



INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM

For ER # 0650-2020

1. Project Title:

SLO Airport Hotel Project

2. Lead Agency Name and Address:

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

3. Contact Person and Phone Number:

Shawna Scott, Senior Planner
(805) 781-7176

4. Project Location:

950 & 990 Aero Drive (APN 053-412-010 & 053-412-011), San Luis Obispo, CA (project site)

5. Project Sponsor's Name and Address:

Sunsmit, LLC
Attn: Sanjay Ganpule
280 Foxtail Lane
Templeton, CA 93465

6. General Plan Designations:

Business Park

7. Zoning:

Business Park-Specific Plan (BP-SP)
Airport Area Specific Plan, Safety Area S-1C (AASP)

8. Description of the Project:

The proposed project includes the construction and operation of a new dual-branded three-story hotel with surface parking on a site comprised of approximately 5.04 acres located at 950 and 990 Aero Drive (APNs 053-412-010 and 053-412-011) in the city of San Luis Obispo, California (Figures 1 and 2). The project site is located at the corner of Aero Drive and Broad Street (Highway 227) and bordered by the San Luis Obispo County Regional Airport to the south and west. The property is zoned Business Park (BP), within the Airport Area Specific Plan (AASP), and within the Airport Land Use Planning Area zones 4 and 5.

The new hotel would consist of two buildings (Building A and Building B) with 204 guest rooms, guest amenities such as an outdoor patio and dining area, meeting space, fitness room, breakfast area, and bar. The proposed hotel would be approximately 125,000 square feet with a maximum height of 45 feet for occupied buildings and 52 feet for non-occupied space. The development would provide 214 vehicle parking spaces, including eight accessible parking spaces, 18 clean air/vanpool parking spaces, 20 electric vehicle (EV)-ready parking spaces, 51 EV-capable

parking spaces, 12 motorcycle parking spaces, 22 bicycle parking spaces, and one loading space pursuant to City Zoning Regulations 17.72.040. The project also includes 219,570 square feet of landscaping. Plans for the project are illustrated in Figures 3 through 5.

Project construction would require approximately 10,000 cubic yards (cy) of cut and 8,900 cy of fill for a total of 18,900 cy of earthwork. Construction is anticipated to last approximately 20 months, beginning in March 2022. Construction would result in approximately 4.33 acres of ground disturbance and approximately 1.8 acres of impervious pavement. Construction would require a scraper, water truck, backhoe, compactor, and skip loader for grading activities; a telescopic forklift and skid steer for building construction; and a skip loader, grader, compactor, and asphalt paver for paving activities.

The proposed project would result in a Floor Area Ratio (FAR) of 0.58 (127,200/219,570). The project site is in the BP zone within the AASP, which allows for a maximum building height of 45 feet for occupied buildings, up to 52 feet for non-occupied architectural features,¹ a maximum lot coverage of 75%, and a maximum FAR of 0.6. The proposed three-story hotel would be designed with contemporary materials, architectural reliefs, and distinguishing color combinations. The architectural style of the hotel would combine the “airport architecture” with hotel architecture. Metal awnings, metal trellises, and low planter walls would create appealing dining and meeting places. A mix of trees, bushes, and groundcovers varying in textures, colors, form, and height would enhance the development and patio and outdoor areas. Access to the project site would be provided via a new driveway 300 feet west of the Broad Street/Aero Drive intersection and a porte cochère is proposed to allow traffic flow within the parking area for guest registration and parking. Visual simulations have been prepared by the applicant for the proposed project and are shown on Figures 6a through 6g. The proposed development program details are summarized in Table 1, and the project site plans are included as Attachment 1.

Table 1. Project Development Program

Site Details	Proposed	Allowed/Required
Setbacks		
Street to Building	>70 feet	16 feet
Street to Parking	10 feet	10 feet
Other Property Lines	40 feet	0 feet
Maximum Height of Structures		
Occupied Buildings	45 feet	45 feet
Non-occupied Features	52 feet	52 feet
Floor Area Ratio (FAR)	0.58	0.6
Building Coverage	70%	90%
Public Art	Paying In-lieu Fee	Provide or Pay In-lieu Fee
Total No. Parking Spaces	214	204
Electric Vehicle Parking	20 EV Ready, 51 EV Capable	20EV Ready, 51 EV Capable
Bicycle Parking	22	21

The project proposes one loading space. Due to the nature of the hotel business, loading spaces are not critical. An exception to City Zoning Regulation 17.72.100 to reduce the required three loading spaces to one space is requested. Additionally, the signage proposed on the hotel would be placed above the architectural reliefs at the entry and in strategic locations (see Figures 6a through 6g). Placing the signage at these locations would require

¹ Airport Area Specific Plan Table 4.9: San Luis Obispo Airport Area Specific Plan Maximum Building Height Standards

the signage to exceed the 25-foot height limit.² The signage would be attached to the building, not free standing. An exception to the height limit identified in the Sign Regulations is being requested for this project.

Water service for the proposed project would be provided by the City's Utilities Department and the project would require a total annual water demand of approximately (87.72 acre-feet). The project would be served by the City's sewer system and would include the installation of a new sewer lateral to connect to existing City sewer infrastructure. Estimated average dry weather flow would be 14,280 gallons per day (City of San Luis Obispo 2020).

The project site is in the AASP area of the city and is generally surrounded by one- and two-story commercial office uses and a few remaining unimproved parcels. The San Luis Obispo Regional Airport is located less than 500 feet southwest of the project site, and residential subdivisions are prominent northeast of the project site across Broad Street (e.g., along Goldenrod Lane approximately 700 feet northeast). The project site currently consists of one unimproved, unoccupied parcel and a second parcel previously used as an overflow parking area that the project sponsor is requesting to be merged as part of the proposed project.

The proposed project site consists of ruderal herbaceous vegetation and non-native trees in the western portion of the site, which has been previously disturbed and consistently mowed since the early 2000s. The project site is located within the San Luis Obispo Creek watershed, approximately 2 miles east of the East Fork of the San Luis Obispo Creek. The project area is characterized by flat to gently sloping land with a steep slope located at the southwest edge of the parcel. There is an unnamed drainage bordering the site that flows generally northwest across the southwestern portion of the project area. The drainage enters the area through a culvert under Aero Drive and flows west along the edge of the project area before making a 90-degree bend and continuing north-northwest for approximately 400 feet, where it flows into a 36-inch culvert in the northwest corner of the project area. The drainage is ephemeral, conveying surface flows from the project parcel and adjacent developments during periods of significant rainfall. The proposed project includes a 35-foot-wide setback from jurisdictional aquatic features located in the southern and western portions of the site.

Since the project site is currently unimproved and allows for the infiltration of stormwater at the site, the project would install a storm drain system, including a catch basin and detention system. A water line, water meter, fire line, and fire hydrant are also proposed.

During operation, a maximum of 604 people would be on-site. On a typical day, the project would be expected to generate an average of 1,822 daily weekday trips, of which 102 would occur during the a.m. peak hour and 131 during the p.m. peak hour.

The proposed project's potential for cumulatively considerable impacts has been evaluated in Section 21, Mandatory Findings of Significance.

9. Project Entitlements:

Major Development Review
Conditional Use Permit

10. Surrounding Land Uses and Settings:

Surrounding uses and stories of surrounding buildings are summarized below:

- Northeast: one- and two-story commercial offices and buildings
- Northwest: one- and two-story commercial office buildings and restaurant buildings (i.e., SLO Brew Rock)
- Southwest: ephemeral drainage, San Luis Obispo County Regional Airport, and ancillary features (i.e., Airport parking lot, buildings)
- Southeast: one- and two-story commercial offices and buildings

² City Municipal Code 15.40.070.A.1: The maximum height of wall signs on multi-story buildings is the uppermost point of the second story unless additional height is approved through a sign program or exception as provided in Sections 15.40.485 and 15.40.600.

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

Native American Tribes were notified on December 11, 2020, about the project consistent with City and State of California regulations, including, but not limited to, Assembly Bill 52, and no tribe requested consultation. The Salinan Tribe responded to the consultation invitation with a request that: (1) if any resources are unearthed that all work to stop in the area until a qualified archaeologist can evaluate the find, and (2) if humans remains are unearthed that all work stop and State law be followed. This request has been incorporated into the Mitigation Monitoring and Reporting Program.

- 12. Other public agencies whose approval is required:**

San Luis Obispo County Air Pollution Control District
Regional Water Quality Control Board (Central Coast)

Figure 1. Project Vicinity Map

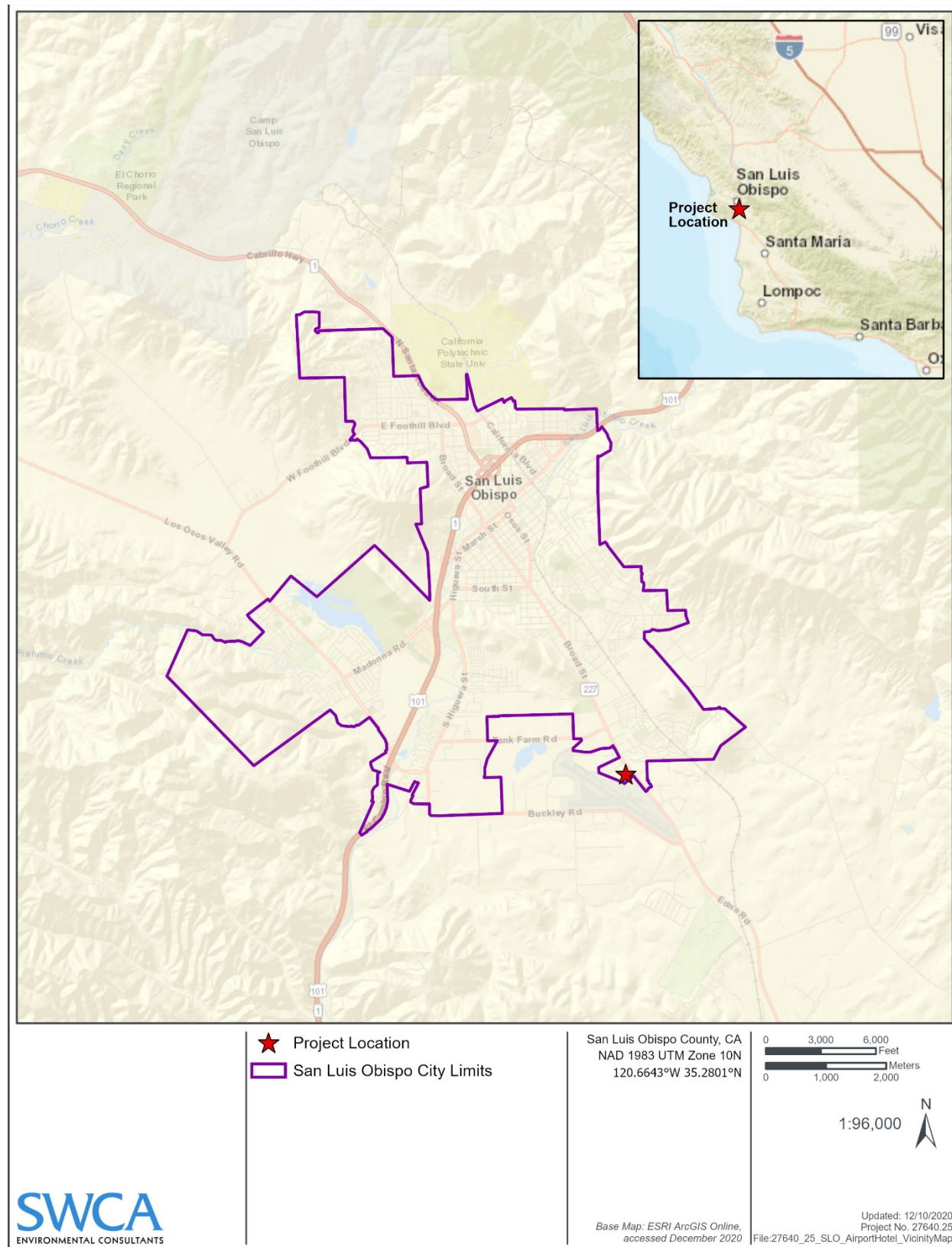
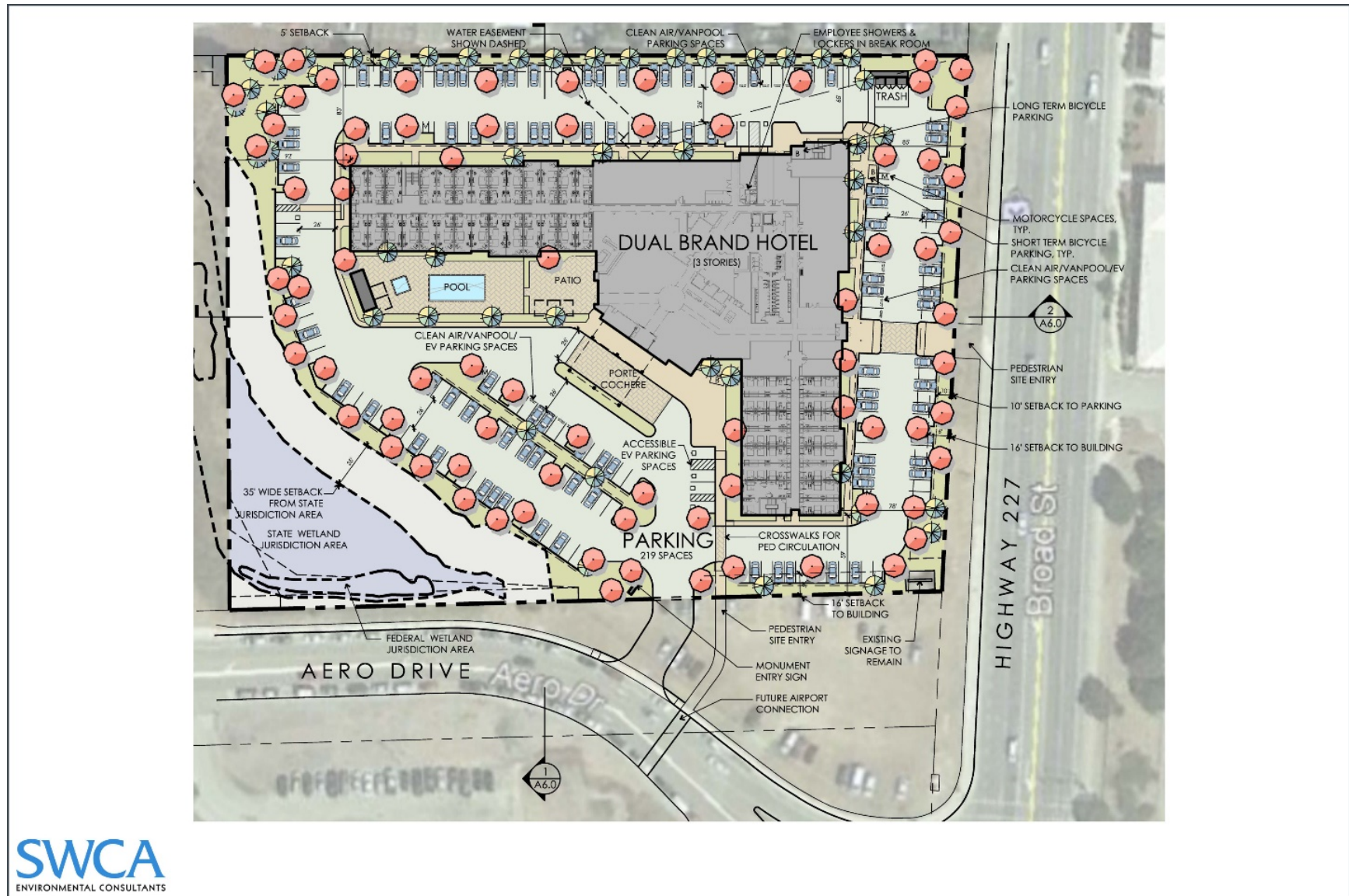


Figure 2. Project Location Map.



Figure 3. Conceptual Site Plan



The site plan illustrates the layout of the proposed hotel building, showing the distribution of guestrooms, common areas, and outdoor amenities. The building is oriented with its long side running horizontally. The top left section is designated for Hotel Brand 2, consisting of 27 guestrooms. The bottom right section is for Hotel Brand 1, consisting of 118 guestrooms. The central part of the building contains a large lobby entrance, dining area, bar, kitchen, and buffet. To the right of the central area are meeting spaces, a pre-function area, and a fitness center. Outdoor amenities include a pool/spa, pool equipment/restroom, and a courtyard with fire pits. The plan also shows a porte cochere, laundry, and various support spaces like electric/mechanical, storage, and restrooms. Dimensions are provided for various sections of the building.

Figure 5. Proposed Second Floor Plan (Third Floor Similar)



Figure 6a. Visual Simulations



SWCA
ENVIRONMENTAL CONSULTANTS

Figure 6b. Visual Simulations



Figure 6c. Visual Simulations



Figure 6d. Visual Simulations



Figure 6e. Visual Simulations



Figure 6f. Visual Simulations



Figure 6g. Visual Simulations



ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

FISH AND WILDLIFE FEES

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

STATE CLEARINGHOUSE

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

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	<input type="checkbox"/>
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made, by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	<input checked="" type="checkbox"/>
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	<input type="checkbox"/>
I find that the proposed project MAY have a “potentially significant” impact(s) or “potentially significant unless mitigated” impact(s) on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed	<input type="checkbox"/>
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	<input type="checkbox"/>



Signature

April 6, 2021

Date

Shawna Scott, Senior Planner

Printed Name

For: Michael Codron,

Community Development Director

EVALUATION OF ENVIRONMENTAL IMPACTS

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

1. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	1, 3	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, open space, and historic buildings within a local or state scenic highway?	2, 4, 8	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	1, 3, 4, 5	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	1, 5	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Evaluation

The proposed project site is located in the AASP portion of the city and is surrounded by one- and two-story commercial offices and scattered restaurant buildings in all directions. The San Luis Obispo County Regional Airport is located less than 500 feet southwest of the project site. The project site consists of one unimproved, currently unoccupied parcel and a second parcel previously used as a parking lot that are proposed to be merged as part of the proposed project. The area is dominated by ruderal herbaceous vegetation and non-native trees in the western portion of the site. The project site has been previously disturbed and considerably altered through past land conversion. The project area is characterized by flat to gently sloping land with a steep slope located at the southwest edge of the site. There is an unnamed drainage that flows generally northwest across the southwestern portion of the project area.

The topography of the city is generally defined by several low hills and ridges, such as Righetti Hill, Bishop Peak, and Cerro San Luis. These are three of the nine peaks known as the Morros and provide scenic focal points for much of the city. The project vicinity exhibits intermittent views of nearby natural landmarks, including Cerro San Luis. The terrain within the project site is relatively flat, with the elevation ranging from 157 to 162 feet above sea level.

Based on the City's Conservation and Open Space Element (COSE) map of scenic roadways and vistas, Broad Street, located adjacent to the eastern boundary of the project site, is designated as having high scenic value. The AASP identifies specific goals, policies, and design guidelines and standards intended to protect and enhance the visual quality and character of the AASP area and land uses with the BP land use designation. Policies in the AASP include, but are not limited to, maintaining community character and assuring a desirable setting for the types of businesses that are the primary reason for business parks. The BP land use designation is generally intended for well-designed, master-planned, campus-type developments that will contribute to community character and the City's objective of attracting jobs that can support households within the city. The AASP Design Guidelines and Standards for the physical development and design of new projects within the Airport Area, include, but are not limited to, the following:

- 5.1.1: Principal buildings shall be oriented parallel to the street.
- 5.1.4: Buildings shall have architecturally articulated entry features facing the street.
- 5.4.1: Parking lots shall be located at the rear or side of buildings, rather than between the front facade of the building and the street. Side parking shall not exceed 40% of the frontage of the lot on the primary street.
- 5.4.4: Parking lots shall be planted with shade trees in a pattern and number that can be reasonably expected to shade at least 50% of the lot surface within ten (10) years of planting, and provide a nearly continuous canopy at maturity.
- 5.6.1: Loading docks and refuse collection areas are not permitted in the area between the building and the street.

- 5.6.6: Rooftop mechanical equipment shall be screened by parts of the roof, or architecturally compatible screening features, so the equipment is not visible from the ground outside the site or open space areas to the public. On sites designated Business Park, such screening shall make rooftop equipment not visible from a viewpoint outside the site and at the same height as the equipment.
- 5.10.1: Building facades visible from streets shall vary in modules of 20 meters (66 feet) or less. On any building facade, continuous wall planes longer than 30 meters (100 feet) should be avoided. Where interior functions require longer continuous spaces, exterior walls should have architectural features such as columns or pilasters at least every 20 meters. Such architectural features shall have a depth of at least 3 percent of the length of the facade, and shall extend at least 20 percent of the length of the façade.
- 5.10.2: Facades that face public streets shall use elements such as arcades, awnings, entry features, windows, or other such animating features along at least 60 percent of their horizontal length.
- 5.17.1: Development in the Airport Area is subject to the requirements of the City's Public Art ordinance.
- 5.18.1: Building identity signs shall be limited to major site entries from public roadways. Corporate and business identity signs can be placed on the buildings themselves, as long as they are located near the building entrance and are for identification within the site (i.e., not from public roadways).
- 5.19.1: Provide minimum levels of lighting consistent with public safety standards along public roadways.
- 5.19.4: To maintain a pedestrian scale and reduce ambient light levels, streetlights shall not exceed 20 feet on all other streets.
- 5.19.7: Light fixtures shall be cut-off type fixtures that focus light down toward the ground and shield the light source from surrounding areas not intended to be illuminated.

- a) A scenic vista is generally defined as a high-quality view displaying good aesthetic and compositional values that can be seen from public viewpoints. A substantial adverse effect on a scenic vista would occur if the proposed project would significantly degrade the scenic landscape as viewed from public roads or other public areas. The project is located in an urbanized area of the AASP area with intermittent views of the Irish Hills to the west and the San Lucia Mountains and Foothills to the east. According to the AASP, scenic views from major roads within the AASP area should be preserved (Table 5.4, *San Luis Obispo Airport Area Specific Plan, Roadway View Protection*). Broad Street (north of Buckley Road) is identified as the closest roadway from which views should be preserved, though the AASP recognizes that views of the Irish Hills to the west are too distinct for views to be feasibly maintained while allowing reasonable foreground development.

