NEGATIVE DECLARATION & NOTICE OF DETERMINATION

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING
976 OSOS STREET • ROOM 200 • SAN LUIS OBISPO • CALIFORNIA 93408 • (805) 781-5600

ENVIRONMENTAL DETERMINATION NO. ED Number 17-138 **DATE:** March 21, 2019

PROJECT/ENTITLEMENT: MJG Property Holding Partners Tract Map and Conditional Use Permit SUB2014-00032

APPLICANT NAME: MJG Property Holding Partners, LLC **Email:** john@belsherlaw.com
ADDRESS: 486 Marsh St., Suite C San Luis Obispo, CA 93401
CONTACT PERSON: John Belsher, Belsher Law, PC **Telephone:** 805-316-0508

PROPOSED USES/INTENT: A request by MJG Property Holding Partners, LLC, to allow the following:

1. A Vesting Tentative Tract Map (Tract 3027) to subdivide an existing 37.67-acre parcel into seven parcels ranging in size from 2.5 to 14.25 acres each for the purpose of sale and/or development; and

2. A Conditional Use Permit to allow expansion of the existing Sweet Springs Mobile Home Park from 14 units to 26 units including a density bonus for affordable housing increasing the allowable number of units from 19 to 26 based on State density bonus law.

The project includes off-site road improvements to Lopez Drive. The project will result in the disturbance of approximately 5,000 square feet of the 37.67-acre parcel for the off-site improvements to Lopez Drive. Improvements to the existing wastewater system, including a new leach field will require an additional approximately 7,500 square feet of site disturbance which would be located within a previously graded area. No additional site disturbance is proposed for future residential development because the site was previously graded under a permit issued by the State Housing and Community Development Department (HCD). The proposed project is within the Residential Suburban land use category.

LOCATION: The project is located at 311 Sweet Springs Lane, north east of Hondonada Road, approximately three miles east of the City of Arroyo Grande. The site is in the San Luis Bay (Inland) sub-area of the South County planning area.

LEAD AGENCY: **County of San Luis Obispo**
Dept of Planning & Building
976 Osos Street, Rm. 200
San Luis Obispo, CA 93408-2040
Website: http://www.sloplanning.org

STATE CLEARINGHOUSE REVIEW: YES ☒ **NO** ☐

OTHER POTENTIAL PERMITTING AGENCIES: State of California Housing and Urban Development; California Department of Fish and Wildlife; Environmental Health; Regional Water Quality Control Board

ADDITIONAL INFORMATION: Additional information pertaining to this Environmental Determination may be obtained by contacting the above Lead Agency address or (805)781-5600.

COUNTY "REQUEST FOR REVIEW" PERIOD ENDS AT ..... 4:30 p.m. , April 4, 2019

30-DAY PUBLIC REVIEW PERIOD begins at the time of public notification

Notice of Determination

State Clearinghouse No. _____

This is to advise that the San Luis Obispo County_____ as ☐ *Lead Agency* ☐ *Responsible Agency* approved/denied the above described project on _____, and has made the following determinations regarding the above described project:

The project will not have a significant effect on the environment. A Negative Declaration was prepared for this project pursuant to the provisions of CEQA. Mitigation measures and monitoring were made a condition of approval of the project. A Statement of Overriding Considerations was not adopted for this project. Findings were made pursuant to the provisions of CEQA.

This is to certify that the Negative Declaration with comments and responses and record of project approval is available to the General Public at the 'Lead Agency' address above.

	Stephanie Fuhs (sfuhs@co.slo.ca.us)		County of San Luis Obispo
Signature	**Project Manager Name**	**Date**	**Public Agency**

Initial Study Summary – Environmental Checklist

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING
976 OSOS STREET • ROOM 200 • SAN LUIS OBISPO • CALIFORNIA 93408 • (805) 781-5600

(ver 6.1)Using Form

Project Title & No. **MJG Property Holding Partners, LLC Tract Mapwith Conditional Use Permit ED17-138 (SUB2014-00023)**

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

☒ Aesthetics	☒ Geology and Soils	☒ Recreation
☐ Agricultural Resources	☒ Hazards/Hazardous Materials	☐ Transportation/Circulation
☒ Air Quality	☐ Noise	☐ Wastewater
☒ Biological Resources	☐ Population/Housing	☒ Water /Hydrology
☐ Cultural Resources	☒ Public Services/Utilities	☐ Land Use

DETERMINATION: (To be completed by the Lead Agency)

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

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

☒ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

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

Stephanie Fuhs (sfuhs@co.slo.ca.us)	Stephanie Fuhs	3/4/19
Prepared by (Print)	Signature	Date
Steve McMasters	Steve McMasters	3/4/19
Reviewed by (Print)	Signature (for) Ellen Carroll, Environmental Coordinator	Date

Project Environmental Analysis

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

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

A. PROJECT

DESCRIPTION: A request by MJG Property Holding Partners, LLC, to allow the following:

1. A Vesting Tentative Tract Map (Tract 3027) to subdivide an existing 37.67-acre parcel into seven parcels ranging in size from 2.5 to 14.25 acres each for the purpose of sale and/or development; and

2. A Conditional Use Permit to allow expansion of the existing Sweet Springs Mobile Home Park from 14 units to 26 units including a density bonus for affordable housing increasing the allowable number of units from 19 to 26 based on State density bonus law.

The project includes off-site road improvements to Lopez Drive. The project will result in the disturbance of approximately 5,000 square feet of the 37.67-acre parcel for the off-site improvements to Lopez Drive. Improvements to the existing wastewater system, including a new leach field will require an additional approximately 7,500 square feet of site disturbance which would be located within a previously graded area. No additional site disturbance is proposed for future residential development because the site was previously graded under a permit issued by the State Housing and Community Development Department (HCD). The proposed project is within the Residential Suburban land use category and is located at 311 Sweet Springs Lane, north east of Hondonada Road, approximately three miles east of the City of Arroyo Grande. The site is in the San Luis Bay (Inland) sub-area of the South County planning area.

Proposed Parcel 1 (14.25 acres) will contain the mobile home park with fourteen units. Parcels 2 through 7 will be residential parcels that will be limited to one primary residence per parcel and allowable accessory structures in the Residential Suburban land use category. No secondary dwellings will be allowed based on the applicant's project description and based on the water study review that was limited to primary dwellings. The applicant has proposed building envelopes ranging in size from 7,000 to 14,000 square feet for the areas previously disturbed by grading activities associated with the relocation of five mobile home units onto proposed Parcels 2, 3, 4, 5 and 7.

No on-site disturbance is required for access and utilities for the current project because the site was previously graded under a grading permit issued by a State Housing and Community Development permit (HCD Permit #6087760). This permit allowed approximately three acres of grading in order to relocate five existing mobile home units onto proposed Parcels 2, 3, 4, 5 and 7 and provide access and utilities to those units. There was no environmental review completed by HCD for this grading permit.

The applicant intends to move the five relocated units back onto proposed Parcel 1 prior to recordation of the final tract map. It was assumed in the environmental analysis that proposed parcels 2 – 7 could be developed in the future with other residential type units such as modular homes or traditional resdential construction. It was assumed that all associated residential development (e.g. residences, garages, accessory structures) would be limited to the designated building envelopes. Five of the twenty mobile home units will be designated as affordable housing in order to qualify for the density bonus; four designated as "low" income, and one as "very low" income. There will be twenty mobile home units located on proposed Parcel 1 and six residential units on Parcels 2 through 7 for a total of 26 units for the project.

ASSESSOR PARCEL NUMBER(S): 047-200-019

Latitude: 35 degrees 8' 54.7" N Longitude: 120 degrees 32' 45.7" W **SUPERVISORIAL DISTRICT** # 3

B. EXISTING SETTING

PLAN AREA: South County **SUB**: San Luis Bay (South) (Inland) **COMM:**

LAND USE CATEGORY: Residential Suburban

COMB. DESIGNATION: None

PARCEL SIZE: 37.67 acres

TOPOGRAPHY: Nearly level to steeply sloping

VEGETATION: Grasses, shrubs, oak woodland, riparian

EXISTING USES: 14 unit state licensed mobile home park

SURROUNDING LAND USE CATEGORIES AND USES:

North: Residential Suburban; scattered residences	*East:* Residential Suburban and Residential Rural; scattered residences
South: Residential Suburban and Agriculture; residences, nursery and row crops	*West:* Residential Suburban; residences

C. ENVIRONMENTAL ANALYSIS

During the Initial Study process, at least one issue was identified as having a potentially significant environmental effects (see following Initial Study). Those potentially significant items associated with the proposed uses can be minimized to less than significant levels.

COUNTY OF SAN LUIS OBISPO
INITIAL STUDY CHECKLIST

1. AESTHETICS *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Create an aesthetically incompatible site open to public view?	☐	☐	☒	☐
b) Introduce a use within a scenic view open to public view?	☐	☒	☐	☐
c) Change the visual character of an area?	☐	☒	☐	☐
d) Create glare or night lighting, which may affect surrounding areas?	☐	☒	☐	☐
e) Impact unique geological or physical features?	☐	☐	☒	☐
f) Other: _____	☐	☐	☐	☐

Aesthetics

Setting. The subject property is mostly level along Hondonada Road to steeply sloping to the east. It is visible from Lopez Drive, an arterial road, and Hondonada Road, a private road. Existing vegetation consists predominately of grasses, ornamentals, scattered pines, riparian, and oak woodland. The surrounding development can be characterized as suburban ranchette development with typical lots of 2.5 to 5 acres each with residences, sometimes including non-commercial farm or livestock activities.

The proposal includes expanding the existing 14 unit mobile home park to twenty units on proposed Parcel 1 and subdividing the remainder of the 37.67 acre parcel into six residential suburban parcels located on the hillside to the east of the park ("hillside" parcels).

Impact. As proposed, the project would result in the relocation of five existing mobile home units currently located on proposed Parcels 2, 3, 4, 5 and 7 onto proposed Parcel 1; residential development of the six hillside parcels, potentially including residences, residential accessory units and other uses allowed in the Residential Suburban land use category (no secondary dwellings are proposed). This will result in visual impacts to public views when traveling east on Lopez Drive from the City of Arroyo Grande and surrounding local roads. The project does not propose removal of any additional oak woodland beyond what was removed as part of the previously issued grading permit for the relocation of the five mobile home units. The mobile home park has been located on the existing parcel since the 1960s, so the primary visual concern is future residential development on the hillside parcels (Parcels 2 through 7). Proposed building envelopes are located below the top of the ridge, so silhouetting is not expected. The remaining oak trees (averaging about 30 feet in height) will provide some screening for development on these parcels; however, some additional screening may be warranted depending on

the size and location of future residences and accessory structures. As discussed in the noise section below, the two lease spaces shown on the tentative map that are closest to Lopez Drive may be located within the 60-65 dbl level which requires some mitigation with regard to outdoor activity areas and sound mitigation for future residential construction.

Mitigation/Conclusion. In order to lessen the visual impacts associated with development of the proposed parcels from the surrounding public roadways, the following mitigation measures have been agreed to by the applicant (see attached Developer's Statement) and will become conditions of approval for the project: 1) providing muted colors for new development; 2) retain existing large shrubs and trees on the hillside parcels (Parcels 2 through 7); 3) provide for additional landscaping, as needed, to provide for at least a 50% screening of structures as seen from Lopez Drive to be achieved within 5 years of landscape planting; 4) minimizing the structure massing of new development; and 5) providing an exterior lighting plan that shows low intensity, shielded and lighting directed downward onto the site. In addition, for the two lease spaces located closest to Lopez Drive, outdoor activity areas for new units shall be located between the noise source (Lopez Drive) and the residence so the residence acts as a sound barrier. If the outdoor activity area cannot be located in this manner, a sound wall or landscaping berm shall be constructed that is of sufficient height that it interrupts the line-of-sight between the noise source and outdoor activity area. The design and materials used for the sound wall or berm shall be reviewed and approved by the Planning and Building Department prior to issuance of construction permits and shall include textures, materials of varied tones and colors. The primary wall shall be of muted earth tones. Incorporation of these measures will reduce impacts to less than significant levels.

2. AGRICULTURAL RESOURCES *Will the project:*	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Convert prime agricultural land, per NRCS soil classification, to non-agricultural use?	☐	☐	☐	☐
b) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use?	☐	☐	☐	☒
c) Impair agricultural use of other property or result in conversion to other uses?	☐	☐	☒	☐
d) Conflict with existing zoning for agricultural use, or Williamson Act program?	☐	☐	☒	☐
e) Other: _____	☐	☐	☐	☐

Agricultural Resources

Setting. Project Elements. The following area-specific elements relate to the property's importance for agricultural production:

Land Use Category: Residential Suburban

State Classification: Not prime farmland, Farmland of Statewide Importance

Historic/Existing Commercial Crops: None

In Agricultural Preserve? Yes

Under Williamson Act contract? No

The soil type(s) and characteristics on the subject property include:

Corralitos sand (0 - 2 % slope). This nearly level sandy bottom soil is considered well drained. The soil has moderate erodibility and low shrink-swell characteristics, as well as having potential septic system constraints due to: poor filtering capabilities. The soil is considered Class VI without irrigation and Class IV when irrigated.

Corralitos sand (2 - 15 % slope). This gently to moderately sloping, sandy bottom soil is considered well drained. The soil has low erodibility and low shrink-swell characteristics, as well as having potential septic system constraints due to: poor filtering capabilities. The soil is considered Class VI without irrigation and Class IV when irrigated.

Gaviota fine sandy loam (15 - 50 % slope). This moderately to steeply sloping, shallow coarse loamy soil is considered very poorly drained. The soil has high erodibility and low shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, shallow depth to bedrock. The soil is considered Class VII without irrigation and Class is not rated when irrigated.

Impact. No agricultural activities occur on the north side of Lopez Drive where the project is located. On the south side of Lopez Drive, there is a mix of nurseries and row crops. The nursery is located directly across Lopez Drive, approximately 200 feet from the project site. The closest row crops are located approximately 700 feet to the southwest. No significant impacts to agricultural resources are anticipated.

Mitigation/Conclusion. Based on the location of the project site in relation to existing agricultural activities, no mitigation measures are considered necessary.

3. AIR QUALITY *Will the project:*	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Violate any state or federal ambient air quality standard, or exceed air quality emission thresholds as established by County Air Pollution Control District?	☐	☐	☒	☐
b) Expose any sensitive receptor to substantial air pollutant concentrations?	☐	☐	☒	☐
c) Create or subject individuals to objectionable odors?	☐	☐	☒	☐
d) Be inconsistent with the District's Clean Air Plan?	☐	☐	☒	☐
e) Result in a cumulatively considerable net increase of any criteria pollutant either considered in non-attainment under applicable state or federal ambient air quality standards that are due to increased energy use or traffic generation, or intensified land use change?	☐	☐	☒	☐
GREENHOUSE GASES				
f) ***Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***	☐	☐	☒	☐

3. AIR QUALITY *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
g) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
h) Other: *cumulative (dust control)*	☐	☒	☐	☐

Air Quality

Setting.

The project proposes to disturb soils that have been given a wind erodibility rating of 1 to 3, which is considered "low to moderately low".

The Air Pollution Control District (APCD) has developed and updated their CEQA Air Quality Handbook (2012) to evaluate project specific impacts and help determine if air quality mitigation measures are needed, or if potentially significant impacts could result. To evaluate long-term emissions, cumulative effects, and establish countywide programs to reach acceptable air quality levels, a Clean Air Plan has been adopted (prepared by APCD).

Greenhouse Gas (GHG) Emissions are said to result in an increase in the earth's average surface temperature. This is commonly referred to as global warming. The rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system. This is also known as climate change. These changes are now thought to be broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

The passage of AB32, the California Global Warming Solutions Act (2006), recognized the need to reduce GHG emissions and set the greenhouse gas emissions reduction goal for the State of California into law. The law required that by 2020, State emissions must be reduced to 1990 levels. This is to be accomplished by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions. Subsequent legislation (e.g., SB97-Greenhouse Gas Emissions bill) directed the California Air Resources Board (CARB) to develop statewide thresholds.

In March 2012, the San Luis Obispo County Air Pollution Control District (APCD) approved thresholds for GHG emission impacts, and these thresholds have been incorporated the APCD's CEQA Air Quality Handbook. APCD determined that a tiered process for residential / commercial land use projects was the most appropriate and effective approach for assessing the GHG emission impacts. The tiered approach includes three methods, any of which can be used for any given project:

1. Qualitative GHG Reduction Strategies (e.g. Climate Action Plans): A qualitative threshold that is consistent with AB 32 Scoping Plan measures and goals; or,
2. Bright-Line Threshold: Numerical value to determine the significance of a project's annual GHG emissions; or,
3. Efficiency-Based Threshold: Assesses the GHG impacts of a project on an emissions per capita basis.

For most projects the Bright-Line Threshold of 1,150 Metric Tons CO2/year (MT CO2e/yr) will be the most applicable threshold. In addition to the residential/commercial threshold options proposed above, a bright-line numerical value threshold of 10,000 MT CO2e/yr was adopted for stationary source (industrial) projects.

It should be noted that projects that generate less than the above mentioned thresholds will also participate in emission reductions because air emissions, including GHGs, are under the purview of the California Air Resources Board (or other regulatory agencies) and will be "regulated" either by CARB, the Federal Government, or other entities. For example, new vehicles will be subject to increased fuel economy standards and emission reductions, large and small appliances will be subject to more strict emissions standards, and energy delivered to consumers will increasingly come from renewable sources. Other programs that are intended to reduce the overall GHG emissions include Low Carbon Fuel Standards, Renewable Portfolio standards and the Clean Car standards. As a result, even the emissions that result from projects that produce fewer emissions than the threshold will be subject to emission reductions.

