR pursuant to State CEQA Guidelines Section 15162, which requires subsequent EIRs when proposed changes would require major revisions to the previous EIR “due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.”

The evaluation below discusses the issue areas covered by the previously approved IS/MND and concludes that in each case no new environmental effects are created and that there is no increase in the severity of previously identified significant effects.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

Environmental impacts associated with development of the project site were evaluated in the Mitigated Negative Declaration (MND) ER #0286-2014. The previous project evaluated in the adopted MND included the construction of three shell buildings, construction of a bridge over Meadow Creek, construction of parking and site improvements, and tree removals. As a component of the previous project entitlement, a Use List for the site was established. The currently proposed project is consistent with the adopted Use List.

The proposed project addressed in this Addendum consists of three residential buildings (104,493 square feet) and one commercial building (924 square feet) and associated parking and site improvements. The tree removals that were identified in the previous entitlement have been removed from the site (Chinese pistache, California pepper tree cluster and Italian stone pine), no additional trees are proposed for removal. The primary changes to the project description since the MND was adopted consist of the proposed use of the proposed buildings from manufacturing to mixed-use (commercial and residential) and the proposed size and architectural design of the structures.

Potential Impacts Mitigated to Less than Significant

The previously-adopted MND found that with incorporation of mitigation measures, potential impacts to aesthetics, air quality, biological resources, geology/soils, and noise will be less than significant. A summary of the potential impacts and adopted mitigation measures is provided below, including an assessment of the potential impacts resulting from the currently proposed project. As discussed below, implementation of the project would not result in any new impacts or impacts with increased severity than what was identified in the adopted MND.

Aesthetics

The adopted MND identified a potential impact due to the potential for glare from the parking lot and building light poles affecting adjacent residences. Adopted mitigation includes replacing freestanding light posts with bollard lighting, to be located outside of required setbacks. This mitigation would apply to the current project. In addition, the current project is subject to Zoning Regulations Section 17.70.050 (Edge Conditions), which requires that any driveways and drive aisles facing an adjacent zone must be fully screened from the adjacent (R-2) use. The proposed project incorporates solid fencing and perimeter landscaping to be consistent with this regulation. All other aesthetic impacts resulting from the proposed project would be less than significant, similar to the previous project, because the project site is not located within a scenic vista, visible from a local or state scenic highway or roadway, and development of the site would be consistent with the underlying zoning and Community Design Guidelines, which address visual compatibility. Therefore, the project would not create any new impacts, the project would not increase the severity of any impact, and impacts would remain less than significant with mitigation.

Agricultural Resources

No impacts to agricultural resources were identified in the adopted IS/MND. Based on the location of the project, underlying zoning, and lack of Farmland, no impact would occur.

Air Quality

The adopted IS/MND identified potentially significant impacts related to the construction and operational phases of the project, and the proximity of sensitive receptors. At the time, the project was reviewed by the San Luis Obispo County Air Pollution Control District (APCD) and mitigation measures recommended by the APCD were incorporated into the adopted Mitigation Monitoring and Reporting Program. Construction-related impacts would be similar to the previously proposed project, and would include potential asbestos exposure, the creation of fugitive dust, and the generation of diesel emissions within 1,000 feet of sensitive receptors. All adopted mitigation measures will be applied to the proposed project (Mitigation Measure AQ-1-6); compliance with these measures and existing air quality regulations would mitigate potential impacts to less than significant. Based on APCD screening criteria (Table 1-1 of the APCD CEQA Air Quality Handbook), the proposed 94 residential units and 924 square feet of commercial use would not result in any significant operational impacts. Therefore, the project would not create any new impacts, the project would not increase the severity of any impact, and impacts would remain less than significant with mitigation.

Biological Resources

The adopted IS/MND identified potential impacts primarily related to the bridge over Meadow Creek, which has been constructed. The IS/MND also identifies mitigation measures to mitigate potential impacts to nesting birds and wildlife during construction of the project, including pre-construction surveys, and requirements for monitoring (BIO-1-5). These mitigation measures would apply to the current project, and would reduce impacts to less than significant. In addition,

standard erosion and sedimentation control measures are required to protect water quality and habitat along the Meadow Creek corridor, pursuant to the City's Municipal Code and Waterways Management Plan. Therefore, the project would not create any new impacts, the project would not increase the severity of any impact, and impacts would remain less than significant with mitigation.

Cultural Resources

The adopted IS/MND identified that the property does not contain any known prehistoric or historic archaeological resources identified on City maintained resource maps. An Archeological Resource Inventory of the site was prepared which did not identify any historic resources on the site or within the immediate vicinity. The City's Archeological Preservation Guidelines include a requirement that in the event that prehistoric or historic archaeological resources are encountered, work shall cease until the Community Development Department can ensure that the project can continue within procedural parameters accepted by the City of San Luis Obispo and the State of California, and any materials discovered during construction activities are appropriately handled. Therefore, the project would not create any new impacts, the project would not increase the severity of any impact, and impacts would remain less than significant.

Geology and Soils

The adopted MND included the findings of a Preliminary Geotechnical Engineering Report and Foundation Alternative Memo, which concluded that the project is structurally feasible. Mitigation is identified to require a final geotechnical engineering investigation and comprehensive design-level report, which is required to address site preparation and grading, total and differential settlement under the structure loads, slabs-on-grade, expansive soils, site-specific seismicity (including seismic loads on retaining walls). This mitigation measure applies to the current project. In addition, as noted above, standard erosion and sedimentation measures are required during construction, which would mitigate potential impacts related to erosion and sedimentation. Therefore, the project would not create any new impacts, the project would not increase the severity of any impact, and impacts would remain less than significant with mitigation.

Greenhouse Gas Emissions and Energy

Construction-related and operation-related greenhouse gas emissions would be similar to the previously proposed project, and would not generate emissions that would result in a significant impact. In addition, all adopted mitigation measures will be applied to the proposed project (Mitigation Measure AQ-1-6), which would reduce potential emissions. The project consists of a primarily residential project, with 924 square feet of commercial use, located proximate to existing parkland, pedestrian paths, transit, and bicycle lanes.. Furthermore, the California Building Code (CBC) contains standards that regulate the method of use, properties, performance, or types of materials used in the construction 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 2019 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. Pacific Gas & Electric Company (PG&E) has historically been the primary electricity provider for the City. In October 2018, the City Council committed to joining Central Coast Community Energy (3CE, formerly Monterey Bay Community Power) and, beginning in January 2020, 3CE became the City's primary electricity provider. 3CE is striving to provide 100% carbon-free electricity to the city by 2030. The City has adopted local amendments to encourage all-electric new buildings. At its meeting on September 3, 2019, the City Council adopted the Clean Energy Choice Program. Unlike other cities that are banning natural gas entirely, the proposed Clean Energy Choice Program encourages clean, efficient, and cost-effective all-electric new buildings through incentives, local amendments to the California Energy Code, and implementation of the Carbon Offset Program. New projects wishing to use natural gas will be required to build more efficient and higher performing buildings and offset natural gas use by performing retrofits on existing buildings or by paying an in-lieu fee that will be used for the same purpose. Therefore, the project would not create any new impacts, would not increase the severity of any impact, and impacts would remain less than significant.

Hazards and Hazardous Materials and Wildfire

The adopted IS/MND identified that the proposed project would not result in the routine transport, use, disposal, handling, or emission of any hazardous materials that would create a significant hazard to the public or to the environment. Compliance with existing regulations, including Title 49, Parts 171–180, of the Code of Federal Regulations would reduce any impacts associated with the potential for accidental release during construction or occupancy of the proposed project or by transporters picking up or delivering hazardous materials to the project site. The proposed project would not increase the area of disturbance or include any elements that require the use or storage of hazardous materials beyond standard, legal use. The project site is not on a parcel included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (DTSC 2021). The project site is not located within any airport land use plan area as it is at the foot of the South Hills and outside any flight pattern. The project site is surrounded by existing urban uses and will have no impact on the placement of people or structures next to wildland areas that could result in loss, injury, or death involving wildland fires. Therefore, the proposed project would not create any new impacts, would not increase the severity of any impact, and impacts would remain less than significant.

Hydrology and Water Quality

Meadow Creek crosses through the northern portion of the project site. The majority of the site is within the boundaries of the area subject to inundation from flood waters in a 100-year storm with inundation depths of up to 2-feet (AO 2' depth Zone). Both the northernmost extent and southeast corner of the site are somewhat higher elevation and are within the XB Zone, which is subject to a 0.2% annual chance of flooding. The project has been designed with elevated structures, retention basins, and permeable structures to ensure that development will not impede or re-direct the flow of any waters. Compliance with City standards will be sufficient to ensure that the proposed project does not endanger structures on this and other adjoining sites.

Similar to the previously project, the proposed project is required to comply with the City's Drainage Design Manual of the Waterway Management Plan, Post Construction Requirements for stormwater, and Floodplain Management Regulations (Zoning Regulations Chapter 17.78). Therefore, based on compliance with existing regulations, the proposed project would not create any new impacts, would not increase the severity of any impact, and impacts would remain less than significant.

Land Use and Planning

The proposed project remains consistent with the General Plan, as the site is designated for mixed-use development, the proposed use of the property would not change, and the project would not physically divide an established community. Therefore, the proposed project would not create any new impacts, would not increase the severity of any impact, and impacts would remain less than significant.

Mineral Resources

No mineral resources are present onsite. Therefore, the proposed project would not create any new impacts, would not increase the severity of any impact, and no impact would occur.

Noise

The adopted IS/MND identified an impact related to use of manufacturing shell building loading docks, and required mitigation states that loading facilities are to be oriented away from residential uses on adjacent properties. The current project has changed manufacturing buildings B and C to mixed-use buildings with commercial uses oriented toward Bridge Street and residential uses above parking areas. This use mix is anticipated to result in less potential operational noise than potential manufacturing uses, and any potential loading facilities are required to be oriented away from residential uses, in compliance with the adopted measure (NOI-1). Based on the changes to the proposed use of the site, and compliance with the Zoning Regulations and Noise Ordinance, no new or greater noise impacts would occur. Therefore, the project would not create any new impacts, would not increase the severity of any impact, and impacts would remain less than significant with mitigation.

Population and Housing

Development under the proposed project would add up to 94 new housing units to the City, and would not displace any existing housing. Similar to the previous project, the proposed project would be consistent with the General Plan and would not induce substantial population growth. The project would not extend roads or other infrastructure beyond those necessary to accommodate the project. Therefore, the proposed project would not create any new impacts, would not increase the severity of any impact, and no impact would occur.

Public Services

The proposed project site is served by the City of San Luis Obispo Fire Department. Implementation of the proposed project would increase the intensity of use of the site and would marginally increase the demand for fire protection services compared to existing conditions. The project would be similar to the land uses on surrounding properties, and the site is currently served by the City for fire protection. The project site is served by the City of San Luis Obispo Police Department for police protection services. The development of the site would not result in the need for increased patrols or additional units such that new police facilities would need to be constructed. The project site is located in the existing services area of the City's schools, parks, and other public facilities. The project would introduce new students to San Luis Coastal Unified School District (SLCUSD). Consistent with the requirements of Senate Bill 50, the project would be required to pay a school impact fee (Government Code Section 65970) to SLCUSD. SB 50 fees would be directed towards the maintenance of adequate school service levels, including increases in capacity. Future development under the proposed project would include construction of new residential uses, which would be served by existing public services and would not require the construction of any new or physically altered governmental facilities. Therefore, the proposed project would not create any new impacts, would not increase the severity of any impact, and impacts would be less than significant.

Recreation

The project would increase the demand on public parkland and neighborhood parks from an increased residential population. While the project may result in an overall increase in residents within the city, the project would be consistent with the General Plan and projected population growth for the city of San Luis Obispo. The project would be subject to Park Land In-Lieu fees, which would offset the project's contribution to increased demand on park and recreational facilities and contribute to helping the City achieve its goal service ratio of 10 acres of parkland per 1,000 residents. These fees would be used in the future to contribute funding for the establishment of new park/recreation facilities or expansion of existing facilities, however, these actions would not be directly triggered by or required as a result of implementation of the project. Through participation in this fee program, potential project impacts associated with accelerated deterioration of existing facilities would be less than . Therefore, the project would not create any new impacts, would not increase the severity of any impact, and impacts would remain less than significant.

Transportation/Traffic

In 2013, the State of California passed Senate Bill (SB) 743, which mandates that jurisdictions can no longer use LOS or other measures of automobile delay/congestion to evaluate transportation impacts under CEQA. The State then issued guidelines identifying vehicles miles traveled (VMT), which measures the total amount of driving over a given area, as the primary metric to be used for CEQA analysis of transportation impacts, with these changes becoming mandatory on July 1, 2020. The City of San Luis Obispo formally adopted VMT impact thresholds in June of 2020, and these thresholds are applied to projects as the primary metric for evaluating potential project impacts under CEQA. The City has a current jobs-to-housing ratio of roughly 2.5:1, which is considered relatively "jobs heavy." The current jobs-to-housing ratio results in longer commute trips – primarily by singleoccupant automobile – for employees commuting into

the City from outside communities. By increasing the number of housing units within the City, regional VMT is projected to experience a net decrease as more residents of the region are able to live within closer proximity of job centers and where there is greater access to a well-connected transit, pedestrian and bicycle network. Based on the City's Multimodal Transportation Impact Study Guidelines, adopted June of 2020, this project falls below the Thresholds of Significance for Mixed-use projects when analyzing the dominant use on the site. The VMT generated from the revised project would be 15% below baseline Regional (County) average Residential VMT per capita. Therefore, no significant impact would occur.

Regional access to the project site is provided by Highway 101, located east of the project site. Local access to the project site is provided by Bridge Street and South Higuera; with pedestrian and bicycle access also available via a bike path connection at the western end of Bridge Street to Exposition Drive and the Meadow Park bicycle path network. All roadways in the immediate project vicinity have curbs, gutters, sidewalks, and on-street parking. The project does not conflict with any applicable circulation system plans and does not significantly add to demand on the circulation system or conflict with any congestion management programs or any other agency's plans for congestion management. Therefore, the proposed project would not create any new impacts, would not increase the severity of any impact, and impacts would be less than significant.

Utilities and Service Systems

Since adoption of the IS/MND and approval of the previous project, the City has initiated the expansion of and improvements to the Water Resource Recovery Facility (WRRF). The WRRF is designed for an average dry-weather flow of 5.1 million gallons per day (mgd) and treated an average of 2.9 mgd during 2020. The average dry weather flow of wastewater is expected to reach 5.4 mgd at the WRRF once the City reaches its 2035 build-out population identified in the General Plan. Upon completion in 2024, the WRRF modifications will increase treatment capacity at the facility to 5.4 mgd, which is planned to accommodate wastewater flows in the City under full buildout of the General Plan. The proposed project is consistent with the General Plan land use designation and would be adequately served by City sewer infrastructure and the WRRF.