Based on the City's COSE, the project site is not within the viewshed of a designated scenic vista. Views of the project site from Broad Street would be consistent with existing one- and two-story commercial buildings along the frontage of Broad Street. The proposed building would be similar in height and scale as existing adjacent buildings and the proposed building height would be consistent with the maximum building height allowed by the AASP. The project proponent has requested a modification to allow for hotel signage to exceed the 25-foot height limit at the entry and in other strategic locations (see Figures 6a through 6g), which is generally consistent with other hotel developments in the city outside of the Downtown Core. The project would not substantially obstruct views of the Irish Hills or San Lucia Mountains from Broad Street; therefore, potential impacts associated with adverse effects on a scenic vista would be *less than significant*.

- b) The project site is located approximately 2.47 miles east of U.S. Highway 101 (U.S. 101). Based on the California Department of Transportation (Caltrans) California Scenic Highways online mapping tool, this section of U.S. 101 is eligible for State scenic highway designation but is not officially designated. The City's COSE also identifies Broad Street (approximately 375 feet east of the project site) as having high scenic value (see additional discussion, above [a]). The project site would not be visible to viewers travelling along U.S. 101 due to the distance between U.S. 101 and the project site, as well as the presence of intervening vegetation and development. The project would not substantially damage scenic resources within a local or state scenic highway; therefore, potential impacts would be *less than significant*.

- c) As discussed previously, the project site is located in an urbanized area and is zoned Business Park-Specific Plan (BP-SP) within the AASP. The proposed project must comply with the City's AASP Design Guidelines and was conceptually reviewed by the City's ARC on March 18, 2019, for consistency with the AASP Design Guidelines and Community Design Guidelines. The ARC generally supported the phased project and the conceptual site design with a few suggestions for design modifications. Following the ARC meeting and conceptual review of the project design, the project was revised to avoid impacts to wetland resources in the western portion of the project area and the two hotels were combined into one building (dual-brand hotel). The project as currently proposed would not conflict with applicable zoning and other regulations governing scenic quality; therefore, impacts would be *less than significant*.
- d) Existing sources of nighttime lighting in the vicinity of the project site include airport-related lighting, spillover parking lot lighting from nearby commercial office buildings, interior lighting emanating from nearby commercial parking lot lighting, and intermittent vehicle lighting from vehicles traveling along Aero Drive, Broad Street, and/or parking at the nearby commercial office buildings. The project is required to comply with the City's AASP Design Guidelines pertaining to lighting and the Lighting and Night Sky Preservation Ordinance (17.70.100) standards for outdoor lighting and new development, which include, but are not limited to, requirements for new outdoor light sources to be shielded and directed away from adjacent properties and public rights-of-way, requirements for minimum levels of lighting consistent with public safety standards, and limits to hours of lighting operation. Therefore, impacts from new sources of light or glare would be *less than significant*.

Mitigation Measures

Mitigation measures are not required.

Conclusion

The project is not located within a scenic vista or within the viewshed of a designated scenic highway and would not be highly visible from nearby public roadways designated as having high scenic value. The project has been designed to comply with all applicable standards set forth in the AASP and the City's Community Design Guidelines. No potentially significant impacts associated with aesthetic resources would occur and mitigation measures are not required.

2. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	7	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	3, 7, 8	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	3, 8	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	3, 8	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	3, 8	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

The California Department of Conservation (DOC) classifies and maps agricultural lands in the state in the Farmland Mapping and Monitoring Program (FMMP). The FMMP identifies five farmland categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Farmland of Local Potential. The project site is designated as Urban and Built-Up Land by the FMMP.

The project site is zoned as BP-SP within the City's AASP area. The project site is not located within or immediately adjacent to land zoned for agricultural uses, land under an active Williamson Act contract, or land currently supporting agricultural uses.

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

According to the FMMP, the project site and surrounding land uses are designated as urban and built-up land (DOC 2020). Since the project site is not located on or adjacent to designated Farmland, the project would not result in the conversion of Farmland to non-agricultural use and *no impacts* would occur.

- b) The project site is not located within an Agricultural Zone and is not located within or immediately adjacent to land under an active Williamson Act contract. Therefore, the project would not conflict with existing agricultural zoning or a Williamson Act contract and *no impacts* would occur.
- c,d) The project site does not include land use designations or zoning for forest land or timberland. Additionally, the project site does not contain 10% tree cover that would classify the site as forest land. Therefore, the project would not conflict with zoning for, result in the loss of, or result in the conversion of forest land, timberland, or timberland zoned Timberland Production and *no impacts* would occur.
- e) The project includes construction of a new hotel building and associated parking in the City's AASP area. The project site is surrounded by urbanized commercial uses. The nearest agricultural uses are approximately 0.75 mile west and southeast of the project site. The proposed project would be consistent with surrounding uses and with existing zoning designated for the project site and would not adversely affect agricultural water supplies or other agricultural support facilities.

Therefore, the project would not result in substantial changes in the environment that could result in conversion of nearby agricultural land or forest land to non-agricultural or non-forest use and *no impacts* would occur.

Mitigation Measures

Mitigation measures are not required.

Conclusion

The project site is located in an urbanized area and is not within or adjacent to Farmland, land zoned for agricultural or forest land use, or land under a Williamson Act contract. No potentially significant impacts to agriculture or forest land would occur and mitigation measures are not required.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	2, 9, 10, 11, 12	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	2, 9, 11	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	2, 11, 14, 15	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	2, 11, 15	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Evaluation

This evaluation is based, in part, on the *Emissions Modelling Report for the San Luis Obispo Airport Hotels Project*, prepared by AMBIENT Air Quality & Noise Consulting in January 2021 (included as Attachment 2).

- a) The city of San Luis Obispo is located within the South Central Coast Air Basin (SCCAB), which also includes Santa Barbara and Ventura Counties. Air quality within the SCCAB is regulated by several jurisdictions, including the U.S. Environmental Protection Agency (EPA), California Air Resources Board (CARB), and the San Luis Obispo County Air Pollution Control District (SLOAPCD).

San Luis Obispo County is currently designated as “nonattainment” for the state standards for ozone, partial nonattainment (in eastern San Luis Obispo County, outside of the project area) for federal ambient standards for ozone, and nonattainment for the state standards for particulate matter 10 microns or less in diameter (PM₁₀). The City’s COSE identifies goals and policies to achieve and maintain air quality that supports health and enjoyment for those who live, work, and visit the city. These goals and policies include meeting federal and state air quality standards, reducing dependency on gasoline- or diesel-powered motor vehicles and to encourage walking, biking, and public transit use.

The SLOAPCD has developed a CEQA Air Quality Handbook (most recently updated with a November 2017 Clarification Memorandum) to evaluate project-specific impacts and determine if potentially significant impacts could result from a project. To evaluate long-term emissions, cumulative effects, and establish countywide programs to reach acceptable air quality levels, a Clean Air Plan (adopted 2002) has been adopted by the SLOAPCD.

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. The CARB has identified the following groups who are most likely to be affected by air pollution (i.e., sensitive receptors): children under 14, the elderly over 65 years of age, athletes, and people with

cardiovascular and chronic respiratory diseases. The nearest sensitive receptors to the project site are the single-family residences located approximately 540 feet northeast of the project site.

Naturally Occurring Asbestos (NOA) has been identified as a toxic air contaminant by the CARB. Any ground disturbance proposed in an area identified as having the potential to contain NOA must comply with the CARB Airborne Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations. The SLOAPCD Naturally Occurring Asbestos Map indicates that the project site is located within an area identified as having a potential for NOA to occur.

In order to be considered consistent with the 2001 San Luis Obispo County Clean Air Plan (2001 CAP), a project must be consistent with the land use planning and transportation control measures and strategies outlined in the 2001 CAP. The project proposes infill development within the AASP area consistent with existing General Plan land use and zoning designations. The project would be easily accessible by Class II bicycle lanes on Broad Street and would include adequate secure bicycle storage, showers on-site, and posting and distribution of public transportation information (consistent with City regulations) to encourage employees to use alternative modes of transportation. The hotel would also provide a shuttle service for guests to the city's downtown area to encourage alternate modes of transportation. The project would, therefore, be consistent with the land use policies identified in the 2001 CAP that encourage cities to develop at higher densities and encourage growth within their respective urban reserve lines to reduce overall vehicle trips and travel distances.

Transportation Control Measures (TCMs) are controls implemented at the local or regional level to reduce emissions resulting from the use of motor vehicles. TCMs are primarily intended to reduce vehicle use by promoting and facilitating the use of alternative transportation options. Many of the TCMs identified within the 2001 CAP are not applicable to the project, such as campus trip reduction programs, local and regional public transportation improvements, motor vehicle inspection programs, and maintenance and development of park-and-ride lots throughout the county. The project proposes infill development within the AASP area and would include a variety of features that would be consistent with the TCMs in the 2001 CAP, including pedestrian- and bicycle-friendly site design, compact infill development within the City's existing urban reserve line, and accessibility to an existing San Luis Obispo Transit stop along Broad Street southbound on Aero Drive, approximately 350 feet east of the project site. The project would be consistent with the 2001 CAP TCM to promote bicycle use through provision of on-site bicycle parking and connectivity to the regional bicycle network, bicycle storage, showers, lockers, and changing room facilities to encourage project employees to bike to and from work. The project site is located within immediate proximity of Class II bicycle lanes on Broad Street, as identified in the City of San Luis Obispo Bicycle Transportation Plan. The project would therefore be consistent with the land use policies and TCMs identified in the 2001 CAP that encourage cities to develop at higher densities and encourage growth within their respective urban reserve lines to reduce overall vehicle trips and travel distances. Potential impacts related to a conflict with an air quality plan would be *less than significant*.

- b) San Luis Obispo County is currently designated as non-attainment for ozone and PM₁₀ under state ambient air quality standards. Construction of the project would result in emissions of ozone precursors including reactive organic gasses (ROG), nitrous oxides (NO_x), and fugitive dust emissions (PM₁₀). During operation, the project would result in emissions of ozone precursors associated with mobile source emissions and other stationary sources.

Construction Emissions

The project would result in the disturbance of approximately 5.04 acres and would require approximately 10,000 cy of cut and 8,900 cy of fill for a total of 18,900 cy of total earthwork. This would result in the generation of construction dust as well as short- and long-term construction vehicle emissions, including diesel particulate matter (DPM), ROG, NO_x, and PM₁₀. Based on the screening emission rates for construction operations in the SLOAPCD CEQA Air Quality Handbook, as shown in Table 2, and assuming a reasonable worst-case scenario of earth movement for the proposed hotel, the project's construction emissions would not exceed the SLOAPCD's applicable threshold for ROG/NO_x, DPM, or PM₁₀.

Table 2. Screening Emission Rates for Project Construction

Criteria Pollutant	Total Project Emissions	SLOAPCD Threshold	Exceeds Threshold?
Reactive Organic Gases (ROG) + Nitrogen Oxides (NO _x)	65.11 lbs/day	137 lbs/day	No
Diesel Particulate Matter (DPM)	2.73 lbs/day	7 lbs/day	No
Fugitive Particulate Matter (PM ₁₀)	0.22 ton/quarter	2.5 tons/quarter	No

The project does not exceed SLOAPCD screening emission rates for construction activities. However, SLOAPCD's CEQA Air Quality Handbook recognizes special conditions, such as proximity to sensitive receptors, that require implementation of standard construction mitigation measures to reduce diesel idling (DPM) and fugitive dust. Due to the project's proximity to surrounding residential areas (less than 1,000 feet), standard measures for reducing DPM and fugitive dust are required and have been included as Mitigation Measures AQ-1 and AQ-2. Therefore, potential air quality impacts associated with project construction would be *less than significant with mitigation*.

Operational Impacts

Implementation of the project would result in an increase in vehicle trips, energy use, and architectural coating off-gassing that would generate criteria pollutant emissions. Based on the SLOAPCD's operational screening criteria for air quality analyses, the project would not exceed the identified operational thresholds established by the SLOAPCD (Table 3).

Table 3. Screening Emission Rates for Project Operation

Criteria Pollutant	Total Project Emissions	APCD Threshold	Exceeds Threshold?
Reactive Organic Gases (ROG) + Nitrogen Oxides (NO _x)	16.12 lbs/day	25 lbs/day	No
Diesel Particulate Matter (DPM)	0.29 lbs/day	1.25 lbs/day	No
Fugitive Particulate Matter (PM ₁₀)	9.0 lbs/day	25 lbs/day	No

As shown in Table 3, the project would not exceed SLOAPCD screening emission rates for operational activities; therefore, impacts from criteria pollutants during project operation would be *less than significant*.

- c) The nearest sensitive receptors to the project site are the single-family residences located approximately 540 feet northeast of the project site, across Broad Street. Construction activities such as excavation, grading, vegetation removal, staging, and building construction would result in temporary construction vehicle emissions and fugitive dust that may affect surrounding sensitive receptors. Based on the SLOAPCD CEQA Air Quality Handbook, construction activities within 1,000 feet of sensitive receptors require standard dust and DPM reduction measures. Mitigation Measures AQ-1 and AQ-2 have been identified to reduce exposure of sensitive receptors to adverse construction vehicle emissions and fugitive dust; therefore, impacts would be *less than significant with mitigation*.
- d) Construction of the proposed project would generate odors associated with construction smoke, dust, and equipment exhaust and fumes. The proposed construction activities would not differ significantly from those resulting from any other type of construction project. Any effects would be short-term in nature and limited to the construction phase of the proposed project.

The SLOAPCD Naturally Occurring Asbestos Map indicates the project site is located within an area identified as having a potential for NOA to be present. The project would include approximately 18,900 cy of total earthwork, removal of low-lying vegetation, and construction of the proposed development. Pursuant to SLOAPCD requirements and the CARB ATCM for Construction, Grading, Quarrying, and Surface Mining Operations (CARB ATCM Section 93105), the applicant is required to provide geologic evaluation prior to any construction activities and comply with existing regulations regarding NOA, if present. Mitigation Measures AQ-3 and AQ-4 have been identified to require the applicant to complete a geologic evaluation and follow all applicable protocol and procedures if NOA is determined to be present.

on-site. The applicant is also required to comply with SLOAPCD regulations related to materials containing asbestos (Mitigation Measure AQ-5). Based on compliance with identified mitigation and existing regulations, potential impacts associated with other emissions would be *less than significant with mitigation*.

Mitigation Measures

AQ-1 During all construction activities and use of diesel vehicles, the applicant shall implement the following idling control techniques:

1. **Idling Restrictions Near Sensitive Receptors for Both On- and Off-Road Equipment**
 - a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors if feasible;
 - b. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted;
 - c. Use of alternative fueled equipment shall be used whenever possible; and
 - d. Signs that specify the no idling requirements shall be posted and enforced at the construction site.
2. **California Diesel Idling Regulations.** On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:
 - a. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and,
 - b. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.

Signs must be posted in the designated queuing areas and job sites to remind drivers of the 5-minute idling limit. The specific requirements and exceptions in the regulation can be reviewed at the following website: www.arb.ca.gov/msprog/truck-idling/2485.pdf.

AQ-2 During all construction and ground-disturbing activities, the applicant shall implement the following particulate matter control measures and detail each measure on the project grading and building plans:

1. Reduce the amount of disturbed area where possible.
2. Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding San Luis Obispo County Air Pollution Control District (SLOAPCD) limit of 20% opacity for no greater than 3 minutes in any 60-minute period. Increased watering frequency shall be required whenever wind speeds exceed 15 miles per hour (mph) and cessation of grading activities during periods of winds over 25 mph. Reclaimed (non-potable) water is to be used in all construction and dust-control work.
3. All dirt stockpile areas (if any) shall be sprayed daily and covered with tarps or other dust barriers as needed.
4. Permanent dust control measures identified in the approved project revegetation and landscape plans shall be implemented as soon as possible, following completion of any soil-disturbing activities.
5. Exposed grounds that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating, non-invasive, grass seed and watered until vegetation is established.
6. All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical binders, jute netting, or other methods approved in advance by the SLOAPCD.
7. All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible. In addition, building pads shall be laid as soon as possible after grading unless seeding or soil binders or soil binders are used.
8. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.

9. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or shall maintain at least 2 feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code Section 23114.
10. Install wheel washers where vehicles enter and exit unpaved roads onto streets or wash off trucks and equipment leaving the site. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads.
11. Water sweepers shall be used with reclaimed water where feasible. Roads shall be pre-wetted prior to sweeping when feasible.
12. All PM₁₀ mitigation measures required shall be shown on grading and building plans.
13. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below the SLOAPCD limit of 20% opacity for no greater than 3 minutes in any 60-minute period. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Compliance Division prior to the start of any grading, earthwork, or demolition.

AQ-3 Prior to initiation of demolition/construction activities, the applicant shall retain a registered geologist to conduct a geologic evaluation of the property including sampling and testing for naturally occurring asbestos in full compliance with California Air Resources Board (CARB) Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (CARB ATCM Section 93105) and SLOAPCD requirements. This geologic evaluation shall be submitted to the City Community Development Department upon completion. If the geologic evaluation determines that the project would not have the potential to disturb naturally occurring asbestos (NOA), the applicant must file an Asbestos ATCM exemption request with the San Luis Obispo County Air Pollution Control District (SLOAPCD).

AQ-4 If naturally occurring asbestos (NOA) are determined to be present on-site, proposed earthwork and construction activities shall be conducted in full compliance with the various regulatory jurisdictions regarding NOA, including the California Air Resources Board (CARB) Asbestos Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (CARB ATCM Section 93105) and requirements stipulated in the National Emission Standards for Hazardous Air Pollutants (40 Code of Federal Regulations 61, Subpart M – Asbestos; NESHAP). These requirements include, but are not limited to, the following:

1. Written notification, within at least 10 business days of activities commencing, to the San Luis Obispo County Air Pollution Control District (SLOAPCD);
2. Preparation of an asbestos survey conducted by a Certified Asbestos Consultant; and,
3. Implementation of applicable removal and disposal protocol and requirements for identified NOA.

AQ-5 Asbestos Material in Demolition. Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos-containing material (ACM). ACMs could be encountered during demolition or remodeling of existing buildings. Asbestos can also be found in utility pipes/pipelines (transite pipes or insulation on pipes). If utility pipelines are scheduled for removal or relocation or a building(s) is proposed to be removed or renovated, various regulatory requirements may apply, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40 Code of Federal Regulations [CFR] 61, Subpart M - asbestos NESHAP). These requirements include but are not limited to: (1) notification to the APCD; (2) an asbestos survey conducted by a Certified Asbestos Inspector; and (3) applicable removal and disposal requirements of identified ACM. More information on asbestos can be found at <http://www.slocleanair.org/business/asbestos.php>.

Conclusion

Standard mitigation measures have been identified above to address potential project impacts associated with sensitive receptors' exposure to air pollutants and potential impacts associated with NOA and materials containing asbestos. Upon implementation of these measures, residual impacts associated with air quality would be less than significant.

4. BIOLOGICAL RESOURCES

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	1, 55, 56	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	1, 55, 56	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	17, 55, 56	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	55, 56	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	3, 16	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	3	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

This evaluation is based, in part, on the *Biological Constraints Memorandum for a Proposed Project at 950 and 990 Aero Drive, San Luis Obispo, California*, prepared by Terra Verde Environmental Consulting (Terra Verde) in February 2020 (included as Attachment 3), and the *Waters and Wetland Delineation Report for Aero Drive Hotel Project at 950 and 990 Aero Drive, San Luis Obispo, California*, prepared by Terra Verde in February 2020 (included as Attachment 4).

The city is generally surrounded by open space, rangeland used for grazing, and other agricultural uses that support a variety of natural habitats and plant communities. The city's many creeks provide sheltered corridors that allow local wildlife to move between habitats and open space areas. The City's COSE identifies various goals and policies to maintain, enhance, and protect natural communities within the City's planning area. These policies include, but are not limited to, protection of listed species and species of special concern, preservation of existing wildlife corridors, protection of significant trees, and maintaining development setbacks from creeks.

The project site is in a developing portion of the city within the AASP area and is surrounded by commercial office and building uses, roadways, and is located directly northwest of the San Luis Obispo County Regional Airport. The project site currently consists of one unimproved, unoccupied parcel and a second parcel previously used as a parking lot that are proposed to be merged as part of the proposed project. The project area is dominated by ruderal herbaceous vegetation and non-native trees in the western portion of the area. The project site has been previously disturbed and considerably altered through past land conversion. The project area is characterized by flat to gently sloping land with a steep slope located at the southwest edge of the parcel. There is an unnamed drainage and associated wetland bordering the site that extends northwest across the southwestern portion of the project area. The project site is regularly mowed to control the growth of vegetation for fire control, as required by the City.

- a,b) Although unimproved, the project site is located in the developing AASP area and is largely surrounded by commercial office uses. The topography, soils, and vegetation of the project site and surrounding areas have been altered considerably through past maintenance activities, land conversion, and construction of adjacent commercial developments. The site has been regularly mowed since the early 2000s for fire control, as required by the City. The results of a literature review and observed site conditions indicate that three special-status plant species, two special-status animal species, and migratory nesting birds and raptors have the potential to occur on the project site or within the project vicinity. In addition to these species, jurisdictional aquatic habitat was observed within the southwestern portion of the survey area with marginally suitable habitat for vernal pool fairy shrimp (VPFS) (*Branchinecta lynchi*) and California red-legged frog (CRLF) (*Rana draytonii*). No special-status species were observed during field surveys conducted in November 2019, which is outside of the appropriate blooming period for most special-status plant species.

Special-Status Plant Species

Due to the high degree of land manipulation (e.g., placed fill, regular mowing etc.) within the project site, the habitat present is only marginally suitable for supporting special-status plant species. Low-suitability habitat is present within the project site for the following species:

- Congdon's tarplant (*Centromadia parryi* subsp. *congdonii*), California Rare Plant Rank (CRPR) 1B.1;
- Hoover's button-celery (*Eryngium aristulatum* var. *hooveri*), CRPR 1B.1; and
- Adobe sanicle (*Sanicula maritima*), State Rare / CRPR 1B.1.