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

Impact. As proposed, the project will result in the disturbance of approximately 0.5 acres for off-site improvements and future residential development. This will result in the creation of construction dust, as well as short- and long-term vehicle emissions. The project will be moving less than 1,200 cubic yards/day of material and will disturb less than four acres of area, and therefore will be below the general thresholds triggering construction-related mitigation. The project is also not in close proximity to sensitive receptors that might otherwise result in nuisance complaints and be subject to limited dust and/or emission control measures during construction.

From an operational standpoint, based on Table 1-1 of the CEQA Air Quality Handbook (2012), the project will not exceed operational thresholds triggering mitigation. The project is consistent with the general level of development anticipated and projected in the Clean Air Plan. No significant air quality impacts are expected to occur.

This project is a seven lot Tract Map and Conditional Use Permit to expand an existing mobile home park from 14 to 26 units and a density bonus project for affordable housing. Using the GHG threshold information described in the Setting section, the project is expected to generate less than the Bright-Line Threshold of 1,150 metric tons of GHG emissions. Therefore, the project's potential direct and cumulative GHG emissions are found to be less significant and less than a cumulatively considerable contribution to GHG emissions. Section 15064(h)(2) of the CEQA Guidelines provide guidance on how to evaluate cumulative impacts. If it is shown that an incremental contribution to a cumulative impact, such as global climate change, is not 'cumulatively considerable', no mitigation is required. Because this project's emissions fall under the threshold, no mitigation is required.

Mitigation/Conclusion. While the project is below operational thresholds warranting mitigation, dust control measures are recommended during construction in order to reduce cumulative impacts associated with this project. These measures include the following:

- Reducing the amount of disturbed area when possible.
- Using water trucks and sprinkler systems to prevent dust from leaving the site.
- Dirt stockpiles sprayed daily and as needed.
- Driveways and sidewalks paved as soon as possible.

In addition, the project will be subject to residential wood combustion and developmental burning standards as recommended by the APCD. Please refer to Exhibit B – Mitigation Summary Table for a detailed list of required mitigation measures. Incorporation of these measures will reduce impacts to less than significant levels.

4. BIOLOGICAL RESOURCES *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Result in a loss of unique or special status species* or their habitats?	☐	☒	☐	☐
b) Reduce the extent, diversity or quality of native or other important vegetation?	☐	☒	☐	☐
c) Impact wetland or riparian habitat?	☐	☒	☐	☐
d) Interfere with the movement of resident or migratory fish or wildlife species, or factors, which could hinder the normal activities of wildlife?	☐	☐	☒	☐
e) Conflict with any regional plans or policies to protect sensitive species, or regulations of the California Department of Fish & Wildlife or U.S. Fish & Wildlife Service?	☐	☐	☒	☐
f) Other: _____	☐	☐	☐	☐

* **Species – as defined in Section15380 of the CEQA Guidelines, which includes all plant and wildlife species that fall under the category of rare, threatened or endangered, as described in this section.**

Biological Resources

Setting. The following are existing elements on or near the proposed project relating to potential biological concerns:

On-site Vegetation: Grasses, shrubs, scattered pine, riparian and oak woodland

Name and distance from blue line creek(s): Hondonada Creek runs along the western property boundary; Arroyo Grande Creek is approximately 261 feet southeast of the proposed project/parcel.

Habitat(s): Pismo Clarkia, oak woodland

Site's tree canopy coverage: Approximately 30%.

The Natural Diversity Database (or other biological references) identified the following species potentially existing within approximately one mile of the proposed project:

Sensitive Habitats

Vegetation:

Mesa horkelia (*Horkelia cuneata var. puberula*) List 1B

Pismo clarkia (*Clarkia speciosa ssp. immaculata*) FE, SR, List 1B

Sand Mesa manzanita (*Arctostaphylos rudis*) List 1B

Santa Margarita manzanita (*Arctostaphylos pilosula*) List 1B

Slender bush-mallow (*Malacothamnus gracilis) List 1B*

Straight-awned spineflower (*Chorizanthe rectispina*) List 1B

Wildlife:

California red-legged frog (Rana draytonii)

South/central California coast steelhead trout *(Oncorhynchus mykiss irideus)* FT, CSC

Western pond turtle (*Emys marmorata pallida*), CSC, FSC

As stated previously, approximately three acres of the subject property were graded under a State Housing and Community Development (HCD) permit to relocate five mobile home units to the hillside parcels (Parcels 2, 3, 4, 5, and 7) and provide access and utility improvements in accordance with Fire and Building Code standards. The applicant has proposed building envelopes ranging in size from 7,000 to 14,000 square feet with no additional site disturbance proposed. The existing units on the hillside parcels are currently served by a community water system and individual septic systems that were issued by the HCD.

Vegetation on the site consists of grasses, shrubs, riparian and oak woodland. No botanical report was prepared for this project as no additional site disturbance is proposed for the project. Staff reviewed the Biological Resources Survey Report prepared for the parcel immediately adjacent to the subject property (Padre Associates, Inc. revised September 2017). The adjacent parcel currently has an 11-lot tract map under review and contains similar vegetation and topography to the project site. The report found no USFWS Critical Habitats occur within a five mile radius of the project site, but did find the following special status plant species: Hoover's Bent Grass, Santa Margarita Manzanita, and Pismo Clarkia. Pismo Clarkia is a federally listed endangered plant species. Blainville's horned lizard was observed during a field survey in 2012 and is a California Species of Concern. Suitable habitat still exists for this species. The report concluded that there is a low likelihood for steelhead to occur and a low to moderate likelihood for California Red-Legged Frog to occur.

Impact. Given the proximity and similar topography and vegetation to the adjacent parcel, it is reasonable to assume that the same special status plants and animal species have the potential to occur on the subject property. No tree removal will be required to relocate or place new mobile home units onto the mobile home park parcel (Parcel 1). Parcels 2, 3, 4 and 6 appear to have adequate vegetation clearance to accommodate future residential development. Parcels 5 and 7 will require additional clearance of vegetation (up to 10 oak trees) to adhere to County Fire/CalFire standards. No additional site disturbance is required for access or utilities because the road, water and utility improvements were completed under the previous HCD grading permit.

Mitigation/Conclusion. The proposed building envelopes have been sized to accommodate a reasonably sized residence and accessory structures. In order to protect the remaining oak woodland and potential special status plant and animal species on the property, the areas on Parcels 2 through 7 that are outside the building envelopes and vegetation clearance areas will be placed in permanent open space, which will allow only activities that help the long-term protection of native plant and animal species. In addition, the applicant has agreed to replant approximately 40 oak trees, based on the actual amount of tree removal, for those proposed to be removed or impacted for vegetation clearance to adhere to County Fire/CalFire standards. Also, additional trees will be planted for impacts of future development within each lot's building envelope. In addition, the applicant has agreed to limit the timing of the removal of any trees to avoid nesting season for raptors and migratory birds (between February and September) and provide for pre-construction surveys for botanical and wildlife (for new construction permits on the hillside lots), and nesting birds if nesting season cannot be avoided.

The applicant has agreed to replace the oak trees removed at a 4:1 ratio and the impacted trees at a 2:1 ratio, and will plant approximately 40 oak tree seedlings, depending upon the actual amount of tree removal required for vegetation clearance. Sufficient area has been shown to exist on site for replanting efforts. These seedlings will be cared for (e.g. adequate watering, weeding, remedial work) until they are successfully established, and include at least a five-year monitoring requirement.

Based on the above discussion, impacts on biological resources can be mitigated to less than significant levels.

5. CULTURAL RESOURCES *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Disturb archaeological resources?	☐	☐	☐	☐
b) Disturb historical resources?	☐	☐	☒	☐
c) Disturb paleontological resources?	☐	☐	☒	☐
d) Cause a substantial adverse change to a Tribal Cultural Resource?	☐	☐	☒	☐
e) Other: _____	☐	☐	☐	☐

Cultural Resources

Setting. The project is located in an area historically occupied by the Chumash. No historic structures are present and no paleontological resources are known to exist in the area. The project is within 300 feet of a blue line creek. Potential for the presence or regular activities of the Native American increases in close proximity to reliable water sources.

In order to meet AB52 Cultural Resources requirements, outreach to two Native American tribes groups had been conducted (Yak Tityu Tityu Northern Chumash and the Northern Chumash Tribal Council).

Impact. While the project is located in an area that could be considered culturally sensitive, no report was prepared because the site had already been disturbed under the previously issued HCD grading permit. Minimal additional disturbance would occur within the project site with the exception of some improvements to Lopez Drive and upgrades to the existing wastewater system. The hillside lots are unlikely to contain resources due to the steepness of the slopes. Per AB52, tribal consultation was performed with no responses received and no Tribal Cultural Resources were identified. Impacts to historical or paleontological resources are not expected.

Mitigation/Conclusion. No significant cultural resource impacts are expected to occur, and no mitigation measures above what area already required by ordinance are necessary.

6. GEOLOGY AND SOILS *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Result in exposure to or production of unstable earth conditions, such as landslides, earthquakes, liquefaction, ground failure, land subsidence or other similar hazards?	☐	☐	☒	☐
b) Be within a California Geological Survey "Alquist-Priolo" Earthquake Fault Zone", or other known fault zones?*	☐	☐	☐	☒

6. GEOLOGY AND SOILS *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
c) Result in soil erosion, topographic changes, loss of topsoil or unstable soil conditions from project-related improvements, such as vegetation removal, grading, excavation, or fill?	☐	☐	☒	☐
d) Include structures located on expansive soils?	☐	☐	☐	☒
e*) Be inconsistent with the goals and policies of the County's Safety Element relating to Geologic and Seismic Hazards?*	☐	☐	☒	☐
f) Preclude the future extraction of valuable mineral resources?	☐	☐	☒	☐
g) Other: *naturally occurring asbestos*	☐	☒	☐	☐

* **Per Division of Mines and Geology Special Publication #42**

Setting. The following relates to the project's geologic aspects or conditions:

Topography: Nearly level to steeply sloping

Within County's Geologic Study Area?: No

Landslide Risk Potential: Low to moderate

Liquefaction Potential: Low to moderate

Nearby potentially active faults?: No Distance? Not applicable

Area known to contain serpentine or ultramafic rock or soils?: Yes

Shrink/Swell potential of soil: Low

Other notable geologic features? None

Geology and Soils

A sedimentation and erosion control plan is required for all construction and grading projects (LUO Sec. 22.52.120) to minimize these impacts. When required, the plan is prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts.

Impact. As proposed, the project will result in the disturbance of approximately 12,000 square feet for off-site road improvements to Lopez Drive and upgrades to the existing wastewater system. These improvements will be located on mostly level terrain. Future residential development on the hillside parcels will require review of geotechnical reports to ensure landslide risk is addressed. Because the parcel is within an area that is known to contain serpentine or ultramafic rock or soils, a geologic report will be needed with future residential development to determine if naturally occurring asbestos is present.

Mitigation/Conclusion. Because the soil surface has moderate erodibility, a sedimentation and erosion control plan will be necessary to address off-site impacts. Because the parcel is within an area that is known to contain serpentine or ultramafic rock or soils, a geologic report will be needed with future residential development to determine if naturally occurring asbestos is present. There is no evidence that any additional measures above what will already be required by ordinance or codes are needed.

7. HAZARDS & HAZARDOUS MATERIALS - *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Create a hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼-mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on, or adjacent to, a site which is included on a list of hazardous material/waste sites compiled pursuant to Gov't Code 65962.5 ("Cortese List"), and result in an adverse public health condition?	☐	☐	☐	☒
e) Impair implementation or physically interfere with an adopted emergency response or evacuation plan?	☐	☐	☒	☐
f) If within the Airport Review designation, or near a private airstrip, result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Increase fire hazard risk or expose people or structures to high wildland fire hazard conditions?	☐	☒	☐	☐
h) Be within a 'very high' fire hazard severity zone?	☐	☒	☐	☐
i) Be within an area classified as a 'state responsibility' area as defined by CalFire?	☐	☐	☒	☐
j) Other: _____	☐	☐	☐	☐

Hazards and Hazardous Materials

Setting. The project is not located in an area of known hazardous material contamination. The hillside portion of the project is within 'very high' severity risk area for fire. The mobile home portion of the project is in the "high" severity risk area for fire. The project is not within the Airport Review area.

With regards to potential fire hazards, the subject project is within the high to very high Fire Hazard Severity Zone(s). Based on the County's fire response time map, it will take approximately 5-15 minutes to respond to a call regarding fire or life safety. Refer to the Public Services section for further discussion on Fire Safety impacts.

The project is within the Lopez Dam "dam inundation" area, and is approximately 4.2 miles below the dam. The boundary of the dam inundation area is intended to show the maximum water limit line should there be a catastrophic release/failure of the upstream dam.

Impact. The project does not propose the use of hazardous materials, nor the generation of hazardous wastes. The proposed project is not found on the 'Cortese List' (which is a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5). County Fire/CalFire conducted a fire safety inspection in February 2015. At that time, the site was in compliance with the California Fire Code. New residential development will need to comply with current Fire Code standards, including but not limited to: vegetation clearance standards (generally 100 feet from structures) and fire sprinklering of new residences.

Mitigation/Conclusion. No significant impacts as a result of hazards or hazardous materials are anticipated, and no mitigation measures are necessary.

8. NOISE *Will the project:*	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Expose people to noise levels that exceed the County Noise Element thresholds?	☐	☐	☒	☐
b) Generate permanent increases in the ambient noise levels in the project vicinity?	☐	☐	☒	☐
c) Cause a temporary or periodic increase in ambient noise in the project vicinity?	☐	☐	☒	☐
d) Expose people to severe noise or vibration?	☐	☐	☒	☐
e) If located within the Airport Review designation or adjacent to a private airstrip, expose people residing or working in the project area to severe noise levels?	☐	☐	☐	☒
f) Other: _____	☐	☐	☐	☐

Noise

Setting. The County has established acceptable noise exposure levels for new development through the Noise Element. A portion of the project is within a transportation noise source (Lopez Drive) and development within the following distances from the noise source will exceed the County's acceptable exterior noise threshold of 60 dBs for sensitive uses as follows:

- ✓ areas within the 60 dB to 65 dB range - 145 feet from road centerline, and closer;
- ✓ areas within the 65 dB to 70 dB range – approximately 72 feet from road centerline, and closer;
- ✓ areas above the 70 dB level – approximately 35 feet from road centerline, and closer.

The project is not expected to generate loud noises, nor conflict with the surrounding uses.

Impact. Acceptable outdoor noise levels would be exceeded for the mobile home park parcel (Parcel 1) if outdoor use areas are located within 145 feet of the center line of Lopez Drive. There is currently one mobile home unit (101A) that is located approximately 160 feet from Lopez Drive. The tentative map shows lease line locations for locating future mobile home units within the park. One of these lease areas is located within 145 feet from the centerline of Lopez Drive; however, there is adequate area to site outdoor areas away from the noise source, and the structure could also be sited in such a way that the residence acts as a noise barrier to the outdoor use areas.

While the project could result in exposure of future residents to unacceptable noise levels, this is no longer considered a potential significant environmental impact under recent case law (CBIA vs. BAAQMD). It would be inconsistent however with the County Noise Element.

Mitigation/Conclusion. While no mitigation is required under CEQA, the project will need to include design provisions, or should be conditioned to provide measure to be consistent with the Noise Element. Should a mobile home be placed in the unoccupied lease area that is located within 145 feet of the centerline of Lopez Drive, the following measures shall be included in the project to achieve acceptable noise levels: outdoor activity areas for the mobile home shall be located between the noise source (Lopez Drive) and the residence so the residence acts as a sound barrier. If the outdoor activity area cannot be located in this manner, a sound wall or landscaping berm shall be constructed that is of sufficient height that it interrupts the line-of-sight between the noise source and outdoor activity area. The design and materials used for the sound wall or berm shall be reviewed and approved by the Planning and Building Department prior to issuance of construction permits and shall include textures, materials of varied tones and colors. The primary wall shall be of muted earth tones.

9. POPULATION/HOUSING *Will the project:*	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Induce substantial growth in an area either directly (e.g., construct new homes or businesses) or indirectly (e.g., extension of major infrastructure)?	☐	☐	☒	☐
b) Displace existing housing or people, requiring construction of replacement housing elsewhere?	☐	☐	☒	☐
c) Create the need for substantial new housing in the area?	☐	☐	☒	☐
d) Other: _____	☐	☐	☐	☐

Population/Housing

Setting In its efforts to provide for affordable housing, the county currently administers the Home Investment Partnerships (HOME) Program and the Community Development Block Grant (CDBG) program, which provides limited financing to projects relating to affordable housing throughout the county. The County's Inclusionary Housing Ordinance requires provision of new affordable housing in conjunction with both residential and nonresidential development and subdivisions.

Impact. The project will not result in a need for a significant amount of new housing, and will not displace existing housing.

Mitigation/Conclusion. No significant population and housing impacts are anticipated. The project will mitigate its cumulative impact to the shortage of affordable housing stock by providing five affordable housing unit(s) on-site, four designated as low income and one designated as very low income. No mitigation measures are necessary.

