City of San Luis Obispo Climate Action Plan Update and CEQA GHG Emissions Thresholds

Draft
Initial Study–Negative Declaration

prepared for

City of San Luis Obispo
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Initial Study

Proposed Plan Title

Climate Action Plan (CAP) Update and CEQA Greenhouse Gas (GHG) Emissions Thresholds

Lead Agency/Plan Sponsor and Contact

Lead Agency/Plan Sponsor

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Plan Location and Physical Setting

The City of San Luis Obispo's CAP Update and CEQA GHG Emissions Thresholds apply to all areas and plans/projects within the City of San Luis Obispo limits. Figure 1 shows the regional location, and Figure 2 shows the plan location.

Regional Location and Setting

The City of San Luis Obispo is located in the Central Coast Region of California[1] along U.S. Highway 101 (U.S. 101), approximately 230 miles south of San Francisco and 190 miles north of downtown Los Angeles. San Luis Obispo is accessible via U.S. 101 from the north and south, State Route 1 (SR 1) from the northwest, and State Route 227 (SR 227) from the south. The City is also served by the City of San Luis Obispo Transit Division[2] as well as the South County Regional Transit Authority (RTA).[3]

Local Setting

The City is characterized by a mild Mediterranean climate that is moderated by the influence of the Pacific Ocean, located approximately 10 miles to the west. The City receives approximately 20 inches of rain annually, 287 sunny days per year, with a July high temperature of 74°F and a January low temperature of 43°F.[4]

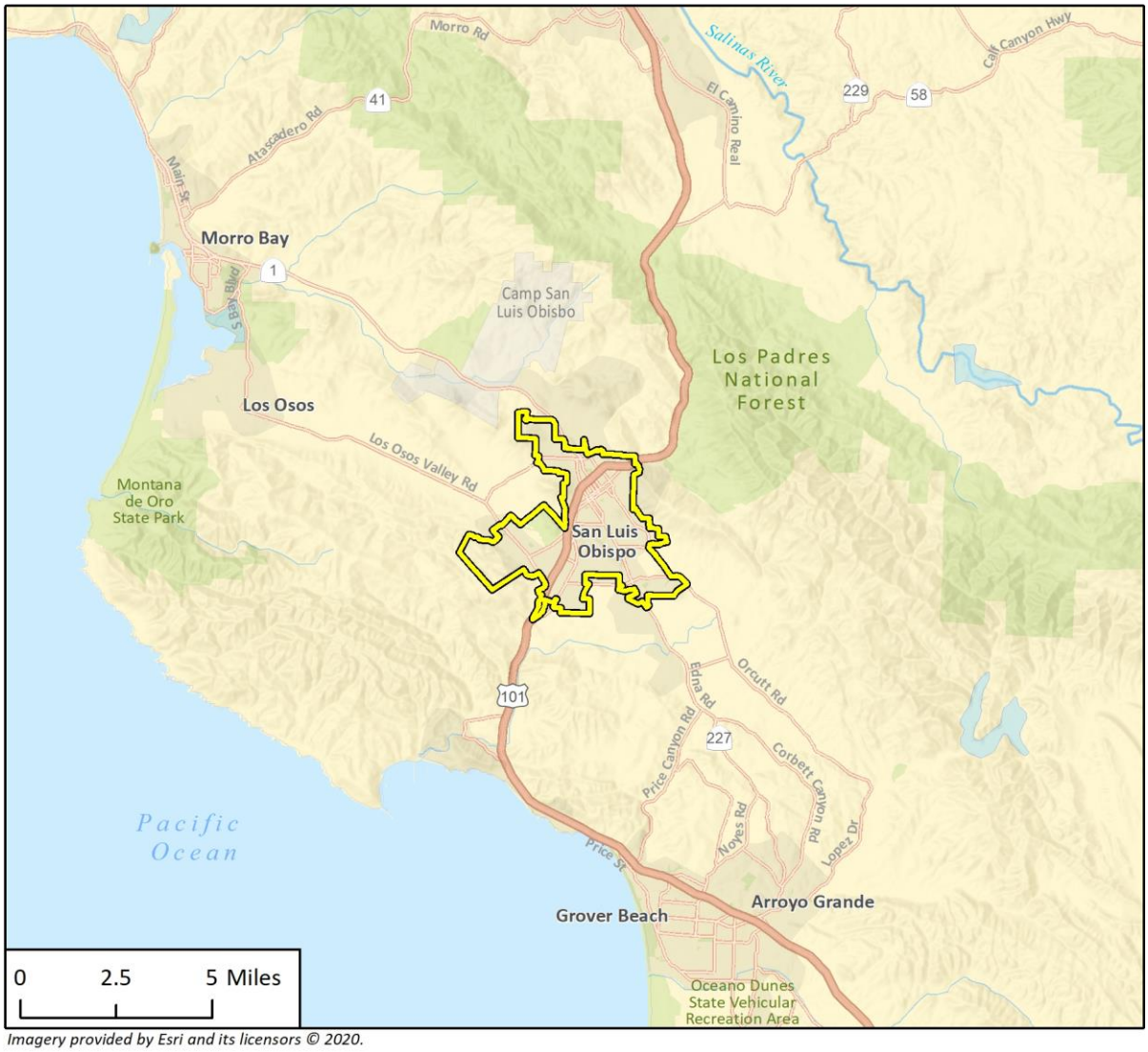
[1] The Central Coast Region of California consists of the coastal areas from Santa Cruz County (on the northern end) to Santa Barbara County (on the southern end).

[2] San Luis Obispo, City of. 2019. SLO Transit. Available at: https://www.slocity.org/government/department-directory/public-works/slo-transit

[3] Regional Transit Authority. 2019. SoCoTransit. Available at: https://www.slorta.org/schedules-fares/

[4] Best Places. 2019. Climate in San Luis Obispo. Available at: https://www.bestplaces.net/climate/city/california/san_luis_obispo

Figure 1 Regional Location



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City of San Luis Obispo

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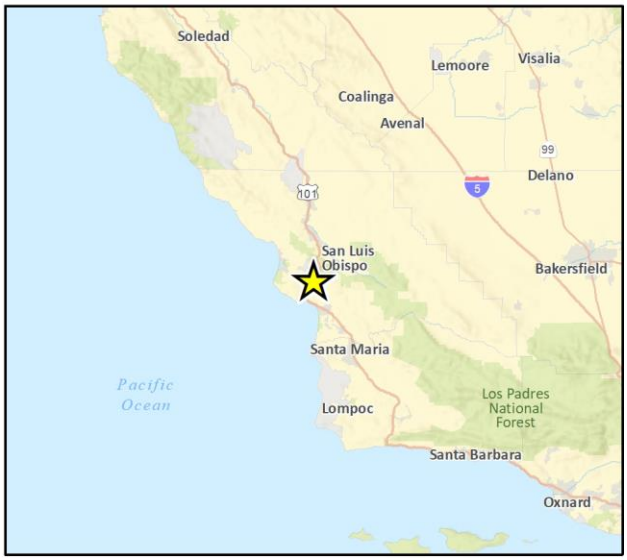

Figure 2 Plan Location

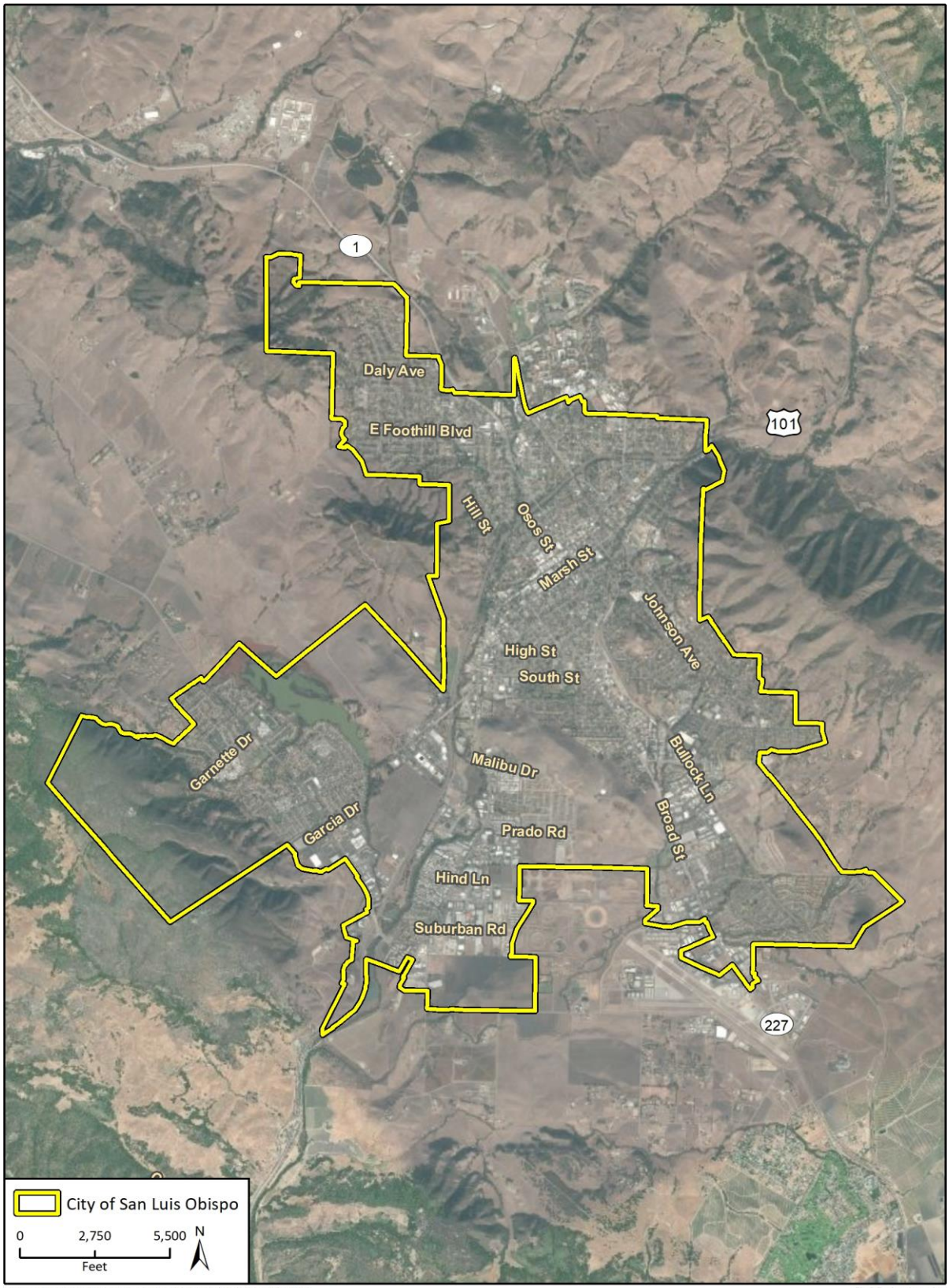

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Fig 2 Project Location

The City encompasses approximately 72,600 acres of land in a narrow valley between the coastal Santa Lucia Mountains on the west and volcanic hills, known as the Nine Sisters, which reach an elevation of up to 3,000 feet on the east. The San Luis Obispo Creek bisects the City and is a defining feature of the Downtown District. The City also has a permanent open space greenbelt at its edges.

Surrounding Uses

The City is surrounded by unincorporated San Luis Obispo County land characterized by agricultural uses (vineyards, field crops) and open space containing oak woodland and grasslands habitat. Distinctive facilities and land uses proximate to the City include California Polytechnic State University San Luis Obispo (Cal Poly), Cuesta College, and San Luis Obispo Military Camp to the north, San Luis Obispo County Regional Airport and numerous vineyards and wineries to the south, Los Padres National Forest to the east, and Montana de Oro State Park to the west.

Existing Setting

Historical and Demographic Setting

The history of San Luis Obispo dates back to 1772 when Junipero Serra founded Mission San Luis Obispo de Tolosa. The City was officially incorporated in 1856.[5] According to the population projections included in the City's General Plan Land Use Element, the City's population in 2020 is 48,826. Over the last twenty years, population in the City has grown by around 3,000, an average rate of 0.4 percent per year, while the County of San Luis Obispo has grown at an average rate of 1.1 percent per year."[6] See Section 4 (Plan Location and Physical Setting) for discussion of the physical setting of the City of San Luis Obispo.

Sustainability and GHG Reduction Efforts Setting

City of San Luis Obispo Sustainability and GHG Reduction Efforts

SAN LUIS OBISPO CAP

In 2012, San Luis Obispo adopted the *City of San Luis Obispo Climate Action Plan* (2012 CAP) as part of the ICLEI-Local Governments for Sustainability's *Cities for Climate Protection Campaign.*[7] The 2012 CAP included a baseline greenhouse gas (GHG) emissions inventory conducted communitywide in 2005 data and forecasted GHG emissions in 2020. The 2012 CAP was adopted by City Council in 2012 to provide guiding documentation that outlines the course of action for identifying and implementing strategies to achieve citywide reductions in GHG emissions for both municipal and community operations.[8] The 2012 CAP was designed to:

- Present baseline emissions of the 2005 inventory;
- Forecast emissions through 2020 relative to Statewide goals;

[5] See California. Mission San Luis Obispo. Available at: http://www.seecalifornia.com/missions/san-luis-obispo-mission.html

[6] San Luis Obispo, City of. 2012. Economic Development Plan. Available at: https://www.slocity.org/home/showdocument?id=4901

[7] San Luis Obispo, City of. 2012. Climate Action Plan. Available at: https://www.slocity.org/home/showdocument?id=2398

[8] San Luis Obispo, City of. 2012. Climate Action Plan. Available at: https://www.slocity.org/home/showdocument?id=2398

- Establish a GHG emissions reduction target of 15 percent below the baseline by the year 2020, which equates to 22 percent below the projected business-as-usual (BAU) forecast; and
- Provide policies and strategies for achieving Statewide GHG emissions reduction targets for 2020.

As part of the 2012 CAP, the City adopted GHG reduction measures to demonstrate consistency with Statewide targets set forth in AB 32. The community's total 2005 baseline GHG emissions were estimated to be 264,237 metric tons of carbon dioxide equivalent ($MTCO_2e$).[9]

The 2012 CAP included emissions reduction strategies from the transportation and land use, energy, and waste management sectors for each of communitywide and municipal operation scopes. Examples of GHG reducing strategies suggested in the 2012 CAP included the creation of a Short-Range Transit Plan, modify the Bicycle Transportation Plan, adopt a Downtown Pedestrian Plan, and implement additional requirements for new development. The 2012 CAP included 36 strategies to reflect currently implemented City regulations and programs expected to be ongoing to help achieve 2020 targets.

SAN LUIS OBISPO CAP UPDATE (PROPOSED PLAN)

In 2020, as part of the CAP Update assessed herein, San Luis Obispo is actively engaged in addressing climate change, sustainability, and reductions in GHG emissions. The City of San Luis Obispo prepared a Draft Climate Action Plan (CAP) Update dated July 1, 2020 to reduce municipal and communitywide GHG emissions with the goal of achieving a communitywide GHG emissions output of 197,180 $MTCO_2e$ per year by 2030 (consistent with California Senate Bill 32 target for 2030) as well as the aspirational goal of achieving carbon neutrality by 2035 (exceeding the California Executive Order B-55-18 target of carbon neutrality by 2045).[10] The CAP Update assessed herein builds upon the goals of the 2012 CAP, is based upon a more recently completed community-level inventory for baseline year 2005 and 2016, and formulates additional pillars, measures, and foundational actions to achieve the City's sustainability goals.[11]

Regional Sustainability and GHG Reduction Efforts

As follows is a summary of the regional GHG emissions reduction efforts, which the City of San Luis Obispo CAP Update is intended to be consistent with or exceed.

CALIFORNIA SENATE BILL 375

In 2008, Senate Bill 375 (SB 375) enhanced the State's ability to reach AB 32 targets by directing CARB to develop regional GHG emissions reduction targets to be achieved from passenger vehicles for 2020 and 2035. In addition, SB 375 directs each of the State's 18 major Metropolitan Planning Organizations (MPO) to prepare a sustainable community's strategy (SCS) that contains a growth strategy to meet such regional GHG emissions reduction targets for inclusion in the respective regional transportation plan (RTP).

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[9] The Climate Action Plan Update uses updated methods and data sources to estimate the 2005 GHG baseline inventory. As a result, the baseline emissions estimates are different in the Climate Action Plan Update than they were in the 2012 Climate Action Plan.

[10] Carbon neutrality is defined as net zero carbon emissions, which is achieved either by balancing carbon emissions with carbon removal or by completely eliminating carbon emissions.

[11] San Luis Obispo, City of. 2019. Community Greenhouse Gas Emissions Inventory and Forecast.

SLOCOG Regional Transportation Plan/Sustainable Communities Strategy

In 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. Specifically, the San Luis Obispo Council of Governments (SLOCOG) was assigned targets of a 3 percent reduction in GHG emissions from transportation sources by 2020 and an 11 percent reduction in GHG emissions from transportation sources by 2035. In 2019, SLOCOG adopted its RTP, which includes the region's SCS and meets the requirements of SB 375.[12]

State Sustainability and GHG Reduction Efforts

As follows is a summary of the State GHG emissions reduction efforts, which the City of San Luis Obispo CAP Update is intended to be consistent with or exceed.

California Executive Order S-3-05

In 2005, the California governor issued Executive Order (EO) S-3-05, which identifies Statewide GHG emissions reduction targets to achieve long-term climate stabilization as follows:

- Reduce GHG emissions to 1990 levels by 2020
- Reduce GHG emissions to 80 percent below 1990 levels by 2050

In response to EO S-3-05, California Environmental Protection Agency (CalEPA) created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report").[13] The *2006 CAT Report* identified a recommended list of strategies that the State could pursue to reduce GHG emissions. These are strategies that could be implemented by various State agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the State agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture, among others.

California Assembly Bill 32

In 2006, the California legislature signed Assembly Bill (AB) 32 – the Global Warming Solutions Act – into law, requiring a reduction in Statewide GHG emissions to 1990 levels by 2020 and California Air Resources Board (CARB) preparation of a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 required CARB to adopt regulations to require reporting and verification of Statewide GHG emissions. Based on this guidance, CARB approved a 1990 Statewide GHG level and 2020 limit of 427 $MTCO_2e$.

California Climate Change Scoping Plan

In 2008, CARB approved the original California Climate Change Scoping Plan, which included measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted and implemented since approval of the Scoping Plan.