No special-status plant species were observed during the survey. Low-suitability habitat is present within the drainage and associated wetland habitat on-site for Congdon's tarplant, Hoover's button-celery, and adobe sanicle. If present, Congdon's tarplant would have been detectable at the time of surveys completed for the project site; therefore, the species is not expected to occur on-site. Though considered unlikely due to degraded site conditions, Hoover's button-celery and adobe sanicle may be present within the ephemeral drainage and associated wetland habitat located in the southwestern portion of the project site. Presence of these species would not have been observed during the field survey conducted in November 2019. As shown on Figure 3, the project would avoid impacts to the ephemeral drainage and associated wetland habitat present within the project site through project design and the identified setback of 35 feet from State jurisdictional features. Implementation of Mitigation Measure BIO-2 would further ensure direct and indirect impacts to hydrological resources and habitat suitable for special-status plant species are avoided by requiring mapping and delineation of work areas and implementation of Best Management Practices (BMPs).

Special-Status Animal Species

The potential for any special-status animal species is considered low due to the disturbed nature of existing habitat within the project area, annual disturbance associated with ongoing site maintenance, and the lack of continuity with areas of adjacent suitable habitat. Special-status animal species determined to have low potential to occur on site include:

- Vernal pool fairy shrimp (*Branchinecta lynchi*), Federal Threatened; and
- California red-legged frog (*Rana draytonii*), Federal Threatened, State Species of Special Concern (SSC).

No special-status animal species were documented during the survey conducted in November 2019. Very low-suitability habitat is present within the ephemeral drainage for VPFS and CRLF. CRLF may temporarily occupy the drainage when water is present; however, the drainage does not provide suitable breeding habitat due to its flashy and ephemeral flows and its lack of protective cover, nor does it maintain natural connection to downstream aquatic features such as the East Fork of San Luis Obispo Creek. The nearest documented occurrence of CRLF is from 2006, approximately 2 miles from the project site.

In addition to the surveys completed by Terra Verde in 2019, wet and dry season protocol surveys were conducted for VPFS by David Wolff Environmental (DWE) in 2007 (DWE 2008b). No VPFS were observed during the protocol wet season surveys. Two intact cysts and one broken cyst identified to the genus *Branchinecta* were documented by Dr. Marie A. Simovich in the soil samples collected for the protocol dry season surveys. It was Dr. Simovich's opinion that habitat with viable populations of fairy shrimp contain cysts in much higher densities than that found in the samples from this drainage (DWE 2008b). In addition, the hydroperiod for ponded water within the drainage, based on current site conditions,

is not expected to support a breeding population of VPFS. Based on the results of the 2007 protocol-level survey coupled with the 2019 assessment of current site conditions, the likelihood of VPFS occurrence on-site is considered low.

The project does not propose work within the ephemeral drainage located in the southwestern portion of the project area and CRLF and VPFS are not expected to be present at the project site based on a field survey and desktop review conducted in November 2019. However, Mitigation Measure BIO-1 is included in the event that a special-status species is observed during project construction.

Suitable habitat for nesting birds and raptors is present within the project area, particularly in the ornamental trees along the northwest corner of the project site. Potential impacts to nesting birds and raptors are considered low because the project site is an infill site located near the airport and experiences a regular level of disturbance from vegetation maintenance and other surrounding land uses. A minimal amount of foraging habitat would be lost as a result of development. Avian species that may occur in or near the project site could be directly impacted if initial clearing, grubbing, grading, and/or construction activities occur during the typical avian nesting season (February 1–September 15), risking the possibility of nest failure. Indirect impacts could include disturbance associated with noise and dust during nesting activities. Mitigation Measure BIO-3 has been included to ensure potential impacts would be avoided and/or minimized to a less-than-significant level. Therefore, impacts would be *less than significant with mitigation*.

- c) There are no mapped blue line creeks within or immediately adjacent to the proposed area of disturbance. A portion of an unnamed ephemeral drainage extends along the southwestern property boundary. The drainage conveys water from the adjacent parking lot south of Aero Drive across the western portion of the project site before entering a 36-inch culvert in the northwest corner of the project site. The drainage is ephemeral, conveying surface flows from the project site and adjacent developments during periods of significant rainfall. To confirm the presence of wetlands along the ephemeral drainage, a wetland delineation was completed by Terra Verde in October 2019. Prior to the field delineation, a desktop review was conducted for the project site which included a review of current and historical aerial imagery, the Natural Resources Conservation Service (NRCS) Web Soil Survey of San Luis Obispo County, U.S. Geological Survey (USGS) topographic maps, regional weather data, the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI), and preliminary site development plans. Within the project area, the drainage displayed intermittent evidence of ordinary high-water mark (OHWM) and a clearly defined bed and bank. Portions of the drainage are likely considered non-wetland waters of the United States, based on the presence of a clearly defined OHWM identified by a distinct transition in vegetative cover, debris wracking, scour, and connectivity to traditionally navigable waters (the East Fork of San Luis Obispo Creek). Areas displaying evidence of OHWM are limited to two sections of the channel: (1) immediately downstream of the culvert under Aero Drive, and (2) in the section downstream of SP-04 until the central wetland (see Figures 3 and 5 in Attachment 4). These areas are connected by areas of federal-defined wetlands and also some transitional areas where seasonal flows become less concentrated, fanning out into a wide floodplains and in-channel wetlands. These transitional areas did not display evidence of OHWM.

The jurisdictional waters identified within the survey area fall under the regulatory jurisdiction of the U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and Regional Water Quality Control Board (RWQCB), as shown in Table 4.

Table 4. Extent and Location of Jurisdictional Waters and Wetlands

Feature Type	Jurisdiction	Acres	Linear Feet
Waters of the United States	USACE	0.009	206
Waters/Wetlands of the State	CDFW, RWQCB	0.63	650
Federal Wetlands	USACE	0.13	N/A

The project proposes to create a minimum 35-foot setback from the ephemeral drainage and associated wetland habitat located in the southwestern portion of the project area. The project proposes the construction of a retaining wall to separate the proposed parking lot from the wetland area during project operation. The project is not expected to directly affect any jurisdictional wetlands; however, Mitigation Measure BIO-2 has been identified to mitigate potential construction-related impacts to jurisdictional wetlands. Therefore, project impacts related to jurisdictional wetlands would be *less than significant with mitigation*.

- d) The project is not located within an area designated as a wildlife corridor within the COSE. In general, the project site does not contain habitat features conducive to migratory wildlife species; however, an ephemeral drainage corridor and connectivity with adjacent undeveloped areas may offer limited wildlife movement, particularly when the ephemeral drainage is flowing.

Suitable habitat for nesting birds and raptors is present within the project area, particularly in the ornamental trees along the northwest corner of the project site. Potential impacts to nesting birds and raptors are considered low because the project site is an infill site located near the airport and experiences a regular level of disturbance from vegetation maintenance and other surrounding land uses. A minimal amount of foraging habitat would be lost as a result of development. Avian species that may occur in or near the project site could be directly impacted if initial clearing, grubbing, grading, and/or construction activities occur during the typical avian nesting season (February 1–September 15), risking the possibility of nest failure. Indirect impacts could include disturbance associated with noise and dust during nesting activities. Mitigation Measure BIO-2 has been included to ensure potential impacts to the ephemeral drainage and ornamental trees would be avoided and/or minimized to a less-than-significant level. Therefore, impacts would be *less than significant with mitigation*.

- e) The project site does not contain any heritage trees or significant native vegetation. The project site has been regularly mowed for fire control, as required by the City, preventing the growth of protected tree species. The existing mature ornamental trees along the northwestern property boundary would be protected by the proposed 35-foot setback for the wetland habitat and the project would be required to comply with the City's Tree Ordinance (Chapter 12.24 of the City's Municipal Code). Additional coast live oak (*Quercus agrifolia*), California pepper (*Schinus mole*), and other ornamental trees would be planted throughout the project site as landscaping. Therefore, the project would not adversely affect any heritage trees designated by the Heritage Tree Program or other protected trees.

The COSE includes various goals and policies to maintain, enhance, and protect natural communities within the City's planning area. These policies include, but are not limited to, protecting listed species and SSC, preserving existing wildlife corridors, protection of significant trees, and maintaining development setbacks from creeks. The project site provides marginal habitat for special-status species and potential impacts to these species would be mitigated with standard avoidance measures. The project site does not provide significant value as a wildlife corridor and does not contain significant mature or native trees. Per the site plans for the proposed project (refer to Attachment 1), the project design includes setback a minimum of 35 feet to avoid impacts to the ephemeral drainage and associated wetland habitat. The project would not result in a conflict with local policies or ordinances protecting biological resources and impacts; therefore, the potential impacts associated with conflicts with local policies would be *less than significant*.

- f) The project is not located within an area under an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with the provisions of an adopted plan and *no impacts* would occur.

Mitigation Measures

BIO-1 The following measures shall be implemented prior to and during construction to avoid potential direct mortality and loss of California red-legged frogs:

1. Prior to the initial site investigation and subsequent ground-disturbing activities, a qualified biologist will instruct all project personnel in worker awareness training, including recognition of California red-legged frogs and their habitat.
2. A qualified biologist will conduct preconstruction surveys within the project area no earlier than 2 days before ground-disturbing activities.
3. No activities shall occur after October 15 or the onset of the rainy season, whichever occurs first, until May 1, except for during periods greater than 72 hours without precipitation. Activities can only resume after site inspection by a qualified biologist. The rainy season is defined as a frontal system that results in depositing 0.25 inches or more of precipitation in one event.
4. Vehicles to and from the project site will be confined to existing roadways to minimize disturbance of habitat.
5. Prior to movement of a backhoe in the project area, a qualified biologist will make sure the route is clear of California red-legged frogs.

6. If a California red-legged frog is encountered during excavations, or any project activities, activities will cease until the frog is removed and relocated by a U.S. Fish and Wildlife Service-approved biologist. Any incidental take will be reported to the USFWS immediately by telephone at (916) 414-6600.

BIO-2 The following measures shall be implemented prior to and during construction to avoid impacts to hydrological resources located within and in the vicinity of the project site:

1. The limits of all work areas shall be clearly delineated in the field during construction and personnel shall be informed of the need to avoid impacts to jurisdictional aquatic features (i.e., waters and wetlands).
2. For short-term, temporary stabilization, an erosion and sedimentation control plan shall be developed outlining Best Management Practices (BMPs) and implemented to prevent erosion and sedimentation into the channel during construction. Acceptable stabilization methods include the use of weed-free, natural fiber (i.e., non-monofilament) fiber rolls, jute or coir netting, and/or other industry standards. BMPs shall be installed and maintained for the duration of the construction period.
3. The mapped limits of jurisdictional areas shall be clearly shown on all site plans and flagged prior to the start of any construction activity within 50 feet of the limits of the drainage.
4. All equipment and materials shall be stored a minimum of 35 feet from the edge of the drainage at the end of each working day, and secondary containment shall be used to prevent leaks and spills of potential contaminants from entering the drainage.
5. During construction, washing of concrete, paint, or equipment and refueling and maintenance of equipment shall occur only in designated areas a minimum of 35 feet from all drainages and aquatic features. Sandbags and/or sorbent pads shall be available to prevent any fluid releases from entering the drainage.
6. Construction equipment shall be inspected by the operator on a daily basis to ensure that equipment is in good working order and no fuel or lubricant leaks are present.
7. Where feasible, the project shall incorporate low impact development (LID) features, including bioswales and permeable pavers, into the overall site design to retain runoff on site and avoid increased surface runoff into the drainage.
8. Where feasible, the project shall incorporate vegetated buffers, bioswales, and/or rain gardens on the drainage side of the development.
9. The use of landscaping plants that are known or have potential to become invasive shall be prohibited.

BIO-3 If any ground disturbance will occur during the nesting bird season (February 1–September 15), prior to any ground-disturbing activity, a preconstruction nesting bird survey shall be conducted by a qualified biologist within 1 week prior to the start of activities. If nesting birds are located on or near the project site, they shall be avoided until they have successfully fledged, or the nest is no longer deemed active. A non-disturbance buffer of 50 feet will be implemented for non-listed, passerine species and a 250-foot buffer will be implemented for raptor species. No construction activities will be permitted within established nesting bird buffers until a qualified biologist has determined that the young have fledged or that proposed construction activities would not cause adverse impacts to the nest, adults, eggs, or young. If special-status avian species are identified, no work shall be conducted until an appropriate buffer is determined in consultation with the City and the California Department of Fish and Wildlife and/or U.S. Fish and Wildlife Service.

Conclusion

The project site supports marginal habitat for special-status plant and animal species, including Congdon's tarplant, Hoover's button celery, adobe sanicle, VPFS, CRLF, and nesting migratory birds. Potential impacts would be avoided through project design and mitigated through standard avoidance measures, BMPs, and regulatory permit requirements. The project would be setback at least 35 feet from the jurisdictional wetland areas and would not conflict with local plans or policies for protection of biological resources. Therefore, potential impacts to biological resources would be *less than significant with mitigation*.

5. CULTURAL RESOURCES

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historic resource pursuant to §15064.5?	3, 6, 18, 19, 58	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	3, 18, 19, 58	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	3, 18, 19, 58	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Evaluation

This evaluation is based, in part, on the technical study An Archaeological Survey for the Airport Hotel Project, 950 & 990 Aero Drive, San Luis Obispo, San Luis Obispo County, California, prepared by Thor Conway of Heritage Discoveries Inc. in March 2007.

Pre-Historic Setting

Archaeological evidence demonstrates that Native American groups (including the Chumash) have occupied the Central Coast for at least 10,000 years. The city of San Luis Obispo is located within the area historically occupied by the Obispeño Chumash, the northernmost of the Chumash people of California. The Obispeño Chumash occupied much of San Luis Obispo County, and the earliest evidence of human occupation in the region comes from archaeological sites along the coast. The project site is not located within a Burial Sensitivity Area as identified in Figure 1: Cultural Resources of the City's COSE.

Historic Setting

The City's COSE establishes various goals and policies to balance cultural and historical resource preservation with other community goals. These policies include, but are not limited to the following:

- Identification, preservation, and rehabilitation of significant historic and architectural resources;
- Prevention of demolition of historically or architecturally significant buildings unless doing so is necessary to remove a threat to health and safety;
- Consistency in the design of new buildings in historical districts to reflect the form, spacing, and materials of nearby historic structures; and
- Identification and protection of neighborhoods or districts having historical character due to the collective effect of Contributing or Master List historic properties.

The project site is not located within the Historic Preservation (H) Overlay Zone, nor does it contain any built structures that may be considered potentially eligible historic resources.

- Neither the project site nor immediate vicinity contain buildings or structures that are old enough to qualify as potentially eligible historic resources. The project site and immediate vicinity primarily consist of recent development that has occurred subsequent to the 1980s. Therefore, the project would not result in a substantial adverse change in the significance of a historic resource pursuant to Section 15064.5 and potential impacts would be *less than significant*.
- The Archaeological Evaluation did not identify any previously known archeological sites in the project area, and a field survey of the project site revealed no evidence that further archaeological study is necessary for the project area.

The project would include ground disturbance (approximately 10,000 cy of cut and 8,900 cy of fill) on-site associated with site preparation (i.e., grading), the installation of utilities and culverts, and the construction of the proposed hotel and parking lot, for a total net of 18,900 cy of proposed earthwork. The project proposes to disturb approximately 4.33 acres of land. The project site is not located within a Burial Sensitivity Area identified in Figure 1 of the City's COSE; however,

there is a potential to disturb previously unidentified buried cultural materials during subsurface grading and excavation activities. Mitigation Measure CR-1 has been identified to require cultural resource awareness training for all construction personnel. If previously unidentified cultural materials are unearthed during proposed ground-disturbing activities, Mitigation Measure CR-2 has been identified to require work be halted in the area until a City-qualified archaeologist can assess the significance of the find. With implementation of identified measures, impacts related to a substantial adverse change in the significance of archaeological resources would be *less than significant with mitigation*.

- c) The project site is not located within a Burial Sensitivity Area identified in Figure 1 of the City's COSE. No human remains are known to exist within the project site; however, the discovery of unknown human remains is possible during ground-disturbing activities. Protocol for properly responding to the inadvertent discovery of human remains is identified in the California Health and Safety Code Section 7050.5 and would be required to be printed on all building and grading plans per Mitigation Measure CR-3. Potential impacts related to disturbance of human remains would be less than significant with incorporation of Mitigation Measure CR-3. Therefore, impacts related to disturbance of human remains would be *less than significant with mitigation*.

Mitigation Measures

CR-1 Prior to construction activities, a City-qualified archaeologist shall conduct cultural resource awareness training for all construction personnel including the following:

1. Review the types of archaeological artifacts that may be uncovered;
2. Provide examples of common archaeological artifacts to examine;
3. Review what makes an archaeological resource significant to archaeologists and local Native Americans;
4. Describe procedures for notifying involved or interested parties in case of a new discovery;
5. Describe reporting requirements and responsibilities of construction personnel;
6. Review procedures that shall be used to record, evaluate, and mitigate new discoveries; and
7. Describe procedures that would be followed in the case of discovery of disturbed as well as intact human burials and burial-associated artifacts.

CR-2 If cultural resources are encountered during subsurface earthwork activities, all ground-disturbing activities within a 25-foot radius of the find shall cease and the City shall be notified immediately. Work shall not continue until a City-qualified archaeologist assesses the find and determines the need for further study. If the find includes Native American-affiliated materials, a local Native American tribal representative will be contacted to work in conjunction with the City-approved archaeologist to determine the need for further study. A standard inadvertent discovery clause shall be included in every grading and construction contract to inform contractors of this requirement. Any previously unidentified resources found during construction shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of California Environmental Quality Act (CEQA) criteria by a qualified archaeologist.

If the resource is determined significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan, in conjunction with locally affiliated Native American representative(s) as necessary, that will capture those categories of data for which the site is significant. The archaeologist shall also perform appropriate technical analysis, prepare a comprehensive report, and file it with the Central Coast Information Center (CCIC), located at the University of California, Santa Barbara, and provide for the permanent curation of the recovered materials.

CR-3 In the event that human remains are exposed during earth disturbing activities associated with the project, an immediate halt work order shall be issued, and the City Community Development Director and locally affiliated Native American representative(s) (as necessary) shall be notified. California Health and Safety Code Section 7050.5 requires that no further disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be of Native American descent, the coroner shall notify the Native American Heritage Commission within 24 hours. These requirements shall be printed on all building and grading plans.

Conclusion

With implementation of the recommended Mitigation Measures CR-1 through CR-3, the project would have a less-than-significant impact on cultural resources.

6. ENERGY

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	1, 18, 20, 22	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	1, 18, 20, 22	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Evaluation

Pacific Gas & Electric Company (PG&E) has historically been the primary electricity provider for the City. In October 2018, the City Council committed to joining Central Coast Community Energy (3CE, formerly Monterey Bay Community Power) and, beginning in January 2020, 3CE became the City's primary electricity provider. 3CE is striving to provide 100% carbon-free electricity to the city by 2030.

The California Building Code (CBC) contains standards that regulate the method of use, properties, performance, or types of materials used in the construction, alteration, improvement, repair, or rehabilitation of a building or other improvement to real property. The CBC includes mandatory green building standards for residential and nonresidential structures, the most recent version of which are referred to as the *2019 Building Energy Efficiency Standards*. These standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to the exterior and vice versa), residential and nonresidential ventilation requirements, and non-residential lighting requirements.

The City recently developed local amendments to encourage all-electric new buildings. When paired with 3CE's carbon-free electricity supply, all electric new buildings will be carbon free and would avoid health and safety issues associated with fossil fuels and greenhouse gases (GHGs). At its meeting on September 3, 2019, the City Council adopted the Clean Energy Choice Program. Unlike other cities that are banning natural gas entirely, the proposed Clean Energy Choice Program encourages clean, efficient, and cost-effective all-electric new buildings through incentives, local amendments to the California Energy Code, and implementation of the Carbon Offset Program. New projects wishing to use natural gas will be required to build more efficient and higher performing buildings and offset natural gas use by performing retrofits on existing buildings or by paying an in-lieu fee that will be used for the same purpose.

Leadership in Energy and Environmental Design (LEED) is an internationally recognized green building certification system that provides third-party verification that a building or community was designed and built using strategies aimed at improving performance metrics in energy savings, water efficiency, carbon dioxide (CO₂) emissions reduction, improved indoor environmental quality, and stewardship of resources and sensitivity to their impacts. LEED provides a point system to score green building design and construction. The system is categorized in nine basic areas: Integrative Process, Location and Transportation, Sustainable Sites, Water Efficiency, Energy and Atmosphere, Materials and Resources, Indoor Environmental Quality, Innovation in Design, and Regional Priority. Buildings are awarded points based on the extent various sustainable strategies are achieved. The more points awarded the higher the level of certification achieved from Certified, Silver, Gold, to Platinum.

The City's COSE establishes goals and policies to achieve energy conservation and increase use of cleaner, renewable, and locally controlled energy sources. These goals include increasing the use of sustainable energy sources and reducing reliance on non-sustainable energy sources to the extent possible and encouraging the provision for and protection of solar access. Policies identified to achieve these goals include, but are not limited to, use of best available practices in energy conservation, procurement, use, and production; energy-efficiency improvements; pedestrian- and bicycle-friendly facility design; fostering alternative transportation modes; compact, high-density housing; and solar access standards.

The *City of San Luis Obispo Climate Action Plan for Community Recovery* also identifies strategies and policies to increase use of cleaner and renewable energy resources in order to achieve the City's GHG emissions reduction target. These strategies include promoting a wide range of renewable energy financing options, incentivizing renewable energy generation in new and existing developments, and increasing community awareness of renewable energy programs. The City's 2020 CAP was updated in August 2020.

- a) During construction, fossil fuels, electricity, and natural gas would be used by construction vehicles and equipment. The energy consumed during construction would be temporary in nature and would be typical of other similar construction activities in the city. State and federal regulations in place require fuel-efficient equipment and vehicles and prohibit wasteful activities, such as diesel idling; therefore, potential impacts associated with construction energy use would be *less than significant*.