10. PUBLIC SERVICES/UTILITIES *Will the project have an effect upon, or result in the need for new or altered public services in any of the following areas:*	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Fire protection?	☐	☒	☐	☐
b) Police protection (e.g., Sheriff, CHP)?	☐	☒	☐	☐
c) Schools?	☐	☒	☐	☐
d) Roads?	☐	☐	☒	☐
e) Solid Wastes?	☐	☐	☒	☐
f) Other public facilities?	☐	☐	☒	☐
g) Other: _____	☐	☐	☐	☐

Setting. The project area is served by the following public services/facilities:

Police: County Sheriff Location: Oceano (Approximately 5 miles to the southwest)

Fire: Cal Fire (formerly CDF) Hazard Severity: High to very high Response Time: 5-15 minutes

Location: 2391 Willow Rd, Arroyo Grande CA, 93420 (Approximately 7 miles to the south)

School District: Lucia Mar Unified School District.

Public Services

For additional information regarding fire hazard impacts, go to the 'Hazards and Hazardous Materials' section.

Impact. No significant project-specific impacts to utilities or public services were identified. This project, along with others in the area, will have a cumulative effect on police/sheriff and fire protection, and schools. The project's direct and cumulative impacts are within the general assumptions of allowed use for the subject property that was used to estimate the fees in place.

Mitigation/Conclusion. Regarding cumulative effects, public facility (County) and school (State Government Code 65995 et seq.) fee programs have been adopted to address this impact, and will reduce the cumulative impacts to less than significant levels.

11. RECREATION

	Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a)	***Increase the use or demand for parks or other recreation opportunities?***	☐	☒	☐	☐
b)	***Affect the access to trails, parks or other recreation opportunities?***	☐	☐	☒	☐
c)	***Other*** _____	☐	☐	☐	☐

Recreation

Setting. Based on the County Trails Map, the project is within proximity to the Arroyo Grande Creek Trail. After review by the County Parks Division, the project will have no impact on this trail and no trail-related improvements are necessary. Prior to map recordation, county ordinance requires the payment of a fee (Quimby) for the improvement or development of neighborhood or community parks.

Impact. Implementation of the proposed tract map and future build-out and occupation of new residences the new parcels will contribute to the local and cumulative demand for recreational resources in San Luis Obispo County.

Mitigation/Conclusion. The "Quimby" fee will adequately mitigate the project's impact on recreational facilities. No significant recreation impacts are anticipated, and no mitigation measures are necessary.

12. TRANSPORTATION/CIRCULATION

	Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a)	***Increase vehicle trips to local or areawide circulation system?***	☐	☐	☒	☐
b)	***Reduce existing "Level of Service" on public roadway(s)?***	☐	☐	☒	☐
c)	***Create unsafe conditions on public roadways (e.g., limited access, design features, sight distance, slow vehicles)?***	☐	☐	☒	☐
d)	***Provide for adequate emergency access?***	☐	☐	☒	☐
e)	***Conflict with an established measure of effectiveness for the performance of the circulation system considering all modes of transportation (e.g. LOS, mass transit, etc.)?***	☐	☐	☐	☒
f)	***Conflict with an applicable congestion management program?***	☐	☐	☐	☒
g)	***Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?***	☐	☐	☐	☒

12. TRANSPORTATION/CIRCULATION *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
h) Result in a change in air traffic patterns that may result in substantial safety risks?	☐	☐	☐	☒
i) Other: _____	☐	☐	☐	☐

Transportation

Setting. The County has established the acceptable Level of Service (LOS) on roads for this rural area as "C" or better. The existing road network in the area, including the project's access street(s) Lopez Drive and Hondonada Drive) are operating at acceptable levels of service. Based on existing road speeds and configuration (vertical and horizontal road curves), sight distance is considered acceptable.

Referrals were sent to County Public Works. There was initial concern regarding site access and an access evaluation was requested. Based on review of this evaluation, no center left turn lane is required. An A-1d rural road section with Class 2 bike lanes is being recommended along Lopez Drive.

Impact. The proposed project is estimated to generate about 249 trips per day, based on the Institute of Traffic Engineer's manual of 9.57 trips/unit. This additional traffic will not result in a significant change to the existing road service or traffic safety levels. The project does not conflict with adopted policies, plans and programs on transportation.

Mitigation/Conclusion. No significant traffic impacts were identified, and no mitigation measures above what are already required by ordinance are necessary.

13. WASTEWATER *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Violate waste discharge requirements or Central Coast Basin Plan criteria for wastewater systems?	☐	☐	☒	☐
b) Change the quality of surface or ground water (e.g., nitrogen-loading, day-lighting)?	☐	☐	☒	☐
c) Adversely affect community wastewater service provider?	☐	☐	☒	☐
d) Other: _____	☐	☐	☐	☐

Wastewater

Setting. There are five existing individual wastewater systems serving each of the hillside parcels and one existing system for Unit 10 as shown on the tentative map. The systems for the hillside parcels were constructed under the HCD permit that approved the relocation of five units to the hillside parcels. Units 1-5 and proposed parcel 6 as shown on the tentative map are proposed to be served by individual septic systems. Units 5-9 and existing Unit 101 will have a shared septic system by lift station to new leach field marked as "proposed new leach field" on the tentative map. Spaces 271, 287, 293, 299, 307 and 311 will use an existing shared septic and leach field system and spaces 261, 241, 233, 223, and 209 will use a separate existing shared septic and leach field system all as shown on the tentative map.

The new leach field is shown on the tentative map and will be located in a previously disturbed area located north of Sweet Springs Lane adjacent to the existing leach fields for the mobile home park.

Regulations and guidelines on proper wastewater system design and criteria are found within the Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems (California OWTS Policy), and the California Plumbing Code. These regulations include specific requirements for both on-site and community wastewater systems and are applied to all new wastewater systems.

The California OWTS Policy includes the option for public agencies in California to prepare and implement a Local Agency Management Program (LAMP), subject to approval by the Central Coast Water Board. Once adopted, the LAMP will ensure local agency approval and permitting of onsite wastewater treatment systems protective of groundwater quality and public health and will incorporate updated standards applicable to onsite wastewater treatment systems. At this time, the California OWTS Policy standards supercede San Luis Obispo County Codes in Title 19. Until the County's LAMP is approved, the County permitting authority is limited to OWTS that meet Tier 1 requirements, as defined by the California OWTS Policy and summarized in the County's **Updated Criteria Policy Document BLD-2028 (dated 06/21/18)**. All other onsite wastewater disposal systems, including all seepage pit systems, must be approved and permitted through the Central Coast Water Board.

For on-site septic systems, there are several key factors to consider for a system to operate successfully, including the following:

- ✓ Sufficient land area to meet the criteria for as currently established in Tier 1 Standards of the California OWTS Policy; depending on rainfall amount, and percolation rate, required parcel size minimums will range from one acre to 2.5 acres;
- ✓ The soil's ability to percolate or "filter" effluent before reaching groundwater supplies (30 to 120 minutes per inch is ideal);
- ✓ The soil's depth (there needs to be adequate separation from bottom of leach line to bedrock [at least 10 feet] or high groundwater [5 feet to 50 feet depending on percolation rates]);
- ✓ The soil's slope on which the system is placed (surface areas too steep creates potential for daylighting of effluent);
- ✓ Potential for surface flooding (e.g., within 100-year flood hazard area);
- ✓ Distance from existing or proposed wells (between 100 and 250 feet depending on circumstances); and
- ✓ Distance from creeks and water bodies (100-foot minimum).

To assure a successful system can meet existing regulation criteria, proper conditions are critical. Above-ground conditions are typically straight-forward and most easily addressed. Below ground criteria may require additional analysis or engineering when one or more factors exist:

- ✓ the ability of the soil to "filter" effluent is either too fast (percolation rate is faster or less than 30 minutes per inch and has "poor filtering" characteristics) or is too slow (slower or more than 120 minutes per inch);
- ✓ the topography on which a system is placed is steep enough to potentially allow "daylighting" of effluent downslope; or
- ✓ the separation between the bottom of the leach line to bedrock or high groundwater is inadequate.

Analysis.

Percolation tests were completed for three lease spaces on Proposed Parcel 1 (GeoSolutions Inc., May 14, 2009). The rates were between 1 and 5 minutes per inch which requires an engineered septic system per County regulations. Since the systems were permitted through the Housing and Community Development Department, the County does not have records of the size of the systems for the units.

Prior to map recordation or construction permit issuance, additional testing will be required by the Environmental Health Division/Building Division to verify acceptable conditions exist for on-site systems. Any proposed lot cannot be recorded until it has shown CPC/California OWTS Policy requirements can be met for that lot. Leach line locations will also be reviewed at this time to verify adequate setbacks are provided from any existing or proposed wells (100 feet for individual wells, 200 feet for community wells).

Based on Natural Resource Conservation Service (NRCS) Soil Survey map, the soil type(s) for the project is provided in the listed in the previous Agricultural Resource section. The main limitation(s) of this soil for wastewater effluent include:

-***poor filtering characteristics*** due to the very permeable nature of the soil, without special engineering will require larger separations between the leach lines and the groundwater basin to provide adequate filtering of the effluent. In this case, due to the limited availability of information relating to the poor filtering soil characteristic, the following additional information will be needed prior to issuance of a building permit: soil borings at leach line location showing that there is adequate separation, or plans for an engineered wastewater system that shows how the basin plan criteria can be met.

--***steep slopes***, where portions of the soil unit contain slopes steep enough to result in potential daylighting of wastewater effluent. In this case, the proposed leach lines are on or located within close proximity of steep slopes where some potential of effluent daylighting exists. A registered civil engineer familiar with wastewater systems, shall prepare an analysis that shows the location

- seepage in bottom layer, where effluent seeps quickly through (rather than be absorbed by) the soil horizon(s) to a soil layer just above bedrock that is typically in a saturated condition. The on-site system needs at least five feet between the bottom of the leach line to the saturated soil (e.g. high groundwater) with possible treatment of the soil to insure effluent movement rate through the soil meets basin plan requirements. Special engineering may be required to provide this acceptable percolation rate.

The percolation rate for the subject property is very fast, which requires greater soil depth to provide for adequate filtering. Therefore, prior to issuance of a building permit, evidence of adequate soil separation to groundwater per CPC, or plans prepared by a qualified individual for an engineered septic system that meets CPC/Basin Plan criteria would need to be provided.

The soil has been tested (GeoSolutions, Inc., May 14, 2009 and Mid-Coast Geotechnical, Inc., July 13, 2009) for the following criteria: percolation rates, soil borings of adequate depth to determine the presence/absence of groundwater, and adequate separation from bedrock or impermeable layer. Based on this information, deep seepage pits and engineered systems are recommended. Prior to map recordation, additional testing will be required by the Environmental Health Division/Building Division to verify acceptable conditions exist for on-site systems. Any proposed lot cannot be recorded until it has shown Basin Plan requirements can be met for that lot. Leach line locations will also be reviewed at that time to verify adequate setbacks are provided from any existing or proposed wells (100 feet for individual wells, 200 feet for community wells).

As discussed above, there are currently six individual wastewater systems serving hillside parcels 2, 3, 4, 5 and 7 and Unit 10 on proposed Parcel 1. Units 1-5 and Parcel 6 will be served by new individual wastewater systems. Six currently vacant lease spaces on proposed Parcel 1 will have a shared septic system by lift station to new leach field marked as “proposed new leach field” on the tentative map. Five

additional spaces will use an existing shared septic and leach field system with five additional spaces using a separate existing shared septic and leach field system. This equates to 12 units being served by individual wastewater systems and 14 units being served by three separate shared systems serving between five and six units each.

Impacts/Mitigation. Based on the following project conditions or design features, wastewater impacts are considered less than significant:

- ✓ The project has sufficient land area per the County's Land Use Ordinance to support an on-site system;
- ✓ The soil's percolation rate is between 1 to 40 minutes per inch and engineered systems will be required;
- ✓ There is adequate soil separation between the bottom of the leach line to bedrock or high groundwater;
- ✓ The soil's slope is between 20% and 30% and proposes an engineered system;
- ✓ The leach lines are outside of the 100-year flood hazard area;
- ✓ There is adequate distance between proposed leach lines and existing or proposed wells;
- ✓ The leach lines are at least 100 feet from creeks and water bodies.

Based on the above discussion and information provided, the site appears to be able to have 12 units served by individual wastewater systems and 14 units served by three separate wastewater systems that will meet CPC/Basin Plan requirements. Prior to building permit issuance and/or final inspection of the wastewater system, the applicant will need to show to the county compliance with the County Plumbing Code/Central Coast Basin Plan, including any above-discussed information relating to potential constraints. Therefore, based on the project being able to comply with these regulations, potential groundwater quality impacts are considered less than significant.

14. WATER & HYDROLOGY

Will the project:	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
QUALITY				
a) Violate any water quality standards?	☐	☐	☒	☐
b) Discharge into surface waters or otherwise alter surface water quality (e.g., turbidity, sediment, temperature, dissolved oxygen, etc.)?	☐	☐	☒	☐
c) Change the quality of groundwater (e.g., saltwater intrusion, nitrogen-loading, etc.)?	☐	☐	☒	☐

14. WATER & HYDROLOGY

Will the project:

	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
QUALITY				
a) Violate any water quality standards?	☐	☒	☐	☐
b) Discharge into surface waters or otherwise alter surface water quality (e.g., turbidity, sediment, temperature, dissolved oxygen, etc.)?	☐	☐	☒	☐
c) Change the quality of groundwater (e.g., saltwater intrusion, nitrogen-loading, etc.)?	☐	☐	☒	☐
d) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff?	☐	☒	☐	☐
e) Change rates of soil absorption, or amount or direction of surface runoff?	☐	☒	☐	☐
f) Change the drainage patterns where substantial on- or off-site sedimentation/ erosion or flooding may occur?	☐	☒	☐	☐
g) Involve activities within the 100-year flood zone?	☐	☐	☐	☒
QUANTITY				
h) Change the quantity or movement of available surface or ground water?	☐	☒	☐	☐
i) Adversely affect community water service provider?	☐	☐	☒	☐
j) Expose people to a risk of loss, injury or death involving flooding (e.g., dam failure,etc.), or inundation by seiche, tsunami or mudflow?	☐	☐	☒	☐
k) Other: _____	☐	☐	☐	☐

Setting. The project is situated in the hills between Lopez Drive and Corbett Canyon Road. The topography of the project site varies from nearly level along the south and west portions to steeply sloping along the north and east portions. Hondonada Creek, a tributary to Arroyo Grande Creek, runs along the western property boundary along Hondonada Road. Despite the proximity to the creek, the project site is not located within a 100-year flood zone. As identified in the previous Geology/Soils section under “Setting”, the soils that make up the site vary in their drainage abilities, ranging from well drained to poorly drained. The proposed water supply for this development is groundwater managed through an existing State Small Water System (Sweet Springs Mobile Home Park [MHP]), which is fed by private wells that draw groundwater from the Pismo Formation. The water system currently serves 24 individuals and contains 5 wells located together in a well field, though according to California State Water Resources Control Board (SWRCB) only one well is identified for currently supplying drinking

water to the MHP (Figure WH-2). State Small Water Systems are not currently considered public water systems and are subject to less rigorous testing than public water systems (see Table WH-1).

Three water supply assessments were prepared for this project (Cleath-Harris Geologists, Inc., July 2015, November 2015, and November 2016). The first two were primarily focused on the subject project while the third assessment included the subject project and cumulative proposed and potential development within the aquifer (see Figure WH-1). These reports were peer-reviewed by GSI Water Solutions, Inc. (May 2018). A response to the peer review was also provided (Cleath-Harris Geologists, Inc., July 2018).

Hydrogeography

The project area is located within the South Coast water planning area, within the Guaya Canyon subwatershed of the Arroyo Grande Creek watershed. The southern-most portion of the project site is located within a non-adjudicated portion of the Santa Maria Groundwater Basin, as defined by the California Department of Water Resources (CA DWR). The remainder of the project site is not located within a CA DWR defined groundwater basin, and instead sits atop a fractured rock aquifer that is approximately 876 acres in size. CA DWR has approved a change to the basin boundary that would reduce the amount of the parcel that lies within the basin boundary; the approval has yet to be finalized. The project's well field is currently located outside the Santa Maria Groundwater Basin boundary portion of the site and the boundary change will not alter the well field's location relative to the basin. (See Figure WH-2.)

The important geologic formations that underlie the project vicinity include the Corbett Canyon Alluvium, fine to coarse sandstone of Pismo Formation Squire member, and fine-grained silty sandstone of the Pismo Formation Edna member. Pismo Formation outcrops are visible at the surface in many of the hills between Arroyo Grande Creek Valley and Price Canyon and contain the layers that serve as an aquifer for local domestic wells. Field observations by Cleath-Harris Geologists, Inc. confirmed Pismo Formation sandstones are present on the property site. (Cleath 2016)

The local structure indicates the aquifer beneath the property deepens from north to south. The groundwater bearing sands and gravels tapped by the Sweet Springs MHP wells crop out on the edges of the Hondonada Road valley and at the sand and gravel quarry at the end of the road. The aquifer appears to subcrop beneath the Arroyo Grande Creek alluvium (Cleath 2015). Based on the Water Supply Assessment and Revised Water Supply Assessment prepared for this project, the extent of the aquifer appears to be limited by a fault boundary to the south, which could restrict the flow of groundwater from the vicinity of Hondonada Road area, and by the Corbett Canyon subwatershed to the west (Cleath 2015). The limit of local groundwater to the north of Sweet Springs MHP is created by the aquifer becoming unsaturated because of the formations becoming shallower in the north due to dips in the Pismo formation (Cleath 2015).