[12] San Luis Obispo Council of Governments (SLOCOG). 2019. 2019 Regional Transportation Plan: Connecting Communities. Available at: https://slocog.org/2019RTP (accessed January 2020).

CALIFORNIA CLIMATE CHANGE SCOPING PLAN UPDATE (2013)

In 2013, CARB approved the first update to the California Climate Change Scoping Plan. The 2013 Scoping Plan Update defined CARB climate change priorities for the next five years and set the groundwork to reach post-2020 Statewide GHG emissions reduction goals. The 2013 Scoping Plan Update highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the State's longer-term GHG reduction strategies with other State policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use.[14]

CALIFORNIA EXECUTIVE ORDER B-30-15

In 2015, the California governor issued Executive Order B-30-15, which established a Statewide mid-term GHG reduction target of 40 percent below 1990 levels by 2030.

CALIFORNIA SENATE BILL 32

In 2016, the California legislature signed Senate Bill 32 (SB 32) into law, extending AB 32 by requiring further reduction in Statewide GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of recently adopted policies and policies, such as SB 350 and SB 1383 (see below).

CALIFORNIA CLIMATE CHANGE SCOPING PLAN UPDATE (2017)

In 2017, CARB approved the second update to the California Climate Change Scoping Plan. The 2017 Scoping Plan put an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan Update, the 2017 Scoping Plan Update does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with Statewide per-capita goals of six MTCO2e by 2030 and two MTCO2e by 2050.[15] As stated in the 2017 Scoping Plan Update, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level), but not for specific individual projects, because they include all GHG emissions sectors in the State.

CALIFORNIA EXECUTIVE ORDER B-55-18

In 2018, the California governor issued Executive Order B-55-18, which established a new Statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing Statewide GHG reduction targets established by SB 32.

For more information on the Senate and Assembly Bills, Executive Orders, and Scoping Plans discussed above, and to view reports and research referenced above, please refer to the following websites: www.climatechange.ca.gov and www.arb.ca.gov/cc/cc.htm.

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[15] California Air Resources Board (CARB). 2017. AB 32 Scoping Plan. Available at: https://ww3.arb.ca.gov/cc/scopingplan/scopingplan.htm

General Plan Designation and Zoning

The CAP would be implemented throughout the City and would occur in all General Plan designations and in all zoning designations.

Description of Plan

2020 CAP Update

In response to the 2017 California Climate Change Scoping Plan, the City updated its baseline 2005 inventory and prepared a comprehensive, community-wide GHG emissions inventory update for the 2016 calendar year. The GHG emissions inventory update was completed in compliance with all relevant protocols and guidance documents, including U.S. Community Protocol, Local Government Operations Protocol (LGOP), the Global Protocol for Community Scale GHG Emissions (GPC), and the Intergovernmental Panel on Climate Change (IPCC) Guidelines for National GHG Inventories. In 2016, San Luis Obispo's total GHG emissions were estimated to be 339,290 $MTCO_2e$. The City has completed communitywide GHG emissions inventories for years 2005 and 2016, which are summarized in Table 1. Table 2 also provides estimated 1990 GHG emissions levels for informational purposes. As shown therein, communitywide GHG emissions declined by approximately 12 percent between 2005 and 2016. The most notable changes occurred in the energy and solid waste sectors due to increasing decarbonization of the State electricity grid, investments in energy efficiency, and a decrease in the amount of solid waste generated.[16]

Table 1 City of San Luis Obispo 1990, 2005, & 2016 Communitywide GHG Emissions Levels

Sector	1990 (MT of CO_2e)[1]	2005 (MT of CO_2e)	2016 (MT of CO_2e)	Percent Change from 2005 to 2016
Transportation	191,580	225,390	212,980	-6%
Non-residential Energy	49,340	58,050	44,270	-24%
Residential Energy	47,130	55,450	39,410	-29%
Solid Waste	40,580	47,740	42,630	-11%
Total	**328,630**	**386,630**	**339,290**	**-12%**

MT = metric tons; CO_2e = carbon dioxide equivalents

Note: Numbers are rounded to the nearest ten.

[1] AB 32 sets a target of reducing GHG emissions to 1990 levels by 2020, which is considered equivalent to a 15 percent reduction in baseline 2005 levels according to the CARB (2008) Climate Change Scoping Plan. Therefore, to estimate 1990 emissions levels, inventoried 2005 emissions from each sector were reduced by 15 percent.

Source: San Luis Obispo, City of. 2019. Community Greenhouse Gas Emissions Inventory and Forecast.

Compared with the 2012 CAP, the 2020 CAP Update puts more emphasis on carbon-free electricity and General Plan transportation mode split. Measures from the 2012 CAP Update were removed and replaced with new foundational actions and supporting measures. The CAP Update builds upon the goals of the 2012 CAP and is based on a more recent inventory for the City.

The CAP Update is organized into six pillars, each of which includes a long-term goal, measures, and foundational actions. Altogether, these measures and foundational actions are intended to reduce

[16] San Luis Obispo, City of. 2019. Community Greenhouse Gas Emissions Inventory and Forecast.

communitywide GHG emissions by 43 percent below 1990 levels by 2030 and by 66 percent below 1990 levels by 2035, which provides substantial progress toward meeting the City carbon neutrality goal while exceeding in time the State carbon neutrality goal. However, full implementation of the 2020 CAP Update would leave a gap of approximately 111,030 $MTCO_2e$ per year that would still need to be addressed to achieve carbon neutrality. As such, the CAP Update acknowledges that additional actions beyond those identified in the plan will be necessary to achieve carbon neutrality and, therefore, provides a mechanism for updating and adopting a new climate action plan connected to the biennial financial plan cycle.[17] This allows for certainty in the updated schedule, ensures that the carbon neutrality work is directly tied to the City's financial decision making and prioritization process and allows for constant integration of learning, best practices, and new measures and technologies to further the City toward meeting its goal of carbon neutrality. Furthermore, in order to execute the CAP, City staff would implement the following administrative actions: regularly update the Climate Action Plan; monitor and report CAP implementation; ensure transparency by reporting GHG and CAP information to public disclosure programs; and develop a mitigation program for new development to illustrate consistency with the CAP. The proposed six pillars/ goals, measures, and foundational actions of the 2020 CAP are listed below in Table 2.

Table 2 City of San Luis Obispo 2020 CAP Pillars, Measures, and Foundational Actions

Pillars/Goals	Measure	Foundational Action
Lead by Example The goals of the "Lead by Example" Pillar are to create of a Municipal Action Plan by the year 2020 and achieve carbon neutral government operations by the year 2030. The proposed measures and actions are expected to reduce emissions by 7,500 $MTCO_2e$ by the year 2035.	Leadership 1 – Municipal Carbon Neutrality Plan	Leadership 1.1 – Adopt a municipal carbon neutrality plan in 2020.
	Leadership 2 – Green Local Economy	Leadership 2.1 – Include carbon neutrality, social equity, and a focus on developing a green local economy in the updated Economic Development Strategic Plan.
		Leadership 2.2 – Research methods to support local contractors and labor.
	Leadership 3 – Community Collaboration	Leadership 3.1 – Create a formal approach to support and empower community collaboration for climate action.
Clean Energy Systems The goal of the "Clean Energy Systems" Pillar is to achieve 100 percent carbon free electricity by 2020. The proposed measures and actions are expected to reduce emissions by 26,050 by 2030 and 39,010 $MTCO_2e$ by the year 2035.	Energy 1 – Monterey Bay Community Power	Energy 1.1 - Launch Monterey Bay Community Power and achieve a 98% participation rate while advocating for programs and that support equity and achieve maximum local benefit.
	Energy 2 – Local Grid Reliability and Storage	Energy 2.1 - Work with MBCP and PG&E to develop a regional grid reliability strategy.
	Energy 3 – Natural Gas	Energy 3.1 - Partner with SoCal Gas to research options for reducing greenhouse gas emissions associated with the existing natural gas grid.
Green Buildings The goals of the "Green Buildings" Pillar are to generate no net new building emissions from on-site energy	Buildings 1 – Carbon Neutral New Buildings	Buildings 1.1 - Adopt and implement the Clean Energy Choice Program for New Buildings and review opportunities for improvement in the 2022 code cycle.

[17] San Luis Obispo, City of. 2019. Carbon Neutrality Vision and Three-Year Strategic Plan Technical Report.

Pillars/Goals	Measure	Foundational Action
use by the year 2020 and achieve a 50 percent reduction in existing building emissions (after accounting for MBCP) by the year 2030. The proposed measures and actions are expected to reduce emissions by 11,980 in by 2030 and 26,740 $MTCO_2e$ by the year 2035.	Buildings 2 – Energy Retrofitting	Buildings 2.1 - Conduct comprehensive retrofit program study and develop and implement a strategic and equity focused building retrofit program by 2021.
Connected Community The goals of the "Connected Community" Pillar are to achieve the General Plan Mode Split Objective by the year 2030 and have 40 percent of Vehicle Miles Travelled (VMT) come from electric vehicles by the year 2030. The proposed measures and actions are expected to reduce emissions by 45,240 $MTCO_2e$ by 2030 and 64,170 $MTCO_2e$ by the year 2035.	Connected 1 – Innovation and Coordination	Connected 1.1 – Establish a consistent method for tracking and reporting mode split metrics.
		Connected 1.2 – Research and develop an approach to a "Mobility as a Service" platform for people to easily use all modes of low carbon mobility in the City.
	Connected 2 – Active Transportation	Connected 2.1 – Complete Active Transportation Plan and begin implementation immediately.
		Connected 2.2 – Launch micro mobility program by 2021.
	Connected 3 – Parking	Connected 3.1 – Establish a policy and strategic approach to leveraging existing and new parking garages for downtown residential and visitor serving uses and to allow for further implementation of the Downtown Concept Plan.
	Connected 4 – Transit	Connected 4.1 – Develop a transit electrification strategic plan and begin implementing in 2020.
		Connected 4.2 – Shorten transit headways through accelerated implementation of the existing Short-Range Transit Plan.
		Connected 4.3 – Explore additional innovative transit options in the 2022 Short-Range Transit Plan (e.g., on-demand deviated routes, electric fleet expansion, micro transit, Bus Rapid Transit, Transit Signal Priority, etc.).
		Connected 4.4 – Assess feasibility of a "free to the user" transit ridership program.
	Connected 5 – Housing	Connected 5.1 – Complete the 2019-21 Housing Major City Goal, including the Housing Element of the General Plan Update and Flexible Zoning Requirements for Downtown.
	Connected 6 – Electric Vehicles	Connected 6.1 – Develop and begin implementing electric mobility plan to achieve a goal of 40 percent electric vehicle miles traveled (VMT) by 2035.
Circular Economy The goals of the "Circular Economy" Pillar are to achieve 75 percent diversion of landfilled organic waste by the year 2035, and 90 percent diversion by the year 2035. The	Circular Economy 1 – Organic Waste Diversion	Circular Economy 1.1 – Adopt an ordinance requiring organic waste subscription for all residential and commercial customers by 2022.
		Circular Economy 1.2 – Develop and implement program to increase edible food rescue by 20 percent.

Pillars/Goals	Measure	Foundational Action
proposed measures and actions are expected to reduce emissions by 37,410 $MTCO_2e$ by the year 2030 and 47,300 $MTCO_2e$ by the year 2035.		Circular Economy 1.3 – Develop and implement a waste stream education program for HOA/Property Managers and the commercial sector.
	Circular Economy 2 – Administrative Capacity	Circular Economy 2.1 – Update the Municipal Code solid waste section and bin enclosure standards. Circular Economy 2.2 – Develop a Solid Waste section in the Utilities Department.
Natural Solutions The goal of the "Natural Solutions" Pillar is to increase carbon sequestration on the San Luis Obispo Greenbelt and Urban Forest through compost application-based carbon farming activities and tree planting. These activities will be ongoing through 2035. The proposed measures and actions are expected to reduce emissions by 3,610 $MTCO_2e$ by 2030 and 7,050 $MTCO_2e$ by the year 2035.	Natural Solutions 1 – Carbon Farming	Natural Solutions 1.1 – Conduct Carbon Farming Study and Pilot Project in 2020 and if feasible, begin implementation by 2023.
	Natural Solutions 2 – Tree Planting	Natural Solutions 2.1 – Prepare the City's first Urban Forest Master Plan by 2021 and plant and maintain 10,000 new trees by 2035.

Source: San Luis Obispo, City of. 2020. Draft Climate Action Plan Update.

Figure 3 and Table 3 summarize the communitywide GHG emissions forecast under three scenarios: 1) business-as-usual, 2) implementation of State laws and programs, and 3) implementation of State laws and programs and the CAP. As shown therein, under the business-as-usual scenario, communitywide GHG emissions are forecasted to increase by approximately 21 percent between 1990 and 2035 based on anticipated economic and population growth. However, with implementation of State laws and programs, communitywide GHG emissions would decline by approximately 22 percent between 1990 and 2035. Furthermore, full implementation of the CAP alongside State laws and programs would reduce communitywide GHG emissions by approximately 66 percent below 1990 levels by 2035.

Figure 3 City of San Luis Obispo GHG Emissions Forecast, 2005 to 2035

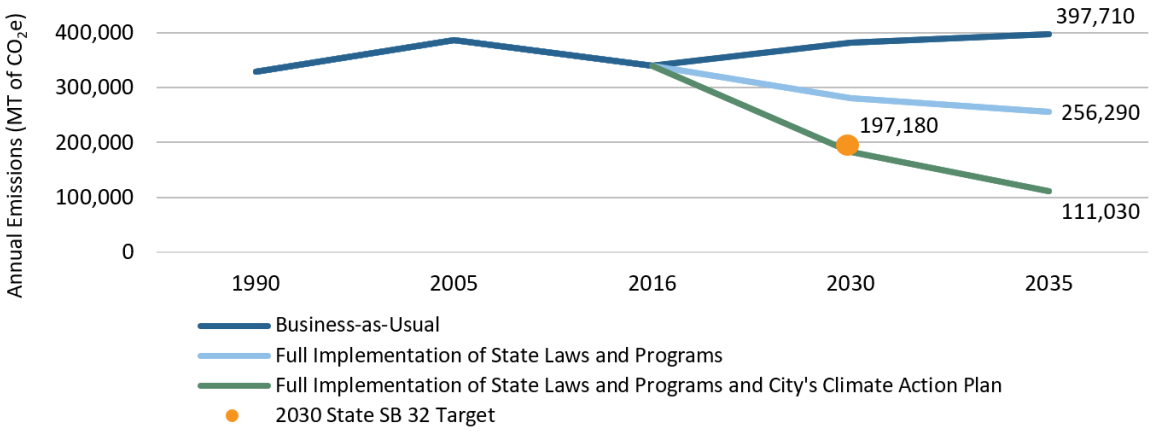


Table 3 City of San Luis Obispo GHG Emissions Forecast Through 2035

Sector	1990 (MT of CO_2e)	2005 (MT of CO_2e)	2016 (MT of CO_2e)	2030 (MT of CO_2e)	2035 (MT of CO_2e)	Percent Change (1990-2035)
Business-as-Usual						
Transportation	191,580	225,390	212,980	234,570	242,280	26%
Non-residential Energy	49,340	58,050	44,270	51,860	54,880	11%
Residential Energy	47,130	55,450	39,410	45,660	47,990	2%
Solid Waste	40,580	47,740	42,630	49,880	52,560	30%
Total	**328,630**	**386,630**	**339,290**	**381,970**	**397,710**	**21%**
Implementation of State Laws and Programs[1]						
Transportation	191,580	225,390	212,980	161,290	142,830	(25%)
Non-residential Energy	49,340	58,050	44,270	33,690	27,720	(44%)
Residential Energy	47,130	55,450	39,410	35,660	33,180	(30%)
Solid Waste	40,580	47,740	42,630	49,880	52,560	30%
Total	**328,630**	**386,630**	**339,290**	**280,520**	**256,290**	**(22%)**
Implementation of State Laws and Programs and City's Climate Action Plan						
Transportation[2]	191,580	225,390	212,980	116,050	78,660	(59%)
Non-residential Energy[3]	49,340	58,050	44,270	29,710	21,000	(57%)
Residential Energy[3]	47,130	55,450	39,410	27,680	13,160	(72%)
Solid Waste[4]	40,580	47,740	42,630	12,470	5,260	(87%)
Carbon Sequestration[5]	0	0	0	(3,610)	(7,050)	n/a
Total	**328,630**	**386,630**	**339,290**	**182,300**	**111,030**	**(66%)**

MT = metric tons; CO_2e = carbon dioxide equivalents; () denotes a negative number
Note: Numbers are rounded to the nearest ten.
[1] State laws and programs include State vehicle fuel efficiency standards, the Renewable Portfolio Standard, and triennial updates of Title 24.
[2] Includes implementation of Pillar 4: Connected Community.
[3] Includes implementation of Pillar 2: Clean Energy Systems and Pillar 3: Green Buildings.
[4] Includes implementation of Pillar 5: Circular Economy.
[5] Includes implementation of Pillar 6: Natural Solutions.
Source: San Luis Obispo, City of. 2019. Community Greenhouse Gas Emissions Inventory and Forecast.

Implementation of the CAP Update measures identified above could result in physical changes to the environment that could potentially have an impact on the environment. While individual projects resulting from these measures have not been identified for the purposes of this document, the types of actions that could result from realization of the CAP measures are taken into account in considering potential environmental impacts that could occur through implementation of the CAP

Update. For example, the use of carbon-free electricity discussed per the Clean Energy Systems pillar may require the installation of new infrastructure to accommodate use and transmission of alternative and renewable fuels. Similarly, the use of electric vehicles identified per Action Connected 6.1 would require the installation of electric vehicle charging stations and supporting infrastructure. Additionally, implementation of Actions Connected 2.1 through 2.3 may require the installation of new bicycle or pedestrian facilities. These types of activities would introduce physical changes, such as the temporary presence and operation of construction vehicles and equipment during installation of required facilities, and the long-term presence of new facilities such as bike and pedestrian facilities, solar arrays, and electric vehicle charging stations, which could alter pedestrian and vehicular traffic patterns. Future plans or projects requiring discretionary approval would be subject to environmental review under CEQA, and individual impact analyses will identify required plan- or project-specific mitigation measures where applicable.