Regarding water, the City maintains adequate, diverse water supply (and excess supply) to meet Citywide water demands during single- and multiple-dry years through 2035 (build-out of the General Plan). The proposed project is consistent with the General Plan land use designation and would be adequately served by City water infrastructure and water supply.

The proposed project would be adequately served by the Cold Canyon Landfill, which serves the area, and has a remaining capacity of 13,000,000 cubic yards (maximum permitted capacity is 24,000,000 cubic yards).

Therefore, the proposed project would not create any new impacts, would not increase the severity of any impact, and impacts would remain less than significant.

DETERMINATION

In accordance with Section 15164 of the State CEQA Guidelines, the City of San Luis Obispo has determined that this addendum to the adopted IS/MND for the Bridge Street Affordable Housing project is necessary to document changes or additions that have occurred in the project description since the IS/MND was adopted. The preparation of a subsequent environmental document is not necessary because:

1. None of the circumstances included in Section 15162 of the CEQA Guidelines have occurred which require a subsequent environmental document:
 - a. The project changes do not result in new or substantially more severe environmental impacts.
 - b. The circumstances under which the project is undertaken will not require major changes to the IS/MND.
 - c. The modified project does not require any substantive changes to previously approved mitigation measures.
2. The changes are consistent with City General Plan goals and policies that promote provision of additional housing within the City.

Attachment:

1. Initial Study / Negative Declaration ER# 0286-2014
2. Previous Addendum to Mitigated Negative Declaration ER#0286-2014



**INITIAL STUDY
ENVIRONMENTAL CHECKLIST FORM
For ER # 0286-2014**

1. Project Title:

279 Bridge Street Project

Development of a 2.73 acre site with three shell buildings, one on-site caretaker unit, an access bridge over Meadow Creek, and other associated site improvements, and including a modified list of allowed uses. ARCH/ER-0286-2014.

2. Lead Agency Name and Address:

City of San Luis Obispo
990 Palm Street
San Luis Obispo, CA 93401

3. Contact Person and Phone Number:

Marcus Carloni, Associate Planner
(805) 781-7176

4. Project Location:

279 Bridge Street, San Luis Obispo, CA 93401

5. Project Sponsor's Name and Address:

Devin Gallagher
1680 La Finca Court
Arroyo Grande, CA, 93420

Projects Representative Name and Address:

John Knight
49 Mariposa Street
San Luis Obispo, CA, 93401

6. General Plan Designation:

Services & Manufacturing

7. Zoning:

Manufacturing (M)

8. Description of the Project:

The proposed project includes development of a 2.73 acre site with three shell buildings. The three separate buildings would include a total of 22,758 square feet of useable space and 13,525 square feet of coverage. All leasable commercial space will be on ground level and a mezzanine level within Building A, with a second level caretakers unit provided on the second floor of Building C. The site would be accessed from Bridge Street via the flag portion of the site, and across a Conspan Bridge that would be constructed to cross Meadow Creek. Allowed uses on the site would be as specified in the attached Use List, which is a more restrictive list of allowed/conditionally allowed uses proposed by the applicant.

9. Surrounding Land Uses and Setting:

The project site is a 2.73-acre flag lot with the flagpole portion of the lot accessing Bridge Street. The northern “flag” portion of the site is developed with a drive aisle and ten parking spaces that serve an existing building on an adjacent property. The property is an existing legal parcel with no developed access from Bridge Street or any other public rights-of-way. Currently undeveloped, the property is primarily covered with non-native annual grasses. It is bordered to the north by the Meadow Creek riparian corridor, and to the south by an ephemeral swale. There are five existing trees on the site (outside the creek corridor), including: one California Pepper Tree, one Italian Stone Pine, one Coastal Live Oak, one Pepper Tree, and one Chinese Pistache. Proposed tree removals include the Italian Stone Pine and Chinese Pistache, and several trees/willow clusters in the riparian corridor to allow for the bridge crossing.

This site is located in an “AO” flood zone. This zone indicates that there is a potential of flooding up to two-feet over the existing grade during the 100 year storm. The site is bordered by existing commercial and industrial uses to the north, by a 17 unit mixed use project to the west and south (currently under construction), by the South Hills Natural Reserve to the Southeast, and two existing single family homes to the east.

The Land Use and Zoning maps for the property identify the property as designated Manufacturing. Existing uses surrounding the site area are as follows:

North: Developed with light industrial and office uses; zoned M and C-S-PD.

East: Developed with single-family residences; zoned R-2-S.

Southeast: Conservation/Openspace (South Hills); zoned C/OS-40-SP.

South: Currently being developed with single-family residences; zoned R-2-PD.

West: Currently being developed with live-work units; zoned M-PD.

See Attachment 1, Vicinity Map.

10. Project Entitlements Requested:

Architectural Review: Architectural Review Commission (ARC) approval is required for the site layout and building design. The ARC will concurrently take action on the requested creek setback reduction and this environmental document.

11. Other public agencies whose approval is required:

San Luis Obispo Air Pollution Control District (SLOAPCD)

Central Coast Water Quality Control Board (CCWQCB)

California Department of Fish and Wildlife (formerly the Department of Fish and Game)

Army Corps of Engineers

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

FISH AND GAME FEES

	The Department of Fish and Wildlife has reviewed the CEQA document and written no effect determination request and has determined that the project will not have a potential effect on fish, wildlife, or habitat (see attached determination).
X	The project has potential to impact fish and wildlife resources and shall be subject to the payment of Fish and Wildlife fees pursuant to Section 711.4 of the California Fish and Wildlife Code. This initial study has been circulated to the California Department of Fish and Wildlife for review and comment.

STATE CLEARINGHOUSE

X	This environmental document must be submitted to the State Clearinghouse for review by one or more State agencies (e.g. Cal Trans, California Department of Fish and Wildlife, Department of Housing and Community Development). The public review period shall not be less than 30 days (CEQA Guidelines 15073(a)).
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DETERMINATION (To be completed by the Lead Agency):

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made, by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	X
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed project MAY have a “potentially significant” impact(s) or “potentially significant unless mitigated” impact(s) on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) 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.	



Signature

04-29-2015

Date

Doug Davidson, Community Development Deputy Director

For: Derek Johnson
Community Development Director

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 19, "Earlier Analysis," as described in (5) below, may be cross-referenced).
5. Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063 (c) (3) (D)). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they addressed site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 0286-2014					

1. AESTHETICS. Would the project:

a) Have a substantial adverse effect on a scenic vista?	1, 4, 16, 28			--X--	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, open space, and historic buildings within a local or state scenic highway?	16, 17, 28				--X--
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	16, 17, 28			--X--	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	8, 28		--X--		

Evaluation

- a. The project site is not located within a scenic vista; however, the site is adjacent to the base of the South Hills Natural Reserve. The higher portions of the South Hills are considered a scenic vista within the City. The significant viewshed of this portion of the property begins at approximately the 300-foot contour and above. Both the existing residential development immediately east of the site and the residential development currently under construction immediately to the south are at similar or higher contours than the proposed development. Because these elevations are well below the 300-foot contour that is considered a significant vista, the proposed development will not result in significant impacts to a scenic vista.
- b. The project site is not within or adjacent to a local or state scenic highway.
- c. The proposed development site is screened from Bridge Street behind existing commercial properties fronting the right-of-way and thick vegetation within the riparian corridor, which limit visibility to the site from the public roadway. A seasonal creek and its associated vegetation that includes willow trees and native shrubs further screen the proposed project site from the roadway and adjacent properties. All proposed structures have been designed to meet or exceed site setback and height limitations, and together with site improvements will be reviewed by the Architectural Review Commission to ensure consistency with the Community Design Guidelines.
- d. The proposed development includes a mix of building-wall mounted fixtures, bollards, and post fixtures for nighttime illumination. All proposed fixtures will include full cut-off shielding and be dark sky compliant, as required by the City's Night Sky Preservation Ordinance (MC Chapter 17.23). Wall mounted fixtures on Buildings A and C are limited to the interior faces of the structures (Building A, north and east facades; Building C, south façade only), and will not cause illumination or glare to cross to adjacent properties. Building B, at the center of the site, has wall mounted fixtures along the east, west and south facades. Along the south façade, which parallels the southern property line, a setback of 32-feet from the closest portion of the structure will ensure that light spillage will not become a nuisance.

A mixture of 15-foot high post lights and 3-foot high bollards are proposed to light the pathways, parking, and other outdoor areas. As discussed in greater detail in Section 12: Noise, with the exception of the caretakers unit, hours of operation for the site will be primarily during daylight hours, therefore nighttime illumination will largely be required for security purposes. As there are no intervening buildings between these parking and open yard areas that will be illuminated, the proposed post lights could create a new source of light and glare impacting the adjacent residents and South Hills Natural Reserve. Mitigation Measure **AES 1** has been recommended that all post lights shall be eliminated and replaced with bollard lighting. An additional mitigation Measure (**AES 2**) has been recommended to require that all freestanding bollard fixtures be outside required yard and creek setbacks. This will necessitate relocation of one bollard currently shown within the creek setback immediately west of the access bridge. Relocation of this bollard outside of the creek setback will ensure that any potentially significant impacts on riparian species are mitigated.

The project may include reflective roofing materials including but not limited to solar panels and metal roofing. Careful design and placement of such materials will reduce off site impacts to a less than significant level.

Mitigation Measures: Aesthetics

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Mitigation Measure AES 1: All freestanding light posts shall be eliminated and replaced with bollard lighting depicted elsewhere on project plans or other low focused lighting fixtures as approved by the Architectural Review Commission.

Mitigation Measure AES 2: All freestanding bollard lighting shall be located outside required yard and creek setbacks.

Conclusion: With the implementation of the recommended mitigation measures potential impacts associated with light, glare, and aesthetics will be reduced to a less than significant level.

2. AGRICULTURE RESOURCES. Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	1, 18				--X--
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	1, 10, 11				--X--
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	17				--X--

Evaluation

- The project site is not designated as Prime or Unique Farmland or Farmland of Statewide Importance on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, the proposed project would not result in conversion of these agricultural resources to nonagricultural use.
- The project site is not located on farmland, nor is it under a Williamson Act contract. The Project site is designated for Commercial uses in the General Plan and is zoned C-S (Commercial Services). The project site is surrounded by developed properties and public streets. Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract.
- Redevelopment of the site will not contribute to conversion of farmland. No impacts to existing on site or off site agricultural resources are anticipated with development of the project site.

Conclusion: No Impact

3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management 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?	19, 28, 29, 32		--X--		
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			--X--		
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			--X--		
d) Expose sensitive receptors to substantial pollutant concentrations?				--X--	
e) Create objectionable odors affecting a substantial number of people?					--X--

Evaluation

a), b), c), d) Both the US Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have

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established ambient air quality standards for common pollutants. These ambient air quality standards are levels of contaminants representing safe levels that avoid specific adverse health effects associated with each pollutant. The ambient air quality standards cover what are called “criteria” pollutants because the health and other effects of each pollutant are described in criteria documents. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. San Luis Obispo is currently designated as nonattainment for the state and federal ambient air quality standards for ground-level ozone and PM_{2.5} as well as the state standards for PM₁₀.

CEQA Appendix G states the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make significance determinations. In April 2012 the San Luis Obispo Air Pollution Control District (SLO APCD) adopted The Clean Air Plan (CAP) for San Luis Obispo County. The CAP is a comprehensive planning document identifying thresholds of significance to assist local jurisdictions during the review of projects that are subject to CEQA, and is designed to reduce emissions from traditional industrial and commercial sources, as well as from motor vehicle use. These thresholds of significance were designed to establish the level at which the SLO APCD believed air pollution emissions would cause significant environmental impacts under CEQA. Conservation and Open Space Element Policy 2.3.2 states that the City will help the APCD implement the CAP. Assessment of potential air quality impacts that may result from the proposed project was conducted using the April 2012, CEQA Air Quality Handbook. The CEQA Air Quality Handbook is provided by the County of San Luis Obispo Air Pollution Control District for the purpose of assisting lead agencies in assessing the potential air quality impacts from residential, commercial and industrial development. Under CEQA, the SLO County APCD is a responsible agency for reviewing and commenting on projects that have the potential to cause adverse impacts to air quality.

Construction Significance Criteria:

Temporary impacts from the project, including but not limited to excavation and construction activities, vehicle emissions from heavy duty equipment and naturally occurring asbestos, has the potential to create dust and emissions that exceed air quality standards for temporary and intermediate periods.

Naturally occurring asbestos (NOA) has been identified by the state Air Resources Board as a toxic air contaminant. Serpentine and ultramafic rocks are very common throughout California and may contain naturally occurring asbestos. The SLO County APCD has identified that NOA may be present throughout the City of San Luis Obispo (APCD 2012 CEQA Handbook, Technical Appendix 4.4), and under the ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (93105) are therefore required to provide geologic evaluation prior to any construction activities. A mitigation measure (AQ 1) has been recommended that all requirements outlined in the Asbestos ATCM be complied with.

The project will include extensive grading, which has the potential to disturb asbestos that is often found in underground utility pipes and pipelines (i.e. transite pipes or insulation on pipes). Demolition of this kind of underground equipment can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos containing material (ACM). As such, the project may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M – asbestos NESHAP). A mitigation measure (AQ 2) has been recommended for compliance with all regulatory requirements pertaining to the disturbance, removal or relocation of utility pipelines.

Construction activities can generate fugitive dust, which could be a nuisance to local residents and businesses in close proximity to the proposed construction site. Because the project is within 1,000 feet of sensitive receptors a mitigation measure (AQ 3) has been recommended to manage fugitive dust emissions such that they do not exceed the APCD’s 20% opacity limit (APCD Rule 401) or prompt nuisance violations (APCD Rule 402).

Construction equipment itself can be the source of emissions, and may be subject to California Air Resources Board or APCD permitting requirements. This includes portable equipment, 50 horsepower (hp) or greater or other equipment listed in the APCD’s 2012 CEQA Handbook, Technical Appendices, page 4-4. Truck trips associated with the 2,210 CY of soils that will be exported from the site may also be a source of emissions subject to APCD permitting requirements, subject to specific truck routing selected. The specific requirements and exceptions in the regulations can be reviewed at the following web

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sites: www.arb.ca.gov/msprog/truck-idling/2485.pdf and www.arb.ca.gov/react/2007/ordiesl07/frooal.pdf. A mitigation measure (AQ 4) has been recommended to ensure proper use of subject equipment. Additionally, because the project is in close proximity to nearby sensitive receptors, an additional mitigation measure (AQ 5) is recommended to ensure that public health benefits are realized by reducing toxic risk from diesel emissions.