Water Quality

The Environmental Health Services Division of the County Health Agency (EHSD) and California Water Boards regulate drinking water systems that supply water for human consumption. The table below shows the difference in drinking water systems and the accompanying regulations. The current water system currently serves 24 individuals and is considered a State Small Water System, which is not currently considered a public water system. After approval of this project, the applicant will be required to upgrade the system to a public Community Water System, which is subject to more demanding testing for water quality (see Table WH-1).

According to anecdotal information from the EHSD, water in this area can contain high levels of arsenic, iron, manganese, hydrogen sulfide, and other minerals which require additional treatment to meet drinking water standards. The Country Hills Estates public water system's well system is located less

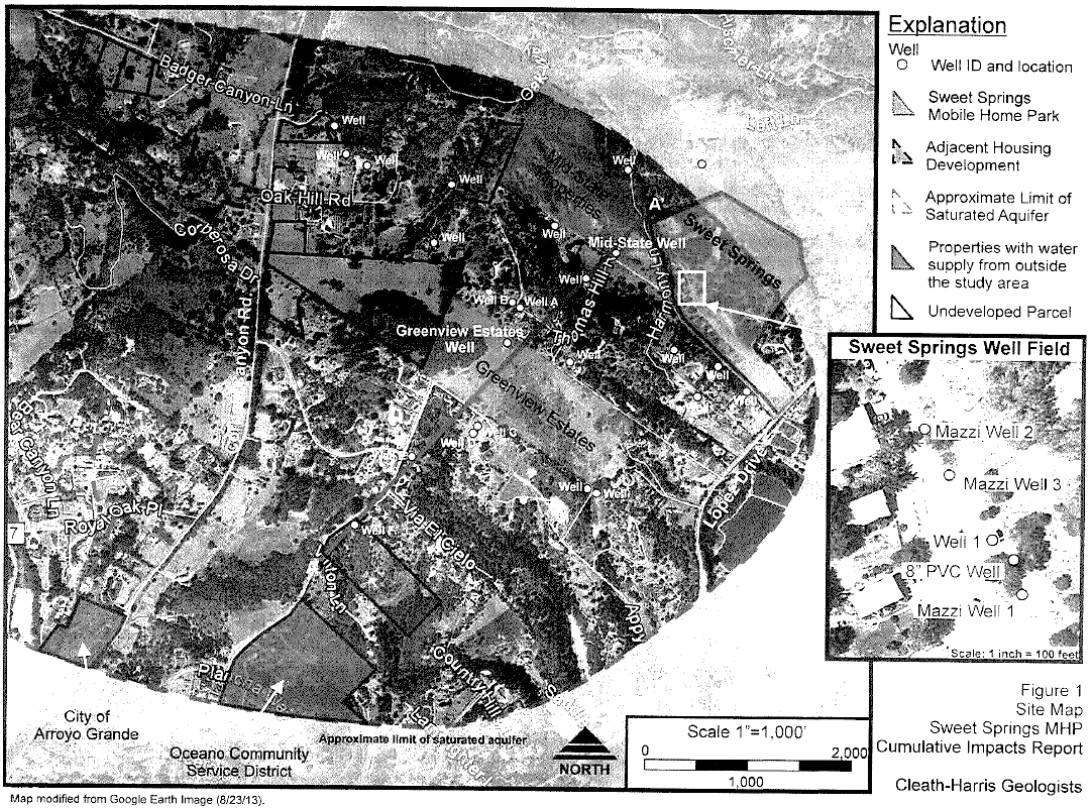
than 3,000 feet from the existing Sweet Springs wells. Based on California Water Boards information, that system is currently under a compliance order for high arsenic levels and has had arsenic levels exceeding standards dating back to at least 2003.

Additionally, the EHSD has indicated that, based on private well data from building permits and new well construction, there is a progressive deterioration in the quality of water in the area over time. Contaminants such as iron, manganese, and sulfur are considered secondary contaminants that result less in health concerns as they do with water color, taste, and odor. According to EHSD, the closer a well is to the valley floor, the more likely these secondary contaminants are to be encountered, though treatment can address these issues.

GSI also indicated the area is prone to highly mineralized groundwater that could exceed drinking water standards (GSI 2018). While a treatment system may be able to handle some or all of the exceedances, it likely would be costly. In its peer review, GSI references a personal communication with a City of Arroyo Grande staff person, wherein a previous development to the southeast of the proposed project was unable to operate their treatment plant economically and had to appeal to the County and the City of Arroyo Grande to provide an alternate water supply (GSI 2018).

According to the California Water Boards, "[b]eing a public water system means providing affordable, safe drinking water to your customers 24 hours a day, 7 days a week, 365 day a year. This includes the associated legal, fiscal, and operational responsibilities, and future planning. Public water systems typically are run more efficiently when costs can be spreadout over a large group of people to obtain good economies of scale. Small public water systems without a very high level of managerial, technical and financial capacity tend to be unsustainable."[a]

Figure WH-1: Cumulative Potential Development Area



[a] https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/documents/waterpartnerships/what_is_a_public_water_sys.pdf

Figure WH-2: Sweet Springs MHP Well Field

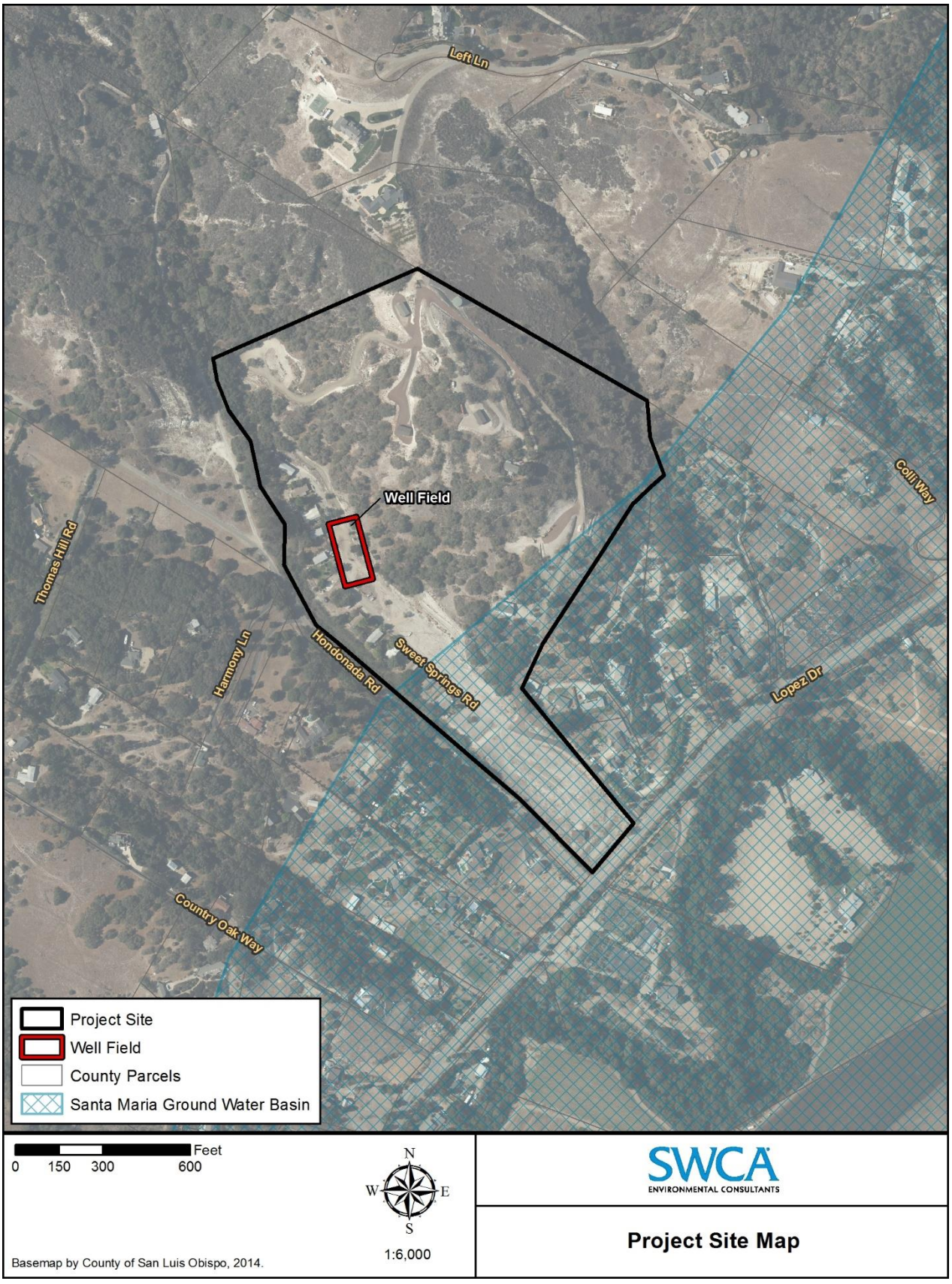


Table WH-1: Drinking Water System Types

System Type	Number Served	Frequency of Testing	Authority
Individual Well (*not considered a public water system)*	4 connections or fewer	▪ Once prior to final inspection/occupancy of a dwelling unit building permit (including metals, arsenic, nitrate and nitrite, bacteria)	County of San Luis Obispo
State Small Water System (*not considered a public water system)*	5 to 14 connections and less than 25 people per day	▪ Bacteriological (monthly) ▪ Inorganic Chemicals and Arsenic (Once) ▪ Nitrate (annually, quarterly if ≥ 0.5MCL) ▪ Nitrite (quarterly for 1 year; every 3 years if ≤ 0.5MCL) ▪ Secondary MCL's (Once) ▪ Annual consumer notice	County of San Luis Obispo
Non-transient Non-Community Water System	Less than 15 connections and serving 25 or more of the same people at least 6 months out of the year	▪ Bacteriological (monthly) ▪ Inorganic Chemicals and Arsenic (Once every 3 years) ▪ Nitrate (annually, quarterly if ≥ 0.5MCL) ▪ Nitrite (quarterly for 1 year; every 3 years if ≤ 0.5MCL) ▪ Asbestos (once every 9 years, can be waived) ▪ VOC's (once every 3 years) ▪ SOC's (once) ▪ Atrazine (once every 9 years) ▪ Simazine (once every 9 years) ▪ Secondary MCL's (Once) ▪ MTBE (as conditioned) ▪ Perchlorate (2 samples 5-7 months apart then every 3 years) ▪ Disinfection byproducts (per "plan" annual then every 3 years) ▪ Lead and copper (2 six-month samples, 2 annual samples, then every 3 years) ▪ Radiochemicals (4 quarterly samples then once every 3, 6 or 9 years) ▪ Annual consumer confidence report (CCR), annual certification of distribution of CCR, electronic annual report, record flow meter monthly-report annually, distribution operator on staff	County of San Luis Obispo
Transient Non-Community Water System	Less than 15 connections and serving 25 or more people per day at least 60 days per year but less than 6 months out of the year	▪ Bacteriological (monthly) ▪ Inorganic Chemicals and Arsenic (Once) ▪ Nitrate (annually, quarterly if ≥ 0.5MCL) ▪ Nitrite (quarterly for 1 year; every 3 years if ≤ 0.5MCL) ▪ Secondary MCL's (Once) ▪ VOC's and SOC's (case by case) ▪ Annual consumer notice, electronic annual report, record flow meter monthly-report annually	County of San Luis Obispo
Community Water System	15 or more connections or 25 people per day at least 60 days per year	▪ Bacteriological (monthly) ▪ Inorganic Chemicals and Arsenic (Once every 3 years) ▪ Nitrate (annually, quarterly if ≥ 0.5MCL) ▪ Nitrite (quarterly for 1 year; every 3 years if ≤ 0.5MCL) ▪ Asbestos (once every 9 years, can be waived) ▪ VOC's (once every 3 years) ▪ SOC's (once) ▪ Atrazine (once every 9 years) ▪ Simazine (once every 9 years) ▪ Secondary MCL's (Once) ▪ MTBE (as conditioned) ▪ Perchlorate (2 samples 5-7 months apart then every 3 years) ▪ Disinfection byproducts (per "plan" annual then every 3 years) ▪ Lead and copper (2 six month samples, 2 annual samples, then every 3 years) ▪ Radiochemicals (4 quarterly samples then once every 3, 6 or 9 years) Annual consumer confidence report (CCR), annual certification of distribution of CCR, electronic annual report, record flow meter monthly-report annually, distribution operator on staff	County of San Luis Obispo if between 5 and 200 connections or serve 25 individuals at least 60 days out of the year; otherwise State.

Water Quantity

The 2016 *Cumulative Projects Water Level Impact and Water Supply Assessment at the Sweet Springs Mobile Home Park, Arroyo Grande, California* study prepared by Cleath-Harris Geologists, Inc. found there is a water deficit of approximately 41-acre-feet-per-year (AFY) in the aquifer during drought conditions and a surplus of potential recharge during average precipitation years of 137 AFY (Cleath 2016). At the end of a drought period, the surplus water from average precipitation is available to replenish the decline from drought years, though the amount of recharge is dependent on how full the aquifer is. The total calculated existing outflow in the study area, which includes water use from existing developed parcels, agricultural activities, and uptake from deep-rooted plants (e.g. willows), was calculated to be 172 AFY. Recharge (inflow) into the aquifer is primarily from deep percolation of rainwater and from stormwater runoff, though domestic wastewater return (septic tanks and irrigation) also contributes to existing inflow (Cleath 2016). Based on well information from the Hondonada and Sweet Springs wells, the groundwater levels within the region are declining at approximately one-foot-per-year during drought conditions, as measured between 2014 and 2016.

Drainage

For areas where drainage is identified as a potential issue, the Land Use Ordinance (LUO Sec. 22.52.110) includes a provision to prepare a drainage plan to minimize potential drainage impacts. When required, this plan would need to address measures such as: constructing on-site retention or detention basins or installing surface water flow dissipaters. This plan would also need to show that the increased surface runoff would have no more impacts than that caused by historic flows. Because the site disturbance was done as part of the HCD permit, the County has no information whether or not the disturbance changed historic drainage patterns. Additional drainage information will need to be provided as part of the tract improvements to determine the extent of future development will contribute to the drainage location (the culvert under Lopez Drive). Additional capacity may be needed in the existing basin to handle the drainage from this project.

Sedimentation and Erosion

Projects involving more than one acre of disturbance are subject to preparation of a Storm Water Pollution Prevention Plan (SWPPP) to minimize on-site sedimentation and erosion. When work is done in the rainy season, the County's Land Use Ordinance requires that temporary erosion and sedimentation measures be installed.

Soil type, area of disturbance, and slopes are key aspects to analyzing potential sedimentation and erosion issues. The project's soil types and descriptions are listed in the previous Agriculture section under "Setting". As described in the NRCS Soil Survey, the project's soil erodibility varies from low to high.

A sedimentation and erosion control plan is required for all construction and grading projects (LUO Sec. 22.52.120) to minimize these impacts. When required, the plan is prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. Projects involving more than one acre of disturbance are subject to the preparation of a Storm Water Pollution Prevention Plan (SWPPP), which focuses on controlling storm water runoff. The Regional Water Quality Control Board is the local extension who monitors this program.

Impact.

Water Quality

With regards to project impacts on water quality the following conditions apply:

- ✓ Approximately 7,500 square feet of site disturbance is proposed;
- ✓ The project will be subject to standard County requirements for drainage, sedimentation and erosion control for construction and permanent use;

- ✓ The project is on highly erodible soils, and on moderate to steep slopes;
- ✓ The project is not within a 100-year Flood Hazard designation;
- ✓ The project is within 100 feet from the closest creek or surface water body;
- ✓ All disturbed areas will be permanently stabilized with impermeable surfaces and landscaping;
- ✓ Parking area drainage inlets will be fitted with hydrocarbon filters;
- ✓ Bioswales will be installed as a part of the drainage plan;
- ✓ Stockpiles will be properly managed during construction to avoid material loss due to erosion;
- ✓ The project is subject to the County's Plumbing Code (Chapter 7 of the Building and Construction Ordinance [Title 19]), and/or the "Water Quality Control Plan, Central Coast Basin" for its wastewater requirements, where wastewater impacts to the groundwater basin will be less than significant; and
- ✓ All hazardous materials and/or wastes will be properly stored on-site, which include secondary containment should spills or leaks occur.

EHSD reviewed the project and raised concern over the quality of water that will serve the proposed project. The water quality at Sweet Springs MHP has been tested as part of their existing water system compliance and, according to California Water Boards, has only exceeded standards for iron. However, arsenic was not a required test for State Small Water Systems until recently, and there are only test results from 2005, 2014, and 2015. While arsenic levels in 2014 and 2015 did not exceed the maximum contamination level (MCL) of 10.00 UG/L, it did exceed the trigger level of 5.00 UG/L. Continued compliance is subject to change based on various conditions, including drought, additional development, or changes in State standards.

While all potential water quality impacts could be addressed through State regulations and treatment, the managerial, technical, and financial capacity of the system could affect the validity of the system to effectively treat water in the event of increased contaminants.

Water Quantity

Sweet Springs MHP

As discussed above, the property lies within the Pismo Formation, an area that is bounded by Price Canyon Road to the north and the Arroyo Grande Creek Valley to the south. The existing outflow of the aquifer has been calculated at 172 AFY, and the existing inflow varies from 131 AFY and 309 AFY, depending on the amount of precipitation received each year. During drought years, the existing water deficit is 41 AFY. As shown below in Table WH-2, development of the Sweet Springs MHP expansion would result in an additional 4.5 AFY of water use (outflow), which would increase the existing water deficit during drought years to 45.8 AFY.