Operation of the project would result in an overall increase in consumption of energy resources associated with vehicle trips, electricity, and natural gas usage by project occupants. The project would rely on the local electricity service provider 3CE to supply project electricity needs. 3CE is striving to provide 100% carbon-free electricity to the city by 2030. The project would be designed in full compliance with the CBC, including applicable green building standards, which include thermal envelope standards (preventing heat transfer from the interior to the exterior and vice versa), nonresidential ventilation requirements, and nonresidential lighting requirements. Based on the LEED checklist provided by the applicant, the project would be built to a certified level (included as Attachment 5). Compliance with existing building codes would ensure the project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, and through use of 100% GHG-free electricity resources, project energy use would not result in a significant environmental impact; therefore, impacts would be *less than significant*.

- b) The project would be designed in full compliance with the CBC including applicable green building standards. The project would be consistent with energy goals and policies in the COSE associated with use of best available practices in energy conservation, encouraging energy-efficient building design and the use of pedestrian- and bicycle-friendly design. The project would not conflict with other goals and policies set forth in the City's 2020 CAP associated with renewable energy or energy efficiency. Therefore, the project would not result in a conflict with or obstruction of a state or local plan for renewable energy or energy efficiency, and impacts would be *less than significant*.

Mitigation Measures

Mitigation measures are not required.

Conclusion

The project has been located and designed in full compliance with applicable energy efficiency standards and would not conflict with state or local plans for renewable energy or energy efficiency. No potentially significant impacts related to energy would occur and mitigation measures are not required.

7. GEOLOGY AND SOILS

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:					
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	23, 24, 25, 26, 27	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	23, 24	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	24, 25	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	26, 27	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	24	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	24, 25	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 1802.3.2 of the California Building Code (2013), creating substantial direct or indirect risks to life or property?	24, 27	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	28	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Evaluation

The City's Safety Element identifies active, potentially active, and inactive mapped and inferred faults with the potential to affect the city in the event of rupture. The Los Osos Fault, adjacent to the city of San Luis Obispo, is identified under the State of California Alquist-Priolo Fault Hazards Act and is classified as active. The West Huasna, Oceanic, and Edna Faults are considered potentially active and present a moderate fault rupture hazard to developments near them. The San Andreas Fault and offshore Hosgri Fault, which present the most likely source of ground shaking for San Luis Obispo, have a high probability of producing a major earthquake within an average lifespan. The highest risk from ground shaking is found on deep soils that were deposited by water, are geologically recent, and have many pore spaces among the soil grains. These soils are typically found in valleys. Faults capable of producing strong ground-shaking motion in San Luis Obispo include the Los Osos, Point San Luis, Black Mountain, Rinconada, Wilmar, Pecho, Hosgri, La Panza, and San Andreas Faults. Engineering standards and building codes set minimum design and construction methods for structures to resist seismic shaking. Based on the DOC Fault Activity Map and the City's Safety Element Earthquake Faults – Local Area map, the project site is not located within or in the immediate vicinity of an active fault zone.

Seismic-Related Ground Failure

Settlement is defined as the condition in which a portion of the ground supporting part of a structure or facility lowers more than the rest or becomes softer, usually because ground shaking reduces the voids between soil particles, often with groundwater rising in the process. Liquefaction is the sudden loss of the soil's supporting strength due to groundwater filling and lubricating the spaces between soil particles as a result of ground shaking. Soils with high risk for liquefaction are typically sandy and in creek floodplains or close to lakes. In extreme cases of liquefaction, structures can tilt, break apart, or sink into the ground. The

likelihood of liquefaction increases with the strength and duration of an earthquake. Based on the Ground Shaking and Landslide Hazards Map in the City's Safety Element, the project site is located within an area with high liquefaction potential.

Slope Instability and Landslides

Slope instability can occur as a gradual spreading of soil, a relatively sudden slippage, a rockfall, or in other forms. Causes include steep slopes, inherently weak soils, saturated soils, and earthquakes. Improper grading and manmade drainage can be contributing factors. Much of the development in San Luis Obispo is in valleys, where there is low potential for slope instability. Based on the Ground Shaking and Landslide Hazards Map in the City's Safety Element, the project site is located within an area with moderate landslide potential.

Subsidence

Land subsidence is a gradual settling or sudden sinking of the Earth's surface due to subsurface movement of earth materials. Primary causes are groundwater withdrawal, in which water is removed from pore space as the water table drops, causing the ground surface to settle; tectonic subsidence, where the ground surface is warped or dropped lower due to geologic factors such as faulting or folding; and earthquake-induced shaking that causes sediment liquefaction, which in turn can lead to ground-surface subsidence. Based on the USGS Areas of Land Subsidence in California Map, the project site is not located in an area of known subsidence.

Soil Limiting Factors

The project site is mostly underlain by the Salinas silty clay loam (0–2 percent slopes) soil unit. This very deep, well-drained, gently sloping soil has moderately slow permeability and slow surface runoff. The hazard of water erosion is slight. Many areas underlain by this soil are used for urban development; roads, buildings, and other structures need to be designed with consideration of the soil's low strength and moderate shrink-swell potential. The project site is also underlain by the Cropley clay (2–9 percent slopes) soil unit. This soil unit is characterized by gentle slopes and medium runoff and is moderately drained.

- a.i) Based on Figure 3 (Earthquake Faults – Local Area) of the City's Safety Element and the DOC Fault Activity Map of California, no known fault lines are mapped on or within 0.5 mile of the project site. Therefore, the project would not have the potential to result in substantial adverse effects involving rupture of a known earthquake fault and impacts would be *less than significant*.
- a.ii) Due to the highly seismic nature of the region, the project would very likely be subject to strong seismic ground shaking at some point(s) during the life of the project. The proposed development would be required to be designed in full compliance with seismic design criteria established in the CBC to adequately withstand and minimize the risk associated with the level of seismic ground shaking expected to occur in the project region; therefore, impacts associated with strong seismic ground shaking would be *less than significant*.
- a.iii) Based on the Ground Shaking and Landslide Hazards Map in the City's Safety Element, the project site is located within an area with high liquefaction potential. Development of the project within this area may have the potential to result in adverse effects due to seismic-related ground failure. A soils report prepared by a qualified engineer is required upon review of the building permit to address the nature of the subsurface soils in response to liquefaction potential, in accordance with CBC Chapter 18. Any issues identified in the report will be addressed through standard site construction techniques, as required by the CBC. This report would also ensure consistency with Policy 4.7 of the City's Safety Element, which states proposed development may be located in high liquefaction potential areas only after completion of a site-specific investigation for risk of damage from liquefaction. In addition, the proposed development would be required to be designed in compliance with standard seismic design criteria established in the CBC to reduce risk associated with seismic-related ground failure, including liquefaction. Therefore, based on compliance with existing regulations, impacts related to substantial adverse effects due to seismic-related ground failure would be *less than significant*.
- a.iv) Based on the Ground Shaking and Landslide Hazards Map in the City's Safety Element, the project site is located within an area of moderate landslide potential. The project site and surrounding areas are predominantly flat, which further reduces the risk for a landslide to occur. In addition, the proposed development would be required to be designed in compliance with standard seismic design criteria established in the CBC to reduce risk associated with seismic-related ground failure; therefore, the project would not result in significant adverse effects associated with landslides, and impacts would be *less than significant*.
- b) The project would require approximately 10,000 cy of cut and 8,900 cy of fill for a net of 18,900 cy of earthwork and a total of 4.33 acres of ground disturbance. The project site is predominantly flat and no substantial vegetation removal or permanent changes in existing topography would occur. Grading permits are required for projects, excavations, or fills

exceeding 50 cubic yards in volume and require implementation of standard BMPs to ensure substantial erosion, siltation, and/or sedimentation are avoided. The project is also required to comply with the Central Coast Regional Water Quality Control Board (RWQCB) requirements set forth in their Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast region. Physical improvement of the project site will be required to comply with the drainage requirements of the City's *Waterway Management Plan*. This plan was adopted for the purpose of ensuring water quality and proper drainage within the City's watershed. Based on the relatively short period of time that soils would be susceptible to erosion, and because construction activities would require implementation of erosion control and water quality measures as required by existing regulations and standard mitigation measures identified in BIO-2, impacts associated with erosion during construction would be reduced to *less than significant with mitigation*.

Following project completion, the project site would be developed with buildings, hardscapes, and landscaping, precluding the potential for substantial long-term erosion or loss of topsoil. Therefore, impacts related to soil erosion and loss of topsoil would be *less than significant with mitigation*.

- c) Landslides typically occur in areas with steep slopes or in areas containing escarpments. Based on the Ground Shaking and Landslide Hazards Map in the City's Safety Element, the project site is located within an area with moderate landslide potential; however, the project site is located on relatively flat land. Based on the City's Safety Element and USGS data, the project site is not located in an area of historical or current land subsidence. Based on the Ground Shaking and Landslide Hazards Map in the City Safety Element, the project site is located within an area with high liquefaction potential. A soils report prepared by a qualified engineer is required upon review of the building permit to address the nature of the subsurface soils in response to liquefaction potential, in accordance with the CBC Chapter 18. Any issues identified in the report will be addressed through standard site construction techniques, as required by the CBC. The project would also be required to comply with CBC seismic requirements to address potential seismic-related ground failure, including lateral spread and liquefaction. Therefore, based on compliance with existing regulations, potential impacts related to location on a geologic unit or soil unit that is unstable would be *less than significant*.
- d) Based on the Soil Survey of San Luis Obispo County and Web Soil Survey, the project site is located in an area underlain by Salinas silty clay loam, 0 to 2 percent slopes, and Copley clay, 2 to 9 percent slopes. Typically, soils that consist of clay or clay materials have a higher shrink-swell potential than soils without clay or clay materials. The soils at the site consist of clay materials and would be considered to have a moderate shrink-swell potential. The volume changes that soils undergo in this cyclical pattern can stress and damage slabs and foundations. A soils report prepared by a qualified engineer is required, per the CBC and Policy 4.7 of the City's Safety Element, upon review of the building permit to evaluate the proposed development activities and provide specific recommendations to adequately protect future proposed development against soil stability hazards, including expansive soils. Typical precautionary measures would likely include premoistening of the underlying soil in conjunction with placement of non-expansive material beneath slabs, and a deepened and more heavily reinforced foundation. Therefore, based on compliance with existing regulations, potential impacts associated with expansive soils would be *less than significant*.
- e) The proposed project includes a new connection to the City's sewer system. No septic tanks or alternative wastewater treatment systems are proposed on-site; therefore, *no impacts* would occur.
- f) The project site is underlain by Holocene-age alluvial gravel and sand of stream channels. Holocene age units, particularly those younger than 5,000 years old, are generally too young to contain fossilized material. The project would result in approximately 18,900 total cy of earthwork; however, the hotel would be constructed on a concrete slab foundation and does not propose subterranean parking that would require cut activity within the bedrock. Therefore, potential impacts to paleontological resources would be *less than significant*.

Mitigation Measures

Implement Mitigation Measure BIO-2.

Conclusion

Based on the location of the project site and underlying geologic and soil properties, and compliance with existing regulations, potential impacts related to seismic and other ground failure and damage to paleontological resources would be less than significant. However, earthwork related to project construction has the potential to result in erosive runoff. In addition to

compliance with existing regulations, implementation of Mitigation Measure BIO-2 would reduce impacts to less than significant.

8. GREENHOUSE GAS EMISSIONS

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	2, 12, 21, 53	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	12, 20, 21, 53	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Evaluation

This evaluation is based, in part, on the *Emissions Modelling Report for the San Luis Obispo Airport Hotels Project*, prepared by AMBIENT Air Quality & Noise Consulting in January 2021 (included as Attachment 2).

GHGs are any gases that absorb infrared radiation in the atmosphere, and are different from the criteria pollutants discussed in Section 3, Air Quality. The primary GHGs that are emitted into the atmosphere as a result of human activities are CO₂, methane (CH₄), nitrous oxide (N₂O), and fluorinated gases. In 2012 the City established a Climate Action Plan that identified measures and implementation strategies in order to achieve the City's GHG reduction target of 1990 emission levels by 2020. In 2020 the City prepared an updated *Climate Action Plan for Community Recovery*, which outlines a strategy for achieving carbon neutrality by 2035, adopts sector specific goals, and provides foundational actions to establish a trajectory towards achieving those goals. In 2018 the City prepared a community-wide inventory of GHG emissions for the 2016 calendar year. In 2016 San Luis Obispo's total GHG emissions were estimated to be 339,290 metric tons of carbon dioxide equivalence (MTCO₂e). As in 2005, transportation was the largest contributor to the City's total GHG emissions with an estimated 212,980 MTCO₂e or 63% of the City's total emissions. Commercial and Industrial energy was the second largest sector with GHG emissions of 44,270 MTCO₂e or 13% of the City's total emissions. The sectors of residential energy and solid waste account for the remaining 26% of the City's total 2016 GHG emissions. Due to lagging data availability, 2016 is the most recent year for complete GHG inventory data. Statewide legislation, rules, and regulations have been adopted to reduce GHG emissions from significant sources. Senate Bill (SB) 32 and Executive Order (EO) S-3-05 extended the State's GHG reduction goals and required the CARB to regulate sources of GHGs to meet a state goal of reducing GHG emissions to 1990 levels by 2020, 40% below 1990 levels by 2030, and 80% below 1990 levels by 2050. Other statewide policies adopted to reduce GHG emissions include Assembly Bill (AB) 32, SB 375, SB 97, Clean Car Standards, Low Carbon Fuel Standard, Renewable Portfolio Standard, California Building Codes, and the California Solar Initiative.

Appendix C of the 2020 CAP Update includes thresholds and guidance for the preparation of GHG emissions analysis under CEQA for projects within the city. To support progress toward the City's long-term aspirational carbon neutrality goal, plans and projects within the city that undergo CEQA review will need to demonstrate consistency with targets in the CAP, a Qualified GHG Emissions Reduction Plan, consistent with CEQA Guidelines Section 15183.5. According to the adopted SLOAPCD guidance, if a project is consistent with a qualified GHG reduction strategy, such as the City's 2020 CAP, the project would not result in a significant impact.

In October 2018, the City Council committed to joining C3E, an existing community choice energy program that serves the counties of Santa Cruz, San Benito, and Monterey and provides 100% carbon-free electricity with a rate savings relative to PG&E. Additionally, the City recently adopted the Clean Energy Choice Program for New Buildings, which encourages clean, efficient, and cost-effective all-electric new buildings through incentives and local amendments to the California Energy Code. When paired with cost-comparable modern electric appliances and carbon-free electricity from C3E, all-electric new buildings are operationally GHG emissions-free, cost effective, and help achieve the community's climate action goals.

- a) As discussed previously, the proposed project would be consistent with the City's BP land use and zoning designation, pending approval of a Conditional Use Permit (CUP). As such, the project is expected to be consistent with the demographic and land use assumptions used for development of the City's 2020 CAP.

The project's GHG emissions have been quantified using California Emissions Estimator Model (CalEEMod), version 2016.3.2, based on estimated acreage and building square footage provided for the proposed project. The buildout year for this project would be post year 2020. The GHG efficiency threshold was calculated by dividing the GHG emissions inventory goal (allowable emissions), by the estimated service population (SP). The efficiency threshold was calculated based on CARB's GHG emissions inventory identified in the *2017 Scoping Plan Update*. Project-generated GHG emissions that would exceed the efficiency threshold of 7.0 MTCO₂e/SP/year would be considered to have a potentially significant impact on the environment that could conflict with GHG-reduction planning efforts. To be conservative, amortized construction-generated GHG emissions were included in annual operational GHG emissions estimates.

The project's short-term emissions were quantified using CalEEMod, version 2016.3.2, based on estimated acreage and building square footage provided for the proposed project. Based on the modeling conducted, construction-related GHG emissions would total approximately 592.28 MTCO₂e. Amortized GHG emissions, when averaged over the assumed 25-year life of the project, would total approximately 23.69 MTCO₂e/year.

Long-term operational GHG emissions were calculated using CalEEMod, version 2016.3.2. Energy use included emissions associated with natural gas use. Electricity use assumes service would be supplied by 3CE, which provides renewable and carbon-free electricity, per the City's existing commitment. Mobile-source emissions were based on vehicle trip generation rates for proposed residential land uses derived from the Transportation Impact Study prepared for the project (W-Trans 2020). Estimated long-term increases in GHG emissions associated with the proposed project for buildout year 2022 and future year 2030 are summarized in Table 5.

Table 5. GHG Emissions Summary

Source	Total MTCO ₂ e (Tons/Year)
Amortized Construction Emissions	23.7
Total Operational with Amortized Construction Emissions	1,385.4
Service Population (Employees)	25
MTCO ₂ e / Service Population	55.4
2020 CAP Threshold (per employee)	0.7/employee (17.5)
Reduction Required to Meet CAP Threshold (MTCO ₂ e)	1,367.9
Reduction Required to Meet CAP Threshold (MTCO ₂ e/Service Population)	54.7

As depicted in Table 5, operational GHG emissions for the proposed project, with the inclusion of amortized construction GHGs, would total approximately 1,385.4 MTCO₂e (1,598.95 MTCO₂e/year during the initial year of full operation [year 2023] and 1,418.2 MTCO₂e/year for operational year 2030). Based on a service population of 25 employees, the project's GHG emissions would exceed the GHG threshold of 0.7 MTCO₂e per employee (17.5 MTCO₂e based on a service population of 25) as established by the 2020 CAP. Therefore, the project would result in a potentially significant impact and would require a reduction of 1,367.9 MTCO₂e to be below the City's threshold.

Mitigation Measures AQ-1 and AQ-2 have been included to require implementation of measures identified by the SLOAPCD to reduce emissions during project construction. Additionally, Mitigation Measure GHG-1 has been incorporated to increase use of alternative means of transportation, waste reduction, and the use of carbon-free energy through the discouraged installation of natural gas-fired appliances, as well as electricity service provided by 3CE. With implementation of Mitigation Measures AQ-1, AQ-2, and GHG-1, construction and operational GHG emissions would be reduced throughout the project's lifetime to achieve a total reduction of 1,367.9 MTCO₂e (or 54.7 MTCO₂e per employee based on a service population of 25). Therefore, potential impacts associated with generation of GHG emissions that may have a significant impact on the environment would be *less than significant with mitigation*.

- b) As discussed previously, the City recently adopted the 2020 CAP, which identifies six pillars, each of which include long-term goals, measures, and foundational actions for reducing GHG emissions throughout the city. The pillars include:
1. Leading by Example: Create a Municipal Action Plan by 2020 and achieve carbon neutral government operations by 2030.
 2. Clean Energy Systems: Achieve 100% carbon-free electricity by 2020.
 3. Green Buildings: Generate no net new building emissions from on-site energy use by 2020 and achieve a 50% reduction in existing building on-site emissions (after accounting for 3CE) by 2030.
 4. Connected Community: Achieve the General Plan mode split objective by 2030 and have 40% vehicle miles traveled (VMT) by electric vehicles by 2030.
 5. Circular Economy: Achieve 75% diversion of landfilled organic waste by 2025 and 90% by 2035.
 6. Natural Solutions: Increase carbon sequestration on the San Luis Obispo Greenbelt and Urban Forest through compost application-based carbon farming activities and tree planting to be ongoing through 2035.

Projects that are consistent with the demographic forecasts and land use assumptions used in the 2020 CAP can utilize the City's CEQA GHG Emissions Analysis Compliance Checklist to demonstrate consistency with the 2020 CAP's GHG emissions reduction strategy. The demographic forecasts and land use assumptions of the CAP are based on the City's Land Use and Circulation Elements. If a plan or project is consistent with the existing 2014 General Plan land use and zoning designations of the project site, then the project would be considered consistent with the demographic forecasts and the land uses assumptions of the Climate Action Plan. The project is consistent with the City's land use and zoning designation and would be consistent with the demographic and land use assumptions used for the development of the 2020 CAP.

The City has prepared a CEQA GHG Emissions Analysis Compliance Checklist for plans and projects to ensure that they are consistent with the pillars of the CAP. Based on the analysis provided in Table 6, the project would be consistent with the City's GHG Emissions Analysis Checklist with implementation of Mitigation Measure GHG-2. Therefore, potential impacts associated with a conflict with a plan or policy adopted for the purpose of reducing GHG emissions of would be *less than significant with mitigation*.

Table 6. Project Consistency with the City's Climate Action Plan

Climate Action Plan Measures	Project Consistency
Clean Energy Systems	
Does the Project include an operational commitment to participate in Central Coast Community Energy?	Consistent with Mitigation. A mitigation measure has been included to require an operational commitment to participate in 3CE.
Green Buildings	
Does the Project exclusively include "All-electric buildings"? For the purpose of this checklist, the following definitions and exemptions apply: <i>All-electric building.</i> A new building that has no natural gas plumbing installed within the building and that uses electricity as the source of energy for all space heating, water heating, cooking appliances, and clothes drying appliances. An All-Electric Building may be plumbed for the use of natural gas as fuel for appliances in a commercial kitchen. Specific exemptions to the requirements for all - electric buildings include: Commercial kitchens a. The extension of natural gas infrastructure into an	Consistent. The project would include development of either all electric or mixed-fuel buildings and would be required to be in full compliance with the City's Energy Reach Code. Additionally, the project proposes a commercial kitchen, which would likely use natural gas; however, this action has been accounted for in the 2020 CAP.