CEQA GHG Emissions Thresholds

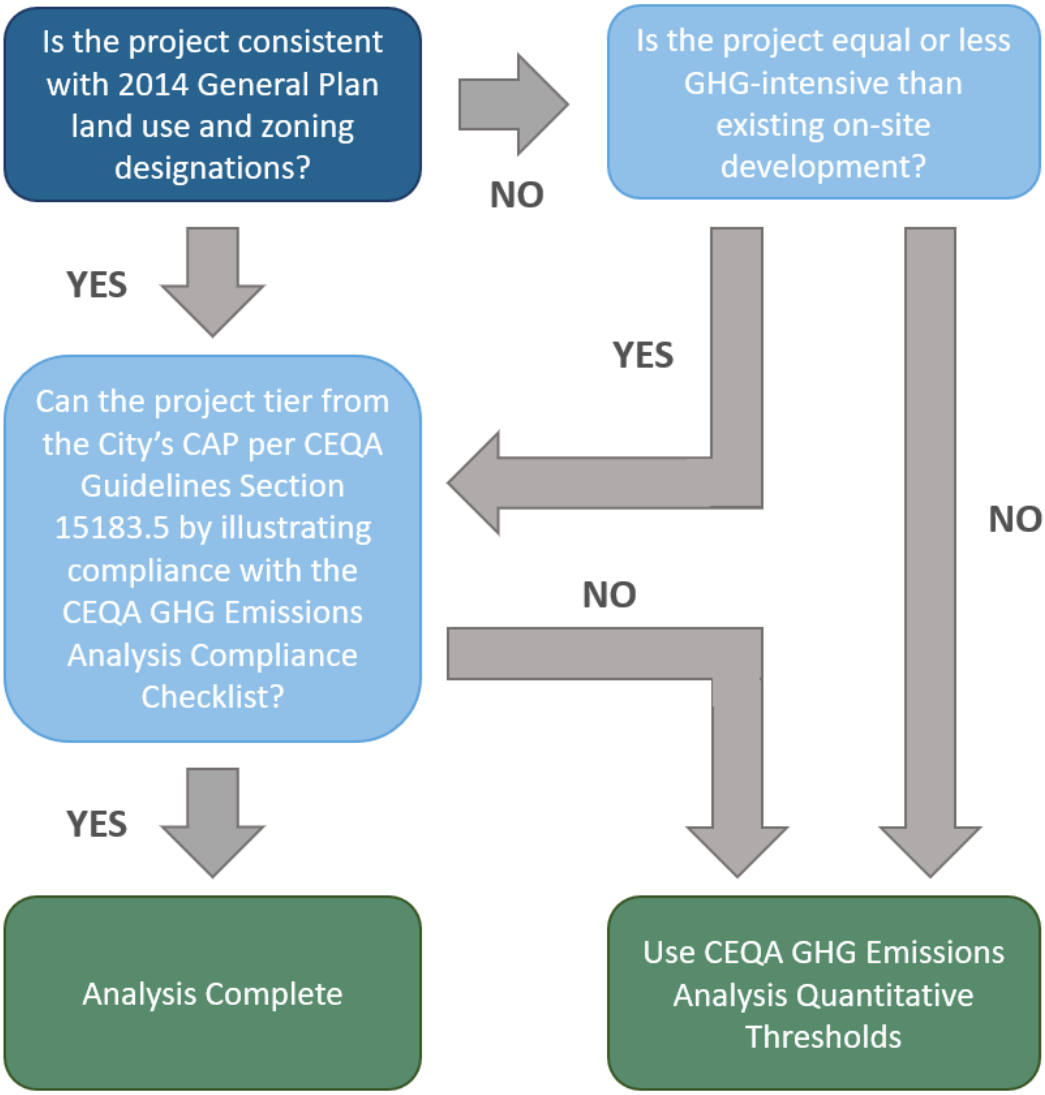
In 2007, SB 97 acknowledged that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents, and in 2010 the California Natural Resources Agency adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines gave lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. Specifically, Section 15183.5(b)(1)A-G of Title 14 of the California Code of Regulations was amended to state that a qualified GHG Reduction Plan, or a Climate Action Plan, may be used for tiering and streamlining the analysis of GHG emissions in subsequent CEQA project evaluation, provided that the GHG Reduction Plan or CAP does the following:

- Quantifies GHG emissions both existing and projected over a specific period of time, resulting from activities within a defined geographical area
- Establishes a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable
- Identifies and analyzes the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area
- Specifies measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level
- Establishes a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels
- Be adopted in a public process following environmental review.

Therefore, the City proposes to also adopt quantitative efficiency thresholds for use in evaluating whether a plan or project’s GHG emissions would result in a potentially significant environmental impact under CEQA for plans or projects with pre-2030 buildout or initial operation years. The CEQA GHG emissions thresholds would be applied to plans or projects that cannot tier from the environmental analysis for the City’s CAP (as contained in this IS/ND) due to one of the following circumstances, which are illustrated in Figure 4:

- The plan or project would not be consistent with the 2014 General Plan land use and zoning designations for the project site and would result in greater GHG emissions than existing on-site development; or
- The plan or project would not be consistent with the CEQA GHG Emissions Analysis Compliance Checklist.

Figure 4 Determining CEQA GHG Emissions Analysis Methodology



These thresholds are set at the level of GHG emissions that new development would need to achieve to be consistent with the CAP's communitywide emissions reduction target of 43 percent below 1990 emissions levels by 2030. The efficiency thresholds, listed below, are expressed in terms of $MTCO_2e$ per service person[18] and are applicable to plans or projects with pre-2030 buildout or initial operational years:

[18] Per the method used by the San Luis Obispo Community Development Department, the service population is equal to the residential population plus half the number of jobs (City of San Luis Obispo 2019).

- 0.7 per resident
- 0.7 per employee
- 0.9 per service person[19]

Efficiency thresholds for beyond 2030 would be established later in conjunction with subsequent CAP Updates.

Plans or projects that do not tier from the City CAP Update IS/ND that would generate GHG emissions in excess of these thresholds would result in a potentially significant impact on the environment related to GHG emissions and climate change. Mitigation measures would be required to be identified to reduce potentially significant impacts resulting from such plans or projects. Plans or projects that are unable to reduce GHG emissions below these thresholds through implementation of identified mitigation measures would result in a significant and unavoidable environmental impact. The GHG Emissions Thresholds provide guidance during CEQA review and do not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not have direct construction or operational impacts.

Cumulative Projects Scenario

For purposes of CEQA cumulative impacts analysis of the City of San Luis Obispo 2020 CAP Update, the cumulative projects scenario is buildout of the San Luis Obispo General Plan per the 2014 Land Use and Circulation Elements Update. The San Luis Obispo 2014 General Plan buildout assumes a total population of 48,550 persons and 23,204 housing units by the horizon year of 2035.

Required Approvals

City of San Luis Obispo

Required approvals include:

- adoption of the CAP Update/GHG Emissions Thresholds Initial Study-Negative Declaration;
- approval of the CAP Update; and
- adoption of a CEQA GHG Emissions Thresholds resolution.

Although individual plans or projects may be implemented later under the umbrella of the CAP Update, each individual plan or project would be subject to separate environmental review under CEQA.

Other Public Agencies

The City of San Luis Obispo has sole approval authority over the CAP Update. There are no other public agencies whose approval is required.

[19] San Luis Obispo, City of. 2019. Community Greenhouse Gas Emissions Inventory and Forecast.

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Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

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

Determination

Based on 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 to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

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

Lead Agency Representative Signature	6/17/2020 Date
Tyler Corey Lead Agency Representative Printed Name	Principal Planner Title

Environmental Checklist

1 Aesthetics

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

1a, 1c. Would the project have a substantial adverse effect on a scenic vista? In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The San Luis Obispo General Plan Conservation/Open Space and Circulation Elements identify viewing corridors and scenic roadways with high or moderate value as well as visual landmarks.[20,21] The applicable goals and policies from these City General Plan elements include:

- 9.1.1 Preserve Natural and Agricultural Landscapes: The City will implement the following policies and will encourage other agencies with jurisdictions to do likewise:
  - Natural and agricultural landscapes that the City has not designated for urban use shall be maintained in their current patterns of use.

[20] San Luis Obispo, City of. 2014. General Plan Circulation Element. Last amended in 2017. Available at: https://www.slocity.org/home/showdocument?id=20412

[21] San Luis Obispo, City of. 2006. General Plan Open Space and Conservation Element. Available at: https://www.slocity.org/home/showdocument?id=6651

- Any Development that is permitted in natural or agricultural landscapes shall be visually subordinate to and compatible with the landscape features. Development includes, but is not limited to buildings, signs (including billboard signs), roads, utility and telecommunication lines and structures. Such development shall:
  - Avoid visually prominent locations such as ridgelines, and slopes exceeding 20 percent.
  - Avoid unnecessary grading, vegetation removal, and site lighting.
  - Incorporate building forms, architectural materials, and landscaping, that respect the setting, including the historical pattern of development in similar settings, and avoid stark contrasts with its setting.
  - The City's non-emergency repair, maintenance, and small construction projects in highly visible locations, such as hillsides and downtown creeks, where scenic resources could be affected, shall be subject to at least "minor or incidental" architectural review.

- 9.1.3 Utilities and Signs**:** In and near public streets, plazas, and parks, features that clutter, degrade, intrude on, or obstruct views shall be avoided. Necessary features, such as utility and communication equipment, and traffic equipment and signs should be designed and placed so as to not impinge upon or degrade scenic views of the Morros or surrounding hillsides, or farmland, consistent with the primary objective of safety. New billboard signs shall not be allowed, and existing billboard signs shall be removed as soon as practicable, as provided in the Sign Regulations.
- 9.1.5 View Protection in New Development: The City will include in all environmental review and carefully consider effects of new development, streets, and road construction on views and visual quality by applying the Community Design Guidelines, height restrictions, hillside standards, Historical Preservation Program Guidelines, and the California Environmental Quality Act and Guidelines.
- 9.2.1 Views to and from Public Places, including Scenic Roadways: The City will preserve and improve views of important scenic resources from public places and encourage other agencies with jurisdiction to do so. Public places include parks, plazas, the grounds of civic buildings, streets and roads, and publicly accessible open space. In particular, the route segments shown in Figure 10 are designated as scenic roadways.
  - Development projects shall not wall off scenic roadways and block views.
  - Utilities, traffic signals, and public and private signs and lights shall not intrude on or clutter views, consistent with safety needs.
  - Where important vistas of distant landscape features occur along streets, street trees shall be clustered to facilitate viewing of the distant features.
  - Development projects, including signs, in the viewshed of a scenic roadway shall be considered "sensitive" and require architectural review.

- 9.3.5 Visual Assessments: Require evaluations (accurate visual simulations) for projects affecting important scenic resources and views from public places.
- 9.3.6 View Blockage along Scenic Highways: Determine that view blockage along scenic roadways is a significant impact.
- 9.3.9 Undergrounding Utilities: Place existing overhead utilities underground, with highest priority for scenic roadways, entries to the city, and historical districts.

The GHG Emissions Thresholds provide guidance during CEQA review and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not have construction or operational impacts related to scenic vistas, visual character, and scenic quality. The CAP Update would not involve land use or zoning changes. Rather, the CAP Update would promote infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR. As a policy document, the CAP Update would not result in impacts related to scenic vistas and visual character. However, implementation of the following CAP Update foundational actions and measures may promote infrastructure development and redevelopment.

The CAP Update includes Action Buildings 2.1, which could include installation of on-site solar arrays within the City. Action Connected 6.1 would require the installation of electric vehicle charging stations and supporting infrastructure. Additionally, implementation of Actions Connected 2.1 through 2.3 may require the installation of new bicycle or pedestrian facilities. Additionally, Measure Natural Solutions 2 facilitates the preparation of an Urban Forest Master Plan and requires planting and maintaining 10,000 new trees by the year 2035. Planting new street trees and private trees may slightly change the visual character of the City. As such, the CAP Update could result in impacts related to scenic vistas and visual character in rural areas or scenic quality in urban areas. However, discretionary development would be required to adhere to City development regulations and General Plan policies, including San Luis Obispo Street Tree Ordinance No. 1544, to retain character of the City and minimize environmental impacts. In addition, discretionary development would be reviewed for consistency with the General Plan and other applicable regulatory land use actions prior to approval. Thus, the CAP Update would result in a ***less than significant impact*** related to scenic vistas and visual character or scenic quality.

1b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

The City's General Plan Conservation and Open Space Element and Circulation Element identifies viewing scenic roadways with high or moderate value, including but not limited to portions of U.S. Highway 101, South Higuera Street, Broad Street, Tank Farm Road, Los Osos Valley Road, and Santa Rosa Street.[22] In 1996, the City established a permanent open space greenbelt at the edge of the community.

The GHG Emissions Thresholds provide guidance during CEQA review and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not have construction or operational impacts related to visual character and scenic quality. The CAP Update would not involve land use or zoning changes. Rather, the CAP Update would promote infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR. As a policy document, the CAP Update would not result in impacts related to scenic resources such as trees, rock outcroppings, and historic buildings in a State scenic highway. However, implementation of the following CAP Update foundational actions and measures may promote infrastructure development and redevelopment.

The CAP Update includes Action Buildings 2.1, which could include installation of on-site solar arrays within the city. Action Connected 6.1 would require the installation of electric vehicle charging stations and supporting infrastructure. Additionally, implementation of Actions Connected 2.1 through 2.3 may require the installation of new bicycle or pedestrian facilities. Additionally,

[22] San Luis Obispo, City of. 2014. General Plan Circulation Element. Last amended in 2017. Available at: https://www.slocity.org/home/showdocument?id=20412

Measure Natural Solutions 2 facilitates the preparation of an Urban Forest Master Plan and requires planting and maintaining 10,000 new trees by the year 2035. Planting new street trees and private trees may change such scenic resources within a State- or City-designated viewing scenic roadway. However, discretionary development would be required to adhere to City development regulations, General Plan policies, and the San Luis Obispo Street Ordinance No. 1544, in order to retain character of the City and minimize environmental impacts. In addition, discretionary development would be reviewed for consistency with the General Plan and other applicable regulatory land use actions prior to approval. Thus, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to scenic resources such as trees, rock outcroppings, and historic buildings in a State scenic highway.

1d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

The GHG Emissions Thresholds provide guidance during CEQA review and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not have construction or operational impacts related to light and glare. The CAP Update would not involve land use or zoning changes. Rather the CAP Update would promote infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR. As a policy document, the CAP Update would not directly result in impacts related to light and glare. However, implementation of the following CAP Update foundational actions and measures may promote infrastructure development and redevelopment. The CAP Update includes Action Buildings 2.1, which could include installation of on-site solar arrays within the City that could result in new glare. Additionally, Action Connected 6.1 would require the installation of electric vehicle charging stations and supporting infrastructure, and implementation of Actions Connected 2.1 through 2.3 may require the installation of new bicycle or pedestrian facilities that could result in new light or glare. However, discretionary development would be required to adhere to City development regulations and General Plan policies to minimize environmental impacts. In addition, discretionary development would be reviewed for consistency with the General Plan and other applicable regulatory land use actions prior to approval. Thus, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to light and glare.

Cumulative Impacts

As determined in the General Plan Land Use and Circulation Elements Update EIR, all development that adheres to the General Plan policies, including General Plan buildout, would result in less-than-significant aesthetic impacts. Cumulative General Plan buildout could impact scenic vistas, visual character, and scenic quality as development intensity increases; however, this change is consistent with the General Plan vision for the rural and urban environments of the City. As such, cumulative impacts related to scenic vistas, visual quality, and scenic quality would be less than significant. Although impacts to light and glare could incrementally change due to implementation of the CAP Update, this change is anticipated to be minimal and consistent with the General Plan vision of the City. As such, cumulative impacts related to light and glare would be less than significant. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Therefore, implementation of the CAP Update and GHG Emissions Thresholds would result in an overall ***less-than-significant cumulative impact*** related to aesthetics.

2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	■	☐
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	■	☐
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	■

2a, 2b, 2e. Would the project:

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

Chapter 17.12 of the San Luis Obispo Municipal Code outlines development standards for the Agricultural (AG) Zone.[23] Properties currently zoned AG are concentrated in the southern city boundary, near Buckley Road, and northwestern city boundary.[24] Additionally, most of the land

[23] San Luis Obispo, City of. Municipal Code. Available at: https://sanluisobispo.municipal.codes/Code/17.12

[24] San Luis Obispo, City of. Zoning Map. Available at: https://www.slocity.org/home/showdocument?id=5857

within the City's greenbelt is designated by the County for agriculture or open space. Agricultural lands allow agricultural cultivation and keeping livestock as well as single family detached dwellings and public and quasi-public land uses.

The GHG Emissions Thresholds provide guidance during CEQA review and do not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to conversion of agricultural land to non-agriculture uses. The CAP Update would also not involve land use or zoning changes. Rather the CAP Update would address infrastructure development that is already accounted for in the General Plan and assessed in the General Plan EIR.

As a policy document, the CAP Update would not result in impacts related to conversion or loss of farmland. Nevertheless, implementation of Action Natural Solutions 1.1 facilitates conducting a carbon farming study and pilot program at Johnson Ranch Open Space and City Farm (also known as "Calle Joaquin Agricultural Reserve") starting in 2020, with monitoring through 2023. Common agricultural uses, including driving a tractor, tilling the soil, over-grazing, using fossil fuel-based fertilizers, pesticides and herbicides result in carbon dioxide (CO_2) release. Alternatively, carbon can be stored long term (decades to centuries or more) beneficially in soils in a process called soil carbon sequestration. Carbon Farming involves implementing practices that are known to improve the rate at which CO_2 is removed from the atmosphere and converted to plant material and/or soil organic matter. If determined feasible and cost-effective, compost would be applied to the first annual 100 acres by the year 2023. Physical implementation of carbon farming could include compost application surrounding existing grazeland areas. As such, the CAP Update could result in minor disruption or minor conversion of agricultural lands. However, carbon farming would be beneficial to agricultural uses, because it would likely increase rangeland or crop productivity. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to degradation of agricultural resources or conversion of agricultural land to non-agriculture uses, nor would there be a conflict with existing zoning.

2c, 2d, 2e. Would the project:

- *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*
- *Result in the loss of forest land or conversion of forest land to non-forest use?*
- *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?*

The City does not contain forest or timberland resources.[25] Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to degradation of forestry resources or conversion of forest land to non-forest uses, nor would there be a conflict with existing zoning.