Operational Screening Criteria for Project Impacts:

Table 1-1 of the CEQA Air Quality Handbook indicates that an industrial park with 22,758 square feet falls below the threshold of significance for the APCD Annual Bright Line threshold (MT CO₂e) (maximum size for exemption stated as 71,000 square feet), therefore it is not necessary to run the more accurate CalEEMod computer model. The CalEEMod computer model is a tool for estimating vehicle travel, fuel use, and the resulting emissions related to the project's land uses. The threshold for reactive organic gases (ROG) and oxides of nitrogen (NO_x) would not be exceeded by the proposed project (maximum size for exemption stated at 130,000). Therefore, the APCD is not requiring any operational phase mitigation measures for this project. Because of the proximity to sensitive receptors, several uses that would otherwise be allowed or conditionally allowed in the Manufacturing Zone may not be appropriate for this site. Included in the project description is a modified list of those uses which may be allowed or conditionally allowed on the site, and excluding those uses which have the potential to cause nuisance in terms of air quality, noise, and/or use of hazardous materials. Specific to Air Quality, those uses which have been prohibited on this site (though otherwise allowed in the Manufacturing Zone) include those uses involving vehicle services, fuel or petroleum dealers, laundry/dry cleaning plants, airports/heliport, cemetery, mausoleum or columbarium and heavy manufacturing. Additionally, the level of scrutiny and permitting requirements have been intensified for several other uses, including outdoor BBQ/Grills, photo and film processing labs, printing and publishing, furniture and fixture manufacturing, and outdoor light industrial uses to ensure that specific practices associated with activities are reviewed and conditioned to ensure that they will not create a nuisance. Please refer to Attachment 3, Use List.

Because future tenants of the shell structures are unknown at this time, it is also not known what types of equipment that may be used in the future. Operational sources may require APCD permits. The following list is provided by the APCD as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendix, page 4-4, in the APCD's 2012 CEQA Handbook.

- New wineries or expanding wineries with the capacity of 26,000 gallons (10,000 cases at twelve 750 milliliter bottles per case) year or more require a Permit to Operate for fermentation and storage of wine;
- Portable generators and equipment with engines that are 50 hp or greater;
- Chemical product processing and or manufacturing;
- Electrical generation plants or the use of standby generator;
- Food and beverage preparation (primarily coffee roasters);
- Furniture and fixture products;
- Metal industries, fabrication;
- Small scale manufacturing;
- Public utility facilities;
- Boilers;
- Internal combustion engines;
- Sterilization units(s) using ethylene oxide and incinerator(s);
- Cogeneration facilities;
- Tub grinders; and
- Trommel screens.

Most facilities applying for an Authority to Construct or Permit to Operate with stationary diesel engines greater than 50 hp, should be prioritized or screened for facility wide health risk impacts. A diesel engine-only facility limited to 20 non-emergency operating hours per year or that has demonstrated to have overall diesel particulate emissions less than or equal to 2 lb/yr does not need to do additional health risk assessment. Specific information regarding permitting requirements is available at the APCD Engineering Division at (805) 781-5912.

In July 2009, the California Air Pollution Control officers Associations (CAPCOA) adopted a guidance document, "HEALTH RISK ASSESSMENTS FOR PROPOSED LAND USE PROJECTS," to provide uniform direction on how to

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assess the health risk impacts from and to proposed land use projects. The CAPCOA guidance document focuses on how to identify and quantify the potential acute, chronic, and cancer impacts of sources under CEQA review. As defined in the CAPCOA guidance document there are basically two types of land use projects that have the potential to cause long-term public health risk impacts and are named Type A and Type B.

This project is considered a Type A project, a new proposed land use project that could generate toxic air contaminants that impact sensitive receptors. Air districts across California are uniform in their recommendation to use the significance thresholds that have been established under each district's "Hot Spots" and permitting programs. The APCD has defined the excess cancer risk significance threshold at 10 in a million for Type A projects in San Luis Obispo County. If tenants for the site are subject to APCD permitting a screening level health risk assessment will be required to determine the potential health risks to residents in the vicinity of the development. If the screening assessment is above 10 in a million, a more comprehensive health risk analysis will be required. Results of the screening and/or the refined health risk assessment need to be provided to the APCD for review and approval. **Mitigation measure (AQ 6)** is recommended to ensure that screening level health risk assessments are completed and provided to the APCD for review and approval prior to the issuance of business permits when required by the APCD.

e) The project includes the development of an industrial park which will potentially be occupied by a variety of uses that are allowed or conditionally allowed in the Manufacturing zone. As noted in the discussion above, the project description includes a modified list of uses which may be allowed or conditionally allowed on the site, excluding those uses which have the potential to objectionable odors and other forms of nuisance.

Mitigation Measures: Air Quality

Mitigation Measure AQ 1: Prior to any construction activities at the site, the project proponent shall ensure that a geologic evaluation is conducted to determine if the area disturbed is exempt from the Asbestos ATCM regulation. An exemption request must be filed with the APCD. If the site is not exempt from the requirements of the regulation, the applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and Asbestos Health and Safety Program for approval by the APCD.

Mitigation Measure AQ 2: Any scheduled disturbance, removal, or relocation of utility pipelines shall be coordinated with the APCD Enforcement Division at (805) 781-5912 to ensure compliance with NESHAP, which include, but are not limited to: 1) written notification, within at least 10 business days of activities commencing, to the APCD, 2) asbestos survey conducted by a Certified Asbestos Consultant, and, 3) applicable removal and disposal requirements of identified ACM.

Mitigation Measure AQ 3: During construction/ground disturbing activities, the applicant shall implement the following particulate (dust) control measures. These measures shall be shown on grading and building plans. In addition, the contractor shall designate a person or persons to monitor the dust control program and to order increased watering, modify practices as necessary, to prevent transport of dust off site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Community Development and Public Works Departments prior to commencement of construction.

- a. Reduce the amount of disturbed area where possible.
- b. Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the APCD's limit of 20% opacity for no greater than 3 minutes in any 60 minute period. Increased watering frequency will be required whenever wind speeds exceed 15 m.p.h. and cessation of grading activities during periods of winds over 25 m.p.h. Reclaimed (non-potable) water is to be used in all construction and dust-control work.
- c. All dirt stock pile areas (if any) shall be sprayed daily and covered with tarps or other dust barriers as needed.
- d. Permanent dust control measures identified in the approved project revegetation and landscape plans shall be implemented as soon as possible, following completion of any soil disturbing activities.

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- e. Exposed grounds that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating, non-invasive, grass seed and watered until vegetation is established.
- f. All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD.
- g. All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible. In addition, building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- h. Vehicle speed for all construction vehicles shall not exceed 15 m.p.h. on any unpaved surface at the construction site.
- i. All trucks hauling dirt, sand, soil, or other loose materials, are to be covered or shall maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code Section 23114.
- j. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site.
- k. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers shall be used with reclaimed water where feasible. Roads shall be pre-wetted prior to sweeping when feasible.
- l. All PM10 mitigation measures required shall be shown on grading and building plans.
- m. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below the APCD's limit of 20% opacity for no greater than 3 minutes in any 60 minute period. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD Compliance Division prior to the start of any grading, earthwork or demolition.

Mitigation Measure AQ 4: Prior to any construction activities at the site, the project proponent shall ensure that all equipment and operations are compliant with California Air Resource Board and APCD permitting requirements, by contacting the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.

Mitigation Measure AQ 5: To reduce sensitive receptor emissions impact of diesel vehicles and equipment used to construct the project and export soil from the site, the applicant shall implement the following idling control techniques:

1. California Diesel Idling Regulations
 - a. On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:
 1. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and,
 2. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of restricted area, except as noted in Subsection (d) of the regulation.
 - b. Off-road diesel equipment shall comply with the 5 minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use off-Road Diesel regulation.
 - c. Signs must be posted in the designated queuing areas and job sites to remind drivers and operators of the state's 5 minute idling limit.
2. Diesel Idling restrictions Near Sensitive Receptors (residential homes). In addition to the State required diesel idling requirements, the project applicant shall comply with these more restrictive requirements to minimize impacts to

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nearby sensitive receptors:

- Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors.
- Diesel idling within 1,000 feet of sensitive receptors shall not be permitted.
- Use of alternative fueled equipment is recommended.
- Signs that specify the no idling areas must be posted and enforced at the site.

- Soil Transport. The final volume of soil that will be hauled off-site, together with the fleet mix, hauling route, and number of trips per day will need to be identified for the APCD. Specific standards and conditions will apply.

Mitigation Measure AQ 6: To confirm the health risks to residents of the development are below APCD thresholds, screening level health risk assessments shall be completed and provided to the APCD for review and approval prior to the issuance of business permits when required by the APCD.

Conclusion: With recommended air quality mitigation measures, the project will have a less than significant impact on air quality.

4. BIOLOGICAL RESOURCES. Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	4,10, 11, 28, 30				--X--
b) Have a substantial adverse effect, on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			--X--		
c) Have a substantial adverse effect on federally protected wetlands as defined in Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?					--X--
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				--X--	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			--X--		
f) Conflict with the provisions of an adopted habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			--X--		

Evaluation

- The project proposes construction adjacent to Meadow Creek, a tributary to San Luis Obispo Creek, with access provided via a new ConspanTM bridge. The project has been designed in substantial compliance with the City's Creek Setback Ordinance, with no encroachments into the established creek setback area other than minor grading and other modifications encroaching into the established setbacks of the creek channel for installation of the proposed bridge. A discretionary creek setback exception will be required for construction of the proposed pedestrian and vehicle bridge (Source Reference 11: City of San Luis Obispo Zoning Regulations 17.16.025). To eliminate the need for lateral over-excavation and re-compaction of soils for structural foundations and bridge abutments, cast-in-drilled-hold concrete pile (caisson) foundation systems can be used. Because of the shallow groundwater conditions, the construction of the caissons will require the use of casing or other similar drilling/construction methods to prevent groundwater from collapsing the sidewalls of drilled piers. A mitigation measure (**BIO 1**) has been recommended to

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ensure that final geotechnical engineering is completed to ensure that caisson foundations in lieu of the over-excavated building pads and bridge foundations with shallow foundations are utilized where adjacent or within riparian setbacks. Standard Conditions of Approval and Building Code Requirements will ensure that proper precautions are taken to ensure that impacts to the creek will be minimized. The Natural Resources Manager has reviewed the project plans and concurred that with the incorporation of recommended mitigation measures for the proposed development, including the bridge access across Meadow Creek, is supportable as there are no other feasible options to access the property.

Natural Communities and Habitat Types

The project site is predominantly composed of a non-native annual grassland habitat bordered by the Meadow Creek riparian corridor on the north and an ephemeral swale along the southern border of the site. The Biological Resources Assessment prepared for the project (Source Reference 30 & Attachment 9) identifies three distinct plant communities and habitat characteristics within the project site, including disturbed non-native annual grassland, Meadow Creek Arroyo Willow riparian woodland, ephemeral swale, and developed land.

The mosaic of remnant patches of habitat within the urbanized landscape around the project area can support a variety of wildlife species that have become adapted to the urban environment, such as raccoons, opossums, rodents, and reptiles, and resident and migratory birds. Common passerines observed during field surveys included the pacific slope flycatcher, chestnut-backed chickadee, bushtit, spotted towhee, northern mockingbird, and house finch. Given the undeveloped hillsides of surrounding areas and nearby Meadow Park, other wildlife species likely to occur on the site are seasonal migrants and/or residents to the area. The proposed new access road crossing of Meadow Creek and conversion of the annual grassland has the potential to impact ground nesting and/or tree nesting bird species if activities are conducted during the nesting season. Mitigation Measure **BIO 2** has been recommended to ensure that appropriate timing and surveys are preformed, and best practices followed, prior to any vegetation removal or ground disturbance. Additionally, while impacts on common ground dwelling wildlife and the loss of less than 2.0 acres of non-native grassland is not considered a significant impact, Mitigation Measure **BIO 3** is recommended to further reduce the level of this less-than-significant impact on common ground dwelling wildlife species.

Although both Meadow Creek and the ephemeral swale are likely considered waters of the U.S. subject to U.S. Army Corps of Engineers (Corps) and waters of the State by the California Department of Fish and Wildlife (CDFW), it is not anticipated that any areas meeting the criteria for jurisdictional wetlands will be disturbed by the project. Additionally, the project site is not part of a local, regional, or state habitat conservation plan.

Special Status Species and Natural Communities of Special Concern

Search of the California Natural Diversity Database (CNDD) identified both botanical and wildlife resources within a five-mile radius of the project site. However, most of these botanical and wildlife species are associated with specific soil types or habitat characteristics which are not present on the project site. Given the urban setting with a limited extent of grassland and riparian habitats, and the seasonal nature of Meadow Creek, the project site does not support suitable habitat for any special-status wildlife species. Although San Luis Obispo Creek is a well-documented stream for the South-central California steelhead Distinct Population Segment, there are significant migration barriers located within Meadow Creek, as well as a lack of sufficient stream flow throughout the year, that prevents steelhead migration into Meadow Creek from San Luis Obispo Creek. Field survey results indicated no observations of any rare, threatened, or endangered plant species within the project site. Further, the observable and identifiable plants, habitats, and soils suggest the site does not support habitat for special-status plants.

Impact Assessment

Implementation of the proposed project would result in impacts to vegetation and wildlife utilizing disturbed non-native annual grassland and willow riparian woodland habitats from the development of the access bridge crossing to the site and for the development area with an approximately 0.2 acre area remaining within the City-required 20-foot creek setback area. Given the small area of non-native vegetation within the urban landscape, this would be considered a less than significant impact. Approximately 0.08 acre (60-foot by 60-foot) of willow riparian woodland

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habitat would be removed for the bridge access across Meadow Creek. Given the value of riparian habitat in all landscape settings, this should be considered a potentially significant impact. The bridge crossing will result in fill of likely waters of the U.S./State and removal of willow and California black walnut riparian habitat that would require regulatory compliance from federal and state agencies. Impacts on seasonal creek and riparian habitat resulting in fill of waters of the U.S./State should be considered a potentially significant impact. To reduce potential impacts on waters of the U.S./State to a less than significant level, Mitigation Measures **BIO 4** and **BIO 5** are recommended to ensure that all Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife regulatory compliance and permitting requirements are met.

- e. No heritage trees or significant native vegetation will be removed with development of the site. There are five existing trees on the site (outside the creek corridor), including: one California Pepper Tree, one Italian Stone Pine, one Coastal Live Oak, one Pepper Tree, and one Chinese Pistache. Proposed tree removals include the Italian Stone Pine and Chinese Pistache, and several trees/willow clusters in the riparian corridor to allow for the bridge crossing. The bridge construction would remove up to two 6-inch diameter at breast height (dbh), four 8-inch dbh and one 12-inch dbh California black walnut trees. The dbh of the willow trunks impacted include 1) 5", 5", 5", 6", 7", 7", 8", 8", 8", 11", and 13"; and 2) 3", 4", 4", 9", and seven stems less than 3" dbh. Both the City Arborist and Natural Resources Manager have reviewed the removals and concurred that the proposed landscape plan, including landscape trees and native trees, shrubs and perennials within the creek setback area, provide adequate mitigation. Recommended Mitigation Measure **BIO 5** would ensure that any compensatory riparian tree plantings required by CDFW would be implemented.
- f. The project site is not subject to any known adopted habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Mitigation Measures: *Biological Resources*

Mitigation Measure BIO 1: The final geotechnical engineering report shall be prepared to ensure that caisson foundations in lieu of over-excavated building pads with shallow foundations are utilized where adjacent to riparian setbacks.