Table WH-2: Sweet Springs Water Balance

	Current Conditions (AF)		Buildout Conditions - Sweet Springs MHP Only (AF)*	
	Drought Year	Average Year	Drought Year	Average Year
Outflow	172	172	176.5	176.5
Inflow	131	309	136.8	314.8
Water Balance with Recharge	-41	137	-45.8	132.2

** The Buildout Conditions for Sweet Springs MHP only were extrapolated from the Full Buildout data and were not calculated individually as part of the water studies prepared for this project.*

Note: Data from Cleath, 2016 (Table 2).

Cumulative

The water balance study prepared for the project evaluates the effects of future development within the limits of the saturated Pismo Formation aquifer underlying the property. As shown in Figure WH-1, cumulative proposed development within the aquifer includes: the proposed Sweet Springs MPH expansion (5 single-family dwellings and 11 mobile homes), the proposed Mid-State Properties (Hondonada) subdivision (12 single-family dwellings), the proposed Greenview Estates subdivision (21 single-family dwellings), and development of currently undeveloped lots in the area (12 single-family dwellings). The cumulative development scenario analyzed 50 new single-family dwellings and 11 new mobile homes within the aquifer. It should be noted that Hondonada has since reduced their project to 11 single-family dwellings, and Greenview Estates has reduced their project to 14 single-family dwellings. While the actual projects are less than anticipated in the cumulative water assessment, the conclusions of the report are not significantly altered.

Full cumulative buildout of the aquifer as described above would result in an additional increase of approximately 33 AFY of water use. During drought years, the project would result in a water deficit of 45.8 AFY (a 4.8 AFY increase over existing conditions). Full cumulative buildout of the aquifer would result in a water deficit of 56 AFY (an additional 15 AFY deficit increase) and potential recharge would decrease by 15 AFY to 122 AFY due to increased domestic pumping. Table WH-3 below shows the water balance summary.

Table WH-3: Water Balance

	Current Conditions (AF)		Buildout Conditions - Sweet Springs MHP Only (AF)*		Buildout Conditions - Full Cumulative Development (AF)	
	Drought Year	Average Year	Drought Year	Average Year	Drought Year	Average Year
Outflow	172	172	176.5	176.5	205	205
Inflow	131	309	136.8	314.8	149	327
Water Balance with Recharge	-41	137	-45.8	132.2	-56	122

** The Buildout Conditions for Sweet Springs MHP only were extrapolated from the Full Buildout data and were not calculated individually as part of the water studies prepared for this project.*

Note: Data from Cleath, 2016 (Table 2).

The results of this analysis imply that in a given drought year, or series of drought years, the groundwater system in the study area may have a deficit in which outflows exceed inflows. However, a water balance may be achieved over a longer time period, as groundwater surpluses from the average years equal or exceed the deficits from the drought years. Under the proposed buildout scenario, the amount of the average year surplus is about two times the amount of the drought year deficit, implying that the impacts of two years of drought in the study area would be offset by a single average year. Implications of the study are that during individual or successive drought years, a reduction of storage may occur, which may be observed in individual wells as a decline in water levels; however, over a multi-year time frame, conditions in the average years would replenish the depleted storage and water levels would likely recover (GSI 2018).

Based on the information available, there doesn't appear to be a long-term issue regarding water quantity as a result from this project or the cumulative buildout of all potential project; during drought years some users may experience more problems than others given site specifics, but average years would be able to offset this. Implementation of drought-management plans would help balance the potential problems during drought years. Given the uncertainties with small water systems and the cumulative effectiveness of differing drought-management efforts, a broader water agency would be better able to balance the regional needs of the aquifer area.

Well Interference

Well interference occurs when a pumping well causes water level drawdown at an adjacent well (Cleath 2016). The cumulative water supply assessment (Cleath 2016) evaluated the cumulative water level drawdown on the nearest wells to the three subdivision properties, listed above. The well interference analysis compares three scenarios of pumping: aggressive pumping (full buildout of all three subdivisions), lower-density pumping (reduction in density of Greenview Estates from 1.7 acres/dwelling to 3-4 acres/dwelling, consistent with the other two subdivisions), and reduced pumping (elimination of the Greenview Estate project). Table WH-4 below shows the well interference levels based on these three scenarios.

Table WH-4: Estimated Cumulative Projects – 1 year Well Interference at Nearest Known Wells to the Proposed Development

Proposed Development	Scenario 1* (feet of interference)	Scenario 2** (feet of interference)	Scenario 3*** (feet of interference)
Sweet Springs MHP Well	3	2.5	1.7
Hondonada Well	3.9	3.1	2.1
Greenview Estates Well	4.8	3.7	--

**Scenario 1 is the anticipated interference at proposed buildout for all three developments*
***Scenario 2 is the anticipated interference if study area housing density is maintained at 3-4 acres/dwelling*
****Scenario 3 is the anticipated Interference if only Sweet Springs MHP and Mid-State Properties (Hondonada) are completed*

Note: Reprinted from Cleath, 2016 (Table 6).

Under the full buildout scenario in Scenario 1, drawdown at wells nearest to the three subdivisions one-year post buildout would range from 3-5 feet, which is unlikely to cause significant impacts to the wells (GSI 2018).

Mitigation/Conclusion.

Drainage, Sedimentation, and Erosion

The applicant will be required to comply with Land Use Ordinance and Regional Water Quality Control Board requirements regarding drainage, sedimentation, and erosion control. A drainage plan will be required and will need to show that increased surface runoff would not have more impacts than those caused by historic flows. No additional measures beyond ordinance requirements are necessary.

Water Quality

Based on historical information and recent water quality data, it is expected that the water pumped for the project will be highly mineralized and will require advanced treatment to remain in compliance with State regulations. While all potential water quality impacts could be addressed through State regulations and treatment, the managerial, technical, and financial capacity of the system could affect the validity of the system to effectively treat water in the event of increased contaminants.

As outlined in Exhibit B, mitigation measures are proposed to require disclosure to buyers (through CCNRs and additional map sheets) about the funding requirements of the community water system, including treatment costs. With implementation of these mitigation measures, and standard requirements by EHSD and the California State Water Resources Control Board, impacts related to water quality are expected to be less than significant. Given the uncertainties with small water systems

and their legal, economic, and fiscal responsibilities, a broader water agency would be better able to balance the regional needs of the aquifer area while obtaining good economies of scale. The applicant is required to coordinate, in a good faith effort, with other community water systems in the area (including Hondonada and Greenview Estates) regarding consolidation of the water systems.

Water Quantity

Based on the water budget analysis provided in the water supply assessments and the peer review, the groundwater system in the study area has enough long-term availability to supply the proposed cumulative project pumping, based on the per capita pumping factors used in the analysis. During drought years some users may experience more problems than others given site specifics, but average years would be able to offset this and overall the water consumption within the aquifer will be balanced over the cycle of drought and regular year. Implementation of drought-management plans would help balance the potential problems during drought years, though these would be more effective on a regional scale. Additionally, a broader water agency would be better able to balance the regional needs of the aquifer area and overcome the technical, managerial, and fiscal problems of a smaller water system. It would also be better able to support users who experience problems during drought by balancing water across the users. Mitigation measures are proposed to increase water conservation awareness and implementation, reduce turf planting, and to regulate water use during drought years. As noted above, the applicant is also required to coordinate, in a good faith effort, with other community water systems in the area (including Hondonada and Greenview Estates) regarding consolidation.

Well Interference

The well interference analysis indicates that the maximum cumulative one-year drawdown at nearby wells attributable to the combined project pumping will be less than five feet. This amount of drawdown is not considered significant enough to pose any risk to operations of nearby wells. (GSI 2018)

Based on the limited information about the Corbett Canyon Watershed, the Pismo Formation, proposed amount of water to be used and the water source, there is concern about the long-term sustainability of the aquifer due to the potential number of parcels that could be created and evolving trend that seems to show that more dry years than wet years can be expected in the future. Water conservation measures and a drought management plan are included as mitigation measures (Exhibit B) for the project. With implementation of these mitigation measures, impacts to well interference would be less than significant.

15. LAND USE

Will the project:	Inconsistent	Potentially Inconsistent	Consistent	Not Applicable
a) Be potentially inconsistent with land use, policy/regulation (e.g., general plan [County Land Use Element and Ordinance], local coastal plan, specific plan, Clean Air Plan, etc.) adopted to avoid or mitigate for environmental effects?	☐	☐	☒	☐
b) Be potentially inconsistent with any habitat or community conservation plan?	☐	☐	☒	☐
c) Be potentially inconsistent with adopted agency environmental plans or policies with jurisdiction over the project?	☐	☐	☐	☒
d) Be potentially incompatible with surrounding land uses?	☐	☐	☒	☐
e) Other: _____	☐	☐	☐	☐

Land Use

Setting/Impact. Surrounding uses are identified on Page 2 of the Initial Study. The proposed project was reviewed for consistency with policy and/or regulatory documents relating to the environment and appropriate land use (e.g., County Land Use Ordinance, Local Coastal Plan, etc.). Referrals were sent to outside agencies to review for policy consistencies (e.g., CAL FIRE for Fire Code, APCD for Clean Air Plan, etc.). The project was found to be consistent with these documents (refer also to Exhibit A on reference documents used).

The existing 14-unit mobile home park was established in the 1960s. HCD permits between 2009 and 2014 resulted in the relocation of five of the mobile home units from proposed Parcel 1 along Hondonada Road to the hillside parcels. This relocation caused 3,964 cubic yards of cut and 4,468 cubic yards of fill in order to improve the access road, grade pads, install wastewater systems and move the units to the hillside locations. Some of the development may not meet County standards for leach field setbacks, setbacks from waterways and stormwater. Overall, environmental review was lacking for this project and creates “existing” conditions that may need to be modified by the County review of the project to meet County standards (i.e., the existing wastewater system for Unit 101A that is too close to the creek, changes to drainage patterns).

The project is not within or adjacent to a Habitat Conservation Plan area. The project is consistent or compatible with the surrounding uses as summarized on page 2 of this Initial Study.

Mitigation/Conclusion. No inconsistencies were identified and therefore no additional measures above what will already be required were determined necessary.

16. MANDATORY FINDINGS OF SIGNIFICANCE

Will the project:

	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or pre-history?	☐	☒	☐	☐
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	☐	☒	☐	☐
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

For further information on CEQA or the County's environmental review process, please visit the County's web site at "www.sloplanning.org" under "Environmental Information", or the California Environmental Resources Evaluation System at: http://resources.ca.gov/ceqa/ for information about the California Environmental Quality Act.

Exhibit A - Initial Study References and Agency Contacts

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

Contacted	Agency	Response
☒	County Public Works Department	**Attached**
☒	County Environmental Health Services	**Attached**
☐	County Agricultural Commissioner's Office	**Not Applicable**
☐	County Airport Manager	**Not Applicable**
☐	Airport Land Use Commission	**Not Applicable**
☒	Air Pollution Control District	**Attached**
☐	County Sheriff's Department	**Not Applicable**
☒	Regional Water Quality Control Board	**None**
☐	CA Coastal Commission	**Not Applicable**
☒	CA Department of Fish and Wildlife	**None**
☒	CA Department of Forestry (Cal Fire)	**Attached**
☐	CA Department of Transportation	**Not Applicable**
☐	Community Services District	**Not Applicable**
☒	Other Parks Division	**Attached**
☒	Other City of Arroyo Grande	**None**

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

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

☒ Project File for the Subject Application

County documents

☐ Coastal Plan Policies
☒ Framework for Planning (Coastal/Inland)
☒ General Plan (Inland/Coastal), includes all maps/elements; more pertinent elements:
  ☒ Agriculture Element
  ☒ Conservation & Open Space Element
  ☐ Economic Element
  ☒ Housing Element
  ☒ Noise Element
  ☒ Parks & Recreation Element/Project List
  ☒ Safety Element
☒ Land Use Ordinance (Inland/Coastal)
☒ Building and Construction Ordinance
☒ Public Facilities Fee Ordinance
☒ Real Property Division Ordinance
☒ Affordable Housing Fund
☐ Airport Land Use Plan
☐ Energy Wise Plan
☒ South County Area Plan/San Luis Bay Sub Area and Update EIR
☐ Design Plan
☐ Specific Plan
☒ Annual Resource Summary Report
☐ Circulation Study

Other documents

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

In addition, the following project specific information and/or reference materials have been considered as a part of the Initial Study:

Biological Resources Survey Report, (Prepared for adjacent property APN 047-182-002), Padre Associates, revised September 2017

Geotechnical Engineering Report, Mid-Coast Geotechnical, Inc., July 13, 2010

Access Evaluation, Associated Transportation Engineers, June 12, 2015

Percolation Data Report, Mid-Coast Geotechnical, Inc., July 13, 2010

Percolation Testing Report, GeoSolutions, Inc., May 14, 2009

Stormwater Pollution Prevention Plan, Granite Ridge Engineering Group, May 2009

Water Supply Assessment, Cleath-Harris Geologists, Inc., July 12, 2015

Water Supply Assessment, Cleath-Harris Geologists, Inc., November 2015

Cumulative Projects Water Level Impact and Water Supply Assessment, Cleath-Harris Geologists, Inc., November 17, 2016

Review of Cumulative Project Water Level Impact and Water Supply Assessment, GSI, Water Solutions, Inc., May 4, 2018

Response to Review of Cumulative Water Level Impact and Water Supply Assessment, Cleath-Harris Geologists, Inc., July 8, 2018

Accessed on November 30, 2018.
https://sdwis.waterboards.ca.gov/PDWW/JSP/WaterSystemDetail.jsp?tinwsys_is_number=13665&tinwsys_st_code=CA

Exhibit B - Mitigation Summary Table

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

Aesthetics

AE-1. **At the time of application for construction permits for Parcels 2-7**, plans shall show existing trees that are outside, but within 50 feet, of the building envelope that are also between the proposed structure and Lopez Drive. Working with County Fire/CalFire, residences shall be located far enough away from these trees to avoid the need of trimming or removing any of these potential screening trees.

AE-2. **Prior to issuance of construction permits for Parcels 2-7**, the applicant shall submit architectural elevations of all proposed structures to the Department of Planning and Building for review and approval in consultation with the Environmental Coordinator. The elevations shall show exterior finish materials, colors, and height above the existing natural ground surface. Colors shall minimize the structure massing of new development by reducing the contrast between the proposed development and the surrounding environment. Colors shall be compatible with the natural colors of the surrounding environment, including vegetation, rock outcrops, etc. Darker, non-reflective, earth tone colors shall be selected for walls, chimneys etc. and darker green, grey, slate blue, or brown colors for the roof structures. All color selections shall fall within a "chroma" and "value" of 6 or less, as described in the Munsell Book of Color (review copy available at County).

AE-3. **Prior to issuance of construction permits for Parcels 2-7**, the applicant shall show the design of proposed residences with hipped roof forms or shaped to follow the sloped hill forms with rounded profiles. No projecting angles or long boxed ridgelines shall be allowed.

AE-4. **Prior to issuance of construction permits on all parcels**, the applicant shall provide a lighting plan showing shielded exterior street and home lighting in order to screen light sources from neighboring properties and Lopez Drive.

AE-5. **At the time of application for construction permits for Parcels 2-7**, the applicant shall clearly delineate the building site(s) on the project plans, as shown on the attached exhibit. All new development (e.g. residences, detached garages, guest houses, sheds, septic tanks and leach lines shall be completely located within the building envelope(s), with the exception of leach lines, which may be located outside the envelopes, outside of the open space easement area and outside driplines of existing coast live oak trees.

Air Quality

AQ-1. **During construction/ground disturbing activities**, the applicant shall implement the following particulate (dust) control measures. These measures shall be shown on the grading and building plans. In addition, the contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust off site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD prior to commencement of construction.

a. Reduce the amount of disturbed area where possible,

b. Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Reclaimed (nonpotable) water should be used whenever possible.
c. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.
d. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between top load and top of trailer) in accordance with CVC Section 23114.
e. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where feasible.
f. All dirt stock-pile areas should be sprayed daily as needed.

AQ-2. Developmental burning of vegetative material within San Luis Obispo County is prohibited. However, under certain circumstances where no technically feasible alternatives are available, limited developmental burning under restrictions may be allowed. Any such exception must complete the following prior to any burning: APCD approval; payment of fee to APCD based on the size of the project; and issuance of a burn permit by the APCD and the local fire department authority. As a part of APCD approval, the applicant shall furnish them with the study of technical feasibility (which includes costs and other constraints) **at the time of application for building permit**s.

AQ-3. Only the following types of wood burning devices shall be allowed (based on District Rule 504): a) EPA-Certified Phase II wood burning devices; b) catalytic wood burning devices emitting less than or equal to 4.1 grams per hour of particulate matter, as verified by a nationally-recognized testing lab; c) non catalytic wood burning devices which emit less than or equal to 7.5 grams per hour of particulate matter, as verified by a nationally-recognized testing lab; d) pellet-fueled woodheaters; or e) dedicated gas-fired fireplaces. **Prior to construction permit issuance**, such devices shall be shown on all applicable plans, and installed as approved by the County.

Biological Resources

BR-1. **Prior to recordation of the final map**, the applicant shall enter into an agreement with the County, in a form acceptable to County Counsel, to create individual open space easements on Parcels 2 through 7 for the areas outside of the proposed building envelopes and vegetation clearance areas. The terms of the open space easement will allow only activities that help the long term protection of native plant species. No off-road vehicle use, crop production, equestrian uses, or other animal raising or keeping activities are allowed in the open space easement area. These provisions for limited open space use shall be added to any CC&Rs developed for the project.