[25] California Department of Fish and Wildlife. California Forests and Timberlands in the California Department of Fish and Wildlife Regions. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109919&inline

Cumulative Impacts

As discussed in the General Plan Land Use and Circulation Elements Update EIR, adherence to General Plan policies and applicable State and Federal regulatory requirements would reduce cumulative agriculture and forestry resources impacts resulting from buildout of the City under the General Plan to a less-than-significant level. Implementation of the CAP Update would not involve land use or zoning changes that would result in cumulative impacts related to conversion or loss of farmland or forest land. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Thus, implementation of the CAP Update would result in a ***less-than-significant cumulative impact*** related to agricultural and forestry resources.

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3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	■
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	■	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	■	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	■	☐

3a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

San Luis Obispo is located in the South Central Coast Air Basin (the Air Basin), which includes San Luis Obispo, Santa Barbara, and Ventura Counties. The plan area is under the jurisdiction of the San Luis Obispo County Air Pollution Control District (SLOCAPCD). As the local air quality management agency, SLOCAPCD is required to monitor air pollutant levels to ensure that State and Federal air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether or not the standards are met or exceeded, San Luis Obispo County is classified as being in "attainment" or "nonattainment." Under State law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-attainment. San Luis Obispo County is designated as nonattainment for the State standards for suspended particulate matter (PM10) and ozone.[26] San Luis Obispo County is designated as attainment or unclassified for all other Federal and State standards.

In 2002, SLOCAPCD adopted the 2001 Clean Air Plan, and in 2005 SLOCAPCD adopted a Particulate Matter Report in order to update the jurisdiction's control measures for particulate matter, as required by SB 656. In 2015, SLOCAPCD adopted an Ambient Air Monitoring Network Assessment in order to identify and analyze its historic and current air monitoring sites. In 2019, SLOAPD updated the Ambient Air Monitoring Network Assessment and adopted an Ozone Emergency Episode Plan, in compliance with the Federal Clean Air Act, in order to provide the basis for taking actions when ambient ozone concentrations reach a level that could endanger public health in San Luis Obispo County. The sources, health effects, and typical controls associated with criteria pollutants are described in Appendix A.

[26] California Air Resources Control Board (CARB). 2017. AB 32 Scoping Plan. Available at: https://ww3.arb.ca.gov/cc/scopingplan/scopingplan.htm

The Federal Clean Air Act Amendments (CAAA) mandate that states submit and implement a State Implementation Plan (SIP) for areas not meeting air quality standards. The SIP includes pollution control measures to demonstrate how the standards will be met through those measures. The SIP is established by incorporating measures established during the preparation of Air Quality Management Plans (AQMP) and adopted rules and regulations by each local APCD and AQMD, which are submitted for approval to CARB and the U.S. EPA.[27] The goal of an AQMP is to reduce pollutant concentrations below the National Ambient Air Quality Standards (NAAQS) through the implementation of air pollutant emissions controls.

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts. Additionally, the CAP Update would not involve land use or zoning changes. Rather the CAP Update would promote infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR. Implementation of proposed foundational actions and supporting measures would be beneficial by helping San Luis Obispo meet applicable air quality plan goals and generally reduce sensitive receptor exposure to pollutant concentrations. Although the purpose and intended effect of the CAP Update is to reduce GHG emissions generated in the City to help reduce the effects of climate change, many of its actions would also reduce air quality emissions. The CAP Update includes Action Connected 4.1 which would develop a strategic electrification plan for the City's transit fleet, which would reduce diesel fuel combustion in the City. Action Connected 1.2 is aimed at making active transportation and transit more accessible, therefore reducing the number of on-road vehicles trips. Action Circular Economy 1.1 would require organic waste subscription for all residential and commercial customers, which would lower the total amount of waste diverted to the landfill. These actions would reduce air quality emissions as well as GHG emissions. Thus, the CAP Update and GHG Emissions Thresholds are consistent with the 2001 Clean Air Plan and would have ***no impact*** related to a conflict with or obstruction of the applicable air quality plan.

3b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?

The GHG Emissions Thresholds provide guidance during CEQA review and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to an increase of criteria pollutants. The CAP Update would not involve land use or zoning changes. Rather the CAP Update would promote infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR. As a policy document, the CAP Update would not result in impacts related to criteria pollutants. However, implementation of the following CAP Update foundational actions and measures may promote infrastructure development and redevelopment.

Action Buildings 2.1, which could include installation of on-site solar arrays within the city. Action Connected 6.1 would require the installation of electric vehicle charging stations and supporting infrastructure. Additionally, implementation of Actions Connected 2.1 through 2.3 may require the installation of new bicycle or pedestrian facilities. Construction-related impacts to air quality are generally associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy

[27] CARB. 2016. State SIP Strategy. Available at: https://ww3.arb.ca.gov/planning/sip/2016sip/2016sip.htm

construction vehicles and soil hauling trucks, in addition to ROG that would be released during the drying phase upon application of architectural coatings. However, implementation of proposed foundational actions would not include large-scale construction within San Luis Obispo. Therefore, it would result in low-level criteria pollutant emissions and negligible impacts to air quality. Discretionary development would be required to undergo CEQA review, including assessment and mitigation incorporation, and compliance with SLOAPCD air quality regulations and other applicable local, State, and Federal regulations once project details and locations are known. Thus, the construction required for implementation of the CAP Update would result in a less-than-significant impact related to net increase of criteria pollutants.

With respect to operational emissions, many CAP Update measures and foundational actions would have the secondary benefit of reducing criteria pollutant emissions. Foundational actions and supporting measures aim to increase building energy efficiency, promote carbon neutral energy, promote electric vehicles, reduce on-road gasoline fuel use, reduce vehicle miles traveled and promote travel via low- and zero-emissions modes, and improve soil sequestration through carbon farming. Implementation of foundational actions and the supporting measures would be beneficial by helping San Luis Obispo meet applicable air quality plan goals. In addition, future discretionary development projects constructed within the City would undergo project-level CEQA review once details and locations are known. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to criteria pollutant emissions.

3c. Would the project expose sensitive receptors to substantial pollutant concentrations?

The GHG Emissions Thresholds provide guidance during CEQA review and do not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to exposure of sensitive receptors to substantial pollutant concentrations. Implementation of the following CAP Update measures and foundational actions may promote infrastructure development and redevelopment.

Action Buildings 2.1 could include installation of on-site solar arrays within the city. Action Connected 6.1 would require the installation of electric vehicle charging stations and supporting infrastructure. Additionally, implementation of Actions Connected 2.1 through 2.3 may require the installation of new bicycle or pedestrian facilities. Construction-related impacts to air quality are generally associated with fugitive dust (PM_{10} and $PM2_{.5}$) and exhaust emissions from heavy construction vehicles and soil hauling trucks, in addition to ROG that would be released during the drying phase upon application of architectural coatings. However, implementation of proposed CAP Update foundational actions would not include large-scale construction within San Luis Obispo. Therefore, it would result in low-level toxic air contaminant emissions. While the CAP Update could result in construction-related impacts related to toxic air contaminants and exposure to sensitive receptors, discretionary development would be required to undergo CEQA review, including assessment and mitigation incorporation, and compliance with SLOAPCD air quality regulations and other applicable local, State, and Federal regulations once project details and locations are known. Thus, the construction associated with implementation of the CAP Update would not result in substantial emissions of toxic air contaminants and exposure to sensitive receptors. No operational toxic air contaminant emissions are anticipated with implementation of the CAP Update foundational actions. Therefore, the CAP Update and GHG Emissions Thresholds would have a ***less-than-significant impact*** related to exposure of sensitive receptors to toxic air contaminants.

3d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The CARB 2005 Air Quality Land Use Handbook: A Community Health Perspective identifies land uses associated with odor complaints which include: sewage treatment plants, landfills, recycling facilities, waste transfer stations, petroleum refineries, biomass operations, auto body shops, coating operations, fiberglass manufacturing, foundries, rendering plants, and livestock operations.[28] The GHG Emissions Thresholds provide guidance during CEQA review and do not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not have construction or operational impacts related to odors. The CAP Update includes Climate Actions Circular Economy 1.1 through 1.3, which would require organic waste subscription for all residential and commercial customers, 20 percent increase in edible food rescue, and development and implementation of a waste stream education program for homeowner associations (HOA) and property managers. Additionally, Climate Action Natural Solutions 1.1 proposes conducting a carbon farming study and pilot program at Johnson Ranch Open Space and City Farm starting in the year 2020, with monitoring through to the year 2023. Carbon Farming involves implementing practices that are known to improve the rate at which CO_2 is removed from the atmosphere and converted to plant material and/or soil organic matter. If determined feasible and cost-effective, compost would be applied to the first annual 100 acres by the year 2023. Physical implementation of carbon farming could include compost application at Johnson Ranch Open Space and City Farm (also known as "Calle Joaquin Agricultural Reserve"). As such, the CAP Update could result in minor odors related to compost. However, carbon farming locations are limited to rural portions of the community that are moderately distant from residential development. Additionally, green waste collection bins and compost application are not identified on the list of "Sources of Odor Complaints" (Table 1-4) as provided in the CARB *Air Quality Land Use Handbook* and would not be anticipated to result in other emissions, such as those leading to odors, adversely affecting a substantial number of people.[29] Therefore, the CAP Update and GHG Thresholds would not facilitate development that could create odors, and there would be a ***less-than-significant impact*** related to odors exposure.

Cumulative Impacts

The City of San Luis Obispo General Plan buildout would not exceed applicable San Luis Obispo Air Pollution Control District (SLOAPCD) thresholds and is consistent with the Clean Air Plan. As such, implementation of the CAP Update and GHG Emissions Thresholds would have a less than significant cumulative impact related to the air quality within the air basin and on sensitive receptors within the City of San Luis Obispo. Implementation of the CAP Update would not result in adverse impacts related to contribution of criteria pollutants to the air basin and exposure of sensitive receptors to toxic air contaminants. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Therefore, implementation of the CAP Update and GHG Emissions Thresholds would result in an overall ***less-than-significant cumulative impact*** related to air quality.

[28] California Air Resources Control Board (CARB). 2005. Air Quality and Land Use Handbook: A Community Health Perspective. Available at: https://ww3.arb.ca.gov/ch/handbook.pdf

[29] CARB. 2005. Air Quality and Land Use Handbook: A Community Health Perspective. Available at: https://ww3.arb.ca.gov/ch/handbook.pdf

4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	■	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	■	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	■	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	■	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	■
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	☐	☐	☐	■

4a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

San Luis Obispo is a primarily urbanized community with neighborhood parks, community parks, mini parks, recreational and open spaces incorporated throughout, and a greenbelt extending from the urban fringes to the City limits.[30] The City's Municipal Code Section 12.22, General Plan Conservation and Open Space Element as well as the Conservation Guidelines for Open Space Lands of the City of San Luis Obispo (Conservation Guidelines) incorporate goals and policies to protect biological resources in rural areas of the City.

The GHG Emissions Thresholds provide guidance during CEQA review and do not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not have construction or operational impacts related to habitat modification. The CAP Update would not involve land use or zoning changes. Rather the CAP Update would address infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR. As a policy document, the CAP Update would not directly result in impacts related to wildlife species identified as candidate, sensitive, or special status. However, implementation of the following CAP Update foundational actions and measures may promote infrastructure development and redevelopment and may result in impacts to species through habitat modification for purposes of infrastructure installation.

The CAP Update includes Action Natural Solutions 1.1, which facilitates carbon farming in the form of compost application at Johnson Ranch Open Space and City Farm (also known as "Calle Joaquin Agricultural Reserve"). As such, the CAP Update could result in minor habitat modifications due to organic nitrogen to grassland habitats where sensitive status plant species may occur. However, peer-reviewed research indicates that application of organic nitrogen-rich compost does not change or adversely affect botanical species.[31] Additionally, carbon farming implementation would specifically be located to avoid serpentine soils. Thus, impacts related to carbon farming would be less than significant.

The CAP Update also includes Action Buildings 2.1, which could include installation of on-site solar arrays within the City. Action Connected 6.1 would require the installation of electric vehicle charging stations and supporting infrastructure. Additionally, implementation of Actions Connected 2.1 through 2.3 may require the installation of new bicycle or pedestrian facilities. Additionally, Measure Natural Solutions 2 facilitates the preparation of an Urban Forest Master Plan and requires planting and maintaining 10,000 new trees by the year 2035. Future related projects would be required to undergo CEQA review, including assessment and mitigation incorporation once project details and locations are known. These CAP Update foundational actions would not conflict with the Municipal Code or objectives and policies of the General Plan or Conservation Guidelines but would rather be consistent with and promote those plans. The pillars, supporting measures, and foundational actions included in the CAP Update would generally apply to the urbanized areas of the City, with little application to parks, open spaces area, or other locations where sensitive habitat and related species may be present. As such, the CAP Update itself would not have a substantial

[30] San Luis Obispo, City of. Parks and Recreation Facilities in San Luis Obispo. Available at: https://www.slocity.org/home/showdocument?id=2270

[31] Whendee, Silver et al. Grassland Compost Amendments Increase Plant Production Without Changing Plant Communities. Available at: https://www.marincarbonproject.org/file/2018-documents/5_Grassland-compost-amendments-increase-plant-production-without-changing-plant-communities.pdf

adverse effect on special-status wildlife species either directly through individual take or indirectly through species habitat modification. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to special-status wildlife species.

4b, 4c. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community (such as State or federally protected wetlands, including, but not limited to, marsh, vernal pool, coastal, etc.) 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 through direct removal, filling, hydrological interruption, or other means?

The GHG Emissions Thresholds provide guidance during CEQA review and do not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not have construction or operational impacts related to riparian or other special habitats. The CAP Update would not involve land use or zoning changes. Rather the CAP Update would address infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR. As a policy document, the CAP Update could result in impacts related to habitat whether riparian, wetland, or other sensitive natural community.

The pillars, supporting measures, and foundational actions included in the CAP Update would generally apply to the urbanized areas of the City, with little application to parks, open spaces area, or other locations where sensitive habitat and related species may be present. The CAP Update includes Action Buildings 2.1, which could include installation of on-site solar arrays within the City. Action Connected 6.1 would require the installation of electric vehicle charging stations and supporting infrastructure. Additionally, implementation of Actions Connected 2.1 through 2.3 may require the installation of new bicycle or pedestrian facilities. Additionally, Measure Natural Solutions 2 facilitates the preparation of an Urban Forest Master Plan and requires planting and maintaining 10,000 new trees by the year 2035. Future related projects would be required to undergo CEQA review, including assessment and mitigation incorporation once project details and locations are known. These CAP Update foundational actions would not conflict with the Municipal Code or objectives and policies of the General Plan or Conservation Guidelines but would rather be consistent with and promote those plans. The pillars, supporting measures, and foundational actions included in the CAP Update would generally apply to the urbanized areas of the City, with little application to parks, open spaces area, or other locations where sensitive habitat and related species may be present. As such, the CAP Update would not have a substantial adverse effect on riparian habitat or sensitive natural community, such as wetlands. Therefore, the CAP Update and GHG Emissions Thresholds would have a ***less-than-significant impact*** related to sensitive natural plant communities.

4d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The GHG Emissions Thresholds provide guidance during CEQA review and do not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not have construction or operational impacts related to interference with species movement. The CAP Update would not involve land use or zoning changes. Rather the CAP Update would promote infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR. As a policy document, the CAP Update would not result in impacts related to interference with species movement. However, implementation of the following CAP Update foundational actions and measures may promote infrastructure development and redevelopment.

The CAP Update includes actions (Connected 2.1 through 2.3, Connected 4.1 through 4.4) that would support pedestrian and bicycle circulation and improved transportation alternatives, which

would improve connectivity throughout the City. Actions Connected 2.1 and 2.4 aim to prioritize an Active Transportation Plan and implement and develop quick-build strategies to streamline implementation of priority bicycle and pedestrian infrastructure projects, which would in turn increase the walkability of the City and decrease vehicle miles traveled. Action Connected 2.2 facilitates launching a micro-mobility program in the form of electric bikes, which would increase active transportation and decrease the vehicle miles traveled. Future related projects would be required to undergo CEQA review, including assessment and mitigation incorporation once project details and locations are known. These CAP Update foundational actions would not conflict with the Municipal Code or objectives and policies of the General Plan or Conservation Guidelines but would rather be consistent with and promote those plans. The pillars, supporting measures, and foundational actions included in the CAP Update would generally apply to the urbanized areas of the City, with little application to parks, open spaces area, or other locations where wildlife corridors or native wildlife nursery sites may be present. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to interference with species movement.

4e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The City of San Luis Obispo's Municipal Code Section 12.22 as well as the General Plan Conservation and Open Space Element and the Conservation Guidelines incorporate goals and policies for resource protection within the City limits and the City's greenbelt[32]. Additionally, the City has passed the Street Tree Ordinance which was established to preserve the trees and plantings on City property and enhance the ecological benefit to the community by providing for the regulation of planting, management, maintenance, preservation and, where necessary, removal of public trees.

The GHG Emissions Thresholds provide guidance during CEQA review and do not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not have construction or operational impacts related to biological resources. The CAP Update would not involve land use or zoning changes. Rather, the CAP Update would address infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR. The purpose and intended effect of the CAP Update is to reduce GHG emissions generated in the city to help reduce the effects of climate change. Implementation of proposed foundational actions and supporting measures would be beneficial by helping San Luis Obispo meet applicable local policies and ordinances for protecting biological resources. The CAP Update would not conflict with or obstruct implementation of the applicable policies for preserving biological resources and would not affect the City's ability to attain goals and policies that protect biological resources. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to consistency with local biological resources protection policies.

4f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

The City's Municipal Code, General Plan Conservation and Open Space Element, and the Conservation Guidelines include mapping of land approved for habitat conservation as well as goals and policies to protect biological resources in rural areas of the City. And specifically, there is the

[32] San Luis Obispo, City of. 2006. General Plan Open Space and Conservation Element. Available at: https://www.slocity.org/home/showdocument?id=6651

adopted Johnson Ranch Conservation Plan located in the southern portion of the City and aimed at preserving natural areas. The GHG Emissions Thresholds provide guidance during CEQA review and do not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not have construction or operational impacts related to conflict with an adopted Habitat Conservation Plan. The CAP Update includes Action Natural Solutions 1.1, which requires conducting a carbon farming study and pilot program at Johnson Ranch Open Space and City Farm starting in the year 2020, with monitoring through to the year 2023. Carbon Farming involves implementing practices that are known to improve the rate at which CO_2 is removed from the atmosphere and converted to plant material and/or soil organic matter. If determined feasible and cost-effective, compost would be applied to the first annual 100 acres by the year 2023. Furthermore, all goals and policies included in the Johnson Ranch Conservation Plan would apply. The CAP Update would not facilitate specific development projects, nor would it add or enable new development that would conflict with the adopted Municipal Code, General Plan, the Conservation Guidelines, or other approved local, regional, or State habitat conservation plan. Therefore, the CAP Update and GHG Emissions Thresholds would have ***no impact*** related to consistency with an adopted habitat or natural community conservation plan.