<p>industrial building for the purpose of supporting manufacturing processes (i.e., not including space conditioning).</p> <ul style="list-style-type: none"> b. Accessory Dwelling Units that are attached to an existing single-family home. Essential Service Buildings including, but not limited to, public facilities, hospitals, medical centers and emergency operations centers. c. Temporary buildings. d. Gas line connections used exclusively for emergency generators. e. Any buildings or building components exempt from the California Energy Code. f. Residential subdivisions in process of permitting or constructing initial public improvements for any phase of a final map recorded prior to January 1, 2020, unless compliance is required by an existing Development Agreement. <p>If the proposed project falls into an above exemption category, what measures are applicants taking to reduce on-site fossil fuel consumption to the maximum extent feasible? If not applicable (N/A), explain why this action is not relevant.</p>	
Connected Community	
<p>Does the Project comply with requirements in the City's Municipal Code with no exceptions, including bicycle parking, bikeway design, and EV charging stations?</p>	<p>Consistent. The project has been designed to comply with the requirements in the City's Municipal Code and would be required to demonstrate compliance with applicable Municipal Code requirements related to bicycle parking, bikeway design, and EV charging stations. The project includes 51 EV parking spaces, 22 bicycle parking spaces, and associated lockers and showers for employees.</p>
<p>Is the estimated Project-generated Vehicle Miles Traveled (VMT) within the City's adopted thresholds, as confirmed by the City's Transportation Division?</p>	<p>Consistent with Mitigation. Transportation Demand Management (TDM) recommendations have been included as Mitigation Measure TR-2.</p>
<p>If "No," does the Project/Plan include VMT mitigation strategies and/or a Transportation Demand Management (TDM) Plan approved by the City's Transportation Division?</p>	
<p>Does the Project demonstrate consistency with the City's Bicycle Transportation Plan?</p>	<p>Consistent. The project has been designed to include, and would be required to incorporate, features to promote alternative means of transportation, including the installation of bicycle facilities connecting to off-site existing or planned bicycle facilities.</p>
Circular Economy	
<p>Will the Project subscribe all units and/or buildings to organic waste pick up and provide the appropriate on-site</p>	<p>Consistent with Mitigation. A mitigation measure has been included to require the project to provide organic</p>

enclosures consistent with the provisions of the City of San Luis Obispo Development Standards for Solid Waste Services? Please provide a letter from San Luis Garbage company verifying that the project complies with their standards and requirements for organic waste pick up.	waste pick up and provide the appropriate on-site enclosures consistent with the provisions of the City's Development Standards for Solid Waste Services.
Natural Solutions	
Does the Project comply with Municipal Code requirements for trees?	Consistent. The project would require removal of four pepper trees and one acacia tree, which would require compensation per Section 12.24.090 (Tree Removal) of the City's Municipal Code.

Mitigation Measures

Implement Mitigation Measures AQ-1 and AQ-2.

GHG-1 A Greenhouse Gas Reduction Plan (GGRP) shall be prepared for the proposed project and shall be submitted to the City for review and approval prior to issuance of grading or building permits. The GGRP shall reduce annual greenhouse gas (GHG) emissions from the development by a minimum of 1,367.9 metric tons of carbon dioxide equivalence (MTCO₂e) per year over the operational life of the proposed project. GHG emissions may be reduced through the implementation of on-site mitigation measures, off-site mitigation measures, or through the purchase of carbon offsets. It is recommended that the GGRP incorporate GHG-reduction measures identified in the City of San Luis Obispo's *CEQA GHG Emissions Analysis Compliance Checklist, Climate Action Plan Consistency Checklist for New Development*, as listed below. In the event that carbon offsets are required, carbon offsets shall be purchased from a validated/verifiable source, such as the *California Climate Action Registry*, and approved by City Planning staff prior to purchase.

1. The project shall be provided electricity by 3CE.
2. The project shall incorporate a pedestrian and bicycle access network that connects proposed on-site land uses to adjacent existing or planned pedestrian and bicycle facilities contiguous with the project site.
3. The project shall be designed to minimize barriers to pedestrian access and interconnectivity.
4. The project shall be designed to provide safe and convenient access to public transit contiguous to the project site.
5. Transportation Demand Management (TDM) reduction measures should be included to reduce vehicle miles traveled (VMT), which include but are not limited to:
 - a. Telecommuting;
 - b. Car sharing;
 - c. Shuttle service;
 - d. Carpools;
 - e. Vanpools;
 - f. Participation in the SLO Rideshare Back 'N' Forth Club;
 - g. Transit subsidies; and
 - h. Off-site sustainable transportation infrastructure improvements.
6. The project shall provide organic waste pick up and shall provide the appropriate on-site enclosures consistent with the provisions of the City's Development Standards for Solid Waste Services.

Conclusion

The proposed project would generate GHG emissions during construction and operation in quantities that exceed the threshold established by the City's 2020 CAP; therefore, the project would result in a potentially significant impact related to GHG emissions and consistency with the 2020 CAP. Mitigation has been included that would ensure GHG emissions would be reduced

below the applicable threshold and ensure the project is consistent with the six pillars of the CAP; therefore, impacts would be less than significant with mitigation.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	1	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	1	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	29, 30, 31	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	32	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	24	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	24	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Evaluation

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

Based on a review of the SWRCB GeoTracker database and the DTSC EnviroStor database, the project site is not an active hazardous waste cleanup site. There is one inactive hazardous waste evaluation located within 1,000 feet of the project site at the San Luis Obispo County Regional Airport. The closest investigation site is located over 1,000 feet away, at 710 Aerovista Place, as discussed below. The project site is located within the San Luis Obispo County Regional Airport Land Use Planning Area and

is within Airport Safety Zone S-1C. Based on previous coordination between the City and the DTSC, the San Luis Obispo County Regional Airport property is known to have been used by the U.S. Army Air Corps and the California National Guard as early as November 1938 and continued until at least November 1941. In May 1946, the U.S. Navy abandoned the airport facilities, leaving all improvements to the County of San Luis Obispo. Disposal records were neither complete nor specific; therefore, undiscovered contaminants of concern, resulting from military or other aeronautical operations, may remain in the airport's subsurface. There is no evidence of hazardous materials on the project site, and in the event unknown subsurface hazardous materials are discovered during subsurface grading, existing regulations (including but not limited to California Health and Safety Code and California Labor Code), would require reporting, assessment, and remedy.

a) The project does not propose the routine transport, use, or disposal of hazardous substances. Any commonly used hazardous substances within the project site (e.g., cleaners, solvents, oils, paints, etc.) during construction would be transported, stored, and used according to regulatory requirements and existing procedures for the handling of hazardous materials. Mitigation Measure BIO-2 reduces the potential for hazardous materials to enter the on-site jurisdictional aquatic features during project construction. Any commonly used hazardous substances utilized during operation of the project (e.g., cleaners, solvents, oils, paints, etc.) would be transported, stored, and used according to regulatory requirements and existing procedures for the handling of hazardous materials. Therefore, with implementation of Mitigation Measure BIO-2, project impacts associated with the routine transport, use, or disposal of hazardous substances would be *less than significant with mitigation*.

b) The project does not propose the handling or use of hazardous materials or volatile substances that would result in a significant risk of upset or accidental release conditions. Construction activities associated with the project are anticipated to require use of limited quantities of hazardous substances, including gasoline, diesel fuel, hydraulic fluid, solvents, oils, paints, etc. Construction contractors would be required to comply with applicable federal and state environmental and workplace safety laws for the handling of hazardous materials, including the federal Occupational Safety and Health Administration (OSHA) Process Safety Management Standard (California Code of Regulations [CCR] 29.1910.119), which includes requirements for preventing and minimizing the consequences of accidental release of hazardous materials. Further, as introduced in Section 3, Air Quality, the project site is within an area identified as having a potential for NOA to occur. Pursuant to SLOAPCD requirements and the CARB ATCM for Construction, Grading, Quarrying, and Surface Mining Operations, the applicant is required to provide a geologic evaluation prior to any construction activities and comply with existing regulations regarding NOA, if present. Mitigation Measures AQ-3 and AQ-4 have been identified to require the applicant to complete a geologic evaluation and follow all applicable protocol and procedures if NOA is determined to be present on-site. The applicant is also required to comply with SLOAPCD regulations related to materials containing asbestos (Mitigation Measure AQ-5).

Any commonly used hazardous substances utilized during operation of the project (e.g., cleaners, solvents, oils, paints, etc.) would be transported, stored, and used according to regulatory requirements and existing procedures for the handling of hazardous materials. Therefore, potential impacts would be *less than significant with mitigation*.

c) The project site is not located within 0.25 mile of an existing or proposed school. The closest school is Los Ranchos Elementary School, located approximately 2 miles southeast of the project site. As a result, there would be *no impact* associated with hazardous emissions within 0.25 mile of school facilities.

d) Based on a search of the DTSC EnviroStor database, SWRCB GeoTracker database, and CalEPA Cortese List website, one inactive hazardous waste site is under investigation in the project vicinity within the San Luis Obispo County Regional Airport at 710 Aerovista Place, located over 1,000 feet south of the project site.

In response to growing concern from the public over the presence of halogenated solvents, specifically trichloroethane (TCA) and dichloroethane (DCE) found in nearby drinking water wells, the Central Coast RWQCB submitted a Request for Information to the current owner of the airport property in June 2016 as part of a broader effort to identify the source of the contaminants in the nearby drinking water wells. The property owner submitted a summary of the site history and included two Phase I Environmental Site Assessments (ESAs) from 1993 and 2001.

The only halogenated solvents identified as being used at 710 Aerovista Place were TCA and dichlorofluoroethane, but other hazardous materials identified as being used on the parcel include tin and lead, polyurethane paint, isopropyl alcohol, and an acid solution containing chromium (also known as chromic acid solution, which is hexavalent chromium and water). The Phase I ESAs state that hazardous materials appear to have been properly stored on-site and had retained regulatory

approval to transport the waste. The Phase I ESAs further concluded that there was no evidence that the parcel was not in compliance with applicable environmental regulations at the time and that no violations or spills were on-file with state and local regulatory agencies.

In a letter dated October 26, 2016, the Central Coast RWQCB requested a workplan to investigate groundwater and soil vapor at the airport property. In December 2016, a consultant for the property owner submitted a workplan for a site investigation to the RWQCB detailing the proposed investigation. As of the most recent EnviroStor update on July 11, 2018, the workplan is pending review and response by the RWQCB. Thus, although the RWQCB is overseeing the activities at the 710 Aerovista Place property, it is not currently categorized as an active case and, as such, is not listed in the SWRCB GeoTracker database.

Project construction would require excavation and ground-disturbing activities associated with site preparation (grading) and the installation of utility connections. Excavation activities are not expected to extend downward to the groundwater table. In addition, a Pre-Screening Assessment prepared for the EPA under Cooperative Agreement with DTSC for the site at 710 Aerovista Place notes that the prevailing groundwater flow in the project vicinity is to the southwest, away from the project site.

NOA has been identified as a toxic air contaminant by the CARB. Any ground disturbance proposed in an area identified as having the potential to contain NOA must comply with the CARB ATCM for Construction, Grading, Quarrying, and Surface Mining Operations. The SLOAPCD Naturally Occurring Asbestos Map indicates that the project site is located within an area identified as having a potential for NOA to occur. The applicant is required to comply with SLOAPCD regulations related to materials containing asbestos (Mitigation Measure AQ-5). As a result, and based on compliance with existing regulations, it is unlikely that project construction would create a significant hazard to the public during construction or operation and potential impacts would be *less than significant with mitigation*.

- e) The project site is located approximately 500 feet north of the San Luis Obispo County Regional Airport and within the airport's Airport Land Use Plan (ALUP). Prior to adoption of the AASP by the City, the Airport Land Use Commission (ALUC) reviewed and approved the AASP and determined it was consistent with the ALUP. The project site is in ALUP Safety Zone S-1c and within the projected 60 decibel (dB) airport noise contour. Per ALUP Table 5.3, *Land Use Compatibility Table*, a hotel building is a compatible use within Safety Zone S-1c, provided that the maximum non-residential density of use is not exceeded. The project would be developed consistent with the height and density limitations of the AASP and the site's BP zoning designation, and would not exceed the allowable development intensities, densities, or building footprints.

Advancements in construction methods, coupled with energy conservation practices, have had a vast performance impact on the way buildings are constructed. Interior noise levels are substantially reduced through compliance with existing CBC requirements. At the most conservative level, a typical structure covered with siding will have a Sound Transmission Class (STC) rating of 39 A-weighted decibels (dBA) based on current methods. Basic dual-pane vinyl windows will achieve an STC rating of 28 dBA. Averaged out, this results in a combined STC rating of approximately 33 dBA, meaning a typical exterior wall assembly will reduce 33 dB of sound transfer. These numbers are based on a 2- by 4-inch wall cavity with insulation and the rating improves with increased wall thickness and/or stucco or other siding materials. In using more current conventional building standards, double, or even triple the noise reduction can be achieved. Therefore, impacts related to the generation of a substantial temporary or permanent increase in ambient noise levels would be less than significant with standard construction techniques. Therefore, potential impacts associated with safety hazards or excessive noise from aircraft would be *less than significant*.

- f) Project construction would result in periodic restrictions on the use of the roadway shoulder for parking along Aero Drive; however, no full road closures would be necessary. Therefore, project implementation would not result in a significant temporary or permanent impact on any adopted emergency response plans or emergency evacuation plans. Any construction-related temporary lane closures would include proper signage and notification and would be short-term and limited in nature and duration. Emergency vehicles have mechanisms to safely traverse areas of congestion, such as the use of sirens and the ability to travel in opposite lanes of travel. The project design plans will be reviewed and approved by the City's Fire Marshall prior to the start of construction. Therefore, potential impacts would be *less than significant*.
- g) The project site is not located within or adjacent to a wildland area, is located within a developing area of the city, and is currently unimproved and requires routine mowing to prevent the growth of brush that could result in a fire hazard to adjacent properties. The project would improve the site with hotel uses, which may slightly reduce the potential for fire

hazard in the immediate project vicinity. The project would be required to comply with all applicable fire safety rules and regulations, including the California Fire Code and Public Resources Code, prior to issuance of building permits; therefore, potential impacts would be *less than significant*.

Mitigation Measures

Implement Mitigation Measures AQ-3, AQ-4, AQ-5, and BIO-2.

Conclusion

The project does not propose the routine transport, use, handling, or disposal of hazardous substances; however, there is the potential for construction equipment to leak or lead to a hazardous materials spill. Implementation of Mitigation Measure BIO-2 would reduce impacts related to accidental construction-related spills to less than significant. The nearest hazardous materials site is located over 1,000 feet south of the project site and construction activities are not anticipated to encounter hazardous materials. The project site is not within 0.25 mile of existing or proposed school facilities. Mitigation Measures AQ-3 and AQ-4 have been identified to require the applicant to complete a geologic evaluation and follow all applicable protocol and procedures if NOA is determined to be present on-site. The applicant is also required to comply with SLOAPCD regulations related to materials containing asbestos (Mitigation Measure AQ-5). Project implementation would not subject people or structures to substantial risks associated with wildland fires and would not impair implementation of or interfere with any adopted emergency response or evacuation plan. Potential impacts associated with hazards and hazardous materials would be *less than significant with mitigation*.

10. HYDROLOGY AND WATER QUALITY

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	1, 3, 55, 56	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	1, 34, 35	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
i. Result in substantial erosion or siltation on or off site;	1, 27, 55, 56	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	1, 3, 27, 55, 56	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	1, 3, 27, 55, 56	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows?	1, 27, 33	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	1, 3, 33, 36	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	1, 3, 35, 37	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Evaluation

The project site is located within the San Luis Obispo Creek watershed and includes an unnamed ephemeral drainage that flows through the southwestern portion of the project area. The San Luis Obispo Creek watershed is an approximately 53,271-acre coastal basin in southern San Luis Obispo County. It rises to an elevation of about 2,500 feet above sea level in the Santa Lucia Range. San Luis Obispo Creek flows to the Pacific Ocean just west of Avila Beach and has six major tributary basins: Stenner Creek, Prefumo Creek, Laguna Lake, East Branch San Luis Obispo Creek, Davenport Creek, and See Canyon.

The City is enrolled in the State General Permit NPDES permit program governing stormwater. As part of this enrollment, the City is required to implement the Central Coast RWQCB's adopted Post-Construction Stormwater Management requirements through the development review process. The primary objective of these post-construction requirements is to ensure that the permittee is reducing pollutant discharges to the maximum extent practicable and preventing stormwater discharges from causing or contributing to a violation of receiving water quality standards in all applicable development projects that require approvals and/or permits issued.

The 100-year flood zone identifies areas that would be subject to inundation in a 100-year storm event, or a storm with a 1% chance of occurring in any given year. Based on the City's Parcel Viewer Map, the project site is not located within a 100-year flood zone.

In 2015, the state legislature approved the Sustainable Groundwater Management Act (SGMA), which requires governments and water agencies of high- and medium-priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under the SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans.

- a) The project does not include substantial vegetation removal and would result in approximately 18,900 cy of earthwork. The City has adopted additional requirements for projects that are subject to an SWRCB General Permit. Per Chapter 12.08 of the City's Municipal Code, prior to issuance of City permits, the applicant must submit a SWPPP, which includes detailed information describing the potential sources of pollution from project activities and the recommended BMPs. The SWPPP would be adjusted during project activities to adapt to unforeseen conditions and changes in work. The project proposes to disturb more than 1 acre of land; therefore, the applicant would be required to prepare a detailed SWPPP, including potential pollutant discharges and BMPs, to satisfy City requirements.

Following project construction, the project site would be developed with buildings, hardscapes, or otherwise landscaped, precluding the potential for substantial erosion or loss of topsoil. The project is required to comply with the Central Coast RWQCB requirements set forth in the Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region. Physical improvement of the project site is required to comply with the drainage requirements of the City's Waterways Management Plan. This plan was adopted for the purpose of ensuring water quality and proper drainage within the City's watershed. As part of these requirements, the City has been mandated to establish a set of minimum designated BMPs and Pollution Prevention Methods (PPMs). BMPs are steps taken to minimize or control the amount of pollutants and runoff. PPMs are strategies to eliminate the use of polluting materials and/or exposure of potential pollutants to rainwater or other runoff.

To meet these requirements, the project would protect existing storm drain lines, manholes, and catch basins in place and proposes additional storm drains, manholes, catch basins, and a storm drain detention system and flared end section. The purpose of these features is to create infrastructure capable of capturing pollutants and conveying stormwater runoff from the project site. Implementation of standard requirements, BMPs and PPMs, standard measures identified in Mitigation Measure BIO-2, and compliance with the City's Engineering Standards and the Waterways Management Plan related to stormwater management would ensure the project would not substantially affect surface water or groundwater quality. Therefore, potential impacts would be *less than significant with mitigation*.

- b) The project would be serviced by the City's water system, which has four primary water sources, including Whale Rock Reservoir, Salinas Reservoir, Nacimiento Reservoir, and recycled water (for irrigation), with groundwater serving as a fifth supplemental source. The City's diversification of water sources in the last several decades has allowed the City to maintain sufficient water supplies even following the driest years on record. The total water available for the City in the 2020 water year (October 1, 2019, to September 30, 2020) was 10,107 acre-feet per year (AFY), which included 215 AFY

of recycled water. As this availability was adjusted following years of drought and updates to the City's safe annual yield model, the availability is considered a reasonable long-term safe yield value for the purposes of this analysis. The City's water demand for 2020 was 4,730 AF. Stormwater flows within the project site would be contained through the construction of a new stormwater drainage system within the site to allow for percolation back into the groundwater table; therefore, the increase in impervious surface area would not decrease groundwater supplies or interfere substantially with groundwater recharge in the project vicinity. Therefore, the project would not deplete groundwater resources, and impacts would be *less than significant*.

- c.i-iii) The project, as proposed, would not result in direct impacts to the ephemeral drainage located within the project site. The drainage would be protected by a 35-foot setback during project construction and operation. However, project construction consists of excavation and other ground-disturbing activities that could result in temporary impacts to drainage patterns in the area through erosive runoff. In accordance with the City's Municipal Code (Chapter 12.08), the project must develop and implement a SWPPP that includes BMPs to protect stormwater runoff, including measures to prevent soil erosion. In addition, Mitigation Measure BIO-2 would be implemented to minimize impacts of erosive runoff resulting from excavation and other groundwork. Following project construction, the project site would be developed with buildings, hardscapes, or otherwise landscaped, precluding the potential for substantial erosion or loss of topsoil.

Implementation of the project would result in new impervious surfaces, including paved roads, hardscapes, and buildings that have potential to increase polluted runoff. To meet the requirements of the City's Municipal Code (Chapter 12.08), the project would protect existing storm drain lines, manholes, and catch basins in place and proposes additional storm drains, manholes, catch basins, and a storm drain detention system and flared end section. The purpose of these features is to create infrastructure capable of conveying stormwater runoff from the project site to the City's utility connections that can support the additional wastewater. Implementation of a SWPPP and Mitigation Measures BIO-2 would minimize potential impacts to drainages during project construction; therefore, project impacts would be *less than significant with mitigation*.

- c. iv) Based on the City's Parcel Viewer Map, the project site is not located within a 100-year flood zone. Additionally, the drainage located within the project site would be protected by a 35-foot setback during project construction and operation. Therefore, potential impacts associated with impeding or redirection of flood flows would be *less than significant*.
- d) Based on the San Luis Obispo County Tsunami Inundation Maps, the project site is not located in an area with potential for inundation by a tsunami. The project site is not located within close proximity to a standing body of water with the potential for a seiche to occur. Therefore, there would be *no impacts* associated with tsunami, seiche zones, or risk of pollutant release due to project inundation.
- e) Per the City's *General Plan Water and Wastewater Management Element*, Policy A2.2.1, the City has four primary water supply sources, including Whale Rock Reservoir, Salinas Reservoir, Nacimiento Reservoir, and recycled water. Groundwater serves as a fifth supplemental source. The City's diversification of water sources in the last several decades has allowed the City to maintain sufficient water supplies even following the driest years on record. The total water available for the City in the 2020 water year (October 1, 2019, to September 30, 2020) was 10,107 AFY, which included 215 AFY of recycled water. As this availability was adjusted following years of drought and updates to the City's safe annual yield model, the availability is considered a reasonable long-term safe yield value for the purposes of this analysis. The City's water demand for 2020 was 4,730 AF. The project includes stormwater treatment and storage facilities and would not conflict with the City's Waterways Management Plan or other water quality control plans. The project would not conflict with the SGMA, Central Coast Basin Plan, or other local or regional plans or policies intended to manage water quality or groundwater supplies; therefore, impacts would be *less than significant*.

Mitigation Measures

Implement Mitigation Measure BIO-2.