Mitigation Measure BIO 2: To reduce potential impacts to nesting birds to a less than significant level, vegetation removal and initial site disturbance for any project elements shall be conducted between September 1st and January 31st outside of the nesting bird season. If vegetation removal is planned for the bird nesting season (February 1st to August 31st), then, preconstruction nesting bird surveys shall be required to determine if any active nests would be impacted by project construction. If no active nests are found, then no further mitigation shall be required.

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

Mitigation Measure BIO 3: Prior to ground disturbing activities, a qualified biologist shall conduct a pre-construction survey within 30 days of initial ground disturbance to identify whether any upland wildlife species are using any portion of the project areas where ground disturbance is proposed. If ground dwelling wildlife species are detected a biological monitor shall be present during initial ground disturbing and/or vegetation removal activities to attempt salvage and relocation efforts for the wildlife that may be present, such as common reptiles and small mammals. The salvage and relocation effort for non-listed wildlife species would further reduce the level of this less than significant impact.

Mitigation Measure BIO 4: The applicant shall obtain Clean Water Act (CWA) regulatory compliance in the form of a permit from the Army Corps of Engineers or written documentation from the Corps that no permit would be required for the proposed bridge crossing. Should a permit be required, the applicant shall implement all the terms and conditions of the permit to the satisfaction of the Corps. Corps permits and authorizations require applicants to demonstrate that the proposed project has been designed and will be implemented in a manner that avoids and minimizes impacts on aquatic resources. Compliance with Corps permitting would also include obtaining a CWA 401 Water Quality Certification from the Regional

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Water Quality Control Board. In addition, the Corps may require compensatory mitigation for unavoidable permanent impacts on riparian habitat to achieve the goal of a no net loss of wetland values and functions. As such, regulatory compliance would reduce potential impacts on waters of the U.S. to a less-than-significant level.

Mitigation Measure BIO 5: The applicant shall obtain compliance with Section 1602 of the California Fish and Wildlife Code (Streambed Alteration Agreements) in the form of a completed Streambed Alteration Agreement or written documentation from the CDFW that no agreement would be required for the proposed bridge crossing. Should an agreement be required, the property owners shall implement all the terms and conditions of the agreement to the satisfaction of the CDFW. The CDFW Streambed Alteration Agreement process encourages applicants to demonstrate that the proposed project has been designed and will be implemented in a manner that avoids and minimizes impacts in the stream zone. In addition, CDFW may require compensatory mitigation for unavoidable impacts on riparian habitat in the form of riparian habitat restoration of disturbed areas to the extent feasible and additional compensatory riparian tree plantings. Using the City-required creek setback area along Meadow Creek for riparian tree replacement would be an appropriate onsite compensatory mitigation approach. As such, regulatory compliance would reduce potential impacts on waters of the state to a less-than-significant level.

Conclusion: With recommended mitigation measures, the potential impacts associated with the project will be reduced to less than significant impact on biological resources.

5. CULTURAL RESOURCES. Would the project:

a) Cause a substantial adverse change in the significance of a historic resource as defined in §15064.5.	4, 10, 21, 22, 23, 24				--X--
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5)			--X--		
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			--X--		
d) Disturb any human remains, including those interred outside of formal cemeteries?			--X--		

Evaluation

- a. The project site is an undeveloped open space area located between industrial development, residential areas, and preserved open space. Historical records, including maps and photographs show that during the late 19th and early 20th century the parcel remained undeveloped while the surrounding properties were developed with residential areas to the north, the Catholic Cemetery to the west, and the Exposition Park Raceway to the east. A Phase I Archeological Resource Inventory was prepared (Attachment 22) which did not identify any historic resources on the site or within the immediate vicinity.
- b-d. The property does not contain any known prehistoric or historic archaeological resources identified on City maintained resource maps. An Archeological Resource Inventory of the site was prepared to determine the presence or likelihood of archaeological historical resources. Prehistoric settlements in this area typically are found near reliable water sources, important raw material sources, or important food resources. The low lying floodplain that encompasses the project area does not meet any of these criteria, although it is near locations that do. The surface survey resulted in no evidence of prehistoric or historic archaeological materials. There is the limited potential that materials (including but not limited to bedrock mortars, historical trash deposits, and human burials) could be encountered given the proximity to the creek. The City's Archeological Preservation Guidelines include a requirement that in the event that prehistoric or historic archaeological resources are encountered that work cease until the Community Development Department can ensure that the project can continue within procedural parameters accepted by the City of San Luis Obispo and the State of California, and any materials discovered during construction activities are appropriately handled.

Conclusion: Less than significant impact.

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6. GEOLOGY AND SOILS. Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:	4,16, 26, 27, 28				
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.				--X--	
II. Strong seismic ground shaking?				--X--	
III. Seismic-related ground failure, including liquefaction?				--X--	
IV. Landslides?				--X--	
b) Result in substantial soil erosion or the loss of topsoil?			--X--		
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off site landslide, lateral spreading, subsidence, liquefaction or collapse?				--X--	
d) Be located on expansive soil, as defined in Table 1802.3.2 [Table 1806.2] of the California Building Code (2007) [2010], creating substantial risks to life or property?				--X--	
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?					--X--

Evaluation

- a, c, d. San Luis Obispo County, including the City of San Luis Obispo is located within the Coast Range Geomorphic Province, which extends along the coastline from central California to Oregon. This region is characterized by extensive folding, faulting, and fracturing of variable intensity. In general, the folds and faults of this province comprise the pronounced northwest trending ridge-valley system of the central and northern coast of California.

Under the Alquist-Priolo Special Studies Zone Act, the State Geologist is required to delineate appropriately wide special studies zones to encompass all potentially and recently-active fault traces deemed sufficiently active and well-defined as to constitute a potential hazard to structures from surface faulting or fault creep. In San Luis Obispo County, the special Studies Zone includes the San Andreas and Los Osos faults. The edge of this study area extends to the westerly city limit line, near Los Osos Valley Road. According to a recently conducted geology study, the closest mapped active fault is the Los Osos Fault, which runs in a northwest direction and is about one mile from the City's westerly boundary. Because portions of this fault have displaced sediments within a geologically recent time (the last 10,000 years), portions of the Los Osos fault are considered "active". Other active faults in the region include: the San Andreas, located about 30 miles to the northeast, the Nacimiento, located approximately 12 miles to the northeast, and the San Simeon-Hosgri fault zone, located approximately 12 miles to the west.

Although there are no fault lines on the project site or within close proximity, the site is located in an area of "High Seismic Hazards," specifically Seismic Zone D, which means that future buildings constructed on the site will most likely be subjected to excessive ground shaking in the event of an earthquake. Structures must be designed in compliance with seismic design criteria established in the California Building Code for Seismic Zone D. To minimize this potential impact, the California Building Code and City Codes require new structures be built to resist such shaking or to remain standing in an earthquake.

The Safety Element of the General Plan indicates that the project site has a high potential for liquefaction, which is true for most of the City. Development will be required to comply with all City Codes, including Building Codes, which require proper documentation of soil characteristics for designing structurally sound buildings to ensure new structures are built to resist such shaking or to remain standing in an earthquake.

Both a Preliminary Geotechnical Engineering Report and Foundation Alternative Memo were prepared for this

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project, which include preliminary conclusions and recommendations related to the development of the property, from a geotechnical and structural standpoint. These analyses conclude that the proposed project, while challenging in its scope and size, is structurally feasible, and that the site seems well-suited for a project of this type. As discussed in Section 4: Biology, to eliminate the need for lateral over excavation and re-compaction of the soils below for structural foundations (both buildings and the proposed bridge), which would encroach into the creek setback adjacent to Building C and expand the area of encroachment surrounding the bridge, cast-in-drilled-hold concrete pile (caisson) foundation systems can be used. Because of the shallow groundwater conditions, the construction of the caissons will require the use of casing or other similar drilling/construction methods to prevent groundwater from collapsing the sidewalls of drilled piers. A mitigation measure, (**BIO 1**) has been recommended to ensure that final geotechnical engineering is completed to ensure that caisson foundations in lieu of the over-excavated building pads and bridge foundations with shallow foundations are utilized where adjacent or within riparian setbacks. Standard Conditions of Approval and Building Code Requirements will ensure that proper precautions are taken to ensure that impacts to the creek will be minimized.

- b. This is an undeveloped infill site, located in an urbanized area of the City. Subsurface soils are generally silty sandy clays overlain by silty sandy clay with gravel, with a "Medium" expansion level. In addition to structures and surface parking, the proposed development plan includes areas of permeable hardscape and ground covers. The planting plan is specifically designed to enhance the biology of the riparian channel and near-creek environment, provide visual screening, and to prevent further erosion. The project will not result in loss of topsoil.
- e. The proposed project will be required to connect to the City's sewer system. Septic tanks or alternative wastewater systems are not proposed and will not be used on the site.

Mitigation Measures: *Geology and Soils*

Mitigation Measure GEO 1: A geotechnical engineering investigation shall be undertaken and a comprehensive design-level report prepared based on the final approved design of the project. Additional borings will be required to address specific areas of the site once building layout and structural foundation loads are determined, or can be reasonably estimated. The report shall address site preparation and grading, total and differential settlement under the structure loads, , slabs-on-grade, expansive soils, site-specific seismicity (including seismic loads on retaining walls), and any other items deemed relevant to the geotechnical engineer.

Conclusion: With recommended mitigation measure, the project will have a less than significant impact on geologic and soil resources.

7. GREENHOUSE GAS EMISSIONS. Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	1,12, 28, 32			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.				X	

Evaluation

- a, b. In addition to the criteria pollutants discussed in the above air quality analysis, the state of California's' Assembly Bill 32, the California Global Warming Solution Act of 2006 and California Governor Schwarzenegger Executive Order S-3-05 (June 1, 2005), both require reductions of greenhouse gases in the State of California. The proposed project will result in infill development, located in close proximity to transit, services and employment centers. City policies recognize that compact, infill development allow for more efficient use of existing infrastructure and Citywide efforts to reduce greenhouse gas emissions. The City's Climate Action Plan (CAP) also recognizes that energy efficient design will result in significant energy savings, which result in emissions reductions.

SLOAPCD states that GHGs (CO₂ and CH₄) from all projects subject to CEQA must be quantified and mitigated to the extent feasible. The California Office of Planning and Research has provided the following direction for the assessment and mitigation of GHG emissions:

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- Lead agencies should make a good-faith effort, based on available information, to calculate, model, or estimate the amount of CO₂ and other GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities;
- The potential effects of a project may be individually limited but cumulatively considerable. Lead agencies should not dismiss a proposed project's direct and/or indirect climate change impacts without careful evaluation. All available information and analysis should be provided for any project that may significantly contribute new GHG emissions, either individually or cumulatively, directly or indirectly (e.g., transportation impacts); and,
- The lead agency must impose all mitigation measures that are necessary to reduce GHG emissions to a less than significant level. CEQA does not require mitigation measures that are infeasible for specific legal, economic, technological, or other reasons. A lead agency is not responsible for wholly eliminating all GHG emissions from a project; the CEQA standard is to mitigate to a level that is "less than significant."

The emissions from project-related vehicle exhaust comprise the vast majority of the total project CO₂eq emissions; see Air Quality discussion in Section 3 (above) for discussion. The remaining project CO₂eq emissions are primarily from building heating systems and increased regional power plant electricity generation due to the project's electrical demands. Utilizing the LEED 2009 Project Checklist for Core and Shell Development, the project proponent identified qualifying project features totaling 110 points, which would qualify the project as LEED Platinum.

Short term GHG emissions from construction activities consist primarily of emissions from equipment exhaust. **Mitigation Measures AQ 3 and AQ 4** address vehicle and equipment exhaust, and include provisions for reducing those impacts to below a level of significance. In San Luis Obispo there are many ways to get around while reducing single-occupant vehicle trips, both for employees of the site and those patronizing the businesses during the operational phase of the project. Among these are the City's Bus system, Rideshare programs that facilitate car and vanpooling, and the intricate bicycle transportation network.

Additional long-term emissions associated with the project relate indirect source emissions, such as electricity usage for lighting. State Title 24 regulations for building energy efficiency are routinely enforced with new construction. So although Table 1-1 of the CEQA Air Quality Handbook indicates that an industrial park smaller than 36,000 square feet is below the threshold of significance for the APCD Annual Bright Line threshold (MT CO₂e) (proposed development includes three buildings totaling 22,758 square feet), running the more accurate CalEEMod computer model identifies that the operational phase impacts will likely be less than the APCD's thresholds in Table 3-2 of the CEQA Handbook. The CalEEMod computer model is a tool for estimating vehicle travel, fuel use, and the resulting emissions related to the project's land uses. The threshold for reactive organic gases (ROG) and oxides of nitrogen (NO_x) would not be exceeded by the proposed project (maximum size for exemption stated at 113,000 square feet). Therefore, the APCD is not requiring any operational phase mitigation measures for this project.

Conclusion: Less than significant impact.

8. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	10, 11, 29			--X--	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				--X--	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				--X--	--X--
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section	31				--X--

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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 for people residing or working in the project area?	10, 17			--X--	
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?					--X--
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	3, 28			--X--	
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?					--X--

Evaluation

- a. Under Title 22 of the California Code of Regulations (CCR), the term “hazardous substance” refers to both hazardous materials and hazardous wastes. Both of these are classified according to four properties: toxicity, ignitability, corrosiveness, and reactivity (CCR Title 22, Chapter 11, Article 3). A hazardous material is defined as a substance or combination of substances that may cause or significantly contribute to an increase in serious, irreversible, or incapacitating illness, or may pose a substantial presence or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed. Hazardous wastes are hazardous substances that no longer have practical use, such as materials that have been discarded, discharged, spilled, or contaminated or are being stored until they can be disposed of properly (CCR Title 22, Chapter 11, Article 2, Section 66261.10). Soil that is excavated from a site containing hazardous materials is a hazardous waste if it exceeds specific CCR Title 22 criteria.

Public health is potentially at risk whenever hazardous materials are or would be used. It is necessary to differentiate between the “hazard” of these materials and the acceptability of the “risk” they pose to human health and the environment. A hazard is any situation that has the potential to cause damage to human health and the environment. The risk to health and public safety is determined by the probability of exposure, in addition to the inherent toxicity of a material.