Cumulative Impacts

As described in the General Plan Land Use and Circulation Elements Update EIR, with incorporation of required project-level mitigation measures to implement program-level mitigation and compliance with applicable General Plan policies and applicable State and federal regulatory requirements, cumulative impacts related to biological resources resulting from buildout of the City under the General Plan, including buildout of the San Luis Ranch Specific Plan, would be significant but mitigable. The CAP Update would promote infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR. Implementation of the CAP Update could result in impacts to biological resources during infrastructure development construction. However, all infrastructure development or redevelopment resulting from implementation of the CAP Update would be required to comply with applicable General Plan policies and State and federal regulatory requirements regarding avoidance of special wildlife species and habitat. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Therefore, implementation of the CAP Update and GHG Emissions Thresholds would result in an overall ***less-than-significant cumulative impact*** related to biological resources.

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5 Cultural Resources

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

5a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

San Luis Obispo Municipal Code Chapter 14.01 Historic Preservation Ordinance requires designation of historic resources and sites.[33] According to the City's General Plan Conservation and Open Space Element there are five historic districts that include a multitude of master list historical properties.[34] As many as a dozen potentially significant historic and prehistoric sites have been identified in the downtown and old town historic districts alone. The City also provides a list of historic properties under the Mills Act within the City limits.[35]

The GHG Emissions Thresholds provide guidance during CEQA review and do not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to historical resources. The CAP Update would not involve land use or zoning changes. Rather the CAP Update would promote infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR.

As a policy document, the CAP Update would not directly result in impacts related to historical resources. Implementation of the CAP Update foundational actions and measures may promote infrastructure development and redevelopment that could have impacts on these resources during construction. Future related projects would be required to undergo CEQA review, including assessment and mitigation incorporation once project details and locations are known. The CAP Update would not conflict with or obstruct the City's ability to comply with applicable historical resources preservation policies. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to historical resources.

[33] San Luis Obispo, City of. Municipal Code. Available at: https://sanluisobispo.municipal.codes/Code/14.01.060

[34] San Luis Obispo, City of. 2006. General Plan Open Space and Conservation Element. Available at: https://www.slocity.org/home/showdocument?id=6651

[35] San Luis Obispo, City of. 2010. City of San Luis Obispo List of Mills Act Properties. Available at: https://www.slocity.org/home/showdocument?id=4160

5b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

As many as a dozen potentially significant historic and prehistoric sites have been identified in the downtown and old town historic districts alone. The GHG Emissions Thresholds provide guidance during CEQA review and do not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not have construction or operational impacts related to archaeological resources. The CAP Update would not involve land use or zoning changes. Rather the CAP Update would promote infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR.

As a policy document, the CAP Update would not directly result in impacts related to archaeological resources. Implementation of the CAP Update foundational actions and measures may promote infrastructure development and redevelopment that could result in an impact on these resources during construction. Future related projects would be required to undergo CEQA review, including assessment and mitigation incorporation once project details and locations are known. The CAP Update would not conflict with or obstruction of the applicable policies for preserving archeological resources and would not affect the City's ability to attain goals and policies that protect archeological resources. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to archaeological resources.

5c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

According to the City's General Plan Conservation and Open Space Element there are burial points and burial sensitivity areas in the City.[36] The GHG Emissions Thresholds provide guidance during CEQA review and do not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not have construction or operational impacts related to human remains. The CAP Update would not involve land use or zoning changes. Rather the CAP Update would promote infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR.

As a policy document, the CAP Update would not directly result in impacts related to human remains. Implementation of the CAP Update foundational actions and measures may promote infrastructure development and redevelopment that could have an impact on these resources during construction. However, future related projects would be required to comply with State coroner requirements related to burial findings. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to human remains.

[36] San Luis Obispo, City of. 2006. General Plan Open Space and Conservation Element. Available at: https://www.slocity.org/home/showdocument?id=6651

Cumulative Impacts

Planned buildout of the City of San Luis Obispo under the General Plan would cumulatively increase the potential for adverse effects on historic and archaeological resources in the City. The CAP Update could incrementally contribute to this cumulative effect. Impacts to historic and archaeological resources are generally site-specific. Accordingly, as required under applicable laws and regulations, potential impacts associated with cumulative developments would be addressed on a case-by-case basis. Implementation of the CAP Update foundational actions may promote infrastructure development and redevelopment that could have an impact on these resources during construction. However, no known cultural resources would be removed, modified, or otherwise affected by the implementation of the CAP Update. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Therefore, implementation of the CAP Update and GHG Emissions Thresholds would result in an overall ***less-than-significant cumulative impact*** related to cultural resources.

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6 Energy

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

6a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

California is one of the lowest per-capita energy users in the United States, ranked 48th in the nation, due to its energy efficiency programs and mild climate.[37] California consumed 292,039 gigawatt-hours of electricity and 2,110,829 million cubic feet of natural gas in 2017.[38,39] The single largest end-use sector for energy consumption in California is transportation (39.8 percent), followed by industry (23.7 percent), commercial (18.9 percent), and residential (17.7 percent).[40]

Adopted in 2018, SB 100 accelerates the State's Renewable Portfolio Standards Program, codified in the Public Utilities Act, by requiring electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

The City of San Luis Obispo has demonstrated its commitment to energy efficiency and renewable energy through many efforts. The City has adopted the California Green Building Standards Code, per San Luis Obispo Municipal Code Chapter 15.02, which requires efficiency measures to reduce energy use, and provide energy reduction benefits. The City has also completed communitywide GHG emissions inventories for years 2005 and 2016, which are summarized in Table 1. Table 1 also provides estimated 1990 emissions levels for informational purposes. Communitywide GHG emissions declined by approximately 12 percent between 2005 and 2016. The most notable changes

[37] United States Energy Information Administration (EIA). 2018a. "California - Profile Overview." Last modified: November 15, 2018. Available at: https://www.eia.gov/state/?sid=CA

[38] California Energy Commission (CEC). 2019. Environmental Health and Equity Impacts from Climate Change and Mitigation Policies in California: A Review of the Literature.

[39] United States Energy Information Administration (EIA). 2018. Natural Gas: Natural Gas Consumption by End Use. December 31, 2018. Available at: https://www.eia.gov/dnav/ng/ng_cons_sum_dcu_SCA_a.htm

[40] United States Energy Information Administration (EIA). 2018. "California - Profile Overview." Last modified: November 15, 2018. Available at: https://www.eia.gov/state/?sid=CA

occurred in the energy and solid waste sectors due to increasing decarbonization of the electricity grid, investments in energy efficiency, and a decrease in the amount of solid waste generated.

The GHG Emissions Thresholds provide guidance during CEQA review and do not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to wasteful consumption of energy resources. The CAP Update is a policy document containing climate action measures and foundational actions to reduce Citywide GHG emissions. The CAP Update would not involve land use or zoning changes. Rather, the CAP Update would promote infrastructure development and redevelopment that is already accounted for in the General Plan and assessed in the General Plan EIR. Furthermore, the purpose and intended effect of the CAP is to reduce GHG emissions generated in the City to help reduce the effects of climate change, including those emissions generated by energy demand and supply. The CAP Update encourages energy efficiency and carbon neutral electricity of existing building stock. Actions Leadership 1.1 through 1.3 aims to facilitate carbon neutral energy for municipal buildings and programs. Actions Energy 1.1, 2.1, and 3.1 focus on carbon neutral electricity throughout the City by launching Monterey Bay Community Power (MBCP). Actions Buildings 1.1, 2.1, and 2.2 aim to facilitate all new residential and/or commercial construction to be 100 percent electric within San Luis Obispo. As such, the CAP Update would not result in the use of non-renewable resources in a wasteful or inefficient manner. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to the wasteful, inefficient, or unnecessary consumption of energy. Rather, the CAP Update would assist in reducing use of non-renewable energy resources.

6b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The City of San Luis Obispo has adopted the California Green Building Standards Code per San Luis Obispo Municipal Code Chapter 15.02. Therefore, construction and operation associated with infrastructure projects stemming from the CAP Update would be designed to comply with the energy source standards of the California Green Building Standard Code. Likewise, discretionary development would be required to comply with the energy efficiency standards in the 2016 California Energy Code, Part 6 of the California Building Standards Code (Title 24). Thus, the CAP Update would not conflict with adopted renewable energy or energy conservation plans. The GHG Emissions Thresholds is a CEQA guidance document that does not propose development or changes to land use and zoning. As such, the GHG Emissions Thresholds would not result in construction or operational impacts related to consistency with a State or local renewable energy plan. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to consistency with State and local renewable energy and energy efficiency plans. Rather, the CAP Update would be consistent with State and local plans for renewable energy and energy efficiency.

Cumulative Impacts

The City of San Luis Obispo General Plan Update EIR did not provide a cumulative impact assessment related to energy. The CAP Update would assist in reducing use of non-renewable energy resources across the community in particular with remodels and new construction. Additionally, construction of the General Plan assumed buildout could result in temporary energy consumption impacts. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Thus, implementation of the CAP Update and GHG Emissions Thresholds would result a ***less-than-significant cumulative impact*** related to energy.

7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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?	☐	☐	☐	■
2. Strong seismic ground shaking?	☐	☐	☐	■
3. Seismic-related ground failure, including liquefaction?	☐	☐	☐	■
4. Landslides?	☐	☐	☐	■
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	■	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	■	☐
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	■	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	■
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	■	☐

7a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- *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?*
- *Strong seismic ground shaking?*
- *Seismic-related ground failure, including liquefaction?*
- *Landslides?*

San Luis Obispo is located in a seismically active region and is identified as Landslide Zone by California Department of Conservation[41]. In 2006, the City adopted a Local Hazard Mitigation Plan (LHMP) to assess hazards and reduce risks prior to a disaster event and fully cover the necessity to address seismic and geological hazards[42]. And, all development projects are required to conform to applicable provisions of the current California Building Code.

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure including liquefaction, or landslides. The CAP Update is a policy document containing climate actions and supporting measures to reduce GHG emissions, which is consistent with the City's General Plan and other regional regulations. The CAP Update does not propose habitable development that could result in exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to seismic- and landslide-related hazards.

7b. Would the project result in substantial soil erosion or the loss of topsoil?

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to substantial loss of topsoil. The CAP Update would not involve land use or zoning changes. Rather, the CAP Update would promote infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR. As a policy document, the CAP Update would not directly require ground disturbing activities. However, implementation of the following CAP Update foundational actions and measures may promote infrastructure development and redevelopment.

The CAP Update includes Action Natural Solutions 1.1, which facilitates carbon farming, in the form of compost application at Johnson Ranch Open Space and City Farm (also known as "Calle Joaquin Agricultural Reserve"). As such, the CAP Update could result in minor retention of topsoil, because compost application improves the quality of topsoil. The CAP Update Action Connected 6.1 would require the installation of electric vehicle charging stations and supporting infrastructure. Additionally, implementation of Actions Connected 2.1 through 2.3 may require the installation of

[41] California Department of Conservation (CDOC). 2015. CGS Information Seismic Hazards Programs https://maps.conservation.ca.gov/cgs/DataViewer/

[42] San Luis Obispo, City of. 2006. Local Hazard Mitigation Plan (LHMP). Available at: https://www.slocity.org/home/showdocument?id=60

new bicycle or pedestrian facilities. Additionally, Measure Natural Solutions 2 facilitates the preparation of an Urban Forest Master Plan and requires planting and maintaining 10,000 new trees by the year 2035. As such, the CAP Update could result in construction-related soil erosion and topsoil loss impacts associated with such installations and plantings. However, discretionary development would be required to conduct geotechnical studies and adhere to related geology and soils recommendations prior to final siting and construction. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to soil erosion, loss of topsoil, and the presence of unstable soils.

7c. Would the project be located on a geologic unit or soil that is unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to project location on an unstable geologic unit or soil. Additionally, the CAP Update is a policy document containing programs that are consistent with the General Plan. Some of the proposed measures in the CAP Update would support small-scale construction projects, such as electric vehicle charging station construction. However, discretionary development would be required to conduct geotechnical studies and adhere to related recommendations prior to final siting and construction. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to risks associated with location on unstable geologic unit or soil.

7d. Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial risks to life or property?

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to project location on expansive soil. Additionally, The CAP Update is a policy document containing measures that are consistent with the General Plan. Some of the proposed measures of CAP Update would support small-scale construction projects, such as electric vehicle charging station construction. However, discretionary development would be required to conduct geotechnical studies and adhere to related recommendations prior to final siting and construction which would reduce impacts. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to risks associated with location on expansive soils.

7e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The CAP Update and GHG Emissions Thresholds would not involve the development of habitable structures and, thus, no use of septic tanks or alternative wastewater disposal systems. Therefore, ***no impact*** would occur related to soil capability support of alternative wastewater disposal systems.

7f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to paleontological resources. The CAP Update would not involve land use or zoning changes. Rather the CAP Update would promote infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR. As a policy document, the CAP Update would not directly result in impacts related to paleontological resources or unique geologic features. However, implementation of the following CAP Update foundational actions and measures may promote infrastructure development and redevelopment.

The CAP Update includes Action Buildings 2.1, which could include installation of on-site solar arrays within the city. Action Connected 6.1 would require the installation of electric vehicle charging stations and supporting infrastructure. Additionally, implementation of Actions Connected 2.1 through 2.3 may require the installation of new bicycle or pedestrian facilities. Additionally, Measure Natural Solutions 2 facilitates the preparation of an Urban Forest Master Plan and requires planting and maintaining 10,000 new trees by the year 2035. Planting new street trees and private trees may expose paleontological resources during ground disturbing activities. However, discretionary development would be required to conduct geotechnical and design guideline studies and adhere to related recommendations prior to final siting and construction. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to paleontological resources or unique geologic features.

Cumulative Impacts

Planned, proposed, and approved projects assumed under General Plan buildout could expose additional people and property to seismic and geologic hazards that are present in the region. The magnitude of geologic hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Specific geologic hazards associated with individual project sites would be limited to those sites without affecting other areas. Similarly, potential impacts to paleontological resources associated with each individual site would be limited to that site without affecting other areas, and impacts related to these resources would be minimized on a case-by-case basis. Compliance with existing regulations, including California Building Code requirements, City-issued permit requirements, and construction general permit requirements, would minimize potential cumulative seismic and geologic impacts. Seismic and geologic hazards would be addressed on a case-by-case basis and would not result in cumulative impacts. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Therefore, implementation of the CAP Update and GHG Emissions Thresholds would result in an overall ***less-than-significant cumulative impact*** related to geology and soils.

8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	■	☐
b. Conflict with any applicable plan, policy, or regulation adopted to reduce the emissions of greenhouse gases?	☐	☐	■	☐

8a. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

The greenhouse effect is a natural occurrence that helps regulate the temperature of the Earth. The majority of radiation from the Sun hits Earth's surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping into space and re-radiate it in all directions. This process is essential to support life on Earth, because it warms the planet by approximately 60°F. Emissions from human activities since the beginning of the industrial revolution (approximately 270 years ago) have been adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat and contribute to an average increase in Earth's temperature. Global warming is the observed increase in the average temperature of the Earth's surface, and climate change is the resultant change in wind patterns, precipitation, and storms over an extended period.

GHGs produced by human activities include CO_2, methane (CH_4), nitrous oxide (N_2O), hydroflourocarcons (HFCs), perfluorinated compound (PFC), and sulfur hexafluoride (SF_6) (see Appendix B for more details related to these GHG gases).[43] Combustion of fossil fuels (gasoline, natural gas, and coal), deforestation, and decomposition of waste release carbon into the atmosphere that had been locked underground and stored in oil, gas, and other hydrocarbon deposits or in the biomass of surface vegetation. Since 1750, estimated concentrations of CO_2, CH_4, and N_2O in the atmosphere have increased by over 36 percent, 148 percent, and 18 percent respectively, primarily due to human activity. Emissions of GHGs affect the atmosphere directly by changing its chemical composition. Changes to the land surface also indirectly affect the atmosphere by changing the way in which Earth absorbs gases from the atmosphere. Potential

[43] The proposed CAP only considers emissions of CO_2, CH_4, and N_2O because these are the GHGs most relevant to local government policymaking. These gases comprise a large majority of GHG emissions at the community level. The remaining gases (HFCs, PFC, and SF_6) are emitted primarily in private sector manufacturing and electricity transmission and are the subject of regulation at the state level. Therefore, these gases were omitted from the CAP.

impacts in California due to climate change include sea level rise, more extreme-heat days and high-ozone days, larger and more frequent forest fires, and more drought years.[44]

Although GHG emissions do not typically cause direct health impacts at a local level, GHG emissions can result in indirect health impacts by contributing to climate change, which can have public health implications. The primary public health impacts of climate change include the following:[45]

- Increased incidences of hospitalization and deaths due to increased incidences of extreme heat events;
- Increased incidences of health impacts related to ground-level ozone pollution due to increased average temperatures that facilitate ozone formation;
- Increased incidences of respiratory illnesses from wildfire smoke due to increased incidences of wildfires;
- Increased vector-borne diseases due to the growing extent of warm climates; and
- Increased stress and mental trauma due to extreme events and disasters, economic disruptions, and residential displacement.

The City of San Luis Obispo has completed communitywide GHG emissions inventories for years 2005 and 2016, which are summarized in Table 1. Table 1 also provides estimated 1990 emissions levels for informational purposes. As shown therein, communitywide GHG emissions declined by approximately 12 percent between 2005 and 2016. The most significant changes occurred in the energy and solid waste sectors due to increasing decarbonization of the electricity grid, investments in energy efficiency, and a decrease in the amount of solid waste generated.[46]

Figure 3 and Table 3 summarize the communitywide GHG emissions forecast under three scenarios: 1) business-as-usual, 2) implementation of State laws and programs, and 3) implementation of State laws and programs and the CAP Update. As shown therein, under the business-as-usual scenario, communitywide GHG emissions are forecasted to increase by approximately 21 percent between 1990 and 2035 based on anticipated economic and population growth. However, with implementation of State laws and programs, communitywide GHG emissions would decline by approximately 22 percent between 1990 and 2035. Furthermore, implementation of the CAP Update alongside State laws and programs would reduce communitywide GHG emissions by 66 percent between 1990 and 2035.