Conclusion

Through project design, implementation of Mitigation Measure BIO-2, standard BMPs, PPMs, and City Engineering Standards, the project would not substantially impede or redirect flood flows, alter existing drainage patterns, degrade surface water quality, decrease groundwater supplies, or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The project would retain the preconstruction infiltration rates and volume currently occurring on

the unimproved project site. Therefore, potential impacts related to hydrology and water quality would be less than significant with mitigation.

11. LAND USE AND PLANNING

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	1, 3, 6	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Evaluation

The project site is comprised of two unoccupied, undeveloped parcels located in the BP zone of the AASP and is generally surrounded by one- and two-story commercial office uses, with a few remaining unimproved parcels, as summarized below:

- Northeast: one- and two-story commercial offices and buildings;
- Northwest: one- and two-story commercial office buildings and restaurant buildings (i.e., SLO Brew Rock);
- Southwest: ephemeral drainage, San Luis Obispo County Regional Airport, and ancillary features (i.e., airport parking lot, buildings); and
- Southeast: one- and two-story commercial offices and buildings.

a) The project would result in the construction and operation of a hotel facility within a currently undeveloped site in the city of San Luis Obispo. The project would be surrounded by other commercial land uses and would not physically divide an established community. The project would be consistent with the general level of development within the project vicinity and would not create, close, or impede any existing public or private roads, or create any other barriers to movement or accessibility within the community. Therefore, the project would not physically divide an established community and *no impacts* would occur.

b) The project would be consistent with the property's BP land use designation and the guidelines and policies for development within the applicable zoning designation, AASP, Land Use Element, and COSE. The project is consistent with existing surrounding development and proposes a compatible land use. Hotel uses are permitted in the BP zone in the AASP with approval of a CUP; therefore, the project would be consistent with existing land uses and designations for the project site and, therefore, would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating environmental effects.

The COSE includes various goals and policies to maintain, enhance, and protect natural communities within the City's planning area. These policies include, but are not limited to, protection of listed species and SSC, preservation of existing wildlife corridors, protection of significant trees, and maintaining development setbacks from creeks. The project site is largely disturbed and does not support highly sensitive environmental resources. The unnamed ephemeral drainage and wetland area at the southwest corner of the project site would be retained in place and protected/enhanced to provide a protected seasonal wetland area. The on-site drainage and associated wetland area would be setback 35 feet from project construction and operations, and implementation of Mitigation Measures BIO-1 through BIO-3 would ensure indirect effects to the drainage, special-status species, and nesting migratory birds resulting from construction activities would be avoided and/or minimized and the project would not result in a conflict with local policies or ordinances protecting

biological resources and impacts. Therefore, the project would not conflict with policies or regulations adopted for the purpose of avoiding or mitigating environmental effects and impacts would be *less than significant with mitigation*.

Mitigation Measures

Implement Mitigation Measures BIO-1 through BIO-3.

Conclusion

The proposed project would not physically divide an established community and would be consistent with surrounding land uses. The project would be consistent with the existing BP zoning designation with City approval of a CUP. The proposed 35-foot design setback from the ephemeral channel within the project site, and implementation of Mitigation Measures BIO-1 through BIO-3 would ensure potential impacts to jurisdictional aquatic habitat, special-status species, and nesting migratory birds would ensure the project would not result in a conflict with local policies or ordinances protecting biological resources and potential impacts would be less than significant.

12. MINERAL RESOURCES

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	3	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	3	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

Based on the City COSE, mineral extraction is prohibited within city limits.

a,b) No known mineral resources are present within the project site and future extraction of mineral resources is very unlikely due to the urbanized nature of the area. Therefore, *no impacts* would occur.

Mitigation Measures

Mitigation measures are not required.

Conclusion

No impacts to mineral resources were identified; therefore, mitigation measures are not required.

13. NOISE

Would the project result in:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	6, 38, 39	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

b) Generation of excessive groundborne vibration or groundborne noise levels?	39, 40, 41	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	32	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Evaluation

The City's Noise Element establishes standards for maximum acceptable noise levels associated with stationary and transportation sources. Noise created by new transportation noise sources are required to be mitigated to not exceed the maximum acceptable noise levels identified in Table 7.

Table 7. Maximum Noise Exposure for Noise-Sensitive Uses due to Transportation Noise Sources

Noise-Sensitive Use	Outdoor Activity Areas ¹	Indoor Spaces		
	Ldn or CNEL, in dB	Ldn or CNEL, in dB	Leq in db ²	Lmax in dB ³
Residences, hotels, motels, hospitals, nursing homes	60	45	--	60
Theaters, auditoriums, music halls	--	--	35	60
Churches, meeting halls, office building, mortuaries	60	--	45	--
Schools, libraries, museums	--	--	45	60
Neighborhood parks	65	--	--	--
Playgrounds	70	--	--	--

Notes: CNEL = Community Noise Equivalent Level; Ldn = day-night average sound level; Leq = equivalent continuous sound level; Lmax = maximum sound level.

¹ If the location of outdoor activity areas is not shown, the outdoor noise standard shall apply at the property line of the receiving land use.

² As determined for a typical worst-case hour during periods of use.

³ Lmax indoor standard applies only to railroad noise at locations south of Orcutt Road.

Outdoor activity areas are not defined in the City's Noise Element but are defined in the *City of San Luis Obispo, Noise Guidebook, Measurement & Mitigation Techniques*. The guidebook states that outdoor activity areas are "patios, decks, balconies, outdoor eating areas, swimming pool areas, yards of dwellings, and other areas commonly used for outdoor activities and recreation."

The City's Noise Element also identifies Policy 1.4 regarding noise created by new transportation sources, including road, railroad, and airport expansion projects, which states noise from these sources shall be mitigated to not exceed the levels specified in Table 7 for outdoor activity areas and indoor spaces of noise-sensitive land uses.

The project site is located in an area where airport operations and roadway traffic dominate the existing noise environment. Hotels are considered a noise-sensitive land use by the City's Noise Element. Per City Municipal Code Chapter 9.12 Noise Control, operating tools or equipment used in construction between weekday hours of 7:00 p.m. and 7:00 a.m. or any time on Sundays or holidays is prohibited, except for emergency works of public service utilities or by exception issued by the Community Development Department. The Municipal Code also states that construction activities shall be conducted in such a manner, where technically and economically feasible, that the maximum noise levels at affected properties will not exceed 85 dBA at mixed residential/commercial uses. Based on the City Municipal Code (9.12.050.B.7), operating any device that creates vibration which is above the vibration perception threshold of an individual at or beyond 150 feet from the source if on a public space or right-of-way is prohibited.

- a) The project includes site preparation and construction of the proposed hotel buildings. During project construction, noise from construction activities may intermittently dominate the noise environment in the immediate area. Typical noise levels produced by equipment commonly used in construction projects are shown in Table 8.

Table 8. Construction Equipment Noise Emission Levels

Equipment Type	Typical Noise Level (dBA) 50 ft From Source
Backhoe	80
Compactor	80
Concrete Mixer	85
Concrete Pump	82
Crane, Mobile	83
Dozer	85
Excavator	85
Heavy Truck	84
Jackhammer	85
Man Lift	85
Paver	85
Scraper	85

As shown above, construction equipment that would be utilized during project construction would not exceed 85 dB and would be similar to other construction activity within the city. Further, the nearest sensitive receptors (i.e., the single-family homes across Broad Street) are located approximately 540 feet northeast of the project site, with the direct line of sight obstructed by existing development. Thus, construction noise, which would be short-term, intermittent, and would only occur during daytime hours per the City Municipal Code (when ambient noise levels are higher), would be largely undetectable at proximate sensitive receptors.

The project does not include components that would significantly add to long-term ambient noise in the project vicinity. Upon completion of construction activities, the project would include the use of heating, ventilation, and air conditioning (HVAC) systems that would have the potential to contribute additional noise to the existing noise environment, as well as mobile noise from project-related traffic. The additional noise generated by the project's HVAC systems would not result in a noticeable increase in ambient noise levels. Relative to vehicular noise, a doubling of traffic is typically needed to produce a noise increase that is audible to the human ear. The project would not result in a doubling of traffic trips; therefore, no substantial increase in mobile source noise would occur. Potential impacts associated with generation of a substantial temporary or permanent increase in ambient noise levels in the project vicinity in excess of standards established would be *less than significant*.

- b) The project does not propose pile driving or other high-impact activities that would generate substantial noise or groundborne vibration during construction. Use of heavy equipment would generate groundborne noise and vibration; however, there are no buildings that surround the project site (i.e., historical buildings and occupants of surrounding buildings) that would be substantially affected by this groundborne vibration. Based on the proposed construction activities, groundborne vibration is expected to be imperceptible at adjacent properties. Therefore, potential impacts would be *less than significant*.
- c) The project site is located within the ALUP Safety Zone S-1c, within the projected 60 dB airport noise contour. The project would be consistent with the property's BP land use designation and the guidelines and policies for development within the applicable zoning designation, AASP, Land Use Element, and COSE. The project is consistent with existing

surrounding development and proposes a compatible land use. As discussed above, the project does not include components that would significantly add to long-term ambient noise in the project vicinity. Operational noise is anticipated to be limited to the use of HVAC systems and operational traffic; however, these uses, combined with noise associated with nearby airport operations, are not anticipated to expose people residing or working in the project area to excessive noise levels; therefore, impacts would be *less than significant*.

Mitigation Measures

Mitigation measures are not required.

Conclusion

The project would not exceed City Municipal Code construction and operational noise standards for commercial development. Further, the project's proposed hotel uses are consistent with the ALUP allowable uses within the 60 dB noise contour. No potentially significant impacts associated with noise would occur and mitigation measures are not required.

14. POPULATION AND HOUSING

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	42, 43	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Evaluation

San Luis Obispo is the largest city in terms of population in San Luis Obispo County and has grown from 45,119 in 2010 to approximately 46,802 in 2019 according to the City's General Plan 2019 Annual Report. The City's housing tenure is approximately 39% owner-occupied and 61% renter-occupied, which is strongly influenced by California Polytechnic State University, San Luis Obispo (Cal Poly) and Cuesta College enrollment. Many segments of the city's population have difficulty finding affordable housing within the city due to their economic, physical, or sociological circumstances. San Luis Obispo contains the largest concentration of jobs in the county and, during workdays, the city's population increases to an estimated 70,000 persons.

The City's Housing Element identifies various goals, policies, and programs based on an assessment of the City's housing needs, opportunities, and constraints. The City's overarching goals for housing include safety, affordability, conservation of existing housing, accommodation for mixed-income neighborhoods, providing housing variety and tenure, planning for new housing, maintaining neighborhood quality, providing special needs housing, encouraging sustainable housing and neighborhood design, maximization of affordable housing opportunities for those who live or work in the City, and developing housing on suitable sites.

- a) The proposed project is consistent with the project site's BP land use and zoning designation. Thus, any indirect population growth resulting from an increase in on-site employment has been planned for with the annexation of the area and with the adoption of the AASP. The project would be consistent with the projected population growth for the city. The project would not result in substantial unplanned population growth; therefore, potential impacts would be *less than significant*.
- b) The project would not result in the displacement of any existing or proposed housing; therefore, *no impacts* would occur.

Mitigation Measures

Mitigation measures are not required.

Conclusion

The project would be consistent with the City's projected population growth. No potentially significant impacts would occur, and mitigation measures are not required.

15. PUBLIC SERVICES

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
Fire protection?	1, 44	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	1, 44	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	1, 44	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	1, 44, 45	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	1, 44	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Evaluation

The project site is located within the existing service area of the City's Fire Department (SLOFD). The SLOFD deploys resources and personnel from four fire stations in order to maintain the response time goal of 4 minutes travel time to 95% of all emergencies. The nearest City fire station to the project site is City Fire Station 3, located at 1280 Laurel Lane, approximately 2 miles north of the project site. City Fire Station 3 provides primary response to the southern portion of the city. This station is staffed by a three-person paramedic engine company. County Fire Station 21 is located at 4671 Broad Street, approximately 0.4 mile southeast of the project site. County Fire Station 21 provides additional fire protection through an automatic aid agreement with the City.

The City's Police Department (SLOPD) provides public safety services for the city and is comprised of 85.5 employees, 59 of which are sworn police officers. The SLOPD operates out of one main police station, located at 1042 Walnut Street at the intersection of Santa Rosa (Highway 1) and U.S. 101, and emergency response times to the site would be less than 5 minutes.

The project site is located within the San Luis Coastal Unified School District (SLCUSD), and public parks and recreation trails within the city are managed and maintained by the City's Parks and Recreation Department.

All new residential and non-residential development within the city is subject to payment of Development Impact Fees, which are administered by and paid through the City's Community Development Department. Development Impact Fees provide funding for maintaining City emergency services, infrastructure, and facilities. For example, fire protection impact fees provide funding for projects such as the renovation of the City's fire stations and the replacement of fire service vehicles and equipment.

- a) **Fire protection:** The project would be served by the SLOFD; the closest station is Fire Station 3, located at 1280 Laurel Lane. The project proposes a new hotel with surface parking that is consistent with the applicable BP land use and zoning designations within the AASP, and the proposed level of development would be compatible with surrounding commercial developments. While the project would not directly result in the need for construction of new fire service facilities, development of a new hotel would result in a marginal cumulative increase in demand on City services, including fire

protection. The project would be required to participate in the City's system of required developer impact fees and dedications established to address direct demand for new facilities associated with new development. Potential increases in property tax revenue associated with valuation of the new businesses and other revenues (e.g., sales tax) would also help offset the increased ongoing cost of provision of public services to the new commercial building. Therefore, impacts associated with the provision of new or physically altered fire protection facilities would be *less than significant*.

Police protection: The project would be served by the SLOPD. Proposed development of a new hotel would result in a marginal increase in demand on City services, including police protection. The project proposes uses generally consistent with the surrounding AASP area and the proposed level of development would be similar to surrounding commercial development. As discussed above, the project would be subject to required developer impact fees established to address direct demand for new facilities associated with new development. Potential increases in property tax revenue associated with valuation of the new businesses and other revenues (e.g., sales tax) would also help offset the increased ongoing cost of provision of public services to new commercial uses. Therefore, a new or physically altered police protection facility would not be required to accommodate the project and impacts would be *less than significant*.

Schools: The project site is located within the SLCUSD and would be subject to payment of SLCUSD developer fees to offset the potential marginal increase in student attendance in the SLCUSD's schools as a result of the project. These fees would be directed towards maintaining sufficient service levels, which include incremental increases in school capacities. The proposed project would not induce unplanned population growth because employees are likely to come from the local workforce and the customer base would not affect enrollment at local schools. Through participation in the existing fee program, potential project impacts on schools would be *less than significant*.

Parks: Proposed development of a new hotel may result in an incremental increase of demand on local parks and recreational facilities in the area. Although employees are likely to come from the local workforce, customers at the new hotel facility may visit local parks and recreational facilities. The project would not induce unplanned population growth and is not expected to result in a significant increase in demand on local parks and recreational facilities. The project is consistent with the City's General Plan designation, AASP, and zoning designation; any indirect population growth resulting from the project would be consistent with the projected population growth for the city. Therefore, potential project impacts on parks would be *less than significant*.

Other public facilities: The project would not induce unplanned population growth and would result in a negligible effect on use of other public facilities, such as roadways and public libraries. The project would be subject to the City's standard development fees, which would offset the project's marginal contribution to increased use of City facilities. Therefore, potential project impacts on public facilities would be *less than significant*.

Mitigation Measures

Mitigation measures are not required.

Conclusion

The project would not induce unplanned population growth because employees are likely to come from the local workforce. Operation of the project may result in a marginal cumulative increase in demand on City services and facilities, including fire protection, police protection, schools, parks and recreational facilities, and other public facilities; however, construction of new facilities is not anticipated to be required. The project would be subject to required developer impact fees established to address direct demand for new facilities associated with new development. Potential increases in property tax revenue associated with valuation of the new businesses and other revenues (e.g., sales tax) would also help offset the increased ongoing cost of provision of public services to new commercial uses. The project would not result in significant impacts to public services; therefore, mitigation measures are not required.

16. RECREATION

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	1, 44, 45	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	1, 44, 45	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Evaluation

Existing City recreational facilities consist of 28 parks and recreational facilities, in addition to 10 designated natural resources and open space areas and two bike trails. The City's Recreation Element identifies goals, policies, and programs to help plan, develop, and maintain community parks and recreation facilities. The City's statement of overall department goals is for the City Parks and Recreation facilities and programs to enable all citizens to participate in fun, healthful, or enriching activities, which enhance the quality of life in the community.

As demand for recreation facilities and activities grow and change, the City intends to focus its efforts in the following areas: continued development of athletic fields and support facilities, providing parks in underserved neighborhoods, providing a multi-use community center and therapy pool, expanding paths and trails for recreational use, linking recreation facilities, and meeting the special needs of disabled persons, at-risk youth, and senior citizens. City Parks and Recreation Element Policy 3.13.1 establishes the City's goal to develop and maintain a park system at the rate of 10 acres of parkland per 1,000 residents, 5 of which shall be dedicated as neighborhood parks.

a,b) Proposed development of a new hotel is not anticipated to result in a significant increase in demand on local parks and recreational facilities in the area. Employees for construction and operation of the hotel are anticipated to come from the local workforce; however, customers of the new hotel may result in a marginal increase in the use of local recreational facilities. As the project is consistent with the City's General Plan designation and underlying zoning, any indirect population growth resulting from the project would be consistent with the projected population growth for the City. Therefore, potential project impacts associated with accelerated deterioration of existing facilities or construction of new park facilities would be *less than significant*.

Mitigation Measures

Mitigation measures are not required.

Conclusion

The project would not induce unplanned population growth because employees are likely to come from the local workforce. Operation of the project may result in a marginal cumulative increase in demand on City recreational facilities; however, construction of new facilities is not anticipated to be required. The project would not result in significant impacts to recreational facilities; therefore, mitigation measures are not required.

17. TRANSPORTATION

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	13, 46	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	1, 13, 46, 54, 57	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	1, 24, 46	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	1, 24, 46	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Evaluation

This evaluation is based, in part, on the *Multimodal Transportation Impact Study for the SLO Airport Hotels Project* prepared by W-Trans in May 2020 (included as Attachment 6.1), the 950 Aero Hotel VMT Analysis prepared by GHD in December 2020 (included as Attachment 6.2), the Recommended Transportation Demand Measures prepared for the 950 Aero SLO Hotel Project by GHD in December 2020 (included as Attachment 6.3), and the Automobile Trip Reduction Plan prepared for the SLO Airport Hotel Project by Arris Studio Architects in February 2020 (included as Attachment 6.4).

The City's Circulation Element identifies current traffic levels and delays of public roadways and identifies transportation goals and policies to guide development and express the community's preferences for current and future conditions. Goals included in the plan include, but are not limited to, maintaining accessibility and protecting the environment throughout San Luis Obispo while reducing dependence on single-occupant use of motor vehicles; reducing use of cars by supporting and promoting alternatives such as walking, riding buses and bicycles, and carpooling; promoting the safe operation of all modes of transportation; and widening and extending streets only when there is a demonstrated need and when the projects would cause no significant, long-term environmental problems.

Level of Service (LOS) is a term used to describe the operating conditions of an intersection or roadway based on factors such as speed, travel time, queuing time, and safety. LOS designations range between A and F, with A representing the best operating conditions and F the worst. The City's Circulation Element establishes the minimum acceptable LOS standard for vehicles in the downtown area of the city as LOS E and LOS D for all other areas and states any degradation of the LOS below these standards shall be interpreted as transportation operations deficiency under local policy thresholds. While LOS deficiencies are evaluated for local policy conformity, LOS or other measures of automobile congestion/delay are not applied when evaluating transportation impacts under CEQA.

The *City of San Luis Obispo Bicycle Transportation Plan* outlines the City's official policies for the design and development of bikeways within the city and in adjoining territory under County of San Luis Obispo jurisdiction but within the City's Urban Reserve and includes specific objectives for reducing vehicle use and promoting other modes of transportation. A Class I bike path provides a completely separated right-of-way for the exclusive use of bicycles and pedestrians with crossflow by motorists minimized. A Class II bike lane provides an on-street striped lane for one-way bicycle travel on the side of the street adjacent to vehicle traffic.

In 2013, SB 743 was signed into law with the intent to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions" and required the Governor's Office of Planning and Research (OPR) to identify new metrics for identifying and mitigating transportation impacts within CEQA. As a result, in December 2018, the California Natural Resources Agency certified and adopted updates to the State CEQA Guidelines. The revisions included new requirements related to the implementation of SB 743 and identified VMT per capita, VMT per employee, and net VMT as new metrics for transportation

analysis under CEQA (as detailed in Section 15064.3[b]). In June 2020, the City formally adopted the transition from LOS to VMT for the purposes of CEQA evaluation and also establish local VMT thresholds of significance.

The project site would be accessed by Aero Drive, a two-way local roadway that, in combination with Aerovista Place, provides a two-lane loop surrounding the project site and buildings north of the project site, with both the northern and southern termini ending at an intersection with Broad Street. At the project site, the City's Circulation Element designates Aero Drive as LOS A. LOS A streets are characterized as free-flow travel with excellent level of comfort and convenience. Based on the City's Traffic County & Speed Surveys Map, the average daily motor vehicle trip volume (ADT) on Aero Drive west of Broad Street is 2,193. Average daily pedestrian volume is six trips, and average daily bicycle volume is seven trips. On Broad Street adjacent to the project site, ADT volume is 19,739, average daily pedestrian volume is 19, and 63 trips for bicycles. On Broad Street southeast of the project site, ADT volume is 18,239 trips for motor vehicles, eight trips for pedestrians, and 54 trips for bicycles.

All roadways in the immediate project vicinity have curbs, gutters, sidewalks, and on-street parking. Broad Street in the project vicinity is a north-south roadway designated as a Highway (Highway 227) and provides two lanes of travel in each direction with a center turn lane. The northern intersection of Broad Street and Aerovista Place is a three-way intersection with stop sign control for drivers on Aerovista Place turning onto Broad Street. A dedicated left-turn lane is provided on northbound Broad Street. The southern intersection of Broad Street and Aero Drive is a signalized four-legged intersection that serves as the primary access to the San Luis Obispo County Regional Airport terminal. Broad Street has designated Class II bike lanes in both directions.