Factors that can influence the health effects when human beings are exposed to hazardous materials include the dose the person is exposed to, the frequency of exposure, the duration of exposure, the exposure pathway (route by which a chemical enters a person’s body), and the individual’s unique biological susceptibility.

Construction Phase. Construction of the proposed project would be required to comply with applicable building, health, fire, and safety codes. Hazardous materials would be used in varying amounts during construction and occupancy of the project. Construction and maintenance activities would use hazardous materials such as fuels (gasoline and diesel), oils, and lubricants; paints and paint thinners; glues; cleaners (which could include solvents and corrosives in addition to soaps and detergents); and possibly pesticides and herbicides. The amount of materials used would be small, so the project would not create a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous materials, because such use must comply with applicable federal, state, and local regulations, including but not limited to Titles 8 and 22 of the CCR, the Uniform Fire Code, and Chapter 6.95 of the California Health and Safety Code.

Operational Phase. The proposed project is a shell industrial park located in the Manufacturing (M) zone, which would allow or conditionally allow a variety of uses. The site’s physical location, directly adjacent to both Meadow Creek and residential uses, renders several of the otherwise permissible uses inappropriate due to the potential of exposure of the public and the environment to hazard through the routine transport, use, or disposal of hazardous materials. As discussed in Section 3: Air Quality, included in the project description is a modified list of those uses

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which may be allowed or conditionally allowed on the site, and excluding those uses which have the potential to cause nuisance in terms of air quality, noise, and/or use of hazardous materials. Specific to Hazards and Hazardous Materials, those uses which have been prohibited on this site (though otherwise allowed in the Manufacturing Zone) include those uses involving vehicle services, fuel or petroleum dealers, laundry/dry cleaning plants, airports/heliport, and heavy manufacturing. Additionally, the level of scrutiny and permitting requirements have been intensified for several other uses, including photo and film processing labs, printing and publishing, furniture and fixture manufacturing, and light industrial uses to ensure that specific practices associated with activities are reviewed and conditioned to ensure that they will not create a nuisance. Please refer to Attachment 3, Use List.

- b. As discussed in Impacts a, the proposed project would not result in the routine transport, use, disposal, handling, or emission of any hazardous materials that would create a significant hazard to the public or to the environment. Implementation of Title 49, Parts 171–180, of the Code of Federal Regulations would reduce any impacts associated with the potential for accidental release during construction or occupancy of the proposed project or by transporters picking up or delivering hazardous materials to the project site. These regulations establish standards by which hazardous materials would be transported, within and adjacent to the proposed project. Where transport of these materials occurs on roads, the California Highway Patrol is the responsible agency for enforcement of regulations.
- c. The proposed project is a shell industrial park, and is located 0.30 miles from the nearest corner of Hawthorne Elementary School, at the intersection of Hutton and Branch Streets. As discussed in Impacts a and b, the proposed project is a shell industrial park, and a truncated list of allowed and conditionally allowed uses has been included in the project description to ensure that individual uses at the site would not result in the routine transport, use, disposal, handling, or emission of any hazardous materials that would create a significant hazard to the public or to the environment, including at the existing school.
- d. The project site is not on a parcel included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (DTSC 2012). The closest listed site is located at 309 South Street, the former McCarthy Steel, approximately 500 feet northeast of the project site. That site is listed on the Cortese State Water Resources Control Board GEOTRACKER database due to the presence of leaking underground Tank (LUSK) Cleanup Sites. That project is considered closed; therefore, the proposed project would not create a significant hazard to the public or to the environment related to an existing hazardous materials site.
- e, f. The project is not located within any airport land use plan area as it is at the foot of the South Hills and outside any flight pattern. There are no private airstrips in the vicinity of the project site that would result in a safety hazard for people residing or working in the project area.
- g. The project would be subject to the requirements contained in the City's emergency response and evacuation plans. Therefore, impacts related to impaired implementation or physical interference with an adopted emergency response or evacuation plan are considered less than significant.
- h. The project site is located in the City of San Luis Obispo and although directly adjacent to the South Hills Open Space is not located within a wildland hazard area. The surrounding land is largely developed with urban and residential uses, and is set back from the creek corridor as required by the Conservation and Open Space Element. The proposed project will have no impact on the placement of people or structures next to wildland areas that could result in loss, injury, or death involving wildland fires.

Conclusion: Less than significant impact.

9. HYDROLOGY AND WATER QUALITY. Would the project:

a) Violate any water quality standards or waste discharge requirements?	6, 14, 15, 17, 25, 28			--X--	
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing					--X--

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nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?					
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site?				--X--	
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?				--X--	
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?				--X--	
f) Otherwise substantially degrade water quality?				--X--	
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X	
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				X	
i) Expose people or structures to significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?					--X--
j) Inundation by seiche, tsunami, or mudflow?	11, 12, 30				--X--

Evaluation

- a, c- f, i. The project site is currently vacant except for a small red bricked parking area and drive aisle on the north panhandle of the site, and is primarily covered with non-native annual grasses with an average slope of less than two percent. It is bordered to the north with the Meadow Creek riparian corridor and on the south with an ephemeral swale. The site is within an AO flood zone with a sheet flow up to 2-feet deep. As such, the development is subject to the Floodplain Management Regulations. Although the project includes less than 22,000 square feet of impervious area, due to its proximity to a blueline creek and location in the 100-year floodplain the project is subject to the Drainage Design Manual (DDM) of the Water Way Management Plan (WWMP) and Post Construction Requirements for storm water control. Under these standards, the projects where Impervious Area \geq 22,000 SF and in Watershed Management Zone 1 shall meet Post Construction Requirements 1 – 4 as follows: 1) Site Design and Runoff Reduction, 2) Water Quality Treatment, 3) Runoff Retention, and 4) Peak Management. For the SLO City/WWMP drainage criteria to be accommodated, Special Floodplain Management Zone Regulations require the analysis to verify that there will be: 1) No change in the 100, 50, 25, 10, 5 & 2 year peak flow runoff exiting the property, 2) Use of Best Management Practices (BMP's) to minimize potential release of sediments and clarify storm flows in minor storm events to reduce pollutants moving downstream into San Luis Creek, and 3) City Standard Criteria for Source Control of Drainage and Erosion Control, page 7 and 8 Standard 1010, "Projects with pollution generating activities and sources must be designed to implement operation or source control measures consistent with recommendations from the California Stormwater Quality Association or other accepted standards.

The on-site watersheds or drainage management areas, when developed will be a mix of hard surfaced roofs and paving, porous pavers, gravel surface and landscaping, as depicted in the September 2014 Preliminary Hydrologic and Hydraulic Analysis. With one exception, the buildings are proposed to be constructed using a flow-under concept, with an open path under the structures to allow the free flow of storm water. For the slab-on-grade building the area is blocked off as an ineffective flow area.

A "train" of Best Management Practices (BMPs) are proposed to mitigate the potential pollutant load. These include the use of the perimeter bioswale or retention basins below the buildings, site design and efficient irrigation practices, roof runoff controls, use of pervious pavements with gravel storage beds, infiltration basins beneath

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buildings A and B, and a vegetated swale along the projects southern perimeter. Based on modeling contained in the report, the Consulting Engineer concluded that the proposed BMPs are adequate to mitigate the increased pollutant load and that the project as proposed will not adversely impact flood levels in the area.

The Preliminary Hydrologic and Hydraulic Analysis prepared by Keith Crow, PE, PLS, September 2014, conclude the project's water flows can adequately be mitigated with proposed BMPs from preconstruction to post-construction, and complies with the City's Floodplain Management Regulations, Waterways Management Plan, LID storm water treatment requirements, and Post Construction Stormwater Requirements. Compliance with the Waterways Management Plan is sufficient to mitigate any potentially significant impacts of the project in the areas of water quality and hydrology. The Public Works Department has determined that the proposed improvements identified in the Crow Analysis are sufficient to avoid drainage impacts on-site, upstream, or downstream.

- b. The project will be served by the City's sewer and water systems and will not deplete groundwater resources. Groundwater recharge will also be maintained through the implementation of best management practices. Roof runoff will be released to either the perimeter bioswale or to shallow detention basins located beneath the buildings. Each basin will contain 12-inches of clean gravel and 24-inches of bioretention soil media to facilitate treatment. All walks and decks are elevated and are permeable with the grade underneath designed to either infiltrate naturally or sheet flow to the detention basins or the perimeter bioswale. The eastern parking area will be treated by a parking lot bioswale and porous pavement with secondary treatment occurring in existing brambles swale.
- g, i. Meadow Creek crosses through the northern portion of the project site. The majority of the site is within the boundaries of the area subject to inundation from flood waters in a 100-year storm with inundation depths of up to 2-feet (AO 2' depth Zone). Both the northernmost extent and southeast corner of the site are somewhat higher elevation and are within the XB Zone, which is subject to a 0.2% annual chance of flooding. As discussed above, the project has been designed with elevated structures, retention basins, and permeable structures to ensure that development will not impede or re-direct the flow of any waters. Compliance with City standards will be sufficient to ensure that the proposed project does not endanger structures on this and other adjoining sites.
- i, j. The proposed development is outside the zone of impacts from any known levee or dam, or potential seiche or tsunami, and the existing upslope projects do not generate significant storm water runoff such to create a potential for inundation by mudflow.

Conclusion: Less than significant impact

10. LAND USE AND PLANNING. Would the project:

a) Physically divide an established community?	1, 4, 10, 28				--X--
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				--X--	
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				--X--	

Evaluation

- a. The proposed development project is designed to utilize an infill development site and fit among existing manufacturing and residential development. Structures and project amenities are contained within the developable portion of the site without encroachment into sensitive creek setback areas, and will not physically divide an established community.
- b. With approval of necessary project entitlements, including environmental review and Architectural Review, the proposed project will not conflict with applicable City of San Luis Obispo land use plans, policies, or regulations for the purpose of avoiding or mitigating an environmental effect. The project is proposed to be consistent with City

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General Plan Designation and zoning for the project site, regulations and development standards. As discussed in Section 3: Air Quality and Section 8: Hazards and Hazardous Materials, included in the project description is a modified list of those uses which may be allowed or conditionally allowed on the site, and excluding those uses which have the potential to cause nuisance in terms of air quality, noise, and/or use of hazardous materials. Please refer to Attachment 3, Use List.

Approval of the access bridge will require findings be made for a Creek Setback Reduction as provided in Municipal Code Section 17.16.025.G4, which include that the location and design of the feature receiving the exception will minimize impacts to scenic resources, water quality, and riparian habitat; that the structure will not limit the city's design options for providing flood control measures; the exception will not prevent the implementation of city-adopted plans, nor increase the adverse environmental effects of implementing such plans; that there are circumstances applying to the site which do not apply generally to land in the vicinity; that the exception will not constitute a grant of special privilege or be detrimental to the public welfare; that site development cannot be accomplished with a redesign of the project, and; redesign of the project would deny the property owner reasonable use of the property. These standards will be reviewed by the Architectural Review Commission, who will take final action on the project.

- c. As discussed in Section 4, Biological Resources, with incorporation of the recommended mitigation measures the proposed project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan or natural community conservation plan.

Conclusion: Less than significant impact.

11. MINERAL RESOURCES. Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	4				--X--
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?					--X--

Evaluation

- a, b. No known mineral resources are present at the project site. Implementation of the proposed project would not result in the loss of availability of a known mineral resource. The project site is not designated by the general plan, specific plan, or other land use plans as a locally important mineral recovery site.

Conclusion: Less than significant impact.

12. NOISE. Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	3, 9, 10, 31		--X--		
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				--X--	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			--X--		
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				--X--	

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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 expose people residing or working in the project area to excessive noise levels?	27				--X--
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	12				--X--

Evaluation

- a, c. The Noise Guidebook was adopted to help assess noise exposure and ensure project designs meet the standards of the City's General Plan Noise Element. The Guidebook applies to noise from road, traffic, the railroad, and aircraft, as well as noise generated by various uses. Noise exposure information covers the major transportation noise sources, and a representative sampling of stationary sources, identified for study when the Noise Element was last updated. The Guidelines describe the compatibility of different land uses with a range of environmental noise levels in terms of Ldn or CNEL. An exterior noise environment of 50 to 60 Ldn or CNEL is considered to be "normally acceptable" for residential uses according to those guidelines. The Guidelines also consider the occupational noise exposure as well as noise exposure away from work environments, recognizing an exterior noise level of 55dB Ldn as a goal to protect the public from hearing loss, activity interference, sleep disturbance, and annoyance. Figure 5 of the Noise Element indicates that existing and build-out noise levels at the site are below 60 decibels (dB) Ldn.

The proposed shell buildings and exterior spaces could house a variety of allowed and conditionally allowed uses, which would be required to conform to adopted noise standards. The proposed site layout has the potential to be problematic for future noise-generating uses, where buildings and building openings are adjacent to existing residences. As currently designed, Buildings A and C are sited with minimal setbacks to adjacent residences, while the loading dock for Building B is located fronting the property line shared with adjacent residential zoning and an approved residential project that is under construction. A mitigation measure (**NOI 1**) has been recommended that loading facilities be sited to orient away from residential development on adjacent properties. The Architectural Review Commission will review final building design and layout to ensure that any loading docks are strategically located so as to attenuate noise generated on the site. Additionally, a six-foot privacy fence has been proposed which would assist in attenuating noise generated on the site.

The Guidebook indicates that noise level estimates should be taken as worst case estimates as they do not take into account shielding by buildings or landforms which can reduce noise exposure up to 14 dB. The Noise Element indicates that for residential uses noise levels of 60 dB are acceptable for outdoor activity areas and 45 dB for indoor areas. As discussed in Section 3: Air Quality, Section 8: Hazards and Hazardous Materials, and Section 10: Land Use and Planning, included in the project description is a modified list of those uses which may be allowed or conditionally allowed on the site, and excluding those uses which have the potential to cause nuisance in terms of air quality, noise, and/or use of hazardous materials. Potential impacts from these individual uses will therefore be evaluated on a case-by-case basis, ensuring that exterior noise levels will be less than 60 dB when attenuation afforded by building features and site design are taken into account. Interior noise levels of less than 45dB will be achievable with standard building materials and construction techniques. Excepting for the caretakers unit, commercial hours of operation will be limited to approximately 7am to 6pm, Please refer to Attachment 3, Use List.

- b. Long-term operational activities associated with the proposed project include a variety of potential uses, as described in the applicant's proposed list of uses, some of which could involve the use of any equipment or processes that would result in some levels of ground vibration. However, such uses would be subject to individual case-by-case evaluation through the use permit process, ensuring that impacts from future activities would not become a nuisance and would be less than significant. Short-term increases in groundborne vibration levels attributable to the construction-related activities for the proposed project are anticipated. Construction activities would likely require the use of various types of equipment, such as forklifts, concrete mixers, and haul trucks. Because construction activities are restricted to the days, hours, and sound levels allowed by City ordinance, impacts associated with groundborne vibration and noise would be less than significant.
- d. Noise generated by the project would occur during short-term construction of the proposed shell buildings. Noise levels during construction may be temporarily higher than existing noise levels in the vicinity. Although there would

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be intermittent construction noise in the project area during the construction period, noise impacts would be less than significant because the construction would be short term and restricted to the typical working hours, and temporary increased noise levels allowed by City ordinance (Municipal Code Chapter 9.12: Noise Control).