The City has an aspirational goal of achieving carbon neutrality by 2035 and has proposed the CAP Update as a pathway to make progress toward this goal. As shown in Table 3, implementation of the CAP Update would achieve an approximately 43 percent reduction in communitywide GHG emissions below 1990 levels by 2030 and an approximately 66 percent reduction in communitywide GHG emissions below 1990 levels by 2035. Therefore, the City goal of carbon neutrality and the associated CAP Update establish a trajectory that provides GHG emissions reductions greater than those required by SB 32 for 2030. Because SB 32 is considered an interim target toward meeting the 2045 State goal of carbon neutrality, implementation of the CAP Update would be considered substantial progress toward meeting the State's long-term 2045 goal. Avoiding interference with, and making substantial progress toward, these long-term State targets is important, because these

[44] California Energy Commission (CEC). 2009. Environmental Health and Equity Impacts from Climate Change and Mitigation Policies in California: A Review of the Literature. March 2009.

[45] State of California. 2018. California's Fourth Climate Change Assessment Statewide Summary Report. August 27, 2018. http://www.climateassessment.ca.gov/state/ (accessed February 2020).

[46] San Luis Obispo, City of. 2019. *Community Greenhouse Gas Emissions Inventory and Forecast*.

targets have been set at levels that achieve California's fair share of international emissions reduction targets that will stabilize global climate change effects and help avoid the associated adverse environmental consequences.

The proposed CAP Update creates a GHG emission reduction strategy (consistent with Section 15183.5 of the CEQA Guidelines)[47] for the City of San Luis Obispo. The inventory performed for 2016 demonstrated that the activities within the City emitted 339,290 metric tons (MT) of carbon dioxide equivalent units (CO_2e). The State has codified a goal of reducing emissions to 1990 levels by 2020 (via AB 32); 40 percent below 1990 emissions levels by 2030 (via SB 32); and carbon neutrality by 2045 (via Executive Order [EO] B-55-18 and pending AB 2832).

The CAP Update includes a series of pillars, measures, and foundational actions intended to reduce communitywide GHG emissions by approximately 66 percent below 1990 levels by 2035, which provides substantial progress toward meeting the City carbon neutrality goal while exceeding the State goal. The CAP Update acknowledges that additional actions beyond those identified in the plan will be necessary to achieve carbon neutrality and, thus, provides a mechanism for updating and adopting a new climate action plan every other financial plan cycle in order to incorporate new measures and technologies that will further the City toward meeting its goal of carbon neutrality.[48] As such, the CAP Update would result in the reduction of communitywide operational GHG emissions, with only generating temporary GHG emissions during construction of infrastructure development and redevelopment such as electric vehicle charging stations, bicycle paths, transit, etc. The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning and, thus, would not result in construction or operational impacts related to GHG emissions. The GHG Emissions Thresholds would establish GHG emissions targets and analysis methodologies that are enforced during CEQA review with the intention of reducing GHG emissions associated with construction and operation of future projects and plans in the City. Additionally, the CAP Update would serve as a pathway to reduce GHG emissions and introduce other beneficial environmental and sustainability effects. These benefits include reduction in building energy consumption and vehicle miles traveled (and thus air pollution), water consumption, and solid waste generation. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to generation of GHG emissions.

8b. Would the project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The CAP Update and GHG Emissions Thresholds are policy-level documents that set strategies to reduce GHG emissions within the City in an effort to also comply with State regulations. As discussed under 8a above, the CAP Update includes GHG emissions reduction measures and supporting foundational actions to reduce City GHG emissions from forecasted business-as-usual levels by approximately 299,730 MT of CO_2e by 2035. The purpose of the CAP Update is to meet San Luis Obispo's proportionate fair share of the Statewide GHG emissions reduction target set by AB 32 and SB 32 and work toward the State's longer-term target identified in Executive Order S-3-05 and

[47] Per the CEQA Statutes and Guidelines Section 15183.5(b)(1), a qualified GHG reduction plan should: quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area; establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable; identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area; specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level; establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and be adopted in a public process following environmental review.

[48] San Luis Obispo, City of. 2019. *Carbon Neutrality Vision and Three-Year Strategic Plan Technical Report*. November 2019.

Executive Order B-30-15. The CAP Update would not conflict with an applicable GHG reduction plans, including the California Climate Change Scoping Plan and the California Climate Change Scoping Plan Updates. The CAP Update identifies how the City would achieve consistency with the Statewide GHG emissions limit.

The GHG Emissions Thresholds would establish GHG emissions targets and analysis methodologies that are enforced during CEQA review with the intention of reducing GHG emissions associated with construction and operation of future projects and plans in the City. Additionally, the CAP Update would serve as a pathway to reduce GHG emissions and introduce other beneficial environmental and sustainability effects. These benefits include reduction in building energy consumption and vehicle miles traveled (and thus air pollution), water consumption, and solid waste generation. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to consistency with applicable GHG emissions reduction plans, policies, and regulations.

Cumulative Impacts

Analyses of GHG emissions and climate change are cumulative in nature, as they affect the accumulation of GHG emissions in the atmosphere. Cumulative projects under San Luis Obispo General Plan buildout that exceed the thresholds discussed above would have a significant impact related to GHG emissions and climate change, both individually and cumulatively. The CAP Update creates a GHG emissions reduction strategy (consistent with Section 15183.5 of the CEQA Guidelines) for the City of San Luis Obispo. The CAP Update includes a series of pillars, measures, and foundational actions that are intended to reduce communitywide GHG emissions by approximately 66 percent below 1990 levels by 2035, which provides substantial progress toward meeting the City carbon neutrality goal while exceeding State goals. The CAP Update acknowledges that additional actions beyond those identified in the plan will be necessary to achieve carbon neutrality and, therefore, provides a mechanism for updating and adopting a new climate action plan every other financial plan cycle in order to incorporate new measures and technologies that will further the City toward meeting its goal of carbon neutrality. As such, the CAP Update would result in the reduction of GHG emissions rather than generating GHG emissions. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Rather, the GHG Emissions Thresholds would establish GHG emissions targets and analysis methodologies that are enforced during CEQA review with the intention of reducing GHG emissions associated with construction and operation of cumulative buildout. Therefore, implementation of the CAP Update and GHG Emissions Thresholds would result in an overall ***less-than-significant cumulative impact*** related to GHG emissions.

9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	■	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	■	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	■	☐
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	■	☐
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	■
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	■
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	■

9a, 9b. Would the project create a significant hazard to the public or the environment through:

- *The routine transport, use, or disposal of hazardous materials?*
- *Reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to creating a significant hazard. The CAP Update is a policy document containing actions and supporting measures to reduce GHG emissions. The proposed CAP Update does not involve identified site-specific development, nor would it facilitate new development. Implementation of the CAP Update measures and foundational actions would not involve the routine transport, use, or disposal of hazardous materials and would not create reasonably foreseeable upset and/or accidental conditions involving the release of hazardous materials into the environment.

Implementation of some of the CAP Update measures and foundational actions, such as the installation of bicycle facilities, energy retrofits, and electric vehicle charging stations, may involve the use and transport of fuels, lubricating fluids, and solvents, among other activities. These types of materials are not considered acutely hazardous, and all storage, handling, and disposal of these materials are regulated by the California Department of Toxic Substances Control (CDTSC), United States Environmental Protection Agency (USEPA), Occupational Safety & Health Administration (OSHA), and San Luis Obispo County Environmental Health Division. Additionally, future discretionary development would be subject to review by the City for compliance with the General Plan and Municipal Code and would also be required to comply with applicable local, State, and Federal regulations. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to creating a significant hazard.

9c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to handling hazardous materials. The CAP Update is a policy document containing pillars, supporting measures, and foundational actions to reduce GHG emissions. The proposed CAP Update does not include site-specific proposals and development, nor would it emit or handle hazardous materials. Implementing some GHG measures may require future development or improvements, such as bike paths, solar panels, or building improvements for efficiency. However, discretionary development would be subject to review by the City for compliance with the General Plan and Municipal Code and would be required to comply with all applicable local, State, and Federal regulations. Therefore, the CAP Update and GHG Thresholds would result in a ***less-than-significant impact*** related to handling of hazardous materials.

9d. Would the project be located on a site included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to project site location on a site listed on a hazardous material site. The CAP Update is a policy document containing actions and supporting measures to reduce GHG emissions. The proposed CAP Update does not include site-specific proposals and development, but CAP measures and foundation actions could result in projects that could be located on listed hazardous materials site. However, discretionary development would be subject to review by the City for compliance with the General Plan and Municipal Code and would be required to comply with applicable local, State, and Federal regulations. Therefore, the CAP Update and GHG Thresholds would result in a ***less-than-significant impact*** related to location on a listed hazardous materials site.

9e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The San Luis Obispo County Regional Airport is the only airport located in San Luis Obispo. The airport and adjoining Airport Safety zone are located in the southern portion of the city limits, at 975 Airport Drive. The location as well as goals and policies associated with the airport area are depicted in the City's General Plan Land Use Element. The CAP Update and GHG Emissions Thresholds are policy documents and implementation of which would not increase airport activity or otherwise increase potential exposure to aircraft-related hazards. Additionally, discretionary development projects associated with the CAP Update would undergo project-level CEQA review. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to risks associated with location proximate to a public airport.

9f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The CAP Update and GHG Emissions Thresholds are policy documents intended to reduce GHG emissions. The proposed CAP Update and GHG Emissions Thresholds do not involve site-specific development, nor would it facilitate new development that would interfere with adopted emergency plans. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to impairment or interference with implementation of an emergency response or evacuation plan.

9g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

According to California Department of Forestry and Fire Protection (CalFIRE), San Luis Obispo is not located in designated California Fire Hazard Severity Zones,[49] or in State Responsibility Areas. No impact associated with wildland fires would occur. According to the City's General Plan Safety Element, the urban reserve consists of low to moderate fire hazard rates.[50] High and extreme fire hazard rates closely surround the San Luis Obispo urban reserve. However, according to CalFIRE, there are five areas categorized as very high fire hazard severity zones within the local responsibility area (LRA).[51] However, these areas are located on the outer fringes of the city boundaries and the CAP Update and GHG Emissions Thresholds do not propose specific development or other physical changes to the environment through would be put at risk in the case of a wildland fire. Therefore, the Update and GHG Emissions Thresholds would result in ***no impact*** related to risks associated with exposure to wildland fires.

Cumulative Impacts

As described in the General Plan Update EIR, adherence to applicable General Plan policies and applicable State and Federal regulatory requirements would reduce cumulative hazards and hazardous materials impacts resulting from buildout of the City under the General Plan to a less-than-significant level. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Thus, implementation of the CAP Update and GHG Emissions Thresholds would result in an overall ***less-than-significant cumulative impact*** related to hazards and hazardous materials.

[49] California Department of Forestry and Fire Protection (CalFIRE). Local Responsibility Area. Available at: https://osfm.fire.ca.gov/media/5980/san_luis_obispo.pdf

[50] San Luis Obispo, City of. City of San Luis Obispo Safety Element Wildland Fire Hazard. Available at: https://www.slocity.org/home/showdocument?id=2274

[51] CalFIRE. Very High Fire Hazard Severity Zones in LRA As Recommended by

10 Hydrology and Water Quality

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

10a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

The GHG Emissions Thresholds is a guidance document as does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to water quality standards. The CAP Update is a policy document containing measures and foundational actions intended to reduce GHG emissions in the City. Discretionary development would be required to undergo CEQA review, including assessment and mitigation incorporation, including the implementation of stormwater pollution prevention plans (SWPP) and compliance with applicable local, State, and Federal regulations once project details and locations are known. As such, the CAP Update's related infrastructure changes and discretionary development would not utilize or alter water supply or result in new or different wastewater discharge. Additionally, discretionary development would be small in scale and not result in substantial, adverse impacts related to surface or groundwater quality. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to surface or groundwater water quality in San Luis Obispo.

10b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to groundwater supplies. The CAP Update is a policy document containing programs that are consistent with the City's General Plan. In addition, implementation of the CAP Update actions related to infrastructure development and redevelopment would not substantially degrade groundwater quality or groundwater recharge. As a result, no adverse impacts related to groundwater water quality or resources would occur.

The CAP Update includes Natural Solutions 2, which facilitates the preparation of an Urban Forest Master Plan and requires planting and maintaining 10,000 new trees by the year 2035. Encouragement of tree planting and thus provision of pervious areas in the City would increase groundwater recharge. As such, implementing the CAP Update would have a beneficial effect related to local groundwater recharge as well as support groundwater management in San Luis Obispo. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to impedance of sustainable groundwater management in the San Luis Obispo Valley Groundwater Basin.

10c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- *Result in substantial erosion or siltation on- or off-site?*
- *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
- *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*
- *Impede or redirect flood flows?*

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to alterations in polluted runoff. Implementation of the following CAP Update foundational actions and measures may promote infrastructure development and redevelopment. Action Buildings 2.1 could include installation of on-site solar arrays within the city. Action Connected 6.1 would require the installation of electric vehicle charging stations and supporting infrastructure. Additionally, implementation of Actions Connected 2.1 through 2.3 may require the installation of new bicycle or pedestrian facilities.

Construction of infrastructure development and redevelopment could result in erosion and potential redirect of flood flows or drainage patterns; however, implementation of proposed actions would not include large-scale construction within San Luis Obispo. Additionally, discretionary development would be required to undergo CEQA review, including assessment and mitigation incorporation, including the implementation of a SWPP and compliance with applicable local, State, and Federal regulations once project details and locations are known. And given the associated small footprints, the CAP Update-related infrastructure changes would not result in substantial additional erosion or runoff. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to polluted runoff.

10d. Would the project result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

The City is not located within designated seiche or tsunami zones. Portions of the City are within the 100- and 500-year flood zones defined by Federal Emergency Management Agency (FEMA).[52] In San Luis Obispo, new construction, including infrastructure projects associated with implementation of the CAP Update, in flood-prone areas must comply with Chapter 17.78 (Flood Damage Prevention) of Title 7 of the San Luis Obispo Municipal Code. The City of San Luis Obispo identified flood preparation areas, but no major flood improvement projects are included in recent City planning documents.[53] In addition, the San Luis Obispo County Flood Control and Water Conservation District established a guide to implementing flood control projects, which includes strategies for San Luis Obispo Creek FC Zone 9 that would decrease the flood risk in San Luis Obispo.[54] Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to flooding and inundation resulting in release of pollutants.

[52] Federal Emergency Management Agency (FEMA). FEMA Flood Map Service Center. Available at: https://msc.fema.gov/portal/search?AddressQuery=turlock%2C%20ca#searchresultsanchor

[53] San Luis Obispo, City of. San Luis Obispo City Flood Prep Map. Available at: https://www.arcgis.com/apps/webappviewer/index.html?id=97ed3e37de014973a2d36f71ae468975

[54] San Luis Obispo, County of. San Luis Obispo County Flood Control and Water Conservation District. Guide to Implementing Flood Control Projects. 2009. Available at: https://www.slocounty.ca.gov/Departments/Public-Works/Forms-Documents/Water-Resources/Drainage-Studies/Guide-to-SLO-Flood-Managemenit-Report.aspx

10e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to obstruction of a water quality control plan. The CAP Update foundational actions would not include direct extraction of groundwater and encourages water savings through conservation. The CAP Update would not interfere with or obstruct implementation of water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to consistency with a water quality control plan or sustainable groundwater management plan.

Cumulative Impacts

As described in the General Plan Update EIR, adherence to applicable General Plan policies and applicable State and Federal regulatory requirements would reduce cumulative hydrology and water quality impacts resulting from buildout of the City under the General Plan to a less-than-significant level. Implementation of the CAP Update would not contribute to an increase in development but could result in infrastructure development or redevelopment projects, including renewable energy facilities and alternative transportation thoroughfares. As such, implementation of the CAP Update and other cumulative projects could have incremental impacts related to hydrology and water quality, with potential minor alterations to existing drainage patterns in the City. However, cumulative projects would comply with applicable local, State, and Federal regulations related to hydrology and water quality. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Therefore, implementation of the CAP Update would result in an overall ***less-than-significant cumulative impact*** related to hydrology and water quality.

11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	■
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	■

11a. Would the project physically divide an established community?

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to division of an established community. The CAP Update is a policy document containing programs that are consistent with San Luis Obispo's General Plan and does not include foundational actions or specific development projects that would divide an established community.

The CAP Update includes actions (Connected 2.1 through 2.3, Connected 4.1 through 4.4) that would support pedestrian and bicycle circulation and improved transportation alternatives, which would improve connectivity throughout the City. Action Connected 2.1 and 2.4 aims to prioritize an Active Transportation Plan and implementation and develop quick build strategies to streamline implementation of priority bicycle and pedestrian infrastructure projects, which would increase the walkability of the City and decrease the vehicle miles traveled. Actions Connected 2.2 facilitates launching a micro-mobility program in the form of electric bikes, which would increase active transportation and decrease the vehicle miles traveled. Actions Connected 5.1 through 5.2 encourages flexible zoning in Downtown as well as updates to the Housing Element of the General Plan to complete the housing Major City Goal. Actions Connected 4.1 through 4.4 proposes improvements to the transit system including but not limited to developing a transit electrification strategic plan and implementation, accelerated implementation of the existing Short-Range Transit Plan, in order to increase ridership and increase sustainable practices within the transit system. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to division of an established community.

11b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in impacts related to conflict with a land use plan. The CAP Update is a policy document containing programs that are consistent with the City's General Plan. Nonetheless, implementing the CAP Update would require some modification of existing policies, including developing and implementing new programs, and projects, or modifying existing ones. For example, Action Leadership 1.1 proposes to present a municipal carbon neutrality plan. Action Leadership 3.1 would include carbon neutrality considerations and a focus on developing the green local economy in the updated Economic Development Strategic Plan. Action Buildings 1.1 would adopt and implement local amendments to the 2019 California Energy Code incentivizing all electric development (Clean Energy Choice Program) and review opportunities for improvement in the 2022 code cycle. Action Buildings 2.2 proposes adopting a building energy score program or benchmark ordinance and begin implementing a retrofit program. In order to implement these measures, the City Municipal Code, General Plan, and other applicable documents may need to be amended to reflect new or modified requirements.

The CAP Update is designed to reduce adverse environmental impacts associated with climate change. Where modifications of existing policies are needed, such as updates to policies related to transit, active transportation, and parking garages, the CAP Update foundational actions would result in greater avoidance or reduction of environmental effects. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to consistency with current land use plans or policies.