- a) The project proposes infill development in the AASP area of the city, in an area surrounded by commercial office and building uses. The project site would be accessed by a new driveway off Aero Drive. The project would be consistent with the goals and policies outlined in the City's Circulation Element regarding traffic congestion reduction through compliance with City Zoning Regulations requiring provision of secure bicycle storage, showers, and locker and changing room facilities to encourage project employees to use alternative modes of transportation. The project would also be required to reduce traffic congestion by providing guests with alternative modes of transportation such as a shuttle or rideshare service. The project site is located within immediate proximity of Class II bicycle lanes on Broad Street, as identified in the City's Active Transportation Plan. The project would require the payment of the City's standard Traffic Impact Fees (TIF). The project does not include any changes to the land use or zoning designation, or associated development standards as identified in the AASP, and is consistent with the AASP Certified Environmental Impact Report (EIR). Therefore, with the payment of standard TIFs, project impacts associated with conflicts with any program, plan, ordinance, or policy addressing transportation facilities would be *less than significant*.
- b) VMT is disclosed and assessed in comparison to citywide and countywide averages. Based on the Draft 2016 Community Greenhouse Gas Emissions Inventory Update, total VMT in San Luis Obispo County in 2016 was approximately 8.3 million; VMT in the city in 2016 was approximately 0.5 million. As reported by the City's Traffic Demand Model, the forecasted 2035 Daily VMT is approximately 12 million miles for the region and approximately 1.5 million miles for the City's sphere of influence. The average VMT per household is 80 for the region and 54 for the City's sphere of influence. According to VMT analysis conducted by GHD for the proposed project, the project would result in a net increase of 393 VMT, constituting a 0.005% increase. This increase in traffic generated by the proposed project would exceed the City's adopted VMT thresholds by the equivalent of approximately 48 daily auto trips, resulting in a significant impact. According to the Multimodal Transportation Impact Study prepared for the project (W-Trans 2020), the project is expected to generate an average of 1,822 daily trips. Based on an assessment of trip lengths from the project's traffic analysis zone within the model it is estimated the average project trip length is approximately 8.3 miles. Therefore, approximately 48 project trips are contributing to the net increase in regional VMT. The project will need to implement transportation demand management (TDM) measures to reduce VMT by 393 or approximately 48 daily trips (3% reduction). Mitigation Measures TR-1 and TR-2 have been included to ensure the project does not result in a net increase in regional VMT. As described in the Recommended Transportation Demand Measures document prepared for the proposed project, the TDM measures would result in a VMT reduction of 4.93%. Further, through compliance with City Zoning Regulations requiring provision of secure bicycle storage, showers, and locker and changing room facilities to encourage project employees to use alternative modes of transportation, as well as being within immediate proximity of the Class II bicycle lane on Broad Street, the project would promote alternate modes of travels that would further reduce VMT. Therefore, the project would be consistent with the standards set forth in State CEQA Guidelines Section 15064.3(b) and impacts would be *less than significant with mitigation*.

- c) During construction, the project would result in periodic access restrictions along road shoulders and parking areas along Aero Drive. Periodic closures of road shoulders and parking areas and the use and transport of construction vehicles and equipment would not substantially affect local traffic on Aero Drive. The project proposes a driveway entrance on a straight segment of Aero Drive that does not contain dangerous curves, short sight distance, or other dangerous design features. The driveway would be designed in accordance with the City's Public Works safety design standards, including the use of red "no parking" curb paint on either side of the driveway entrance to allow for safe turning movements and provide motorists an adequate line of sight from the driveway. The project will be reviewed by the Transportation and Engineering Divisions prior to approval of any building permits. Therefore, project impacts associated with increased hazards due to a geometric design feature would be *less than significant*.
- d) The project has been designed to comply with the State and City Fire Codes and would be subject to review by the City Fire Marshal to ensure adequate emergency access has been provided. Therefore, potential impacts related to inadequate emergency access would be *less than significant*.

Mitigation Measures

TR-1 Trip Reduction Coordinator. The project applicant shall identify a Trip Reduction Coordinator to act as the contact person for the City of San Luis Obispo and SLO Regional Rideshare. The Coordinator shall be responsible for:

1. Implementing an annual vehicle trip survey (can be administered through SLO Regional Rideshare.)
2. Preparing an annual report, subject to the City's review and approval, on the program's effectiveness and recommendations for revisions if needed to improve the program's effectiveness.
3. Providing quarterly information (electronically or hard copy) regarding area transportation services and City and County transit passes.
4. Coordinating employee transportation board meetings.
5. Coordinator will be responsible for establishing the Back 'N' Forth Club (for employees sponsored by Rideshare for the complex at a minimum of the Silver level).

TR-2 The project applicant shall submit a proposed Transportation Demand Management (TDM) Plan and Monitoring Program for City review prior to issuance of building permits. City approval of a Final TDM Plan and Monitoring Program is required prior to issuance of occupancy permits. The applicant shall submit a TDM Performance Monitoring Report at 12 months and 24 months after first occupancy and agree to annual TDM compliance inspections by the City Transportation Division. Transportation Demand Management (TDM) measures shall be implemented to reduce the project's trip generation by at least 3% and may include, but are not limited to, the measures identified in GHG-1 and the following measures:

1. **Shuttle Service.** The hotel shall offer a shuttle service to the airport terminal and downtown as requested by the guests. The hotel will also coordinate with local wine tours to encourage guests interested in wine tasting to utilize communal travel options rather than individual vehicles.
2. **Community Transportation Board.** A group of managers and employees, including the Trip Reduction Coordinator who meets to discuss and implement new ways to encourage employees and guests to participate in the community's alternative transportation programs.
3. **Shared Automobile.** On-site accommodations will be made available for a communal short-term rental car to enable guests to utilize a shared vehicle for short errands and other related needs. It is estimated that utilizing a car-sharing program alone will offset up to 10 required parking spaces. One company that offers this service is Zipcar. Information on their services can be found on their website (<https://www.zipcar.com/>) or similar.
4. **Bicycle Repair Station.** A convenient station equipped with all of the tools necessary for employees to perform basic bike repairs and maintenance.
5. **Long-term Bicycle Parking.** The project shall provide adequate, secure long-term bicycle parking for employees.
6. **Showers and Locker Facilities.** The hotel will include shower and locker facilities for employees that bike to work.

7. **Shared Bicycles for Guests.** The hotel will own and maintain bicycles available for guests to use to as an alternative to using vehicles.
8. **SLO Rideshare Back 'N' Forth Club.** The project shall participate in the SLO Rideshare Back 'N' Forth Club.
9. **Transit Passes.** The project shall provide free or discounted transit passes to employees.
10. **Information Packets.** Introductory packets, in either electronic or hardcopy form, for new employees with information pertaining to the car-sharing program, bicycle parking, bicycle repair station and a map showing the nearby bus stops.
11. **Information Sharing.** Management will distribute emails to keep the employees informed of activities. These emails will include up-to-date facts on car sharing availability, bicycle parking locations, alternative transportation programs and transit schedules. These emails will also include maps showing walking and bicycle routes to nearby retail, dining, and service locations. These emails will be distributed to all residents.

Conclusion

The project would result in a net increase in trips and VMT and would exceed the City's established thresholds for VMT; therefore, the project would be inconsistent with the City's Circulation Element and CEQA Guidelines Section 15064.3 subdivision (b) regarding VMT. Mitigation has been included to ensure payment of appropriate TIF fees and implementation of Transportation Demand Management measures to reduce VMT by at least 3%. The project would be required to meet City Public Works safety design standards and would maintain adequate emergency access. Therefore, potential impacts associated with transportation would be *less than significant with mitigation*.

18. TRIBAL CULTURAL RESOURCES

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, or 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:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Evaluation

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

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

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

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

Native American Tribes were notified about the project consistent with State and City regulations under AB 52. As of January 18, 2021, the City has received one response from Patti Dunton of the Salinas Tribe of San Luis Obispo and Monterey Counties.

- a,b) The City has provided notice of the opportunity to consult to appropriate tribes per the requirements of AB 52 and received one response from Patti Dunton of the Salinas Tribe of San Luis Obispo and Monterey Counties, as of January 18, 2021. Ms. Dunton submitted a response via email on January 11, 2021, requesting mitigation measures be included for the project so that, if any resources are unearthed, all work in the area shall stop until a qualified archaeologist can evaluate the find and if any human remains are unearthed, all work shall stop, and state laws shall be adhered to. The project site does not contain any known tribal cultural resources that have been listed or been found eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1. Mitigation Measures CR-1 through CR-3 have been identified to require cultural resource awareness training, and cessation of work if a discovery is made until a qualified archaeologist can assess the significance of the find. Therefore, impacts related to a substantial adverse change in the significance of tribal cultural resource would be *less than significant with mitigation*.

Mitigation Measures

Implement Mitigation Measures CR-1 through CR-3.

Conclusion

With implementation of Mitigation Measures CR-1 through CR-3, the project would have a less-than-significant impact on tribal cultural resources.

19. UTILITIES AND SERVICE SYSTEMS

Would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	47, 50, 51	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	49, 50	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	47, 50, 57	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	48, 49, 50	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	3, 49, 50	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Evaluation

The City's Utilities Department is the sole water provider within the city, provides potable and recycled water to the community, and is responsible for water supply, treatment, distribution, and resource planning. The City's Water Resource Recovery Facility (WRRF) treats all of the wastewater from the city, Cal Poly, and the airport. The facility treats 4.5 million gallons of wastewater per day. The WRRF manages and treats wastewater in accordance with standards established by the SWRCB to remove solids, reduce the amount of nutrients, and eliminate bacteria in treated wastewater. A portion of the treated water is recycled for irrigation use within the city and the remaining flow is discharged to San Luis Obispo Creek.

Water service for the project would be provided by the City's Utilities Department and the project would be served by the City's sewer system. The project site has existing utility infrastructure on-site, including a storm drain line, a storm drain manhole, a storm drain catch basin, a sewer line located off of Broad Street, a sewer cleanout, a water line, a recycled water line, a water valve, a fire hydrant, a water meter, an electrical line, and a gas line.

a) The project includes the installation of new water, wastewater, stormwater, and energy extensions and connections to City infrastructure. Necessary connections would be along the property site frontage and would not require off-site utility extensions or improvements. These components have been evaluated for their potential to result in adverse environmental effects throughout this document. Mitigation Measures AQ-1 through AQ-5, BIO-1 through BIO-3, CR-1 through CR-3, GHG-1, and TR-1 and TR-2 would reduce potentially significant environmental impacts resulting from installation and establishment of new utility connections associated with air quality, biological resources, and cultural resources to a less-than-significant level. Therefore, potential environmental impacts associated with construction of utility connections would be *less than significant with mitigation*.

b) The project would require an estimated 87.72 acre-feet of water per year during operation for the interior uses and landscape watering. Per the City's Water and Wastewater Management Element, Policy A2.2.1, the City has four primary water supply sources, including Whale Rock Reservoir, Salinas Reservoir, Nacimiento Reservoir, and recycled water. Groundwater serves as a fifth supplemental source. The City's diversification of water sources in the last several decades has allowed the City to maintain sufficient water supplies even following the driest years on record. The total water available for the City in the 2020 water year (October 1, 2019, to September 30, 2020) was 10,107 AFY, which included 215 AFY of recycled water. As this availability was adjusted following years of drought and updates to the City's safe annual yield model, the availability is considered a reasonable long-term safe yield value for the purposes of this analysis. The City's water demand for 2020 was 4,730 AF.

Therefore, based on the project's consistency with the General Plan and AASP, and the City's current and projected water availability to serve the project, potential impacts associated with having sufficient water supplies during normal, dry, and multiple dry years would be *less than significant*.

c) The project would be served by the City's wastewater system and would include the installation of a new wastewater pipe to connect to existing City wastewater infrastructure along Broad Street. Estimated average dry weather flow would be 14,280 gallons per day. Thus, the project would result in an incremental increase in demand on the City's WRRF and wastewater conveyance infrastructure. The project is consistent with the general level of growth anticipated in the City's General Plan and AASP and would be required to pay standard development impact fees to offset the project's incremental contribution to demand on the City's WRRF. Therefore, impacts associated with the wastewater treatment provider's capacity to serve the project's wastewater needs would be *less than significant*.

d) Based on the California Department of Resources Recycling and Recovery (CalRecycle), the project would result in the generation of approximately 408 pounds of solid waste per day (Table 9).

Table 9. Estimated Project Solid Waste Generation

Use	Generation Rate	Project	Pounds Solid Waste Per Day
Hotel	2 lbs/room/day	204 rooms	408
Total			408

Project construction and operational solid waste materials would likely be disposed of at the Cold Canyon Landfill. The Cold Canyon Landfill has approximately 14,500,000 cy of remaining capacity as of March 2020, with a maximum daily permitted intake capacity of 1,650 tons per day. Based on these capacities, the Cold Canyon Landfill is expected to remain operational through at least 2040. Therefore, potential impacts related to solid waste reduction goals and capacity would be *less than significant*.

- e) Background research for the Integrated Waste Management Act of 1989 (AB 939) shows that Californians dispose of roughly 2,500 pounds of waste per month. Over 90% of this waste goes to landfills, posing a threat to groundwater, air quality, and public health. To help reduce the waste stream generated by this project, consistent with the City's COSE policies to coordinate waste reduction and recycling efforts (COSE 5.5.3), and the City's Development Standards for Solid Waste Services, recycling facilities have been incorporated into the project design and a solid waste reduction plan for recycling discarded construction materials is a submittal requirement with the building permit application. Therefore, the project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste and impacts would be *less than significant*.

Mitigation Measures

Implement Mitigation Measures AQ-1 through AQ-5, BIO-1 through BIO-3, CR-1 through CR-3, GHG-1, and TR-1 and TR-2.

Conclusion

With implementation of the identified mitigation measures, the project's potential impacts associated with utilities and service systems would be less than significant.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	1, 24	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	1, 24, 52	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	1, 24	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Evaluation

Urban fire hazards result from the materials, size, and spacing of buildings, and from the materials, equipment, and activities they contain. Additional factors include access, available water volume and pressure, and response time for fire fighters. Based on the City Local Hazard Mitigation Plan, the risk of wildland fires is greatest near the City limits where development meets rural areas of combustible vegetation. Most of the community is within one mile of a designated High or Very High Fire Hazard Severity Zone, which indicates significant risk to wildland fire.

The City's Safety Element identifies four policies to address the potential hazards associated with wildfire, including approving development only when adequate fire suppression services and facilities are available, classification of wildland fire hazard severity zones as prescribed by the California Department of Forestry and Fire Protection (CAL FIRE), prohibition of new subdivisions located within "Very High" wildland fire hazard severity zones, and continuation of enhancement of fire safety and construction codes for buildings.

- a) Implementation of the project would not result in a significant temporary or permanent impact to any adopted emergency response plans or emergency evacuation plans. No breaks in utility service would occur as a result of project implementation. During operation, the project would result in an increase in the number of employees in the AASP and, therefore, would result in an increase in the number of evacuees traveling on evacuation routes such as Broad Street (Highway 227) and U.S. 101. This increase would be marginal and would not result in substantial impairment of the applicable evacuation plans and/or routes; therefore, potential impacts would be *less than significant*.
- b) The project site is located in a developing area of the city. The project site is currently unimproved and requires routine mowing to prevent the growth of brush that could result in a fire hazard to adjacent properties. The project would not substantially change the existing topography of the project site. The project would result in the conversion of the existing undeveloped site into a fully developed site comprised of a hotel with surface parking and ornamental landscaping, which would reduce wildfire fuels on-site and may marginally reduce the potential for fire hazard in the immediate project vicinity. The project would be required to meet all applicable standards for fire prevention pursuant to the CBC and California Fire Code. For instance, the project would include the installation of a new fire hydrant and fire department connection as well as additional an additional water line. A fire sprinkler system would also be installed within the building. Therefore, the project would not exacerbate wildfire risks or expose project occupants to substantial pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Potential impacts would be *less than significant*.
- c) The project includes the installation of new water, emergency water, wastewater, stormwater, and energy extensions and connections to City infrastructure. These proposed infrastructure components would occur within an urbanized area and would be required to be installed in full compliance with applicable CBC and California Fire Code regulations. As discussed above, construction of this infrastructure would not result in substantial temporary or ongoing impacts on the environment. Therefore, potential impacts associated with exacerbation of fire risk or environmental impacts from installation of new infrastructure would be *less than significant*.
- d) The project site is generally flat and is not located near slopes or other areas subject to downstream flooding or landslides. The project does not include any design elements that would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be *less than significant*.

Mitigation Measures

Mitigation measures are not required.

Conclusion

The project would not expose people or structures to new or exacerbated wildfire risks and would not require the development of new or expanded infrastructure or maintenance to reduce wildfire risks. Therefore, potential impacts associated with wildfire would be *less than significant* and mitigation measures are not required.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	1, 2, 15, 16, 18, 25	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The project is proposed in the developing AASP area of the city of San Luis Obispo and the project vicinity generally contains low habitat value for protected plant and animal species. Although the project site is unimproved, it is routinely mowed for fire protection, as required by the City. An ephemeral drainage and associated wetland habitat are located in the southwestern portion of the project area and would be avoided and protected by a 35-foot setback during project construction and operation. There is potential for special-status plant and animal species to occur on-site and mitigation measures have been incorporated to avoid and minimize potential impacts to these resources. Mitigation Measures BIO-1 and BIO-2 have been identified to avoid potential impacts to CRLF and VPFS should they occur within the ephemeral drainage and Mitigation Measure BIO-3 has been identified to avoid impacts to migratory nesting birds if construction activities occur during the typical nesting season.</p> <p>There are no known historic or prehistoric resources within the project site and Mitigation Measures CR-1 through CR-3 would reduce potential inadvertent discovery of these resources to less than significant. With implementation of identified mitigation measures and standard requirements, the project would not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of 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. Potential impacts would be <i>less than significant with mitigation</i>.</p>					
	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	N/A	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The project proposes the development of a hotel facility that is consistent with the AASP land use designation and the project site’s BP zoning. The AASP area would continue to be developed in accordance with the allowable development permitted in the AASP. When project impacts are considered in combination with other reasonably foreseeable impacts, the project’s potential cumulative impacts may be significant. Mitigation measures have been identified to reduce project-related impacts to a less-than-significant level. With the implementation of identified project-specific mitigation measures and payment of the City’s standard Development Impact Fees, the individual effects of the project would be marginal and cumulative effects of the project would not be cumulatively considerable. Therefore, potential impacts would be <i>less than significant with mitigation</i>.</p>					

	Sources	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	N/A	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The project has the potential to result in significant impacts associated with air quality that, if left unmitigated, could result in substantial adverse effects on human beings. Standard mitigation measures have been identified to reduce these potential impacts to less than significant, including, but not limited to, standard idling restrictions, dust control measures, implementation of BMPs, and compliance with the CARB ATCM for Construction, Grading, Quarrying, and Surface Mining Operations to avoid impacts related to naturally occurring asbestos. With incorporation of identified project-specific mitigation and the payment of the City's standard Development Impact Fees, potential environmental effects of the project would not directly or indirectly result in any substantial adverse effects on human beings. Therefore, potential impacts would be <i>less than significant with mitigation</i>.</p>					

22. EARLIER ANALYSES

<p>Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or Negative Declaration. Section 15063 (c) (3) (D). In this case a discussion should identify the following items:</p>
<p>a) Earlier analysis used. Identify earlier analyses and state where they are available for review.</p>
<p>The potential environmental effects of developing the project site with uses consistent with the BP zoning designation were previously evaluated in the Certified EIR for the AASP (SCH # 2000051062), which was certified by the City Council in September 2003. The Certified EIR is available on the city's Community Development Department website at: <https://www.slocity.org/government/departments-directory/community-development/documents-online/environmental-review-documents/-folder-719></p>
<p>b) Impacts adequately addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.</p>
<p>In general, the Certified EIR adequately analyzed the environmental effects of developing the project site with uses permitted under the BP zoning designation. Section 15152 of the State CEQA Guidelines allows the Lead Agency to “tier” the environmental analysis for separate but related projects. Per Section 15152(b) of the State CEQA Guidelines, tiering “can eliminate repetitive discussions of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy, or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration.” Per Section 15152(d) of the State CEQA Guidelines, tiering “shall be limited to situations where the project is consistent with the general plan and zoning of the city or county in which the project is located, except that a project requiring a rezone to achieve or maintain conformity with a general plan may be subject to tiering.”</p> <p>The preparation of a Tiered Initial Study/Mitigated Negative Declaration (IS/MND) for this project, which is consistent with the general plan and zoning, may have been appropriate, except that the existing baseline conditions, regulatory requirements and standard of analysis under CEQA, regulatory planning documents, and standards of mitigation have been improved considerably since the EIR was certified in September 2003. For example, in September 2003, CEQA did not require the evaluation of GHG emissions, energy consumption, VMT, tribal cultural resources, or wildfires. Many of the mitigation requirements listed in the AASP would need to be updated to meet more stringent and performance-oriented standards since the Certified EIR. Further, the existing setting and background conditions within the AASP have changed meaningfully since the AASP EIR was certified. As a result, this IS/MND incorporated information and findings from the Certified EIR where appropriate, but also evaluated the project's potential environmental impacts at the project level, with project-specific mitigation measures.</p>
<p>c) Mitigation measures. For effects that are “Less than Significant with Mitigation Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions of the project.</p>
<p>As discussed above, project-specific mitigation measures have been developed for the project to address a more stringent regulatory environment and more complex analysis methodology. All project-specific mitigation measures recommended in this IS/MND are consistent with and build upon the programmatic mitigation measures identified in the Certified EIR.</p>

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Attachments

1. Arris Studio Architects, SLO Airport Hotel Design Plans (May 2020)
2. AMBIENT Air Quality & Noise Consulting, Emissions Modelling Report (January 2021)
3. Terra Verde Environmental Consulting, Biological Constraints Memorandum (February 2020)
4. Terra Verde Environmental Consulting, Waters and Wetlands Delineation Report (February 2020)
5. LEED Project Checklist (February 2020)
- 6.1. W-Trans, Multimodal Transportation Impact Study for the SLO Airport Hotels Project (May 2020)
- 6.2. GHD, 950 Aero Hotel VMT Analysis (December 2020)
- 6.3. GHD, 950 Aero SLO Hotel Project Recommended Transportation Demand Measures (December 2020)
- 6.4. Arris Studio Architects, 790 Foothill – Automobile Trip Reduction Plan (February 2020)

REQUIRED MITIGATION AND MONITORING PROGRAMS

Air Quality

AQ-1 During all construction activities and use of diesel vehicles, the applicant shall implement the following idling control techniques:

1. **Idling Restrictions Near Sensitive Receptors for Both On- and Off-Road Equipment**
 - a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors if feasible;
 - b. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted;
 - c. Use of alternative fueled equipment shall be used whenever possible; and
 - d. Signs that specify the no idling requirements shall be posted and enforced at the construction site.
2. **California Diesel Idling Regulations.** On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:
 - a. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and,
 - b. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.