- e, f. The project site is located approximately 1.8 miles from the nearest point of San Luis Air Port, but is not located within any airport land use plan area as it is at the foot of the South Hills and outside any flight pattern. There are no private airstrips in the vicinity of the project site that would result in a safety hazard for people residing or working in the project area.

Mitigation Measures: Noise

Mitigation Measure NOI 1: Loading facilities shall be sited to orient away from residential development on adjacent properties, to increase the separation from noise-sensitive uses and to allow the buildings to attenuate any generated noise. The Architectural Review Commission will review final building design and layout to ensure that any loading docks are strategically located so as to attenuate noise generated on the site.

Conclusion: With recommended mitigation measure, the project will have a less than significant impact on area noise levels.

13. POPULATION AND HOUSING. Would the project:

a) Induce substantial 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)?	1, 29				--X--
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?					--X--
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?					--X--

Evaluation:

- a. The proposed project includes construction of a business park appropriate for a variety of light industrial and manufacturing uses. The three buildings include 22,758 square feet, including one 2-bedroom caretakers unit. The new employment generated by the project would not be considered substantial, nor would the addition of one residential unit to the existing housing stock. Considering the surrounding area is currently developed, and the proposed project would utilize existing infrastructure at the subject location, the project would not induce additional growth that would be considered significant. No upgrades to the existing infrastructure are required to serve the project. The proposed project would not involve any other components that would induce further growth.

- b, c. The site is currently undeveloped. Therefore no housing would be displaced with the proposed development.

Conclusion: No impact

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

a) Fire protection?	17, 29			--X--	
b) Police protection?				--X--	
c) Schools?					--X--
d) Parks?				--X--	
e) Roads and other transportation infrastructure?				--X--	
f) Other public facilities?					--X--

Evaluation

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- a. The proposed project site is served by the City of San Luis Obispo Fire Department. Implementation of the proposed project would increase the intensity of use of the site and would marginally increase the demand for fire protection services over existing conditions. The project would be similar to the land uses on surrounding properties, and the site is already served by the City for fire protection. The project would not substantially alter the number of housing units or population in the city and would not result in the need for new fire protection facilities to serve the site. There would be no physical impacts related to the construction of new fire protection facilities and impacts related to fire protection would be less than significant.
- b. The project site is served by the City of San Luis Obispo Police Department for police protection services. The development of the site would not result in the need for increased patrols or additional units such that new police facilities would need to be constructed. There would be no physical impacts related to the construction of new police facilities, and impacts related to police protection would be less than significant.
- c. Consistent with SB 50, the proposed project will be required to pay developer fees to the SLOCUSD. These fees would be directed toward maintaining adequate service levels, which include incremental increases in school capacities. Implementation of this state fee system would ensure that any significant impacts to schools which could result from the proposed project would be offset by development fees, and in effect, reduce potential impacts to a less than significant level. As the proposed structures are for commercial use, no new students are anticipated to be associated with this development.
- d. Because the project is primarily commercial in nature, it would result in a very minor increase in the number of people utilizing park facilities relative to the city's existing population, and significant deterioration or accelerated deterioration at parks and recreation-oriented public facilities from possible increased usage is not expected. The proposed project is within close proximity to Meadow Park and the South Hills Open Space, which are within easy walking distance, and would have a less than significant impact on parks.
- e. As noted above and discussed in Section 16: Transportation/ Traffic, the project will not significantly add to demand on the circulation system. Because the proposed use is similar to surrounding uses and would result in a relatively minor increase in users relative to the city's existing population, significant deterioration or accelerated deterioration of transportation infrastructure and other public facilities from possible increased usage is not expected. The proposed project would have a less than significant impact on transportation infrastructure and public facilities.

Conclusion: Less than significant impact.

15. RECREATION.

a) Would the project increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	10, 29			--X--	
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?					--X--

Evaluation:

- a. The project will result in a minor demand for parks and other recreational facilities. Given that the project is largely commercial in nature no significant recreational impacts are expected to occur with development of the site. Park Land In-Lieu fees will be required to be paid to the City to help finance additional park space, maintenance or equipment in the vicinity, per existing City policy. Collection of these fees helps offset the impacts of new projects on the City's recreational facilities.
- b. The project includes a small area near the creek for employees to take breaks and enjoy the site, including picnic table and landscaping. No other recreational facilities are proposed or will be necessitated.

Conclusion: Less than significant impact

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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16. TRANSPORTATION/TRAFFIC. Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	1, 16, 17, 20, 28			--X--	
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				--X--	
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?					--X--
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?					--X--
e) Result in inadequate emergency access?					--X--
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?					--X--

Evaluation

- a, b. Regional access to the project site is provided by Highway 101, located east of the project site. Local access to the project site is provided by Bridge Street and South Higuera; with pedestrian and bicycle access also available via a bike path connection at the western end of Bridge Street to Exposition Drive and the Meadow Park bicycle path network. All roadways in the immediate project vicinity have curbs, gutters, sidewalks, and on-street parking. The project does not conflict with any applicable circulation system plans and does not significantly add to demand on the circulation system or conflict with any congestion management programs or any other agency's plans for congestion management. As currently proposed, the project will generate approximately 21 AM peak trips and 23 peak PM trips, which are well within the available capacity of the existing street network.

	ITE Code	AM Rate	AM Trips	PM Rate	PM Trips
23,300 sf light manufacturing	110	0.92	21	0.97	23

These vehicular trips will be added to local and area streets. While existing streets have sufficient capacity to accommodate the added vehicular traffic without reducing existing levels of service, the project location and anticipated business mix make it a prime candidate for use of non-motorized forms of transportation, particularly walking and biking. The proposed project would not result in a significant impact with regard to increased vehicular trips and does not conflict with performance standards provided in City adopted plans or policies. The project will also contribute to overall impact mitigation for transportation infrastructure by participating in the Citywide Transportation Impact Fee program.

- c. The project is not located in the vicinity of any public or private airports and will not result in any changes to air traffic patterns, nor does it conflict with any safety plans of the Airport Land Use Plan.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- d. The project would not modify existing intersections or roadways, including Bridge Street. The project would improve require through traffic through an existing parking lot, but would not significantly alter the existing travel flow of vehicles, bicyclists, or pedestrians. The project driveway and bridge would be consistent with City code requirements for ingress/egress to safely and adequately serve potential users of the site. Because the project is a similar use to those in the immediate vicinity, the project would not introduce any incompatible uses.
- e. The project has been reviewed by the City Fire Marshal to ensure adequate emergency access has been provided. As proposed, the project bridge access would provide adequate access for all vehicles (including emergency vehicles), bicyclists, and pedestrians. Therefore, the proposed project would not have a negative effect on emergency access.
- f. The project is consistent with policies supporting alternative transportation due to the site's location within the City's urban center, and its proximity to shopping, parks and services. South Higuera is served by the SLO City bus lines for Routes 2, 4 and 5, which are located within walking distance on South Higuera. The projects central location is also convenient for walking and biking, with a bike path at the eastern end of Bridge Street connecting the area to Exposition Drive, Meadow Park, and points east. City standards require provision of on-site bicycle storage. The proposed project includes short term bicycle racks near each of the building entrances and long term bicycle storage within the buildings.

Conclusion: Less than significant impact

17. UTILITIES AND SERVICE SYSTEMS. Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	6, 7, 14,16, 25,26, 27, 28			--X--	
b) Require or result in the construction or expansion of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				--X--	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				--X--	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed?				--X--	
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				--X--	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				--X--	
g) Comply with federal, state, and local statutes and regulations related to solid waste?				--X--	

Evaluation

a-c, e. The proposed project would result in an incremental increase in demand on City infrastructure, including water, wastewater and storm water facilities. Development of the site is required to be served by City sewer and water service, which both have adequate capacity to serve the use. Existing storm water facilities are present in the vicinity of the project site, and it is not anticipated the proposed project will result in the need for new facilities or expansion of existing facilities which could have significant environmental effects. This project has been reviewed by the City's Utilities Department and no resource/infrastructure deficiencies have been identified.

The developer will be required to construct private sewer facilities to convey wastewater to the nearest public sewer.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The on-site sewer facilities will be required to be constructed according to the standards in the Uniform Plumbing Code and City standards. Sewer impact fees are collected at the time building permits are issued to pay for capacity at the City's Water Resource Recovery Facility (WRRF). The fees are set at a level intended to offset the potential impacts of the project.

- d. The proposed project would result in an incremental increase in demand on water supplies, as anticipated by the General Plan. Per the General Plan Water/Wastewater Element and the 2014 Water Resource Status Report, the City has sufficient water supplies for build-out of the City's General Plan. The incremental change is not considered to be significant. Water impact fees are collected at the time building permits are issued to pay for water supplies and water facilities, such as the City's water treatment plan. The fees are set at a level intended to offset the potential impacts of the project. This project has been reviewed by the City's Utilities Department and no resource/infrastructure deficiencies have been identified.

- f, g. The proposed project will be served by San Luis Garbage Company, which maintains standards for access and access to ensure that collection is feasible, both of which will be reviewed by the Architectural Review Commission. San Luis Garbage has reviewed the location and size of enclosures and determined that they are sufficient in size to handle garbage and recycling.

Background research for the Integrated Waste Management Act of 1989 (AB 939) shows that Californians dispose of roughly 2,500 pounds of waste per month. Over 90% of this waste goes to landfills, posing a threat to groundwater, air quality, and public health. Cold Canyon landfill is projected to reach its capacity by 2018. The Act requires each city and county in California to reduce the flow of materials to landfills by 50% (from 1989 levels) by 2000. To help reduce the waste stream generated by this project, consistent with the City's Conservation and Open Space Element policies to coordinate waste reduction and recycling efforts (COSE 5.5.3), and Development Standards for Solid Waste Services (available at <http://www.slocity.org/utilities/download/binstandards08.pdf>) recycling facilities have been accommodated on the project site and a solid waste reduction plan for recycling discarded construction materials is a submittal requirement with the building permit application. The incremental additional waste stream generated by this project is not anticipated to create significant impacts to solid waste disposal.

Conclusion: Less than significant impact.

18. MANDATORY FINDINGS OF SIGNIFICANCE.

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			--X--		
The project is an infill commercial development in an urbanized area of the city. Without mitigation, the project could have the potential to have adverse impacts on all of the issue areas checked in the Table on Page 3. As discussed above, potential impacts to aesthetics, air quality, biological and cultural resources will be less than significant with incorporation of recommended mitigation measures.					
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 the past projects, the effects of other current projects, and the effects of probable future projects)?				--X--	
The impacts of the proposed project are individually limited and not considered "cumulatively considerable." Although incremental changes in certain issue areas can be expected as a result of the proposed project, all environmental impacts that					

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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could occur as a result of the proposed project would be reduced to a less than significant level through compliance with existing regulations discussed in this Initial Study and/or implementation of the mitigation measures recommended in this Initial Study for the following resource areas: aesthetics (AES 1-2), air quality (AQ 1-6), biological resources (BIO 1-5), cultural resources (CULT 1-2), and noise (NOI 1).

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				--X--	
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Implementation of the proposed project would result in no environmental effects that would cause substantial direct or indirect adverse effects on human beings with incorporation of the mitigation measures recommended in this Initial Study.

19. EARLIER ANALYSES.

Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or Negative Declaration. Section 15063 (c) (3) (D). In this case a discussion should identify the following items:

a) Earlier analysis used. Identify earlier analyses and state where they are available for review.

N/A

b) Impacts adequately addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

N/A

c) Mitigation measures. For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions of the project.

N/A

20. SOURCE REFERENCES.

1.	City of SLO General Plan Land Use and Circulation Element, December 2014
2.	City of SLO General Plan Noise Element, May 1996
3.	City of SLO General Plan Safety Element, March 2012
4.	City of SLO General Plan Conservation & Open Space Element, April 2006
5.	City of SLO General Plan Housing Element, January 2015
6.	City of SLO Water and Wastewater Element, July 2010
7.	City of SLO Source Reduction and Recycling Element, on file in the Utilities Department
8.	City of San Luis Obispo Municipal Code
9.	City of San Luis Obispo Community Design Guidelines, June 2010
10.	City of San Luis Obispo, Land Use Inventory Database
11.	City of San Luis Obispo Zoning Regulations March 2015
12.	City of SLO Climate Action Plan, August 2012
13.	2013 California Building Code
14.	City of SLO Waterways Management Plan
15.	Water Resources Status Report, October 2014, on file with in the Utilities Department
16.	Site Visit
17.	City of San Luis Obispo Staff Knowledge
18.	Website of the Farmland Mapping and Monitoring Program of the California Resources Agency: http://www.consrv.ca.gov/dlrp/FMMP/
19.	CEQA Air Quality Handbook, Air Pollution Control District, April 2012
20.	Institute of Transportation Engineers, Trip Generation Manual, 9 th Edition, on file in the Community Development Department
21.	City of San Luis Obispo, Archaeological Resource Preservation Guidelines, on file in the Community Development Department
22.	City of San Luis Obispo, Historic Site Map
23.	City of San Luis Obispo Burial Sensitivity Map
24.	Archeological Resource Inventory, Bertrando & Bertrando, July 2014

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25.	Preliminary Hydrologic & Hydraulic Analysis, September 2014
26.	Geotechnical Engineering Report, Beacon Geotechnical, April 2012
27.	Geotechnical Engineering Report Alternative Foundation Addendum, Beacon Geotechnical, March 16, 2015
28.	Project Plans, dated November 14, 2014
29.	Applicant project statement/description
30.	Biological Resources Assessment, Sage Institute, July 2014
31.	Website of the California Environmental Protection Agency, Cortese List: http://calepa.ca.gov/sitecleanup/corteselist/default.htm
32.	San Luis Obispo County Air Pollution Control District Referral Comments, via email March and April 2015

Attachments:

1. Vicinity Map
2. Project Plans
3. Use List
4. Archeological Resource Inventory, Bertrando & Bertrando, July 2014
5. Preliminary Hydrologic & Hydraulic Analysis, September 2014
6. Geotechnical Engineering Report, Beacon Geotechnical, April 2012
7. Geotechnical Engineering Report Alternative Foundation Addendum, Beacon Geotechnical, March 16, 2015
8. Applicant project statement/description
9. Biological Resources Assessment, Sage Institute, July 2014

REQUIRED MITIGATION AND MONITORING PROGRAMS

Aesthetics

Mitigation Measure AES 1: All freestanding light post shall be eliminated and replaced with bollard lighting depicted elsewhere on project plans.