Cumulative Impacts

The CAP Update and GHG Emissions Thresholds are policy documents containing programs that are consistent with the City's General Plan. Nonetheless, implementing the CAP Update would require some modification of existing policies, including developing and implementing new programs, and projects, or modifying existing ones. The proposed policy changes are consistent with the intent of the goals and policies established within the City General Plan and Zoning Regulations and would not cumulatively contribute to the loss of open space or agricultural land beyond that already anticipated in the City General Plan Land Use and Circulation Elements Update and EIR. Cumulative projects would be required to adhere to City development regulations and General Plan policies to retain land use character and minimize environmental impacts. And discretionary development would be reviewed for consistency with the General Plan and other applicable regulatory land use actions prior to approval. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Therefore, implementation of the CAP Update and GHG Emissions Thresholds would result in an overall ***less-than-significant cumulative impact*** related to land use.

12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	■
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	■

12a, 12b. Would the project result in the loss of availability of a:

- *Known mineral resource that would be of value to the region and the residents of the State?*
- *Locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

The City of San Luis Obispo General Plan does not identify any mineral resources or mineral resources recovery sites within the City of San Luis Obispo.[55] The CAP Update and GHG Emissions Thresholds would not facilitate infrastructure development projects within the City that could result in the loss of availability of known mineral resources. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to mineral resource.

Cumulative Impacts

The City of San Luis Obispo General Plan Update EIR did not provide a cumulative impact assessment related to mineral resources, since the General Plan Update does not identify mineral resources in the City of San Luis Obispo. As such, no cumulative impact related to mineral resources is assumed as a result of General Plan buildout. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Thus, implementation of the CAP Update and GHG Emissions Thresholds would result in ***no cumulative impact*** related to mineral resources.

[55] 2006. General Plan Open Space and Conservation Element. Available at: https://www.slocity.org/home/showdocument?id=6651

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13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	■	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	■	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	■

13a. Would the project result in 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?

Noise is unwanted sound that disturbs human activity. Environmental noise levels typically fluctuate over time, and different types of noise descriptors are used to account for this variability. Noise level measurements include intensity, frequency, and duration, as well as time of occurrence. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). Because of the way the human ear works, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise levels typically attenuate (or drop off) at a rate of 6 dBA per doubling of distance from point sources (such as construction equipment). Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance; while noise from a point source typically attenuates at about 6 dBA per doubling of distance. Noise levels may also be reduced by the introduction of intervening structures. For example, a single row of buildings between the receptor

and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm that breaks the line-of-sight reduces noise levels by 5 to 10 dBA.

The Noise Element of the San Luis Obispo General Plan aims to ensure appropriate noise levels considered compatible for community noise environments. The City's normally acceptable exterior noise exposure standard is 60 dBA community noise equivalent level (CNEL) or less for residential, schools and hotels and 70 dBA CNEL. A detailed noise exposure threshold is shown below in Table 4.[56]

Table 4 Land Use Compatibility for Community Noise Exposure

	Normally Acceptable	Conditionally Acceptable	Unacceptable
Residences, Theatres, Auditoriums, Music Halls	60 dB or less	61-70 dB	Over 70 dB
Motels and hotels	60 dB or less	61-75 dB	Over 75 dB
Schools, Libraries, Museums, Hospitals, Nursing Homes, Meeting Halls, Churches, Mortuaries	60 dB or less	61-75 dB	Over 85 dB
Playgrounds	70 dB or less	70-75 dB	Over 75 dB
Office Buildings	60 dB or less	60-75 dB	Over 75 dB
Neighborhood Parks	65 dB or less	65-75 dB	Over 75 dB

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to excessive noise levels. The CAP Update is a policy document containing programs that are consistent with the General Plan. Some of the proposed measures of CAP Update would support small scale construction projects, such as EV charging station construction, which may result in a temporary increase in noise levels. However, discretionary development would be subject to review by the City for compliance with the General Plan and Municipal Code, and would be required to comply with applicable local, State, and Federal regulations.

The City's General Plan indicates that traffic is the major source of noise in San Luis Obispo[57]. The CAP Update encompasses a suite of GHG-reduction opportunities that affect the transportation sector. For example, the CAP Update includes actions (Connected 2.1 through 2.3, Connected 4.1 through 4.4) that would support pedestrian and bicycle circulation and improved transportation alternatives, which would improve connectivity throughout the City. Action Connected 2.1 and 2.4 aims to prioritize an Active Transportation Plan and implementation and develop quick build strategies to streamline implementation of priority bicycle and pedestrian infrastructure projects, which would increase the walkability of the City and decrease the vehicle miles traveled. Actions Connected 2.2 facilitates launching a micro-mobility program in the form of electric bikes, which would increase active transportation and decrease the vehicle miles traveled. These measures would reduce vehicle miles traveled and further reduce traffic-related noise in San Luis Obispo. Therefore, the CAP Update and GHG Emissions Thresholds would not generate excessive noise levels; thus, there would be a ***less-than-significant impact*** related to noise exposure.

[56] San Luis Obispo, City of. 1996. General Plan Noise Element. Available at: https://www.slocity.org/home/showdocument?id=6643

[57] San Luis Obispo, City of. 1996. General Plan Noise Element. Available at: https://www.slocity.org/home/showdocument?id=6643

13b. Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise.[58] Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or Root Mean Square (RMS) vibration velocity. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings.[59]

Vibration significance ranges from approximately 50 vibration decibels (VdB), which is the typical background vibration-velocity level, to 100 VdB, the general threshold where minor damage can occur in fragile buildings.[60] The general human response to different levels of groundborne vibration velocity levels is described in Table 5.

Table 5 Human Response to Different Levels of Groundborne Vibration

Vibration Velocity Level	Human Reaction
65 VdB	Approximate threshold of perception for many people
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level is unacceptable.
85 VdB	Vibration acceptable only if there are an infrequent number of events per day

VdB = vibration decibels
Source: Federal Transit Administration. Transit Noise and Vibration Impact Assessment Manual. 2018. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf [61]

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to groundborne vibration. The CAP Update is a policy document containing programs that are consistent with the General Plan. Some of the proposed measures of CAP Update would support small-scale construction projects, such as electric

[58] California Department of Transportation (Caltrans). 2013. Transportation and Construction Vibration Guidance Manual (CT-HWANP-RT-13-069.25.3). http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf

[59] Federal Highway Administration (FHWA). 2006. FHWA Highway Construction Noise Handbook. (FHWAHEP-06-015; DOT-VNTSC-FHWA-06-02). http://www.fhwa.dot.gov/environment/construction_noise/handbook

[60] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

[61] Federal Transit Administration. Transit Noise and Vibration Impact Assessment Manual. 2018. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

vehicle charging station construction that may result in a temporary increase in groundborne vibration. However, discretionary development would be subject to review by the City for compliance with the General Plan and Municipal Code and would be required to comply with applicable local, State, and Federal regulations. Thus, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to groundbourne vibration.

13c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The San Luis Obispo County Regional Airport is the only public airport or airstrip located in San Luis Obispo. The airport and adjoining Airport Safety zone are located in the southern portion of the City limits, at 975 Airport Drive. The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in noise exposure impacts related to airports, airstrips, or helicopters. The CAP Update does not propose land use or zoning changes related to airports, airstrips, or heliports, nor does it include development that would increase exposure to excessive noise levels associated with operation of airports, airstrips, or heliports. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to aviation-related noise exposure.

Cumulative Impacts

The CAP Update is a policy document containing programs that are consistent with the City of San Luis Obispo General Plan. Some of the proposed measures of CAP Update would support small scale construction projects, such as electric vehicle charging station construction, which may result in a temporary increase in groundborne vibration or noise levels. However, discretionary development would be subject to review by the City for compliance with the General Plan and Municipal Code, and would be required to comply with applicable local, State, and Federal regulations. Additionally, the CAP Update encompasses a suite of GHG-reduction opportunities that would decrease traffic and traffic-related noise. As such, implementation of the CAP Update would not generate excessive groundborne vibration or noise levels. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Therefore, the CAP Update and GHG Emissions Thresholds would result in an overall ***less-than-significant cumulative impact*** related to noise.

14 Population and Housing

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

14a, 14b. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to substantial unplanned population growth. The CAP Update is a policy document containing programs that are consistent with the City's General Plan. Nonetheless, implementing the CAP Update would require some modification of existing policies, including developing and implementing new programs, and projects, or modifying existing ones. For example, Action Connected 5.1 proposes developing flexible zoning requirements for Downtown. Additionally, Action Connected 5.2 proposes updating the Housing Element of the General Plan and complete the Housing-Major City Goal. In order to implement these measures, the City Municipal Code, General Plan, and other applicable documents may need to be amended to reflect new or modified requirements.

The CAP Update is designed to reduce adverse environmental impacts associated with climate change. Where modifications of existing policies are needed the CAP Update actions would not result in increases in population or induce additional population growth and would not displace people or housing. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to population and housing.

Cumulative Impacts

Buildout of development assumed under the San Luis Obispo General Plan would not displace people or housing nor induce substantial unplanned population growth in the City. And the CAP Update would not contribute to person or housing displacement in the City of San Luis Obispo nor result in population growth beyond that already assumed and planned for in the General Plan. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no cumulative impact*** related to population and housing.

15 Public Services

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

15a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- *Fire protection?*
- *Police protection?*
- *Schools?*
- *Parks?*
- *Other public facilities?*

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to public services. The CAP Update is a policy document containing programs that are consistent with the San Luis Obispo General Plan. New development facilitated by the General Plan would increase public service needs in San Luis Obispo by adding population and housing. However, implementation of the CAP Update and the proposed foundational actions would not result in increases in population and induce additional population growth. As such, the CAP Update would not require the construction of new or physically altered governmental facilities to serve additional population, the construction of which could cause

significant environmental impacts. Furthermore, future site-specific discretionary projects would be subject to subsequent environmental review wherein site-specific public service impacts would be addressed accordingly.

Nonetheless, implementing the CAP Update would require some modification of existing policies, including developing and implementing new programs, and projects, or modifying existing ones. The CAP Update is designed to reduce adverse environmental impacts associated with climate change. Where modifications of existing policies are needed the CAP Update actions would not result in increases in population or induce additional population growth and would not displace people or housing. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to public services in terms of need for the construction of new or altered governmental facilities.

Cumulative Impacts

Implementation of cumulative projects, including the CAP Update, would not result in increases in population or induce additional population growth beyond that assumed under the San Luis Obispo General Plan. Per the General Plan EIR, the cumulative need for construction of new fire, police, school, park, or other public facilities would be reduced to a less-than-significant level. The CAP Update and GHG Emissions Thresholds would not result in substantial population growth or direct land use change. Therefore, implementation of the CAP Update would not result in substantial cumulative need to expand public services facilities. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Thus, CAP Update and GHG Emissions Thresholds would result in an overall ***less-than-significant cumulative impact*** related to public services.

16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	■
b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	■

16a, 16b. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

San Luis Obispo is a primarily urbanized community with neighborhood parks, community parks, mini parks, recreational and open spaces incorporated throughout, and a greenbelt extending from the urban fringes[62]. The City's General Plan Parks and Recreation Element identifies goals, policies, and programs to manage the local parks and recreational facilities that were available for the current and future population of San Luis Obispo[63]. The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to neighborhood or regional parks. The CAP Update is a policy document containing programs that are consistent with San Luis Obispo's General Plan. Additionally, the CAP Update would not result in substantial population growth or direct land use change. As such, implementation of the CAP Update would not result in a substantial physical deterioration of parks or other recreational facilities or result in the need to expand recreational facilities. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to the need for construction of new or altered recreational facilities.

[62] San Luis Obispo, City of. Parks and Recreation Facilities in San Luis Obispo. Available at: https://www.slocity.org/home/showdocument?id=2270

[63] San Luis Obispo, City of. General Plan Parks and Recreation Element. Available at: https://www.slocity.org/home/showdocument?id=6647

Cumulative Impacts

Implementation of cumulative projects, including the CAP Update, would not result in increases in population or induce additional population growth beyond that assumed under the General Plan. Per the General Plan EIR, the cumulative need for construction of new recreational facilities would be reduced to a less than significant level. The CAP Update and GHG Emissions Thresholds would not result in substantial population growth or direct land use change. Therefore, implementation of the CAP Update would not result in substantial cumulative physical deterioration of parks or other recreational facilities or result in the cumulative need to expand recreational facilities. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Therefore, implementation of the CAP Update and GHG Emissions Thresholds would result in ***no cumulative impact*** related to recreation.

17 Transportation

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

17a, 17b. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

The City adopted the City of San Luis Obispo Bicycle Transportation Plan in 2013 and amended it in 2017. The updated Bicycle Transportation Plan contains goals and policies for development and implementation of a bicycle and pedestrian network that provides a viable transportation alternative to the automobile, improves safety for bicyclists and pedestrians, and provides residents with access and good connections to parks, open space, trails and other recreational opportunities.

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to conflict with a program, plan, ordinance, or policy addressing the transportation circulation system. The CAP Update is a policy document containing measures and supporting foundational actions that are consistent with the City General Plan with many that are aimed at facilitating the implementation of the local transportation regulations. For example, the CAP Update includes foundational actions (Connected 2.1 through 2.3, Connected 4.1 through 4.4) that would support pedestrian and bicycle circulation and improved transportation alternatives, which would improve connectivity throughout the City. Action Connected 2.1 and 2.4 aims to prioritize an Active Transportation Plan and implement quick-build strategies to streamline implementation of priority bicycle and pedestrian infrastructure projects, which would increase the walkability of the City and decrease the vehicle miles traveled (VMT). Actions Connected 2.2 facilitates launching a micro-mobility program in the form of electric bikes, which would increase active transportation and decrease VMT. Actions Connected 5.1 through 5.2 encourages flexible zoning in Downtown as well as updates to the Housing Element of the General

Plan. Actions Connected 4.1 through 4.4 proposes improvements to the transit system including but not limited to developing a transit electrification strategic plan and implementing the existing Short-Range Transit Plan, in order to increase ridership and increase sustainable practices within the transit system. These CAP Update foundational actions would be consistent with and promote the General Plan or Bicycle Transportation Plan. Implementation of some of the measures and foundational actions may require future infrastructure development or improvements, such as bike paths, solar panels, or building energy efficiency retrofits. However, discretionary development would be subject to review by the City for compliance with the General Plan and Municipal Code and be required to comply with applicable local, State, and Federal regulations. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to consistency with plans addressing the transportation circulation system.

17c, 17d. Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment) or result in inadequate emergency access?

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to risk associated with transportation design or features. The CAP Update is a policy document containing programs that are consistent with the City General Plan and would not facilitate development beyond that allowed under the General Plan. As such, it would not directly create transportation hazards or result in inadequate emergency access. However, the proposed CAP Update measures and supporting foundational action included in the CAP Update promotes alternative modes of transportation and reduction in the amount of vehicle miles traveled throughout City. For example, the CAP Update promotes the Bicycle Transportation Plan implementation to enhance bicycle, pedestrian, and transit connectivity, which would reduce potential transportation hazards and would provide adequate emergency access. The CAP does not include measures that would substantially increase transportation hazards due to a design feature or incompatible land uses. Furthermore, future site-specific discretionary projects would be subject to subsequent CEQA review wherein site-specific impacts related to hazards or emergency access would be addressed accordingly. Thus, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to transportation hazards and emergency access.

Cumulative Impacts

The goals, policies, objectives, measures, and actions included in the San Luis Obispo General Plan Update and CAP Update promote alternative modes of transportation and reduction of the amount of vehicle miles traveled throughout the City. The CAP Update foundational actions would not conflict with the objectives and policies of the General Plan Update or Bicycle Transportation Plan but would rather be consistent with and promote those plans. The CAP Update is a policy document containing programs that are consistent with the City's General Plan and does not propose new development beyond that anticipated under the General Plan and assessed in the General Plan EIR. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Therefore, the CAP Update and GHG Emissions Thresholds would result in an overall ***less-than-significant cumulative impact*** related to transportation.

18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	■	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 2024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significant of the resource to a California Native American tribe?	☐	☐	■	☐

18a, 18b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and that is:

- *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1 (k)?*
- *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1.*

In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

On February 13, 2020, local Native American tribal groups were formally notified that the City initiated environmental review of the Climate Action Plan (CAP) and CEQA Greenhouse Gas (GHG) Emissions Threshold(s) of Significance and were invited to provide consultation. No formal consultation was requested. On April 25, 2020, Fred Collins with the Northern Chumash Tribal

Council requested to be kept informed regarding the Climate Action Plan, indicating support of the Plan.

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to tribal cultural resources. The CAP Update would not involve land use or zoning changes. Rather the CAP Update would promote infrastructure development and redevelopment that is already accounted for in the General Plan and is assessed in the General Plan EIR. As a policy document, the CAP Update would not directly require ground disturbing activities. However, implementation of the following CAP Update foundational actions and measures may promote infrastructure development and redevelopment.

The CAP Update includes Action Connected 6.1 would require the installation of electric vehicle charging stations and supporting infrastructure. Additionally, implementation of Actions Connected 2.1 through 2.3 may require the installation of new bicycle or pedestrian facilities. Additionally, Measure Natural Solutions 2 facilitates the preparation of an Urban Forest Master Plan and requires planting and maintaining 10,000 new trees by the year 2035. Implementation of the CAP Update measures and foundational actions would result in infrastructure development and redevelopment that could impact unknown tribal cultural resources during construction, but such resources would be protected upon discovery and, thus, impacts would be reduced to a minimal level. Furthermore, the CAP Update would not conflict with or obstruction of the applicable policies for preserving tribal cultural resources and would not affect the City's ability to attain goals and policies that protect tribal cultural resources. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to tribal cultural resources.

Cumulative Impacts

Planned buildout within the City of San Luis Obispo under the General Plan would cumulatively increase the potential for adverse effects to unknown tribal cultural resources in the City. Impacts to tribal cultural resources are site-specific; accordingly, as required under applicable laws and regulations, potential impacts associated with cumulative developments would be addressed on a case-by-case basis as cumulative project details and locations become known. The CAP Update would not conflict with or result in the obstruction of applicable policies for preserving tribal cultural resources and, thus, would not affect the City's ability to attain goals and policies that protect tribal cultural resources. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant cumulative impact*** related to tribal cultural resources.