Signs must be posted in the designated queuing areas and job sites to remind drivers of the 5-minute idling limit. The specific requirements and exceptions in the regulation can be reviewed at the following website: www.arb.ca.gov/msprog/truck-idling/2485.pdf.

AQ-2 During all construction and ground-disturbing activities, the applicant shall implement the following particulate matter control measures and detail each measure on the project grading and building plans:

1. Reduce the amount of disturbed area where possible.
2. Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding San Luis Obispo County Air Pollution Control District (SLOAPCD) limit of 20% opacity for no greater than 3 minutes in any 60-minute period. Increased watering frequency shall be required whenever wind speeds exceed 15 miles per hour (mph) and cessation of grading activities during periods of winds over 25 mph. Reclaimed (non-potable) water is to be used in all construction and dust-control work.
3. All dirt stockpile areas (if any) shall be sprayed daily and covered with tarps or other dust barriers as needed.
4. Permanent dust control measures identified in the approved project revegetation and landscape plans shall be implemented as soon as possible, following completion of any soil-disturbing activities.
5. Exposed grounds that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating, non-invasive, grass seed and watered until vegetation is established.
6. All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical binders, jute netting, or other methods approved in advance by the SLOAPCD.
7. All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible. In addition, building pads shall be laid as soon as possible after grading unless seeding or soil binders or soil binders are used.
8. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.
9. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or shall maintain at least 2 feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code Section 23114.

10. Install wheel washers where vehicles enter and exit unpaved roads onto streets or wash off trucks and equipment leaving the site. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads.
11. Water sweepers shall be used with reclaimed water where feasible. Roads shall be pre-wetted prior to sweeping when feasible.
12. All PM₁₀ mitigation measures required shall be shown on grading and building plans.
13. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below the SLOAPCD limit of 20% opacity for no greater than 3 minutes in any 60-minute period. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Compliance Division prior to the start of any grading, earthwork, or demolition.

AQ-3 Prior to initiation of demolition/construction activities, the applicant shall retain a registered geologist to conduct a geologic evaluation of the property including sampling and testing for naturally occurring asbestos in full compliance with California Air Resources Board (CARB) Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (CARB ATCM Section 93105) and SLOAPCD requirements. This geologic evaluation shall be submitted to the City Community Development Department upon completion. If the geologic evaluation determines that the project would not have the potential to disturb naturally occurring asbestos (NOA), the applicant must file an Asbestos ATCM exemption request with the San Luis Obispo County Air Pollution Control District (SLOAPCD).

AQ-4 If naturally occurring asbestos (NOA) are determined to be present on-site, proposed earthwork and construction activities shall be conducted in full compliance with the various regulatory jurisdictions regarding NOA, including the California Air Resources Board (CARB) Asbestos Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (CARB ATCM Section 93105) and requirements stipulated in the National Emission Standards for Hazardous Air Pollutants (40 Code of Federal Regulations 61, Subpart M – Asbestos; NESHAP). These requirements include, but are not limited to, the following:

1. Written notification, within at least 10 business days of activities commencing, to the San Luis Obispo County Air Pollution Control District (SLOAPCD);
2. Preparation of an asbestos survey conducted by a Certified Asbestos Consultant; and,
3. Implementation of applicable removal and disposal protocol and requirements for identified NOA.

AQ-5 Asbestos Material in Demolition. Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos-containing material (ACM). ACMs could be encountered during demolition or remodeling of existing buildings. Asbestos can also be found in utility pipes/pipelines (transite pipes or insulation on pipes). If utility pipelines are scheduled for removal or relocation or a building(s) is proposed to be removed or renovated, various regulatory requirements may apply, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40 Code of Federal Regulations [CFR] 61, Subpart M - asbestos NESHAP). These requirements include but are not limited to: (1) notification to the APCD; (2) an asbestos survey conducted by a Certified Asbestos Inspector; and (3) applicable removal and disposal requirements of identified ACM. More information on asbestos can be found at <http://www.slocleanair.org/business/asbestos.php>.

Monitoring Program: Measures AQ-1 through AQ-5 shall be incorporated into project grading and building plans for review and approval by the City Community Development Department. Compliance shall be verified by the City during regular inspections, in coordination with the SLOAPCD, as necessary. The applicant shall submit the geologic evaluation detailed in measure AQ-3 to the City Community Development Department upon completion.

Biological Resources

BIO-1 The following measures shall be implemented prior to and during construction to avoid potential direct mortality and loss of California red-legged frogs:

1. Prior to the initial site investigation and subsequent ground-disturbing activities, a qualified biologist will instruct all project personnel in worker awareness training, including recognition of California red-legged frogs and their habitat.
2. A qualified biologist will conduct preconstruction surveys within the project area no earlier than 2 days before ground-disturbing activities.
3. No activities shall occur after October 15 or the onset of the rainy season, whichever occurs first, until May 1, except for during periods greater than 72 hours without precipitation. Activities can only resume after site inspection by a qualified biologist. The rainy season is defined as a frontal system that results in depositing 0.25 inches or more of precipitation in one event.
4. Vehicles to and from the project site will be confined to existing roadways to minimize disturbance of habitat.
5. Prior to movement of a backhoe in the project area, a qualified biologist will make sure the route is clear of California red-legged frogs.
6. If a California red-legged frog is encountered during excavations, or any project activities, activities will cease until the frog is removed and relocated by a U.S. Fish and Wildlife Service-approved biologist. Any incidental take will be reported to the USFWS immediately by telephone at (916) 414-6600.

BIO-2 The following measures shall be implemented prior to and during construction to avoid impacts to hydrological resources located within and in the vicinity of the project site:

1. The limits of all work areas shall be clearly delineated in the field during construction and personnel shall be informed of the need to avoid impacts to jurisdictional aquatic features (i.e., waters and wetlands).
2. For short-term, temporary stabilization, an erosion and sedimentation control plan shall be developed outlining Best Management Practices (BMPs) and implemented to prevent erosion and sedimentation into the channel during construction. Acceptable stabilization methods include the use of weed-free, natural fiber (i.e., non-monofilament) fiber rolls, jute or coir netting, and/or other industry standards. BMPs shall be installed and maintained for the duration of the construction period.
3. The mapped limits of jurisdictional areas shall be clearly shown on all site plans and flagged prior to the start of any construction activity within 50 feet of the limits of the drainage.
4. All equipment and materials shall be stored a minimum of 35 feet from the edge of the drainage at the end of each working day, and secondary containment shall be used to prevent leaks and spills of potential contaminants from entering the drainage.
5. During construction, washing of concrete, paint, or equipment and refueling and maintenance of equipment shall occur only in designated areas a minimum of 35 feet from all drainages and aquatic features. Sandbags and/or sorbent pads shall be available to prevent any fluid releases from entering the drainage.
6. Construction equipment shall be inspected by the operator on a daily basis to ensure that equipment is in good working order and no fuel or lubricant leaks are present.
7. Where feasible, the project shall incorporate low impact development (LID) features, including bioswales and permeable pavers, into the overall site design to retain runoff on site and avoid increased surface runoff into the drainage.
8. Where feasible, the project shall incorporate vegetated buffers, bioswales, and/or rain gardens on the drainage side of the development.
9. The use of landscaping plants that are known or have potential to become invasive shall be prohibited.

BIO-3 If any ground disturbance will occur during the nesting bird season (February 1–September 15), prior to any ground-disturbing activity, a preconstruction nesting bird survey shall be conducted by a qualified biologist within 1 week prior to the start of activities. If nesting birds are located on or near the project site, they shall be avoided until they have successfully fledged, or the nest is no longer deemed active. A non-disturbance buffer of 50 feet will be implemented for non-listed, passerine species and a 250-foot buffer will be implemented for raptor species. No construction activities will be permitted within established nesting bird buffers until a qualified biologist has determined that the young have fledged or that proposed construction activities would not cause adverse impacts to the nest, adults, eggs, or young. If special-status avian species are identified, no work shall be conducted until an appropriate buffer is determined in consultation with the City and the California Department of Fish and Wildlife and/or U.S. Fish and Wildlife Service.

Monitoring Program: The survey requirements of Mitigation Measures BIO-1 and BIO-3 shall be incorporated into the project grading and building plans for review and approval by the City Community Development Department and verified through submittal of a preconstruction nesting bird survey report to the City Community Development Department. The City Community Development Department shall confirm that all BMPs included in BIO-2 to avoid impacts to aquatic resources are incorporated into the grading plans prior to approval. Compliance shall be verified by the City prior to the start of construction and during regular inspections, as necessary.

Cultural Resources

CR-1 Prior to construction activities, a City-qualified archaeologist shall conduct cultural resource awareness training for all construction personnel including the following:

1. Review the types of archaeological artifacts that may be uncovered;
2. Provide examples of common archaeological artifacts to examine;
3. Review what makes an archaeological resource significant to archaeologists and local Native Americans;
4. Describe procedures for notifying involved or interested parties in case of a new discovery;
5. Describe reporting requirements and responsibilities of construction personnel;
6. Review procedures that shall be used to record, evaluate, and mitigate new discoveries; and
7. Describe procedures that would be followed in the case of discovery of disturbed as well as intact human burials and burial-associated artifacts.

CR-2 If cultural resources are encountered during subsurface earthwork activities, all ground-disturbing activities within a 25-foot radius of the find shall cease and the City shall be notified immediately. Work shall not continue until a City-qualified archaeologist assesses the find and determines the need for further study. If the find includes Native American-affiliated materials, a local Native American tribal representative will be contacted to work in conjunction with the City-approved archaeologist to determine the need for further study. A standard inadvertent discovery clause shall be included in every grading and construction contract to inform contractors of this requirement. Any previously unidentified resources found during construction shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of California Environmental Quality Act (CEQA) criteria by a qualified archaeologist.

If the resource is determined significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan, in conjunction with locally affiliated Native American representative(s) as necessary, that will capture those categories of data for which the site is significant. The archaeologist shall also perform appropriate technical analysis, prepare a comprehensive report, and file it with the Central Coast Information Center (CCIC), located at the University of California, Santa Barbara, and provide for the permanent curation of the recovered materials.

CR-3 In the event that human remains are exposed during earth disturbing activities associated with the project, an immediate halt work order shall be issued, and the City Community Development Director and locally affiliated Native American representative(s) (as necessary) shall be notified. California Health and Safety Code Section 7050.5 requires that no further disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98. If the remains are determined to be of Native American descent, the coroner shall notify the Native American Heritage Commission within 24 hours. These requirements shall be printed on all building and grading plans.

Monitoring Program: These conditions shall be noted on all grading and construction plans. The City shall review and approve the City-qualified archaeologist consistent with the Archaeological Resource Preservation Program Guidelines.

Geology and Soils

Implement Mitigation Measure BIO-2.

Monitoring Program: The City Community Development Department shall confirm that all BMPs included in BIO-2 to avoid impacts to aquatic resources are incorporated into the grading plans prior to approval. Compliance shall be verified by the City prior to the start of construction and during regular inspections, as necessary.

Greenhouse Gas Emissions

Implement Mitigation Measures AQ-1 and AQ-2.

GHG-1 A Greenhouse Gas Reduction Plan (GGRP) shall be prepared for the proposed project and shall be submitted to the City for review and approval prior to issuance of grading or building permits. The GGRP shall reduce annual greenhouse gas (GHG) emissions from the development by a minimum of 1,367.9 metric tons of carbon dioxide equivalence (MTCO_{2e}) per year over the operational life of the proposed project. GHG emissions may be reduced through the implementation of on-site mitigation measures, off-site mitigation measures, or through the purchase of carbon offsets. It is recommended that the GGRP incorporate GHG-reduction measures identified in the City of San Luis Obispo's *CEQA GHG Emissions Analysis Compliance Checklist, Climate Action Plan Consistency Checklist for New Development*, as listed below. In the event that carbon offsets are required, carbon offsets shall be purchased from a validated/verifiable source, such as the *California Climate Action Registry*, and approved by City Planning staff prior to purchase.

1. The project shall be provided electricity by 3CE.
- 2.
3. The project shall incorporate a pedestrian and bicycle access network that connects proposed on-site land uses to adjacent existing or planned pedestrian and bicycle facilities contiguous with the project site.
4. The project shall be designed to minimize barriers to pedestrian access and interconnectivity.
5. The project shall be designed to provide safe and convenient access to public transit contiguous to the project site.
6. Transportation Demand Management (TDM) reduction measures should be included to reduce vehicle miles traveled (VMT), which include but are not limited to:
 - a. Telecommuting;
 - b. Car sharing;
 - c. Shuttle service;
 - d. Carpools;
 - e. Vanpools;
 - f. Participation in the SLO Rideshare Back 'N' Forth Club;
 - g. Transit subsidies; and
 - h. Off-site sustainable transportation infrastructure improvements.
7. The project shall provide organic waste pick up and shall provide the appropriate on-site enclosures consistent with the provisions of the City's Development Standards for Solid Waste Services.

Monitoring Program: Measure GHG-1 shall be incorporated into project grading and building plans for review and approval by the City Community Development Department. Compliance shall be verified by the City during regular inspections, in coordination with the SLOAPCD, as necessary. The applicant shall submit the Greenhouse Gas Reduction Plan (GGRP) to the City Community Development Department upon completion.

Hazards and Hazardous Materials

Implement Mitigation Measures AQ-3, AQ-4, AQ-5, and BIO-2.

Monitoring Program: Mitigation Measures AQ-3, AQ-4, AQ-5, and BIO-2 shall be incorporated into project grading and building plans for review and approval by the City Community Development Department. Compliance shall be verified by the City during regular inspections, in coordination with the SLOAPCD, as necessary. The applicant shall submit the geologic evaluation detailed in measure AQ-3 to the City Community Development Department upon completion. The City Community Development Department shall confirm that all BMPs included in BIO-2 to avoid impacts to aquatic resources are incorporated into the grading plans prior to approval. Compliance shall be verified by the City prior to the start of construction and during regular inspections, as necessary.

Hydrology and Water Quality

Implement Mitigation Measure BIO-2.

Monitoring Program: The City Community Development Department shall confirm that all BMPs included in Mitigation Measure BIO-2 to avoid impacts to aquatic resources are incorporated into the grading plans prior to approval. Compliance shall be verified by the City prior to the start of construction and during regular inspections, as necessary.

Land Use and Planning

Implement Mitigation Measures BIO-1 through BIO-3.

Monitoring Program: The survey requirements of Mitigation Measures BIO-1, BIO-2, and BIO-3 shall be incorporated into the project grading and building plans for review and approval by the City Community Development Department and verified through submittal of a preconstruction nesting bird survey report to the City Community Development Department. The City Community Development Department shall confirm that all BMPs included in BIO-2 to avoid impacts to aquatic resources are incorporated into the grading plans prior to approval. Compliance shall be verified by the City prior to the start of construction and during regular inspections, as necessary.

Transportation

TR-1 Trip Reduction Coordinator. The project applicant shall identify a Trip Reduction Coordinator to act as the contact person for the City of San Luis Obispo and SLO Regional Rideshare. The Coordinator shall be responsible for:

1. Implementing an annual vehicle trip survey (can be administered through SLO Regional Rideshare.)
2. Preparing an annual report, subject to the City's review and approval, on the program's effectiveness and recommendations for revisions if needed to improve the program's effectiveness.
3. Providing quarterly information (electronically or hard copy) regarding area transportation services and City and County transit passes.
4. Coordinating employee transportation board meetings.
5. Coordinator will be responsible for establishing the Back 'N' Forth Club (for employees sponsored by Rideshare for the complex at a minimum of the Silver level).

TR-2 The project applicant shall submit a proposed Transportation Demand Management (TDM) Plan and Monitoring Program for City review prior to issuance of building permits. City approval of a Final TDM Plan and Monitoring Program is required prior to issuance of occupancy permits. The applicant shall submit a TDM Performance Monitoring Report at 12 months and 24 months after first occupancy and agree to annual TDM compliance inspections by the City Transportation Division. Transportation Demand Management (TDM) measures shall be implemented to reduce the project's trip generation by at least 3% and may include, but are not limited to, the measures identified in GHG-1 and the following measures:

1. **Shuttle Service.** The hotel shall offer a shuttle service to the airport terminal and downtown as requested by the guests. The hotel will also coordinate with local wine tours to encourage guests interested in wine tasting to utilize communal travel options rather than individual vehicles.
2. **Community Transportation Board.** A group of managers and employees, including the Trip Reduction Coordinator who meets to discuss and implement new ways to encourage employees and guests to participate in the community's alternative transportation programs.
3. **Shared Automobile.** On-site accommodations will be made available for a communal short-term rental car to enable guests to utilize a shared vehicle for short errands and other related needs. It is estimated that utilizing a car-sharing program alone will offset up to 10 required parking spaces. One company that offers this service is Zipcar. Information on their services can be found on their website (<https://www.zipcar.com/>) or similar.
4. **Bicycle Repair Station.** A convenient station equipped with all of the tools necessary for employees to perform basic bike repairs and maintenance.
5. **Long-term Bicycle Parking.** The project shall provide adequate, secure long-term bicycle parking for employees.

6. **Showers and Locker Facilities.** The hotel will include shower and locker facilities for employees that bike to work.
7. **Shared Bicycles for Guests.** The hotel will own and maintain bicycles available for guests to use to as an alternative to using vehicles.
8. **SLO Rideshare Back 'N' Forth Club.** The project shall participate in the SLO Rideshare Back 'N' Forth Club.
9. **Transit Passes.** The project shall provide free or discounted transit passes to employees.
10. **Information Packets.** Introductory packets, in either electronic or hardcopy form, for new employees with information pertaining to the car-sharing program, bicycle parking, bicycle repair station and a map showing the nearby bus stops.
11. **Information Sharing.** Management will distribute emails to keep the employees informed of activities. These emails will include up-to-date facts on car sharing availability, bicycle parking locations, alternative transportation programs and transit schedules. These emails will also include maps showing walking and bicycle routes to nearby retail, dining, and service locations. These emails will be distributed to all residents.

Plan Requirements and Timing: The Applicant shall submit a proposed TDM Plan and Monitoring Program for City review prior to issuance of building permits. City approval of a Final TDM Plan and Monitoring Program is required prior to issuance of occupancy permits. The applicant shall submit a TDM Performance Monitoring Report at 12 months and 24 months after first occupancy and agree to annual TDM compliance inspections by the City Transportation Division.

If the TDM Performance Monitoring Report shows that the targeted trip/VMT reduction has not been achieved, the applicant is responsible for increasing the level of TDM actions to the satisfaction of the City Transportation Division, which may include increasing information, incentives or subsidies to encourage employees to use alternative modes of transportation, or providing a direct fair share financial contribution to the City to be used towards programmed off-site VMT-reducing capital projects. The final approved TDM program shall be implemented in perpetuity as a condition of the use permit for this development, unless otherwise approved by the City Transportation Division.

Monitoring Program: City staff shall review and approve the final TDM Plan and Monitoring Program. City staff shall work with the applicant to ensure that these strategies are implemented. The City shall conduct annual site visits and/or outreach to the property owners to ensure ongoing compliance.

Tribal Cultural Resources

Implement Mitigation Measures CR-1 through CR-3.

Monitoring Program: These conditions shall be noted on all grading and construction plans. The City shall review and approve the City-qualified archaeologist consistent with the Archaeological Resource Preservation Program Guidelines.

Utilities and Service Systems

Implement Mitigation Measures AQ-1 through AQ-5, BIO-1 through BIO-3, CR-1 through CR-3, GHG-1, and TR-1 and TR-2.

Monitoring Program: Measures AQ-1 through AQ-5 shall be incorporated into project grading and building plans for review and approval by the City Community Development Department. Compliance shall be verified by the City during regular inspections, in coordination with the SLOAPCD, as necessary. The applicant shall submit the geologic evaluation detailed in Mitigation Measure AQ-3 to the City Community Development Department upon completion. The survey requirements of Mitigation Measures BIO-1, BIO-2, and BIO-3 shall be incorporated into the project grading and building plans for review and approval by the City Community Development Department and verified through submittal of a preconstruction nesting bird survey report to the City Community Development Department. The City Community Development Department shall confirm that all BMPs included in BIO-2 to avoid impacts to aquatic resources are incorporated into the grading plans prior to approval. Compliance shall be verified by the City prior to the start of construction and during regular inspections, as necessary. These conditions shall be noted on all grading and construction plans. The City shall review and approve the City-qualified archaeologist consistent with the Archaeological Resource Preservation Program Guidelines. Mitigation Measure GHG-1 shall

Required Mitigation and Monitoring Programs

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be incorporated into project grading and building plans for review and approval by the City Community Development Department. Compliance shall be verified by the City during regular inspections, in coordination with the SLOAPCD, as necessary. The applicant shall submit the GGRP to the City Community Development Department upon completion. Compliance shall be verified by the City Community Development Department prior to issuance of any construction permits. Contact information for the Trip Reduction Coordinator identified in Mitigation Measure TR-1 shall be submitted to the City Community Development Department. Compliance with TDM measures identified in TR-2 shall be verified by the City prior to the start of construction and during regular inspections, as necessary.