- **Monitoring Plan, AES 1:** Final plans shall be reviewed Community Development Planning staff as part of the Building Permit application package, who shall require modifications as necessary for consistency with City standards and to ensure that light spillage into the creek corridor or across property lines will not occur, prior to department sign off and issuance of permits.

Mitigation Measure AES 2: All freestanding bollard lighting shall be located outside required yard and creek setbacks.

- **Monitoring Plan, AES 2:** Final plans shall be reviewed Community Development Planning staff as part of the Building Permit application package, who shall ensure that all lighting is outside required yard and creek setbacks, prior to department sign off and issuance of permits.

Air Quality

Mitigation Measure AQ 1: Prior to any construction activities at the site, the project proponent shall ensure that a geologic evaluation is conducted to determine if the area disturbed is exempt from the

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Asbestos ATCM regulation. An exemption request must be filed with the APCD. If the site is not exempt from the requirements of the regulation, the applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and Asbestos Health and Safety Program for approval by the APCD.

- **Monitoring Plan, AQ 1:** All mitigation measures shall be shown on grading and building plans. In addition, the contractor shall designate a person or persons to monitor compliance with APCD requirements. The name and telephone number of such persons shall be provided to the APCD, Community Development and Public Works Departments prior to commencement of construction. The applicant shall provide documentation of compliance with APCD requirements to City staff prior to issuance of any grading or building permits.

Mitigation Measure AQ 2: Any scheduled disturbance, removal, or relocation of utility pipelines shall be coordinated with the APCD Enforcement Division at (805) 781-5912 to ensure compliance with NESHAP, which include, but are not limited to: 1) written notification, within at least 10 business days of activities commencing, to the APCD, 2) asbestos survey conducted by a Certified Asbestos Consultant, and, 3) applicable removal and disposal requirements of identified ACM.

- **Monitoring Plan, AQ 2:** All mitigation measures shall be shown on grading and building plans. In addition, the contractor shall designate a person or persons to monitor compliance with APCD requirements. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD, Community Development and Public Works Departments prior to commencement of construction.

Mitigation Measure AQ 3: During construction/ground disturbing activities, the applicant shall implement the following particulate (dust) control measures. These measures shall be shown on grading and building plans. In addition, the contractor shall designate a person or persons to monitor the dust control program and modify practices, as necessary, to prevent transport of dust off site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Community Development and Public Works Departments prior to commencement of construction.

- a. Reduce the amount of disturbed area where possible.
- b. Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site, and from exceeding the APCD's limit of 20% opacity for no greater than 3 minutes in any 60 minute period. Increased watering frequency will be required whenever wind speeds exceed 15 m.p.h. and cessation of grading activities during periods of winds over 25 m.p.h. Reclaimed (non-potable) water is to be used in all construction and dust-control work.
- c. All dirt stock pile areas (if any) shall be sprayed daily and covered with tarps or other dust barriers as needed.
- d. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible, following completion of any soil disturbing activities.

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- e. Exposed grounds that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating, non-invasive, grass seed and watered until vegetation is established.
- f. All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD.
- g. All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible. In addition, building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- h. Vehicle speed for all construction vehicles shall not exceed 15 m.p.h. on any unpaved surface at the construction site.
- i. All trucks hauling dirt, sand, soil, or other loose materials, are to be covered or shall maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code Section 23114.
- j. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site.
- k. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers shall be used with reclaimed water should be used where feasible. Roads shall be pre-wetted prior to sweeping when feasible.
- l. All PM10 mitigation measures required shall be shown on grading and building plans.
- m. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below the APCD's limit of 20% opacity for no greater than 3 minutes in any 60 minute period. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD Compliance Division prior to the start of any grading, earthwork or demolition.

➤ **Monitoring Plan, AQ 3:** All mitigation measures shall be shown on grading and building plans. In addition, the contractor shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust off site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD, Community Development and Public Works Departments prior to commencement of construction.

Mitigation Measure AQ 4: Prior to any construction activities at the site, the project proponent shall ensure that all equipment and operations are compliant with California Air Resource Board and APCD permitting requirements, by contacting the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.

➤ **Monitoring Plan, AQ 4:** All mitigation measures shall be shown on grading and building plans. In addition, the contractor shall designate a person or persons to monitor compliance with APCD requirements. The name and telephone number of such persons shall be provided to the APCD, Community Development and Public Works Departments prior to commencement of construction. The applicant shall provide documentation of compliance with APCD requirements to City staff prior to issuance of any grading or building permits.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 0286-2014					

Mitigation Measure AQ 5: To reduce sensitive receptor emissions impact of diesel vehicles and equipment used to construct the project and export soil from the site, the applicant shall implement the following idling control techniques:

1. California Diesel Idling Regulations
 - a. On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:
 1. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection)d) of the regulation; and,
 2. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of restricted area, except as noted in Subsection (d) of the regulation.
 - b. Off-road diesel equipment shall comply with the 5 minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use off-Road Diesel regulation.
 - c. Signs must be posted in the designated queuing areas and job sites to remind drivers and operators of the state's 5 minute idling limit.
2. Diesel Idling restrictions Near Sensitive Receptors (residential homes). In addition to the State required diesel idling requirements, the project applicant shall comply with these more restrictive requirements to minimize impacts to nearby sensitive receptors:
 - a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors.
 - b. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted.
 - c. Use of alternative fueled equipment is recommended.
 - d. Signs that specify the no idling areas must be posed and enforces at the site.
3. Soil Transport. The final volume of soil that will be hauled off-site, together with the fleet mix, hauling route, and number of trips per day will need to be identified for the APCD. Specific standards and conditions will apply.

- **Monitoring Plan, AQ 5:** All mitigation measures shall be shown on grading and building plans. In addition, the contractor shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust off site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD, Community Development and Public Works Departments prior to commencement of construction. The applicant shall provide documentation of compliance with APCD requirements to City staff prior to issuance of any grading or building permits.

Mitigation Measure AQ 6: To confirm the health risks to residents of the development are below APCD thresholds, screening level health risk assessments shall be completed and provided to the APCD for review and approval prior to the issuance of business permits when required by the APCD.

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 0286-2014					

- **Monitoring Plan, AQ 6:** Confirmation with compliance with APCD regulations shall be provided with business permit applications as applicable. All mitigation measures shall be shown on grading and building plans. In addition, the contractor shall designate a person or persons to monitor compliance with APCD requirements. The name and telephone number of such persons shall be provided to the APCD, Community Development and Public Works Departments prior to commencement of construction. The applicant shall provide documentation of compliance with APCD requirements to City staff prior to issuance of any grading or building permits.

Biological Resources

Mitigation Measure BIO 1: The final geotechnical engineering report shall be prepared to ensure that caisson foundations in lieu of over-excavated building pads with shallow foundations are utilized where adjacent to riparian setbacks.

- **Monitoring Plan, BIO 1:** All mitigation measures shall be shown on grading and building plans and be clearly visible to contractors and City inspectors. Final plans and supporting materials shall be reviewed by the City's Community Development staff and Natural Resources Manager as part of the Building Permit application package, who shall confirm the conclusion and recommendations of the final geotechnical engineering report and use of caisson foundations, and provide site inspections as necessary to ensure implementation.

Mitigation Measure BIO 2: To reduce potential impacts to nesting birds to a less than significant level, vegetation removal and initial site disturbance for any project elements shall be conducted between September 1st and January 31st outside of the nesting bird season. If vegetation removal is planned for the bird nesting season (February 1st to August 31st), then, preconstruction nesting bird surveys shall be required to determine if any active nests would be impacted by project construction. If no active nests are found, then no further mitigation shall be required.

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

- **Monitoring Plan, BIO 2:** All mitigation measures shall be shown on grading and building plans and be clearly visible to contractors and City inspectors. Final plans and supporting materials shall be reviewed by the City's Planning staff and Natural Resources Manager as part of the Building Permit application package, who shall confirm the conclusion and recommendations of the preconstruction nesting bird surveys and provide site inspections as necessary to ensure implementation.

Mitigation Measure BIO 3: Prior to ground disturbing activities, a qualified biologist shall conduct a pre-construction survey within 30 days of initial ground disturbance to identify whether any upland wildlife species are using any portion of the project areas where ground disturbance is proposed. If ground dwelling wildlife species are detected a biological monitor shall be present during initial ground

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 0286-2014					

disturbing and/or vegetation removal activities to attempt salvage and relocation efforts for the wildlife that may be present, such as common reptiles and small mammals. The salvage and relocation effort for non-listed wildlife species would further reduce the level of this less than significant impact.

- **Monitoring Plan, BIO 3:** All mitigation measures shall be shown on grading and building plans and be clearly visible to contractors and City inspectors. Final plans and supporting materials shall be reviewed by the City's Planning staff and Natural Resources Manager as part of the Building Permit application package, who shall confirm the conclusion and recommendations of the preconstruction surveys and provide site inspections as necessary to ensure implementation.

Mitigation Measure BIO 4: The applicant shall obtain Clean Water Act (CWA) regulatory compliance in the form of a permit from the Corps or written documentation from the Corps that no permit would be required for the proposed bridge crossing. Should a permit be required, the applicant shall implement all the terms and conditions of the permit to the satisfaction of the Corps. Corps permits and authorizations require applicants to demonstrate that the proposed project has been designed and will be implemented in a manner that avoids and minimizes impacts on aquatic resources. Compliance with Corps permitting would also include obtaining a CWA 401 Water Quality Certification from the Regional Water Quality Control Board. In addition, the Corps may require compensatory mitigation for unavoidable permanent impacts on riparian habitat to achieve the goal of a no net loss of wetland values and functions. As such, regulatory compliance would reduce potential impacts on waters of the U.S. to a less-than-significant level.

- **Monitoring Plan, BIO 4:** All mitigation measures shall be shown on grading and building plans and be clearly visible to contractors and City inspectors. Final plans and supporting materials, including documentation of compliance with any Corps permitting or compensatory mitigation requirements shall be reviewed by the City's Planning staff and Natural Resources Manager as part of the Building Permit application package, who shall confirm the adequacy of CWA/Corps compliance.

Mitigation Measure BIO 5: The applicant shall obtain compliance with Section 1602 of the California Fish and Wildlife Code (Streambed Alteration Agreements) in the form of a completed Streambed Alteration Agreement or written documentation from the CDFW that no agreement would be required for the proposed bridge crossing. Should an agreement be required, the property owners shall implement all the terms and conditions of the agreement to the satisfaction of the CDFW. The CDFW Streambed Alteration Agreement process encourages applicants to demonstrate that the proposed project has been designed and will be implemented in a manner that avoids and minimizes impacts in the stream zone. In addition, CDFW may require compensatory mitigation for unavoidable impacts on riparian habitat in the form of riparian habitat restoration of disturbed areas to the extent feasible and additional compensatory riparian tree plantings. Using the City-required creek setback area along Meadow Creek for riparian tree replacement would be an appropriate onsite compensatory mitigation approach. As such, regulatory compliance would reduce potential impacts on waters of the state to a less-than significant level.

- **Monitoring Plan, BIO 5:** All mitigation measures shall be shown on grading and building plans and be clearly visible to contractors and City inspectors. Final plans and supporting materials, including documentation of compliance with any CDFW permitting or compensatory mitigation requirements

Issues, Discussion and Supporting Information Sources	Sources	Potentially Significant Issues	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ER # 0286-2014					

shall be reviewed by the City's Planning staff and Natural Resources Manager as part of the Building Permit application package, who shall confirm the adequacy of CDFW compliance.

Geology & Soils

Mitigation Measure GEO 1: A geotechnical engineering investigation shall be undertaken and a comprehensive design-level report prepared based on the final approved design of the project. Additional borings will be required to address specific areas of the site once building layout and structural foundation loads are determined, or can be reasonably estimated. The report shall address site preparation and grading, total and differential settlement under the structure loads, retaining wall design parameters, slabs-on-grade, expansive soils, site-specific seismicity (including seismic loads on retaining walls), and any other items deemed relevant to the geotechnical engineer.

- **Monitoring Plan, GEO 1:** All mitigation measures shall be shown on grading and building plans. Community Development Planning and Public Works staff shall review the geotechnical analysis as part of the Building Permit application package prior to issuance of grading or construction permits.

Noise

Mitigation Measure NOI 1: Loading facilities shall be sited to orient away from residential development on adjacent properties, to increase the separation from noise-sensitive uses and to allow the buildings to attenuate any generated noise. The Architectural Review Commission will review final building design and layout to ensure that any loading docks are strategically located so as to attenuate noise generated on the site.

- **Monitoring Plan, NOI 1:** The Architectural Review Commission will review the site plan to ensure loading docks are located to attenuate generated noise effect on adjacent residential land.

ADDENDUM TO INITIAL STUDY ER #0286-2014

1. **Project Title:** 279 Bridge Street Mixed-Use Project
2. **Lead Agency Name and Address:**
City of San Luis Obispo
919 Palm Street
San Luis Obispo, CA 93401
3. **Contact Person and Phone Number:**
Shawna Scott, Senior Planner
sscott@slocity.org
(805) 781-7176
4. **Project Location:** 279 Bridge Street
5. **Project Sponsor's Name and Address:**
Bridge Squared, LLC
1680 La Finca Court
Arroyo Grande, California 93420
6. **General Plan Designation:** Services & Manufacturing
7. **Zoning:** Manufacturing (M)
8. **Description of the Project:** The proposed mixed-use project consists of three buildings including: Building A (8,636-square foot [sf] manufacturing shell with mezzanine); Building B (31,726 sf mixed-use building including 7,200 sf of commercial shell on the ground level with 16 loft-style, two-bedroom residential units above); and Building C (6,850-sf mixed-use building including 3,421-sf of commercial shell on the ground level with two residential units above) with associated parking and site improvements. The project includes a request for a mixed-use parking reduction of six percent.
9. **Surrounding Land Uses and Settings:** The project site is a 2.73-acre flag lot with the flagpole portion of the lot accessing Bridge Street. The northern "flag" portion of the site is developed with a drive aisle and ten parking spaces that serve an existing building on an adjacent property. The property is an existing legal parcel with access provided by a bridge over Meadow Creek. The project site is bordered to the north by the Meadow Creek riparian corridor, existing commercial and industrial uses to the north (M and C-S-PD), live/work units to the west (M-PD), and residential development to the south and east (R-2-PD and R-2-S). The South Hills Open Space area is located further to the south.

10. **Project Entitlements Requested:** Major Development Review and Planning Commission Use Permit
11. **Other public agencies whose approval is required:** Air Pollution Control District, Regional Water Quality Control Board

Previous Entitlement and Environmental Review: On June 1, 2015, the Architectural Review Commission (ARC) adopted a Mitigated Negative Declaration (MND) for the previous project, which included approval of construction of the existing access bridge over Meadow Creek, three manufacturing shell buildings (including caretaker's quarters), tree removals, and site improvements. A copy of the adopted Mitigated Negative Declaration is attached.