19 Utilities and Service Systems

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

19a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not have direct construction or operational impacts related to utilities and service systems. The CAP Update is a policy document aimed at reducing water and energy consumption and related GHG emissions throughout the City of San Luis Obispo and does not include site-specific infrastructure designs or project proposals. Implementing the CAP Update would not result in an increase in

population and housing nor would it facilitate growth beyond that anticipated by the General Plan Update and assessed by the General Plan Update EIR. As such, implementing the CAP Update would not create new demand related to water, wastewater, stormwater drainage, electric power, natural gas power, or telecommunications utilities. However, projects resulting from CAP Update implementation could include redevelopment and/or restructuring of electricity and natural gas power facilities and infrastructure.

Water Supply Facilities/Infrastructure

The City of San Luis Obispo provides potable and recycled water to the community and is responsible for water supply, treatment, distribution, and resource planning. The City is the sole water provider within the City limits and most of the City's water is supplied from multiple surface water sources. Groundwater is also used to supplement surface water supplies and recycled water is used to supplement irrigation demand. The Water and Wastewater Element of the General Plan, first adopted in 1987 and most recently updated in 2018, specifies that the City shall utilize multiple water resources, including the Salinas Reservoir, Nacimiento Reservoir, and recycled water from the City's Water Resource Recovery Facility (WWRF), to meet water needs.[64] The CAP Update and GHG Emissions Thresholds would not result in new land uses that would generate sanitary wastewater or otherwise contribute to an increase in wastewater treatment requirements, change the amount or characteristics of wastewater treated at the WRRF compared to existing conditions, or require relocation or construction of new water infrastructure. Therefore, ***no impact*** related to need for construction or expansion of water supply facilities and infrastructure would occur.

Wastewater Treatment Facilities/Infrastructure

The City of San Luis Obispo WRRF collects and processes wastewater from land uses in the City, Cal Poly, and the airport. The WRRF treats approximately 4.5 million gallons per day (mgd) of wastewater, prior to discharge to San Luis Obispo Creek.[65] The CAP Update and GHG Emissions Thresholds would not result in new land uses that would generate sanitary wastewater or otherwise contribute to an increase in wastewater treatment requirements. The amount or characteristics of wastewater treated at the WRRF would not change compared to existing conditions with implementation of the proposed plan. The CAP Update and GHG Emissions Thresholds would not require relocation or construction of new wastewater treatment infrastructure. Therefore, ***no impact*** related to need for construction or expansion of wastewater treatment facilities and infrastructure would occur.

Stormwater Drainage Facilities/Infrastructure

As discussed in Section 10, *Hydrology and Water Quality*, the GHG Emissions Thresholds provide guidance during CEQA review, and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not have direct construction or operational impacts related to alterations in polluted runoff. However, implementation of the following CAP Update foundational actions and measures may promote infrastructure development and redevelopment. Action Buildings 2.1 could include installation of on-site solar arrays within the city. Action Connected 6.1 would require the installation of electric vehicle charging stations and

[64] San Luis Obispo, City of. 1987. General Plan Water and Wastewater Element. Last revised May 15, 2018. Available at: https://www.slocity.org/home/showdocument?id=19965

[65] San Luis Obispo, City of. 2019d. https://www.slocity.org/government/department-directory/utilities-department/wastewater/wastewater-treatment

supporting infrastructure. Additionally, implementation of Actions Connected 2.1 through 2.3 may require the installation of new bicycle or pedestrian facilities. Construction of infrastructure development and redevelopment could result in erosion and potential redirect of flood flows or drainage patterns. However, implementation of proposed actions would not include large scale construction within San Luis Obispo and the CAP Update-related infrastructure changes would not result in additional sources of polluted runoff. As a result, no negative impacts related to polluted runoff would occur. Therefore, implementing the CAP Update would have no effect on polluted runoff. As such, implementation of the CAP Update would not require a Stormwater Pollution Prevention Plan (SWPPP). Therefore, ***no impact*** related to need for construction or expansion of stormwater drainage facilities and infrastructure would occur.

Electric Power Facilities/Infrastructure

The CAP Update includes foundational actions, such as Actions Energy 1.1, 2.1, and 3.1 that focus on carbon neutral electricity throughout the City by launching MBCP. In addition, new electric vehicle charging station installation would involve the construction of new electric power facilities and infrastructure and could also involve the relocation of existing electric power infrastructure and transmission lines. The CAP Update and GHG Emissions Thresholds would serve as a pathway to reduce GHG emissions and other beneficial environmental and sustainability effects. These benefits include reduction in energy consumption. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to construction, expansion, or relocation of electric power facilities and infrastructure.

Natural Gas Power Facilities/Infrastructure

The CAP Update would not involve new land uses that require new or additional natural gas service. However, implementation of the CAP could involve the relocation or removal of existing natural gas facilities and infrastructure. The CAP Update would serve as a pathway to reduce GHG emissions and other beneficial environmental and sustainability effects. These benefits include reduction in energy consumption. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to construction, removal, or relocation of natural gas power facilities and infrastructure.

Telecommunications Facilities/Infrastructure

The proposal plan would not involve new land uses that would require telecommunications infrastructure and is not anticipated to involve the relocation of existing telecommunications facilities. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to need for construction or expansion of telecommunication facilities and infrastructure.

19b, 19c. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to water supplies. The CAP Update is a policy-level document that does not include site-specific infrastructure designs or project proposals, nor

does it grant entitlements for development that would have the potential to increase demand for water supply or other utility services. Implementing the CAP Update would include no new residential construction and would have no effect on water demand and wastewater treatment demand. Thus, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to water supply and wastewater treatment.

19d, 19e. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? Would the project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

The City of San Luis Obispo Utilities Department is responsible for administering an exclusive franchise agreement with San Luis Garbage Company to collect and dispose solid waste generated by residential, commercial, and industrial customers in San Luis Obispo. There are three solid waste disposal facilities within San Luis Obispo County, including Cold Canyon Landfill located in San Luis Obispo, Chicago Grade Landfill located in Atascadero, and Paso Robles Landfill located in Paso Robles.[66]

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to solid waste. The CAP Update includes Pillar 5: Circular Economy, which is intended to divert 75 percent of landfilled organic waste by 2025 and 90 percent by 2035. Specifically, foundational actions Circular Economy 1.1 through 1.3 would require organic waste subscription for all residential and commercial customers, 20 percent increase in edible food rescue, and development and implementation of a waste stream education program for HOAs and property managers. Additionally, Climate Action Natural Solutions 1.1 proposes conducting a carbon farming study and pilot program at Johnson Ranch Open Space and City Farm starting in the year 2020, with monitoring through to the year 2023. Carbon Farming involves implementing practices that are known to improve the rate at which CO_2 is removed from the atmosphere and converted to plant material and/or soil organic matter. If determined feasible and cost-effective, compost would be applied to the first annual 100 acres by the year 2023. The CAP Update would not facilitate habitable development and, thus, would not affect solid waste collection and disposal demand. Additionally, because the CAP Update is a policy document that would not facilitate growth beyond that anticipated by the General Plan, it would not generate solid waste in excess of State or local standards. Therefore, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to solid waste.

Cumulative Impacts

Implementing the CAP Update and GHG Emissions Thresholds would not result in increases in population or induce additional population growth that would require additional use of existing City utilities or service systems. However, implementation of new or replacement energy or transportation infrastructure could result in less-than-significant cumulative construction impacts. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Thus, implementation of the CAP Update GHG Emissions Thresholds would result in an overall ***less-than-significant cumulative impact*** related to utilities and service systems.

[66] San Luis Obispo, City of. 2014. Land Use and Circulation Update Draft Program EIR. Available at: https://www.slocity.org/home/showdocument?id=6723

20 Wildfire

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

20a-20d. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- *Substantially impair an adopted emergency response plan or emergency evacuation plan?*
- *Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- *Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
- *Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

According to California Department of Forestry and Fire Protection (CalFIRE), the City of San Luis Obispo is not located in a designated California Fire Hazard Severity Zones[67] or in a State Responsibility Area. According to the City's General Plan Safety Element, the urban reserve consists of low to moderate fire hazard risk rates.[68] High and extreme fire hazard rates closely surround the San Luis Obispo urban reserve. And according to CalFIRE, there are five areas categorized as very high fire hazard severity zones within the local responsibility area (LRA).[69] However, these areas are located just outside the City boundaries.

The GHG Emissions Thresholds is a guidance document and does not propose development or changes to land use and zoning. Thus, implementation of the GHG Emissions Thresholds would not result in construction or operational impacts related to wildfire. Additionally, the CAP Update is a policy-level document that does not propose new habitable development that could be at risk from wildfire, nor does it grant entitlements for development that would have the potential to directly cause wildfire. Rather, the CAP Update would aim to reduce natural gas infrastructure that poses wildfire risk if damaged during seismic events and to underground new or restructured electric power lines that pose wildfire risk if damaged during high-wind events. Thus, the CAP Update and GHG Emissions Thresholds would result in ***no impact*** related to wildfire.

Cumulative Impacts

The City of San Luis Obispo General Plan Update EIR did not provide a cumulative impact assessment related to wildfires. And the CAP Update and GHG Emissions Thresholds do not include new habitable development that could be at risk from wildfire, nor does it grant entitlements for development that would have the potential to cause wildfire. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Thus, the CAP Update and the GHG Emissions Thresholds would result in ***no cumulative impact*** related to wildfire.

[67] California Department of Forestry and Fire Protection (CalFIRE). Local Responsibility Area. Available at: https://osfm.fire.ca.gov/media/5980/san_luis_obispo.pdf

[68] San Luis Obispo, City of. City of San Luis Obispo Safety Element Wildland Fire Hazard. Available at: https://www.slocity.org/home/showdocument?id=2274

[69] CalFIRE. Very High Fire Hazard Severity Zones in LRA As Recommended by

21 Mandatory Findings of Significance

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

21a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The intent of the 2020 CAP Update is to reduce GHG emissions from San Luis Obispo community operations through implementation of measures and supporting foundational actions. The CAP Update foundational actions are consistent with the San Luis Obispo General Plan and encourage residents, businesses, and the City to reduce energy, fuel use, water use, VMT, and solid waste generation and the associated GHG emissions. The CAP Update would not facilitate development that would eliminate or threaten wildlife habitats or eliminate important examples of the major periods of California history or prehistory. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in significant biological and cultural resources impacts. Therefore, as discussed in more detail in Sections 4, *Biological Resources*, and 5, *Cultural Resources*,

the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to biological and cultural resources.

21b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Implementation of the 2020 CAP Update would result in a cumulatively beneficial reduction of GHG emissions across the City. In addition, as discussed throughout the respective cumulative impacts discussions within this document, the CAP Update and GHG Emissions Thresholds would not result in significant cumulative impacts. Rather, implementation of the CAP Update would be consistent with General Plan policies aimed at reducing emissions of GHGs and air pollutants, reducing VMT, reducing energy and water supply demands on utilities, and decreasing solid waste generation. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in cumulative impacts. Therefore, the CAP Update and GHG Emissions Thresholds would result in an overall ***less-than-significant cumulative impact*** related to all CEQA topics addressed within this document.

21c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The 2020 CAP Update would not result in adverse effects on human beings. Rather, as discussed throughout this document, the CAP Update would serve as a pathway to reduce GHG emissions and other positive environmental and sustainability effects. These benefits include reduction in building energy consumption and VMT (and thus air pollution), in transportation related GHG emissions, energy and water consumption, and solid waste generation. However, as discussed in more detail in Sections 3, *Air Quality*, 13, *Noise*, and 17, *Transportation*, the CAP Update could cause temporary construction impacts related to transportation, air quality, and noise that could, in turn, affect human beings but would not result in a substantial adverse environmental effect. Furthermore, as a guidance document, the GHG Emissions Thresholds would not result in significant air quality, noise, and transportation impacts. Therefore, the CAP Update and GHG Emissions Thresholds would result in a ***less-than-significant impact*** related to potential for adverse effects on human beings.

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Rincon prepared this CAP Update and GHG Emissions Thresholds Initial Study-Negative Declaration under contract to the City of San Luis Obispo. Persons involved in data gathering, environmental impact analysis, quality review, graphics preparation, and document formatting include the following.

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Appendix A

Sources, Health Effects, and Typical Controls Associated with Criteria Pollutants

Sources, Health Effects, and Typical Controls Associated with Criteria Pollutants

Pollutant	Sources	Health Effects	Typical Controls
Ozone (O_3)	Formed when reactive organic gases (ROG) and nitrogen oxides react in the presence of sunlight. ROG sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage.	Breathing difficulties, lung tissue damage, vegetation damage, damage to rubber and some plastics.	Reduce motor vehicle reactive organic gas (ROG) and nitrogen oxide (NO_X) emissions through emission standards, reformulated fuels, inspections programs, and reduced vehicle use. Limit ROG emissions from commercial operations, gasoline refueling facilities, and consumer products. Limit ROG and NO_X emissions from industrial sources such as power plants and manufacturing facilities.
Carbon monoxide (CO)	Any source that burns fuel such as automobiles, trucks, heavy construction and farming equipment, residential heating.	Chest pain in heart patients, headaches, reduced mental alertness.	Control motor vehicle and industrial emissions. Use oxygenated gasoline during winter months. Conserve energy
Nitrogen dioxide (NO_2)	See Carbon Monoxide.	Lung irritation and damage. Reacts in the atmosphere to form ozone and acid rain.	Control motor vehicle and industrial combustion emissions. Conserve energy.
Sulfur dioxide (SO_2)	Coal or oil burning power plants and industries, refineries, diesel engines.	Increases lung disease and breathing problems for asthmatics. Reacts in the atmosphere to form acid rain.	Reduce use of high sulfur fuels (e.g., use low sulfur reformulated diesel or natural gas). Conserve energy.
Respirable particulate matter (PM_{10})	Road dust, windblown dust, agriculture and construction, fireplaces. Also formed from other pollutants (NO_X, SO_X, organics).	Increased respiratory disease, lung damage, cancer, premature death, reduced visibility, surface soiling.	Control dust sources, industrial particulate emissions, woodburning stoves and fireplaces. Reduce secondary pollutants which react to form PM_{10}. Conserve energy.
Fine particulate matter ($PM_{2.5}$)	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning. Also formed from reaction of other pollutants (NO_X, SO_X, organics, and NH3).	Increases respiratory disease, lung damage, cancer, and premature death, reduced visibility, surface soiling. Particles can aggravate heart diseases such as congestive heart failure and coronary artery disease.	Reduce combustion emissions from motor vehicles, equipment, industries, and agricultural and residential burning. Precursor controls, like those for ozone, reduce fine particle formation in the atmosphere.
Lead	Metal smelters, resource recovery, leaded gasoline, deterioration of lead paint.	Learning disabilities, brain and kidney damage. Control metal smelters.	No lead in gasoline or paint.
Sulfur Dioxide (SO_2)	Coal or oil burning power plants and industries, refineries, diesel engines.	Increases lung disease and breathing problems for asthmatics. Reacts in the atmosphere to form acid rain.	Reduce use of high sulfur fuels (e.g., use low sulfur reformulated diesel or natural gas). Conserve energy.
Sulfates	Produced by reaction in the air of SO2, (see SO2 sources), a component of acid rain.	Breathing difficulties, aggravates asthma, reduced visibility.	See SO2

Pollutant	Sources	Health Effects	Typical Controls
Hydrogen Sulfide	Geothermal power plants, petroleum production and refining, sewer gas.	Nuisance odor (rotten egg smell), headache and breathing difficulties (higher concentrations).	Control emissions from geothermal power plants, petroleum production and refining, sewers, and sewage treatment plants.
Visibility Reducing Particulates	See $PM_{2.5}$	Reduced visibility (e.g., obscures mountains and other scenery), reduced airport safety.	See $PM_{2.5}$
Vinyl Chloride	Exhaust gases from factories that manufacture or process vinyl chloride (construction, packaging, and transportation industries).	Central nervous system effects (e.g., dizziness, drowsiness, headaches), kidney irritation, liver damage, liver cancer.	Control emissions from plants that manufacture or process vinyl chloride, installation of monitoring systems.
Toxic Air Contaminant (TAC)	Combustion engines (stationary and mobile), diesel combustion, storage and use of TAC-containing substances (i.e., gasoline, lead smelting, etc.)	Depends on TAC, but may include cancer, mutagenic and/or teratogenic effects, other acute or chronic health effects.	Toxic Best Available Control Technologies (T-BACT), limit emissions from known sources.

Source: Compiled by Rincon Consultants, Inc. in March 2020

Appendix B

Description of Greenhouse Gases of California Concern

Description of Greenhouse Gases of California Concern

Greenhouse Gas	Physical Description and Properties	Global Warming Potential (100 years)	Atmospheric Residence Lifetime (years)	Sources
Carbon dioxide (CO_2)	Odorless, colorless, natural gas.	1	50–200	Burning coal, oil, natural gas, and wood; decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; oceanic evaporation; volcanic outgassing; cement production; land use changes
Methane (CH_4)	Flammable gas and is the main component of natural gas.	28[70]	12	Geological deposits (natural gas fields) extraction; landfills; fermentation of manure; and decay of organic matter
Nitrous oxide (N_2O)	Nitrous oxide (laughing gas) is a colorless GHG.	298	114	Microbial processes in soil and water; fuel combustion; industrial processes
Chloro-fluoro-carbons (CFCs)	Nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (level of air at the Earth's surface); formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms.	3,800–8,100	45–640	Refrigerants aerosol propellants; cleaning solvents.
Hydro-fluoro-carbons (HFCs)	Synthetic human-made chemicals used as a substitute for CFCs and contain carbon, chlorine, and at least one hydrogen atom.	140 to 11,700	1–50,000	Automobile air conditioners; refrigerants
Per-fluoro-carbons (PFCs)	Stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface.	6,500 to 9,200	10,000–50,000	Primary aluminum production; semiconductor manufacturing
Sulfur hexafluoride (SF_6)	Human-made, inorganic, odorless, colorless, and nontoxic, nonflammable gas.	22,800	3,200	Electrical power transmission equipment insulation; magnesium industry, semiconductor manufacturing; a tracer gas

[70] The City of San Luis Obispo used a 20-year Global Warning Potential for methane.

Greenhouse Gas	Physical Description and Properties	Global Warming Potential (100 years)	Atmospheric Residence Lifetime (years)	Sources
Nitrogen trifluoride (NF_3)	Inorganic, is used as a replacement for PFCs, and is a powerful oxidizing agent.	17,200	740	Electronics manufacture for semiconductors and liquid crystal displays.

Source: Compiled by Rincon Consultants, Inc. in March 2020