BR-2. **As a part of a second sheet of the tract map and included as a part of any individual construction permit application**, and included in any CC&Rs developed for the project, the following shall apply to the areas within the open space: no oak trees, or other visually significant vegetation, shall be impacted or removed; no activities (including grazing or the keeping of animals) shall be allowed that could adversely impact the open space area. Any removal of non-sensitive vegetation shall be done by hand, and by a qualified individual that can identify and avoid those sensitive species. All applicable plans shall show open space areas and building envelopes, where all trees outside of the building envelopes shall be protected during all construction activities. Plans shall show how these trees will be protected from any disturbance/ compaction at 1-1/2 times the distance between the trunk and dripline edge (e.g., install sturdy fencing, install retaining walls, etc.). This protection shall be installed prior to construction work beginning and remain in effect during the entire construction phase.

BR-3. **Prior to any site disturbance for new residential development on Parcels 2 through 7**, to avoid conflicts with nesting raptors, construction activities shall not be allowed during to the nesting season (February - September), unless a county-approved, qualified biologist has surveyed the impact zone and determined that no nesting activities will be adversely impacted. At such time, if any evidence of nesting activities are found, the biologist will determine if any construction activities can occur during the nesting period and to what extent. The results of the surveys will be passed immediately to the County Environmental Division, possibly with recommendations for variable buffer zones, as needed, around individual nests. The applicant agrees to incorporate those recommendations approved by the county.

BR-4. **At the time of application for grading permits and/or construction permits for Parcels 2-7**, the applicant shall clearly show on the project plans the type, size, and location of all trees to be removed as part of the project and all remaining trees within 50 feet of construction activities. The project plans shall also show the type and location of tree protection measures to be employed. All trees to remain on-site that are within fifty feet of construction or grading activities shall be marked for protection (e.g., with flagging) and their root zone protected with orange construction fencing prior to any grading. The outer edge of the tree root zone is 1-1/2 times the distance from the trunk to the drip line of the tree. Grading, utility trenching, compaction of soil, or placement of fill shall be avoided within these fenced areas. If grading in the root zone cannot be avoided, retaining walls shall be constructed to minimize cut and fill impacts. Care shall be taken to avoid surface roots within the top 18 inches of soil. If any roots must be removed or exposed, they shall be cleanly cut and not left exposed above the ground surface.

BR-5. **At the time of application for grading permits and/or construction permits for Parcels 2-7**, plans shall shows all coast live oak trees (with 6" diameter or greater at 4 feet from ground) to be removed and impacted. Removed trees shall be replaced at a 4:1 ratio and impacted trees at a 2:1 ratio. Average tree planting density shall be no greater than 10 feet on center. Plans shall also indicate the method for irrigation, mulching, caging and what amendments will be used until the plants are successfully established.

BR-6. These seedlings will be cared for (e.g. adequate watering, weeding, remedial work) until they are successfully established. Location of newly planted trees should adhere to the following, whenever possible: on the north side of and at the canopy/dripline edge of existing mature native trees; on north-facing slopes; within drainage swales (except when riparian habitat present); where topsoil is present; and away from continuously wet areas (e.g. lawns, leach lines).

BR-7. To minimize impacts to the sensitive oak woodland understory habitat (e.g. coastal chaparral, coastal scrub), the applicant agrees to the following during construction/ tract improvements and for the life of the project:

a. All native vegetation removal shall be shown on all applicable grading/ construction or improvement plans, and reviewed/ approved by the County (Planning and Building Dept.) before any work begins.

b. Vegetation clearance for fire safety purposes shall be limited to the minimum setbacks required by CDF. Where feasible, all efforts will be made to retain as much of this vegetation within the setback as possible (e.g. remove/trim only enough vegetation to create non-contiguous islands of native vegetation). Additional removal of non-native vegetation could be approved with a landscape plan as required by #10 above.

c. Any CC&R's created shall include the above provisions to protect the native habitat.

BR-8. **Prior to any site disturbance for new residential development on Parcels 2 through 7**, a pre-construction survey for botanical resources shall be conducted in order to assess if any special status plant species exist in the areas proposed for disturbance.

If the results of the survey determine that there are no special status plants on the project site, no further mitigation measures are required.

If any special status plants are present on the project site, the County, in consultation with the applicant and applicant's biologist, shall determine if removal of these plants can be avoided. If removal of plants cannot be avoided, the applicant's biologist shall prepare a restoration plan to be reviewed and approved by the County Planning and Building Department, **prior to issuance of construction permits**. This plan shall include, at a minimum, the following:

- Identification of the type and number of plants to be removed.
- Identification of locations, amounts, size and types of plants to be replanted, as well as any other necessary components (e.g., temporary irrigation, amendments, etc.) to ensure successful reestablishment.
- Provide for a native seed collection effort prior to any ground disturbing activities. Collection of native seed shall be propagated by a County approved biologist. Plant shall include, but not be limited to California Native Plant Society (CNPS) listed plant species that may be affected.
- Quantification of the impact based on construction drawings and quantification of mitigation areas such that the replacement criteria are met (2:1 acreage ratio or 3:1 for individual plants).
- A program schedule and success criteria for a minimum five year monitoring and reporting program that is structured to ensure the success of the restoration plan.
- Identification of access and methods of materials transport to the restoration area, including personnel, vehicles, tools, plants, irrigation equipment, water and all other similar supplies. Access shall not result in new or additional impacts to habitat and special status species.
- The restoration plan shall incorporate an invasive species control program.

BR-9. **Prior to issuance of construction permits**, if removal of special status plants is necessary, the applicant shall submit a cost estimate for the restoration plan described above under BR-8. **Prior to issuance of construction permits**, a performance bond, equal to the cost estimate, shall be posted by the applicant.

BR-10. **Prior to any site disturbance for new residential development on Parcels 2 through 7**, a pre-construction survey for biological resources shall be conducted in order to assess if any special status animal species exist in the areas proposed for disturbance.

If the results of the survey determine that there are no special status plants on the project site, no further mitigation measures are required.

If any special status animal species are present on the project site, the County, in consultation with the applicant and applicant's biologist, shall determine if impacts to the animal species can be avoided. If impacts cannot be avoided, the applicant's biologist shall prepare a mitigation plan to be reviewed and approved by the County Planning and Building Department, **prior to issuance of construction permits** that includes methods for limiting the impacts to these species to the greatest extent feasible.

Geology and Soils

GS-1. **Prior to any site disturbance**, the applicant shall have a geologic evaluation completed to determine if naturally occurring asbestos (NOA) is present within the area of disturbance. If NOA is not present, an exemption request shall be filed with the APCD. If NOA is present, the applicant shall comply with all requirements of the Air Toxics Control Measure.

Noise

N-1. **Prior to locating a mobile home unit on the unoccupied lease area located within 145 of the centerline of Lopez Drive**, if the outdoor use area is located within 145 feet of the centerline of Lopez Drive, the applicant shall show outdoor activity areas that are located with the residence between Lopez Drive and the outdoor area so the residence acts as a sound barrier. If the outdoor activity area cannot be located in this manner, a sound wall or landscaping berm shall be constructed that is of sufficient height that it interrupts the line-of-sight between the noise source and outdoor activity area. The design and materials used for the sound wall or berm shall be reviewed and approved by the Planning and Building Department prior to issuance of construction permits and shall include natural materials and colors. The design shall use materials that blend with the surrounding environment (e.g. slump stone, stone veneer) rather than contrasting materials such as cinderblock, and shall incorporate berming and landscaping to reduce the visible height and massing of the wall when viewed from Lopez Drive.

Water

W-1. **Water Conservation – Education Program**. To reduce water usage, **prior to approval of subdivision improvement plans/recordation of the final map,** the Applicant shall develop and implement a Water Conservation Education Program (WCEP) for all project-related personnel, including residents and commercial operators/employees. The WCEP shall be prepared by an individual knowledgeable on current conservation methods for interior and exterior water usage as it relates all project development, as well as any applicable County regulations and existing building codes on conserving water. The Program shall focus on a) all consumer-controlled water uses (e.g. landscaping, washing {e.g. dishes, clothes}, showers, etc.); b) project design elements that would make water conservation easier to implement; and c) the creation of 'good practices' user documents for daily use and during drought conditions; furthermore the WCEP shall describe the most effective means to best disseminate this information to target audience(s) on an ongoing basis.

Monitoring/compliance. **Prior to approval of subdivision improvement plans/recordation of the final map**, the Applicant shall submit for County review and approval the Water Conservation Education Program (WCEP), which will include 'good practices' user documents for each project element. Once approved by the County, any recommendations for project design changes shall be incorporated into all applicable construction drawings. **Prior to recordation of the final map**, the WCEP shall be disclosed through CCNRs on an additional map sheet. **Prior to and/or during construction/ improvements**, as applicable, all program-approved water conservation construction practices shall be administered. **Prior final inspection/occupancy of individual lot construction permits**, the County will verify installation of any WCEP-approved design features. Furthermore, the Applicant shall verify that the 'good practices' user documents are complete and are made available to the end users.

W-2. **Water Conservation – Limit Turf Planting**. To limit water usage, the Applicant shall limit the use of turf for landscaping and maximize turf maintenance elements that reduce water consumption. Turf shall be limited to no more than 100 square-feet per single-family residence, and no more than 500 square-feet total in common areas. The following measures shall be shown on applicable construction drawings and applied to the proposed turf areas:

a. To maximize drought-tolerance and minimize water usage, warm season grasses (excludes Bermuda grass) such as buffalo grass, shall be used;

b. To minimize establishment of shallow roots, the following shall be avoided on turf areas, and provided in all applicable documents (e.g., educational brochure, CC&Rs, landscape plans): close mowing, overwatering, excessive fertilization, soil compaction, and accumulation of thatch;

c. Watering times shall be programmed for longer and less frequently rather than for short periods and more frequently; length of time and delivery rate shall be monitored to avoid runoff to surrounding areas.

Monitoring/compliance. **Prior to final map recordation,** the Applicant shall include these measures as CCNRs shown on an additional map sheet. **Prior to issuance of a construction permit**, the Applicant shall show these measures on all applicable construction drawings and landscape plans. Prior to final inspection/occupancy of individual lot construction permits, the County will verify installation of any approved irrigation design features. Furthermore, the Applicant shall verify that the approved irrigation system parameters meet the intent of this measure and have been tested by a qualified expert. The Applicant understands that the approved irrigation system and water scheduling shall be kept in good working as long as the turf remains.

W-3. **Water Conservation – Landscaping.** To reduce water use, the applicants of individual residences shall install landscaping that will have low-water requirements and be drought-tolerant. **At the time of application for construction permits,** the applicant shall provide, at

a minimum, a landscape plan that includes the following:

b. all common area and individual residential irrigation shall employ low water use techniques (e.g., drip irrigation);

c. individual residential turf shall not exceed 20 percent of landscaped area, or 100-square-feet, whichever is less, with remaining landscaping being drought-tolerant and having low water requirements (e.g. use of native vegetation, etc.).

W-4. **Water Conservation – Drought Water Management Program**. To reduce water consumption during droughts, a master "Drought Water Management Program" (Program) shall be prepared and implemented by the Applicant, **prior to recordation of the final map**. The Program shall provide guidelines on how all future uses will be managed during "severe" drought (including landscaping and indoor uses). These measures would go into effect during periods of "severe" drought, as defined in the Program. This Program shall include, but is not necessarily limited to the following, or other similar measures as approved by the County:

a. the definition of a "severe" drought year (as defined by NOAA's Palmer Drought Severity method or other similarly recognized methodology);

b. identification of general measures available to reduce indoor water usage for future development (to be refined as needed for each use approved);

c. identification of specific measures to be applied for landscape watering;

d. determination of appropriate early triggers to determine when "severe" drought conditions exist and process for initiating additional water conservation measures for tract and future development.

Once it is determined that a "severe" drought condition exists, the Program's approved restricted (drought) water usage measures shall remain in effect until it is shown satisfactorily to the County that the "severe" drought condition no longer exists.

Monitoring/compliance. **Prior to recordation of the final map**, the Applicant shall submit for County review and approval the Drought Water Management Program (DWMP), which will include water reduction guidelines for each project element. Once approved by the County, any recommendations for project design changes shall be incorporated into all applicable construction drawings. The Program shall be disclosed through CCNRs and included on an additional map sheet **prior to recordation of the final map. Prior to and/or during construction**, as applicable, all Program-approved water reducing construction practices shall be administered. **Prior to final inspection/occupancy of individual lot construction**

permits, the County will verify installation of any DWMP-approved design features. Furthermore, the Applicant shall verify that the water reduction guidelines during drought conditions are complete and are made available to the end users. Furthermore, the Applicant understands that the approved Program shall be administered for the life of the project.

W-5 **Water Supply – Community Water System. Prior to recordation of the final map,** the applicant shall disclose to buyers through CC&Rs and on an additional map sheet, the costs associated with a public water system, including potential costs that may be passed on to consumers in the event upgrades to the system, or advanced treatment is needed. Items to be disclosed in the Buyer Information Guide shall include, but are not limited to, the items listen on California Water Boards handout – What is a Public Water System, and potential costs associated with increased treatment and disposal of arsenic.

W-6 **Water Supply – Water System Upgrade. Prior to recordation of the final map,** the existing Sweet Springs Water System shall upgrade from a State Small Water System to a Community Water System. A "will serve" letter shall be obtained and provided to Environmental Health Services Division from the newly created water company, stating there are operable water facilities immediately available for connection to the parcels created, prior to **recordation of the final map.** Water main extensions and related facilities (except wells) may be bonded for, subject to the discretion and approval of the Department of Public Works and Environmental Health Services Division.

W-7 **Water Supply - Water System Consolidation.** As an **ongoing condition valid for the life of the project**, the applicant shall explore consolidation or regionalization of the Sweet Springs Mobile Home Park community water system with other water systems in the area to help reduce expenses and provide a regional approach to water management. Coordination and consolidation discussions shall include the Mid-State Properties (Hondonada) and Greenview Estates subdivisions, if and when those developments are approved.

Date: January 25, 2019
revised February 6, 2019

DEVELOPER'S STATEMENT FOR
MJG Properties Tract Map/Conditional Use Permit
SUB2014-00023 (Tract 3027) / ED17-138

The applicant agrees to incorporate the following measures into the project. These measures become a part of the project description and therefore become a part of the record of action upon which the environmental determination is based. All development activity must occur in strict compliance with the following mitigation measures. These measures shall be perpetual and run with the land. These measures are binding on all successors in interest of the subject property.

Note: The items contained in the boxes labeled "Monitoring" describe the County procedures to be used to ensure compliance with the mitigation measures.

The following mitigation measures address impacts that may occur as a result of the development of the project.

It should be noted for this project that as long as this project site remains a mobile home park, placement and re-location of the number of mobile home units allowed under the Conditional Use Permit is subject to approval by the State Department of Housing and Community Development (HCD). In the event of closure or partial closure of the mobile home park, the following standards would apply to any construction subject to County construction permits.

Aesthetics

AE-1. **At the time of application for construction permits for Parcels 2-7, where County permits are required**, plans shall show existing trees that are outside, but within 50 feet, of the building envelope that are also between the proposed structure and Lopez Drive. Working with County Fire/CalFire, residences shall be located far enough away from these trees to avoid the need of trimming or removing any of these potential screening trees.

AE-2. **Prior to issuance of construction permits for Parcels 2-7, where County permits are required,** the applicant shall submit architectural elevations of all proposed structures to the Department of Planning and Building for review and approval in consultation with the Environmental Coordinator. The elevations shall show exterior finish materials, colors, and height above the existing natural ground surface. Colors shall minimize the structure massing of new development by reducing the contrast between the proposed development and the surrounding environment. Colors shall be compatible with the natural colors of the surrounding environment, including vegetation, rock outcrops, etc. Darker, non-reflective, earth tone colors shall be selected for walls, chimneys etc. and darker green, grey, slate blue, or brown colors for the roof structures. All color selections shall fall within a "chroma" and "value" of 6 or less, as described in the Munsell Book of Color (review copy available at County).

AE-3. **Prior to issuance of construction permits for Parcels 2-7, where County permits are required**, the applicant shall show the design of proposed residences with hipped roof forms or shaped to follow the sloped hill forms with rounded profiles. No projecting angles or long boxed ridgelines shall be allowed.

AE-4. **Prior to issuance of construction permits on all parcels, where County permits are required**, the applicant shall provide a lighting plan showing shielded exterior street and home lighting in order to screen light sources from neighboring properties and Lopez Drive.

AE-5. **At the time of application for construction permits for Parcels 2-7, where County permits are required**, the applicant shall clearly delineate the building site(s) on the project plans, as shown on the attached exhibit. All new development (e.g. residences, detached garages, guest houses, sheds, septic tanks and leach lines shall be completely located within the building envelope(s), with the exception of leach lines, which may be located outside the envelopes, outside of the open space easement area and outside driplines of existing coast live oak trees.

Monitoring: AE-1-AE-5: The Planning and Building Department shall verify compliance.

Air Quality

AQ-1. **During construction/ground disturbing activities**, the applicant shall implement the following particulate (dust) control measures. These measures shall be shown on the grading and building plans. In addition, the contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust off site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD prior to commencement of construction.

a. Reduce the amount of disturbed area where possible,
b. Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Reclaimed (nonpotable) water should be used whenever possible.
c. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.
d. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between top load and top of trailer) in accordance with CVC Section 23114.
e. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where feasible.
f. All dirt stock-pile areas should be sprayed daily as needed.