At the time, the ARC approved the bridge component of the project, pending further design review of the manufacturing shell buildings. On May 1, 2017, the ARC approved a project on this project site that consisted of three shell buildings including the following: Building A (8,636 square feet including mezzanine level); Building B (9,957 square feet); and Building C (4,704 square feet including a second floor caretaker's residence with outdoor patio). The previous approval included tree removals and onsite plantings as recommended by the City Arborist, and associated site improvements (Attachment 2, Previous ARC Report and Resolution). Since that time, the applicant has substantially modified the project and proposed uses for the site, which require design review by the ARC (with a recommendation to be provided to the Planning Commission) and consideration of a Planning Commission Use Permit to establish the proposed mixed-use project and mixed-use parking reduction.

Section 15164 of the CEQA Guidelines allows a lead agency to prepare an addendum to a previously adopted Negative Declaration if only "minor technical changes or additions" have occurred in the project description since the initial study was originally prepared.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

Environmental impacts associated with development of the project site were evaluated in the MND (ER #0286-2014). The previous project evaluated in the adopted MND included the construction of three shell buildings (a total of 22,758 square feet of useable space and 13,525 square feet of coverage), construction of a bridge over Meadow Creek (which has been completed), construction of parking and site improvements, and tree removals. As a component of the previous project entitlement, a Use List for the site was established. The currently proposed project is consistent with the adopted Use List.

The proposed project addressed in this Addendum consists of three buildings 8,636 (Building A), 31,726 (Building B), and 6,850 (Building C) square feet each and associated parking and site improvements. Proposed tree removals would be the same as identified in the previous entitlement (Chinese pistache, California pepper tree cluster and Italian stone pine). The primary changes to the project description since the MND was adopted consist of the proposed use of the proposed buildings from manufacturing to mixed-use (commercial and residential) and the proposed size and architectural design of

Buildings B and C. No changes to approved Building A (manufacturing shell) are proposed.

Potential Impacts Mitigated to Less than Significant

The previously-adopted MND found that with incorporation of mitigation measures, potential impacts to aesthetics, air quality, biological resources, geology/soils, and noise will be less than significant. A summary of the potential impacts and adopted mitigation measures is provided below, including an assessment of the potential impacts resulting from the currently proposed project. As discussed below, implementation of the project would not result in any new impacts or impacts with increased severity than what was identified in the adopted MND, and no new or amended mitigation measures are required.

Aesthetics: The adopted MND identified a potential impact due to the potential for glare from the parking lot and building light poles affecting adjacent residences. Adopted mitigation includes replacing freestanding light posts with bollard lighting, to be located outside of required setbacks. This mitigation would apply to the current project. In addition, the current project is subject to Zoning Regulations Section 17.70.050 (Edge Conditions), which requires that any driveways and drive aisles facing an adjacent zone must be fully screened from the adjacent (R-2) use. The proposed project incorporates solid fencing and perimeter landscaping to be consistent with this regulation. All other aesthetic impacts resulting from the proposed project would be less than significant, similar to the proposed project, because the project site is not located within a scenic vista, is not visible from a local or state scenic highway or roadway, and development of the site would be consistent with the underlying zoning and Community Design Guidelines, which address visual compatibility, including consistency with “Edge Condition” regulations due to the adjacent residential (R-2) zoning.

Air Quality and Greenhouse Gas Emissions: The adopted MND noted potential construction-related air quality impacts, which would be mitigated by compliance with standard APCD mitigation measures and permitting requirements. These mitigation measures would apply to the current project. Regarding operational impacts, the current mixed-use project would not exceed the operational thresholds identified by the APCD, and would be consistent with the Clean Air Plan because the project locates commercial and residential uses proximate to each other, and the site has access to bicycle lanes, transit, and a local park.

Zoning Regulations Section 17.70.130 (Mixed-use Development) which notes that mixed-use development forwards the City’s sustainability goals by locating housing, jobs, recreation and other daily needs in close proximity to each other. Furthermore, Mixed-use Development regulations prohibit activities or uses that would be “incompatible with residential activities and/or have the possibility of affecting the health or safety of mixed-use development residents due to the potential for the use to create dust, glare, heat, noise, noxious gasses, odor, smoke, traffic, vibration, or other impacts, or would be hazardous because of materials, processes, products, or wastes”. Mixed-Use Development performance standards also state that “all residential units shall be designed

to minimize adverse impacts from mechanical equipment and operations of nonresidential project air pollutant emissions and odors in compliance with the Air Pollution Control District Air Quality Handbook and [Municipal Code] Chapter 8.22 (Offensive Odors)". Therefore, based on the design of the proposed project and compliance with existing regulations and adopted mitigation measures, the project would not result in any new or increased significant impacts.

Biological Resources: The adopted MND identified potential impacts primarily related to the bridge over Meadow Creek, which has been constructed. The MND also identifies mitigation measures to mitigate potential impacts to nesting birds and wildlife during construction of the project, including pre-construction surveys, and requirements for monitoring. These mitigation measures would apply to the current project. In addition, standard erosion and sedimentation control measures, are required to protect water quality and habitat along the Meadow Creek corridor, pursuant to the City's Municipal Code and Waterways Management Plan. Therefore, based on the design of the proposed project and compliance with adopted mitigation measures, the project would not result in any new or increased significant impacts.

Geology/Soils: The adopted MND included the findings of a Preliminary Geotechnical Engineering Report and Foundation Alternative Memo, which concluded that the project is structurally feasible. Mitigation is identified to require a final geotechnical engineering investigation and comprehensive design-level report, which is required to address site preparation and grading, total and differential settlement under the structure loads, slabs-on-grade, expansive soils, site-specific seismicity (including seismic loads on retaining walls). This mitigation measure applies to the current project. In addition, as noted above, standard erosion and sedimentation measures are required during construction, which would mitigate potential impacts related to erosion and sedimentation.

Noise: The adopted MND identified an impact related to use of manufacturing shell building loading docks, and required mitigation states that loading facilities are to be oriented away from residential uses on adjacent properties. The current project has changed manufacturing buildings B and C to mixed-use buildings with commercial uses on the ground floor and residential uses above. This use mix is anticipated to result in less potential operational noise than potential manufacturing uses, and any potential loading facilities are required to be oriented away from residential uses, in compliance with the adopted measure.

In addition, the current project is subject to Zoning Regulations Section 17.70.050 (Edge Conditions), which: prohibits balconies and terraces above the first floor on the building side facing the R-2 zone; increased setbacks for roof top uses (ten feet greater than the standard); siting and four-sided screening of trash and recycling collection areas such that noise impacts are avoided; limited hours of operation (7:00 AM – 8:00 PM); and screening of mechanical service and loading areas. In addition, as noted above (Air Quality and Greenhouse Gas Emissions), the mixed-use project is subject to regulations identified in Zoning Regulations Section 17.70.130 (Mixed-use Development), including performance standards that require that "all residential units shall be designed to minimize adverse impacts from nonresidential project noise and shall comply with

[Municipal Code] Chapter 9.12 (Noise Control)”. Based on the changes to the proposed use of the site, and compliance with the Zoning Regulations, no new or greater noise impacts would occur.

Other Resources: Based on the changes to the project description, no other significant impacts would occur. The project is required to comply with the City’s adopted Drainage Design Manual and Waterways Management Plan to address drainage, stormwater management, and flooding (similar to the proposed project). The project would be adequately served by existing City water, sewer, parks, schools, and roadways and would not require off-site improvements beyond what was identified in the previous project. The applicant is required pay impact fees, including Traffic Impact Fees, to address the project’s contribution to cumulative impacts related to water, sewer, and transportation infrastructure. Therefore, based on the design of the proposed project and compliance with existing regulations, the project would not result in any new or increased significant impacts to other environmental resources.

DETERMINATION:

In accordance with Section 15164 of the State CEQA Guidelines, the City of San Luis Obispo has determined that this addendum to the 279 Bridge Street MND is necessary to document changes or additions that have occurred in the project description since the MND was adopted. The preparation of a subsequent environmental document is not necessary because:

1. None of the following circumstances included in Section 15162 of the State CEQA Guidelines have occurred which require a subsequent environmental document:
 - a. The project changes do not result in new or more severe environmental impacts.
 - b. The circumstances under which the project is undertaken will not require major changes to the adopted Mitigated Negative Declaration.
 - c. The modified project does not require any new mitigation measures.
2. The changes are consistent with City General Plan goals and policies that promote provision of additional housing within the City.

Attached: Initial Study / Negative Declaration ER# 0286-2014

ADDENDUM TO INITIAL STUDY ER #0286-2014

1. **Project Title:** 279 Bridge Street Mixed-Use Project
2. **Lead Agency Name and Address:**
City of San Luis Obispo
919 Palm Street
San Luis Obispo, CA 93401
3. **Contact Person and Phone Number:**
Shawna Scott, Senior Planner
sscott@slocity.org
(805) 781-7176
4. **Project Location:** 279 Bridge Street
5. **Project Sponsor's Name and Address:**
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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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Buildings B and C. No changes to approved Building A (manufacturing shell) are proposed.

Potential Impacts Mitigated to Less than Significant

The previously-adopted MND found that with incorporation of mitigation measures, potential impacts to aesthetics, air quality, biological resources, geology/soils, and noise will be less than significant. A summary of the potential impacts and adopted mitigation measures is provided below, including an assessment of the potential impacts resulting from the currently proposed project. As discussed below, implementation of the project would not result in any new impacts or impacts with increased severity than what was identified in the adopted MND, and no new or amended mitigation measures are required.

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Air Quality and Greenhouse Gas Emissions: The adopted MND noted potential construction-related air quality impacts, which would be mitigated by compliance with standard APCD mitigation measures and permitting requirements. These mitigation measures would apply to the current project. Regarding operational impacts, the current mixed-use project would not exceed the operational thresholds identified by the APCD, and would be consistent with the Clean Air Plan because the project locates commercial and residential uses proximate to each other, and the site has access to bicycle lanes, transit, and a local park.

Zoning Regulations Section 17.70.130 (Mixed-use Development) which notes that mixed-use development forwards the City’s sustainability goals by locating housing, jobs, recreation and other daily needs in close proximity to each other. Furthermore, Mixed-use Development regulations prohibit activities or uses that would be “incompatible with residential activities and/or have the possibility of affecting the health or safety of mixed-use development residents due to the potential for the use to create dust, glare, heat, noise, noxious gasses, odor, smoke, traffic, vibration, or other impacts, or would be hazardous because of materials, processes, products, or wastes”. Mixed-Use Development performance standards also state that “all residential units shall be designed

to minimize adverse impacts from mechanical equipment and operations of nonresidential project air pollutant emissions and odors in compliance with the Air Pollution Control District Air Quality Handbook and [Municipal Code] Chapter 8.22 (Offensive Odors)". Therefore, based on the design of the proposed project and compliance with existing regulations and adopted mitigation measures, the project would not result in any new or increased significant impacts.

Biological Resources: The adopted MND identified potential impacts primarily related to the bridge over Meadow Creek, which has been constructed. The MND also identifies mitigation measures to mitigate potential impacts to nesting birds and wildlife during construction of the project, including pre-construction surveys, and requirements for monitoring. These mitigation measures would apply to the current project. In addition, standard erosion and sedimentation control measures, are required to protect water quality and habitat along the Meadow Creek corridor, pursuant to the City's Municipal Code and Waterways Management Plan. Therefore, based on the design of the proposed project and compliance with adopted mitigation measures, the project would not result in any new or increased significant impacts.

Geology/Soils: The adopted MND included the findings of a Preliminary Geotechnical Engineering Report and Foundation Alternative Memo, which concluded that the project is structurally feasible. Mitigation is identified to require a final geotechnical engineering investigation and comprehensive design-level report, which is required to address site preparation and grading, total and differential settlement under the structure loads, slabs-on-grade, expansive soils, site-specific seismicity (including seismic loads on retaining walls). This mitigation measure applies to the current project. In addition, as noted above, standard erosion and sedimentation measures are required during construction, which would mitigate potential impacts related to erosion and sedimentation.

Noise: The adopted MND identified an impact related to use of manufacturing shell building loading docks, and required mitigation states that loading facilities are to be oriented away from residential uses on adjacent properties. The current project has changed manufacturing buildings B and C to mixed-use buildings with commercial uses on the ground floor and residential uses above. This use mix is anticipated to result in less potential operational noise than potential manufacturing uses, and any potential loading facilities are required to be oriented away from residential uses, in compliance with the adopted measure.

In addition, the current project is subject to Zoning Regulations Section 17.70.050 (Edge Conditions), which: prohibits balconies and terraces above the first floor on the building side facing the R-2 zone; increased setbacks for roof top uses (ten feet greater than the standard); siting and four-sided screening of trash and recycling collection areas such that noise impacts are avoided; limited hours of operation (7:00 AM – 8:00 PM); and screening of mechanical service and loading areas. In addition, as noted above (Air Quality and Greenhouse Gas Emissions), the mixed-use project is subject to regulations identified in Zoning Regulations Section 17.70.130 (Mixed-use Development), including performance standards that require that "all residential units shall be designed to minimize adverse impacts from nonresidential project noise and shall comply with

[Municipal Code] Chapter 9.12 (Noise Control)”. Based on the changes to the proposed use of the site, and compliance with the Zoning Regulations, no new or greater noise impacts would occur.

Other Resources: Based on the changes to the project description, no other significant impacts would occur. The project is required to comply with the City’s adopted Drainage Design Manual and Waterways Management Plan to address drainage, stormwater management, and flooding (similar to the proposed project). The project would be adequately served by existing City water, sewer, parks, schools, and roadways and would not require off-site improvements beyond what was identified in the previous project. The applicant is required pay impact fees, including Traffic Impact Fees, to address the project’s contribution to cumulative impacts related to water, sewer, and transportation infrastructure. Therefore, based on the design of the proposed project and compliance with existing regulations, the project would not result in any new or increased significant impacts to other environmental resources.

DETERMINATION:

In accordance with Section 15164 of the State CEQA Guidelines, the City of San Luis Obispo has determined that this addendum to the 279 Bridge Street MND is necessary to document changes or additions that have occurred in the project description since the MND was adopted. The preparation of a subsequent environmental document is not necessary because:

1. None of the following circumstances included in Section 15162 of the State CEQA Guidelines have occurred which require a subsequent environmental document:
 - a. The project changes do not result in new or more severe environmental impacts.
 - b. The circumstances under which the project is undertaken will not require major changes to the adopted Mitigated Negative Declaration.
 - c. The modified project does not require any new mitigation measures.
2. The changes are consistent with City General Plan goals and policies that promote provision of additional housing within the City.

Attached: Initial Study / Negative Declaration ER# 0286-2014