AQ-2. Developmental burning of vegetative material within San Luis Obispo County is prohibited. However, under certain circumstances where no technically feasible alternatives are available, limited developmental burning under restrictions may be allowed. Any such exception must complete the following prior to any burning: APCD

approval; payment of fee to APCD based on the size of the project; and issuance of a burn permit by the APCD and the local fire department authority. As a part of APCD approval, the applicant shall furnish them with the study of technical feasibility (which includes costs and other constraints) at the time of **application for building permits for development subject to County construction permits**.

AQ-3. Only the following types of wood burning devices shall be allowed (based on District Rule 504): a) EPA-Certified Phase II wood burning devices; b) catalytic wood burning devices emitting less than or equal to 4.1 grams per hour of particulate matter, as verified by a nationally-recognized testing lab; c) non catalytic wood burning devices which emit less than or equal to 7.5 grams per hour of particulate matter, as verified by a nationally-recognized testing lab; d) pellet-fueled woodheaters; or e) dedicated gas-fired fireplaces. **Prior to construction permit issuance for development subject to County construction permits**, such devices shall be shown on all applicable plans, and installed as approved by the County.

Monitoring:	AQ-1- AQ-3: The Planning and Building Department, in consultation with the Air Pollution Control District (APCD), shall verify compliance.

Biological Resources

BR-1. **Prior to recordation of the final map**, the applicant shall enter into an agreement with the County, in a form acceptable to County Counsel, to create individual open space easements on Parcels 2 through 7 for the areas outside of the proposed building envelopes and vegetation clearance areas. Existing roads within the proposed open space areas can remain and can be maintained, but cannot be widened or otherwise increase the area of disturbance on the parcels. The terms of the open space easement will allow only activities that help the long term protection of native plant species. No off-road vehicle use, crop production, equestrian uses, or other animal raising or keeping activities are allowed in the open space easement area. These provisions for limited open space use shall be added to any CC&Rs developed for the project.

Monitoring:	The Planning and Building Department, in consultation with Public Works, shall verify compliance.

BR-2. **As a part of a second sheet of the tract map and included as a part of any individual construction permit application**, and included in any CC&Rs developed for the project, the following shall apply to the areas within the open space: no oak trees, or other visually significant vegetation, shall be impacted or removed; no activities (including grazing or the keeping of animals) shall be allowed that could adversely impact the open space area. Any removal of non-sensitive vegetation shall be done by hand, and by a qualified individual that can identify and avoid those sensitive species. All applicable plans shall show open space areas and building envelopes, where all trees outside of the building envelopes shall be protected during all construction activities. Plans shall show how these trees will be protected from any disturbance/ compaction at 1-1/2 times the distance between the trunk and dripline edge (e.g., install sturdy fencing, install retaining walls, etc.). This protection shall be installed prior to construction work beginning and remain in effect during the entire construction phase.

Monitoring: The Planning and Building Department shall verify compliance.

BR-3. **Prior to any site disturbance for new residential development on Parcels 2 through 7 for development subject to County construction permits**, to avoid conflicts with nesting raptors, construction activities shall not be allowed during to the nesting season (February - September), unless a county-approved, qualified biologist has surveyed the impact zone and determined that no nesting activities will be adversely impacted. At such time, if any evidence of nesting activities are found, the biologist will determine if any construction activities can occur during the nesting period and to what extent. The results of the surveys will be passed immediately to the County Environmental Division, possibly with recommendations for variable buffer zones, as needed, around individual nests. The applicant agrees to incorporate those recommendations approved by the county.

Monitoring: The Planning and Building Department shall verify compliance.

BR-4. **At the time of application for grading permits and/or construction permits for Parcels 2-7 for development subject to County construction permits**, the applicant shall clearly show on the project plans the type, size, and location of all trees to be removed as part of the project and all remaining trees within 50 feet of construction activities. The project plans shall also show the type and location of tree protection measures to be employed. All trees to remain on-site that are within fifty feet of construction or grading activities shall be marked for protection (e.g., with flagging) and their root zone protected with orange construction fencing prior to any grading. The outer edge of the tree root zone is 1-1/2 times the distance from the trunk to the drip line of the tree. Grading, utility trenching, compaction of soil, or placement of fill shall be avoided within these fenced areas. If grading in the root zone cannot be avoided, retaining walls shall be constructed to minimize cut and fill impacts. Care shall be taken to avoid surface roots within the top 18 inches of soil. If any roots must be removed or exposed, they shall be cleanly cut and not left exposed above the ground surface.

Monitoring: The Planning and Building Department shall verify compliance.

BR-5. **At the time of application for grading permits and/or construction permits for Parcels 2-7 for development subject to County construction permits**, plans shall shows all coast live oak trees (with 6" diameter or greater at 4 feet from ground) to be removed and impacted. Removed trees shall be replaced at a 4:1 ratio and impacted trees at a 2:1 ratio. Average tree planting density shall be no greater than 10 feet on center. Plans shall also indicate the method for irrigation, mulching, caging and what amendments will be used until the plants are successfully established.

Monitoring: The Planning and Building Department shall verify compliance.

BR-6. These seedlings planted as part of the mitigation measure above requiring replanting for removed and impacted trees will be cared for (e.g. adequate watering, weeding,

remedial work) until they are successfully established. Location of newly planted trees should adhere to the following, whenever possible: on the north side of and at the canopy/dripline edge of existing mature native trees; on north-facing slopes; within drainage swales (except when riparian habitat present); where topsoil is present; and away from continuously wet areas (e.g. lawns, leach lines).

Monitoring: The Planning and Building Department shall verify compliance.

BR-7. To minimize impacts to the sensitive oak woodland understory habitat (e.g. coastal chaparral, coastal scrub), the applicant agrees to the following **during construction subject to County construction permits/ tract improvements and for the life of the project:**

a. All native vegetation removal shall be shown on all applicable grading/ construction or improvement plans and reviewed/ approved by the County (Planning and Building Dept.) before any work begins.

b. Vegetation clearance for fire safety purposes shall be limited to the minimum setbacks required by County Fire/CalFire. Where feasible, all efforts will be made to retain as much of this vegetation within the setback as possible (e.g. remove/trim only enough vegetation to create non-contiguous islands of native vegetation). Additional removal of non-native vegetation could be approved with a landscape plan as required by above.

c. Any CC&R's created shall include the above provisions to protect the native habitat.

Monitoring: The Planning and Building Department shall verify compliance.

BR-8. **Prior to any site disturbance for new residential development on Parcels 2 through 7**, a pre-construction survey for botanical resources shall be conducted in order to assess if any special status plant species exist in the areas proposed for disturbance.

If the results of the survey determine that there are no special status plants on the project site, no further mitigation measures are required.

If any special status plants are present on the project site, the County, in consultation with the applicant and applicant's biologist, shall determine if removal of these plants can be avoided. If removal of plants cannot be avoided, the applicant's biologist shall prepare a restoration plan to be reviewed and approved by the County Planning and Building Department, **prior to issuance of construction permits**. This plan shall include, at a minimum, the following:

- Identification of the type and number of plants to be removed.
- Identification of locations, amounts, size and types of plants to be replanted, as well as any other necessary components (e.g., temporary irrigation,

amendments, etc.) to ensure successful reestablishment.

- Provide for a native seed collection effort prior to any ground disturbing activities. Collection of native seed shall be propagated by a County approved biologist. Plant shall include, but not be limited to California Native Plant Society (CNPS) listed plant species that may be affected.
- Quantification of the impact based on construction drawings and quantification of mitigation areas such that the replacement criteria are met (2:1 acreage ratio or 3:1 for individual plants).
- A program schedule and success criteria for a minimum five year monitoring and reporting program that is structured to ensure the success of the restoration plan.
- Identification of access and methods of materials transport to the restoration area, including personnel, vehicles, tools, plants, irrigation equipment, water and all other similar supplies. Access shall not result in new or additional impacts to habitat and special status species.
- The restoration plan shall incorporate an invasive species control program.

Monitoring: The Planning and Building Department shall verify compliance.

BR-9. **Prior to issuance of construction permits**, if removal of special status plants is necessary, the applicant shall submit a cost estimate for the restoration plan described above under BR-8. **Prior to issuance of construction permits**, a performance bond, equal to the cost estimate, shall be posted by the applicant.

Monitoring: The Planning and Building Department shall verify compliance.

BR-10. **Prior to any site disturbance for new residential development on Parcels 2 through 7**, a pre-construction survey for biological resources shall be conducted in order to assess if any special status animal species exist in the areas proposed for disturbance.

If the results of the survey determine that there are no special status plants on the project site, no further mitigation measures are required.

If any special status animal species are present on the project site, the County, in consultation with the applicant and applicant's biologist, shall determine if impacts to the animal species can be avoided. If impacts cannot be avoided, the applicant's biologist shall prepare a mitigation plan to be reviewed and approved by the County Planning and Building Department, **prior to issuance of construction permits** that includes methods for limiting the impacts to these species to the greatest extent feasible.

Monitoring: The Planning and Building Department shall verify compliance.

Noise

N-1. **Prior to locating a mobile home unit on the unoccupied lease area located within 145 of the centerline of Lopez Drive**, if the outdoor use area is located

within 145 feet of the centerline of Lopez Drive, the applicant shall show outdoor activity areas that are located with the residence between Lopez Drive and the outdoor area so the residence acts as a sound barrier. If the outdoor activity area cannot be located in this manner, a sound wall or landscaping berm shall be constructed that is of sufficient height that it interrupts the line-of-sight between the noise source and outdoor activity area. The design and materials used for the sound wall or berm shall be reviewed and approved by the Planning and Building Department prior to issuance of construction permits and shall include natural materials and colors. The design shall use materials that blend with the surrounding environment (e.g. slump stone, stone veneer) rather than contrasting materials such as cinderblock and shall incorporate berming and landscaping to reduce the visible height and massing of the wall when viewed from Lopez Drive.

Monitoring: The Planning and Building Department shall verify compliance.

Water

Because mobilehomes are licensed at the factory and not subject to modification, the water provisions below do not preempt or supplant the factory-approved housing product as licensed by Federal and State law.

W-1. **Water Conservation – Education Program**. To reduce water usage, **prior to approval of subdivision improvement plans/recordation of the final map,** the Applicant shall develop and implement a Water Conservation Education Program (WCEP) for all project-related personnel, including residents and commercial operators/employees. The WCEP shall be prepared by an individual knowledgeable on current conservation methods for interior and exterior water usage as it relates all project development, as well as any applicable County regulations and existing building codes on conserving water. The Program shall focus on a) all consumer-controlled water uses (e.g. landscaping, washing {e.g. dishes, clothes}, showers, etc.); b) project design elements that would make water conservation easier to implement; and c) the creation of 'good practices' user documents for daily use and during drought conditions; furthermore the WCEP shall describe the most effective means to best disseminate this information to target audience(s) on an ongoing basis.

Monitoring/compliance. **Prior to approval of subdivision improvement plans/recordation of the final map**, the Applicant shall submit for County review and approval the Water Conservation Education Program (WCEP), which will include 'good practices' user documents for each project element. Once approved by the County, any recommendations for project design changes shall be incorporated into all applicable construction drawings. **Prior to recordation of the final map**, the WCEP shall be disclosed through CC&Rs on an additional map sheet. **Prior to and/or during construction/ improvements**, as applicable, all program-approved water conservation construction practices shall be administered. **Prior final inspection/occupancy of individual lot construction permits**, the County will verify installation of any WCEP-approved design features. Furthermore, the Applicant shall verify that the 'good practices' user documents are complete and are made available to the end users.

Monitoring: The Planning and Building Department shall verify compliance.

W-2. **Water Conservation – Limit Turf Planting**. To limit water usage, the applicant shall limit the use of turf for landscaping and maximize turf maintenance elements that reduce water consumption. Turf shall be limited to no more than 100 square-feet per single-family residence, and no more than 500 square-feet total in common areas. The following measures shall be shown on applicable construction drawings and applied to the proposed turf areas:

a. To maximize drought-tolerance and minimize water usage, warm season grasses (excludes Bermuda grass) such as buffalo grass, shall be used;

b. To minimize establishment of shallow roots, the following shall be avoided on turf areas, and provided in all applicable documents (e.g., educational brochure, CC&Rs, landscape plans): close mowing, overwatering, excessive fertilization, soil compaction, and accumulation of thatch;

c. Watering times shall be programmed for longer and less frequently rather than for short periods and more frequently; length of time and delivery rate shall be monitored to avoid runoff to surrounding areas.

Monitoring/compliance. Prior to final map recordation, the applicant shall include these measures as CC&Rs shown on an additional map sheet. **Prior to issuance of a construction permit for development requiring a County construction permit,** the applicant shall show these measures on all applicable construction drawings and landscape plans. Prior to final inspection/occupancy of individual lot construction permits, the County will verify installation of any approved irrigation design features. Furthermore, the Applicant shall verify that the approved irrigation system parameters meet the intent of this measure and have been tested by a qualified expert. The Applicant understands that the approved irrigation system and water scheduling shall be kept in good working as long as the turf remains.

Monitoring: The Planning and Building Department shall verify compliance.

W-3. **Water Conservation – Landscaping.** To reduce water use, the applicants of individual residences shall install landscaping that will have low-water requirements and be drought-tolerant. **At the time of application for construction permits for development requiring a County construction permit,** the applicant shall provide, at a minimum, a landscape plan that includes the following:

a. all common area and individual residential irrigation shall employ low water use techniques (e.g., drip irrigation);

b. individual residential turf shall not exceed 20 percent of landscaped area, or 100-square-feet, whichever is less, with remaining landscaping being drought-tolerant and having low water requirements (e.g. use of native vegetation, etc.).

Monitoring: The Planning and Building Department shall verify compliance.

W-4. **Water Conservation – Drought Water Management Program.** To reduce water consumption during droughts, a master "Drought Water Management Program" (Program) shall be prepared and implemented by the Applicant, **prior to recordation of the final map**. The Program shall provide guidelines on how all future uses will be managed during "severe" drought (including landscaping and indoor uses). These measures would go into effect during periods of "severe" drought, as defined in the Program. This Program shall include, but is not necessarily limited to the following, or other similar measures as approved by the County:

a. the definition of a "severe" drought year (as defined by NOAA's Palmer Drought Severity method or other similarly recognized methodology);

b. identification of general measures available to reduce indoor water usage for future development (to be refined as needed for each use approved);

c. identification of specific measures to be applied for landscape watering;

d. determination of appropriate early triggers to determine when "severe" drought conditions exist and process for initiating additional water conservation measures for tract and future development.

Once it is determined that a "severe" drought condition exists, the Program's approved restricted (drought) water usage measures shall remain in effect until it is shown satisfactorily to the County that the "severe" drought condition no longer exists.

Monitoring/compliance. Prior to recordation of the final map, the Applicant shall submit for County review and approval the Drought Water Management Program (DWMP), which will include water reduction guidelines for each project element. Once approved by the County, any recommendations for project design changes shall be incorporated into all applicable construction drawings. The Program shall be disclosed through CCNRs and included on an additional map sheet **prior to recordation of the final map. Prior to and/or during construction**, as applicable, all Program-approved water reducing construction practices shall be administered. **Prior to final inspection/occupancy of individual lot construction permits for development requiring a County construction permit**, the County will verify installation of any DWMP-approved design features. Furthermore, the Applicant shall verify that the water reduction guidelines during drought conditions are complete and are made available to the end users. Furthermore, the Applicant understands that the approved Program shall be administered for the life of the project.

Monitoring: The Planning and Building Department shall verify compliance.

W-5 **Water Supply – Community Water System. Prior to recordation of the final map,** the applicant shall disclose to buyers through CC&Rs and on an additional map

sheet, the costs associated with a public water system, including potential costs that may be passed on to consumers in the event upgrades to the system, or advanced treatment is needed. Items to be disclosed in the Buyer Information Guide shall include, but are not limited to, the items listed on California Water Boards handout – What is a Public Water System, and potential costs associated with increased treatment and disposal of arsenic.

Monitoring: The Planning and Building Department shall verify compliance.

W-6 **Water Supply – Water System Upgrade. Prior to recordation of the final map,** the existing Sweet Springs Water System shall upgrade from a State Small Water System to a Community Water System. A "will serve" letter shall be obtained and provided to Environmental Health Services Division from the newly created water company, stating there are operable water facilities immediately available for connection to the parcels created, prior to **recordation of the final map.** Water main extensions and related facilities (except wells) may be bonded for, subject to the discretion and approval of the Department of Public Works and Environmental Health Services Division.

Monitoring: The Planning and Building Department shall verify compliance.

W-7 **Water Supply - Water System Consolidation.** As an **ongoing condition valid for the life of the project**, the applicant shall explore consolidation or regionalization of the Sweet Springs Mobile Home Park community water system with other water systems in the area to help reduce expenses and provide a regional approach to water management. Coordination and consolidation discussions shall include the Mid-State Properties (Hondonada) and Greenview Estates subdivisions, if and when those developments are approved.

Monitoring: The Planning and Building Department shall verify compliance.

The applicant understands that any changes made to the project description subsequent to this environmental determination must be reviewed by the Environmental Coordinator and may require a new environmental determination for the project. By signing this agreement, the owner(s) agrees to and accepts the incorporation of the above measures into the proposed project description.

Signature of Owner(s) Date 2/12/2019

Ronis P. Cox

Name (Print)

COUNTY OF SAN LUIS OBISPO
Department of Public Works
Colt Esenwein, *Director*

REFERRAL

Date: March 8, 2019

To: Stephanie Fuhs, Project Planner

From: Mark Davis, Development Services

Subject: Public Works Project Referral for Tract 3027 SUB2014-00023 – MJG PROPERTY for Mobile Home Park Expansion. Lopez Drive Arroyo Grande, APN 047-200-019

Thank you for the opportunity to provide information on the proposed subject project. It has been reviewed by several divisions of Public Works, and this represents our consolidated response.

PUBLIC WORKS REQUESTS THAT AN INFORMATION HOLD BE PLACED ON THIS PROJECT UNTIL THE APPLICANT PROVIDES THE FOLLOWING DOCUMENTS FOR OUR REVIEW AND COMMENT:

1. Revise the Tentative Map to address the following:
   a. Address all deficient items as shown on attached Checklist.

Public Works Comments:

A. At the time the project referral was received by Public Works on September 26, 2014 the application acceptance date had not been established. The attached recommended conditions of approval are subject to change based on Ordinances and Policies in affect at the date of application acceptance.

B. In accordance with the Grading and Drainage, Section 22.52.070 (B) (9) [Res. 3188 4/13/2010] onsite pad and access road grading is not exempt from a Grading Permit. Therefore, this work must be processed through the Planning and Building Department. Public Works recommends the internal road work be completed prior to final map recordation [21.03.010 (d) (2)]

C. In accordance with Resolution 2008-152 Lopez Drive shall be improved to an A-1 standards along the project frontage.

D. Unless otherwise determined by Resolution 2007-344, the streets/roads within this tract shall not be accepted for County maintenance following completion and certification of the improvements.

E. The proposed project fronts Lopez Drive, identified in the latest County Bikeways Plan as a Class 2 bike lane. Road widening improvements are required for compliance with the County Bikeways Plan.

F. Project site is located adjacent to the City of Arroyo Grande and may impact their facilities. It is recommended a referral be sent to the City for their comments and recommended mitigation measure, including road impact fees.

G. All subdivision improvements must be designed and constructed in accordance with the recommended Best Management Practices (BMPs) as listed in Table 4.10 of the "Arroyo Grande Creek Erosion, Sedimentation and Flooding Alternatives Study" (Swanson Hydrology & Geomorphology, January 2006), and county Public Improvement Standards.

H. This project is not a Stormwater regulated project.

I. If the project site disturbs 1.0 acre or more the applicant must enroll for coverage under California's Construction General Permit, which may require preparation of a project Stormwater Control Plan even though its located outside a Stormwater Management Area.

J. We have reviewed the June 12, 2015, traffic report and have no further comments. Buildout ADT=5815, A-1d rural road section with Class 2 bike lanes is being recommended. Center left turn lane is not required.

K. The site is partially within the DWR B118 (2016) groundwater basin and may be subject to the Sustainable Groundwater Management Act (SGMA). However, the Groundwater Sustainability Agency responsible for overseeing SGMA compliance has not completed the planning efforts that will define the need for any groundwater mitigation requirements. In the interim, consideration of the project's impacts on the groundwater basin should be included in the project's CEQA analysis.

Recommended Public Works Conditions of Approval

Access and Improvements:

1. Road and/or streets to be constructed to the following standards, unless design exceptions are approved by the Public Works Department in accordance with Section 1.2 of the Public Improvement Standards:

   a. Lopez Drive shall be widened to complete the project frontage of an A-1d rural road section with Class 2 bike lane fronting the property within a dedicated right-of-way easement of sufficient width to contain all elements of the roadway prism.

   b. A private access road providing internal circulation shall be constructed to Cal Fire Standards within a minimum 24-foot private access, utility, and drainage easement with additional easement width as necessary to contain all elements of the roadway prism. The access road shall terminate in a Cal Fire standard cul-de-sac or other approved terminus.

   c. The driveway approach to Lopez Drive shall be reconstructed in accordance with County Public Improvement Standard B-1e drawing for high speed and/or high volume rural roadways.

   d. All roadway grading shall be done in accordance with Title 19 and the California Building Code. All lot lines shall be considered as Site Area Boundaries with slopes setback accordingly.

   e.

2. The applicant shall provide the county with an Engineer of Work Agreement retaining a registered civil engineer to furnish construction phase services, Record Drawings and to certify the final product to the Department of Public Works. The civil engineer, upon completion of the improvements, shall certify to the Department of Public Works that the improvements are made in accordance with all conditions of approval, including any related land use permit conditions and the approved improvement plans.

3. The applicant shall enter into an agreement and post a deposit with the county for the cost of checking the map, the improvement plans if any, and the cost of inspection of any such improvements by the county or its designated representative.

Offers, Easements and Restrictions:

4. The applicant shall reserve the following private easements by certificate on the map or by separate document:

a. A minimum 24-foot shared private access, utility, and drainage easement in favor of all parcels with additional width as necessary to include all elements of the roadway prism and the cul-de-sac or other Cal Fire approved road terminus.

5. The applicant shall show the following restrictions by certificate on the map or record by separate document:

   a. Except for the permitted driveway, access shall be denied from Lopez and this shall be by certificate and designation on the map.
   b. If drainage basins are required then the basin areas shall be indicated as a building restriction on the map.
   c. If a drainage basin is required, the drainage basin(s) along with rights of ingress and egress shall be offered for dedication to the public by certificate on the map with an additional easement reserved in favor of the owners and assigns.

Improvement Maintenance:

6. Roads and/or streets shall be maintained as follows:

   a. The roads internal to the tract shall not be accepted for County maintenance following completion and certification of the improvements. The developer shall establish a Property Owners' Association or other organized and perpetual mechanism to ensure adequate private maintenance, acceptable to the Department of Planning & Building.

Grading Improvement Maintenance:

7. Grading plans shall be prepared by a Registered Civil Engineer and submitted to the Department of Planning and Building for approval. The plan is to include, as applicable:

   a. Road plan and profile for the required onsite shared access road improvements including both as-built and proposed grading.
   b. Drainage ditches, culverts, and other structures (if drainage calculations require).
   c. Erosion and Sedimentation control plan for road related improvements.
   d. Public utility plan, showing all existing utilities and installation of all utilities to serve every lot.

Improvement Plans:

8. Improvement plans shall be prepared in accordance with County Public Improvement Standards by a Registered Civil Engineer and submitted to the Department of Public Works and the county Health Department for approval. The plans are to include, as applicable:

   a. Street plan and profile.
   b. Drainage ditches, culverts, and other structures (if drainage calculations require).
   c. Utility plan.
      1. Water plan to be approved jointly with County Environmental Health. Water facilities and appurtenances shall be constructed and service laterals stubbed to each new parcel (if applicable).
      2. Sewer plan to be approved jointly with County Environmental Health. Sewer facilities and appurtenances shall be constructed and service laterals stubbed to each new parcel (if applicable).

3. New electric power, telephone and cable television service conduits and appurtenances shall be constructed and service conduits stubbed to each new parcel.
4. New gas distribution mains and appurtenances shall be installed along the entire project frontage(s) and gas service laterals stubbed to each new parcel (if applicable).

d. Sedimentation and erosion control plan for subdivision related improvements.

e. Traffic control plan for construction in accordance with the California Manual on Uniform Traffic Control Devices (CA-MUTCD).

f. Public utility plan, showing all existing utilities and installation of all new utilities to serve each lot.

g. If environmental permits from the Army Corps of Engineers or the California Department of Fish and Game are required for any public improvements that are to be maintained by the County, the applicant or his engineer, prior to the approval of the plans by the Department of Public Works shall:

5. Submit a copy of all such permits to the Department of Public Works OR
6. Document that the regulatory agencies have determined that said permit is not required.

Drainage & Flood Control:

9. All subdivision improvements must be designed and constructed in accordance with the recommended Best Management Practices (BMPs) as listed in Table 4.10 of the "Arroyo Grande Creek Erosion, Sedimentation and Flooding Alternatives Study" (Swanson Hydrology & Geomorphology, January 2006), and county Public Improvement Standards. These BMPs shall include and not be limited to:
    a. Dispersing and/or slowing runoff with swales, infiltration trenches or similar
    b. Controlling concentrated runoff with curb usage or culverts or similar
    c. Soil stabilization with decomposed granite, retaining walls or slough walls or similar
    d. Sediment retention with staged catch or retention basins, vegetated filter strips or similar.
10. Submit complete drainage calculations in conformance with Title 21.03.010(e)(2) and the 2014 Public Improvement Standards prepared by a licensed civil engineer to the Department of Public Works for review and approval. If calculations so indicate, drainage must be detained or retained in drainage basins on the property. The design of the basin is to be approved by the Department of Public Works, in accordance with county standards. The basin/s is/are to be maintained in perpetuity.

Stormwater Pollution Prevention Plan (SWPPP)

11. **At the time of application for construction permits**, if the project disturbs more than 1.0 acre or is part of a common plan of development, the applicant must enroll for coverage under California's Construction General Permit. Sites that disturb less than 1.0 acre must implement all required elements within the site's erosion and sediment control plan as required by San Luis Obispo County Codes.

Fees:

12. The project is located adjacent to the City of Arroyo Grande. City road impact fees applicable to this project include:

a. [Planner should coordinate applicable fees with City of Arroyo Grande. FYI – the adjacent Tract 2383 is required to pay the City $11,708.40 for the 11 Lot Subdivision]

Additional Map Sheet:

13. The applicant shall prepare an additional map sheet to be approved by the County Department of Planning and Building and the Department of Public Works. The additional map sheet shall be recorded with the final parcel or tract map. The additional map sheet shall include the following:

    a. Notification to prospective buyers that all subdivision roads and streets are to be privately maintained, indicating the proposed maintenance mechanism, and indicating the proposed maintenance mechanism.

    b. Notification that the owner(s) of all lots are responsible for on-going maintenance of drainage and flood control improvements including basins, pipes, manholes, inlets, headwalls, sediment control devices, fencing, landscaping, etc. in a viable condition on a continuing basis into perpetuity, and indicating the proposed maintenance mechanism. The improved areas shall be indicated as a building restriction.

    c. All driveway approaches constructed on County roads shall require an encroachment permit.

    d. Lot development must be designed and constructed in accordance with the recommended Best Management Practices (BMPs) as listed in Table 4.10 of the "Arroyo Grande Creek Erosion, Sedimentation and Flooding Alternatives Study" (Swanson Hydrology & Geomorphology, January 2006), and county Public Improvement Standards.

    e. The property owner shall be responsible for the operation and maintenance of public road frontage landscaping and driveway sight distance in a viable condition and on a continuing basis into perpetuity.

    f. The additional map sheet shall contain the final conditions of approval as they are shown in the Notice of Final Action.

Covenants, Conditions and Restrictions:

14. The developer shall submit proposed Covenants, Conditions, and Restrictions (CC&R) for the subdivision to the county Department of Planning and Building for review and approval, and shall establish a Property Owners' Association or other organized and perpetual mechanism to ensure adequate inspection, operation, and maintenance (Maintenance) of the below project features in a form acceptable to the Department of Planning & Building, and in conformance with the requirements of the State Department of Real Estate:

    a. Maintenance of all private access roads in perpetuity.

    b. Maintenance of all drainage and flood control facilities including basins, inlets, pipes, fencing, landscaping, and related drainage appurtenances in a viable condition on a continuing basis into perpetuity.

    c. Maintenance of all common areas within the subdivision in perpetuity.

    d. Notification to prospective buyers that an additional map sheet was recorded with the final parcel or tract map. The restrictions, conditions and standards set forth in the additional map sheet apply to future development. It is the responsibility of the prospective buyers to read the information contained on the additional map sheet.

Miscellaneous:

15. The project shall comply with the requirements of the National Pollutant Discharge Elimination System Phase I and / or Phase II storm water program and the County's Storm Water Pollution Control and Discharge Ordinance, Title 8, Section 8.68 et sec.
16. Three (3) copies of a Preliminary Soils Report prepared by a Registered Civil Engineer in accordance with Sections 17953, 17954, 17955 of the California Health and Safety Code shall be submitted to the Public Works, Health and Planning and Building Departments prior to the filing of the final tract map. The date and person who prepared the report are to be noted on the map.
17. This subdivision is also subject to the standard conditions of approval for all subdivisions using community water and sewer a copy of which is attached hereto and incorporated by reference herein as though set forth in full.
18. All lots must be numbered in sequence.
19. All timeframes on approved tentative maps for filing of parcel or final tract maps are measured from the date the Review Authority approves the tentative map as required by the Subdivision Map Act.

County Govt Center, Room 206 | San Luis Obispo, CA 93408 | (P) 805-781-5252 | (F) 805-781-1229
pwd@co.slo.ca.us | slocounty.ca.gov

21.02.046(a) Tentative Map Check List

Status	Item	Comments
O	Preliminary Title Report. Preliminary title report concerning the property which is not more than six months old showing current property owners.	*Non provided*
✓	(1) Record Data. The boundary lines of the original parcel, with dimensions shown in feet, based on survey data or information of record, and area of the property shown in square feet or acres to the nearest tenth.	
✓	(2) Property Description. A description of the property as well as the assessor's parcel number(s) for the property.	
✓	(3) Legend and Owner Information. A north arrow and scale, the name and address of the record owner(s), and the name and address of the subdivider.	
✓	(4) Vicinity Map. A vicinity map on which shall be shown the general area including adjacent property, subdivisions and roads	
✓	(5) Existing Structures. All existing structures, wells, septic tanks, driveways and other improvements located on the original parcel shall be accurately located, identified and drawn to scale. The distance between structures, the distance from existing structures to the boundary lines of the new parcel on which the structures are to be located, and the height of each structure shall be shown. Such distances shall be established by a registered civil engineer's or licensed land surveyor's survey when deemed necessary by the planning department.	
O	(6) Contour Lines. Contour lines of the property shall be shown at intervals set forth: >40 Ac, 40ft; 20-40 AC, 20 ft; 10-20 AC, 10 ft; <10 AC w/ 0-12% slope, 2 ft; >12% slope , 5 ft	*No contours for northerly portion of project. No contour labels*
✓	(7) Drainage. The approximate location of all watercourses, drainage channels and existing drainage structures.	
✓	(8) Landforms. The approximate location of other topographic or manmade features, such as bluff tops and ponds.	
✓	(9) Lakes and Ocean. Approximate high-water lines in lakes or reservoirs, and the mean high tide line of the ocean.	
✓	(10) Flood Hazard. The location of all areas subject to inundation or stormwater overflow.	
X	(11) Proposed Parcel Lines. The proposed division lines with dimensions in feet and the gross and net area of each parcel created by such division in square feet or acres to the nearest tenth. Also, each parcel created shall be designated on the tentative map by number.	
✓	(12) Designated Building Sites. Any designated building sites proposed by the applicant to minimize grading, tree removal, and other potential adverse impacts, or any areas proposed for exclusion from construction activities, shall be shown on the tentative map for proposed parcels greater than ten thousand square feet. Also, any details on proposed building setback lines and widths of side yards shall be shown on the tentative map.	
✓	(13) Streets. The locations, names, county road numbers and widths of all adjoining and contiguous highways, streets and ways.	
O	(14) Easements. The locations, purpose and width of all existing and proposed easements, streets (with proposed names) and appurtenant utilities.	*No easements shown for access, utilities, etc.*
✓	(15) Coastal Zone. For tentative maps for properties located within the coastal zone between the sea and the first public road paralleling the sea, show the location of the public access ways nearest to the subject site	

Status: **X** = *Not Applicable* **O** = *Requires Compliance* ✓ = *Complied*

EMR 1/17/2019 3rd Review

County Govt Center, Room 206 | San Luis Obispo, CA 93408 | (P) 805-781-5252 | (F) 805-781-1229
pwd@co.slo.ca.us | slocounty.ca.gov

COUNTY OF SAN LUIS OBISPO HEALTH AGENCY

Public Health Department

Jeff Hamm
Health Agency Director

Penny Borenstein, M.D., M.P.H.
Health Officer

Public Health
Prevent. Promote. Protect.

December 17, 2014

To: Department of Planning and Building
Stephanie Fuhs, South County Team / Development Review

From: Environmental Health
Leslie Terry

Project Description: TRACT 3027 SUB2014-00023, MJG PROPERTY
APN: 047-200-019

See attached prelim letter.

Applicant should initiate Technical, Managerial and Financial (TMF) Assessment preparation prior to hearing. A complete and approved TMF is required as part of the water system permit. Water system permit must be in place prior to map recordation.

Submital drawing does not appear to indicate water wells and wastewater disposal systems. An updated drawing should be provided to this office which clearly indicates water and wastewater systems.

2191 Johnson Avenue, San Luis Obispo, California 93401
(805) 781-5500 FAX (805) 781-5543 www.SLOpublichealth.org

COUNTY OF SAN LUIS OBISPO HEALTH AGENCY

Public Health Department

Jeff Hamm
Health Agency Director

Penny Borenstein, M.D., M.P.H.
Health Officer

Public Health
Prevent. Promote. Protect.

December 17, 2014

MJG Property Holding Partners
412 Marsh Street
San Luis Obispo, CA 93401

RE: TENTATIVE TRACT MAP 3027 (SWEET SPRINGS MOBILE HOME PARK)
APN # 047-200-019

Water Supply

This office is in receipt of **preliminary** evidence of water in the form of an Intent to Serve Letter from the Sweet Springs Water System dated December 8, 2014. Applicant is proposing to upgrade an existing State Small Water System to a Community Water System. Operable water facilities, from an approved public water source, shall be assured prior to the filing of the final map. Contact this office for specific water system requirements.

A "will serve" letter shall be obtained from the newly created water company and shall be submitted to this office for review and approval. Said document shall state that there are operable water facilities immediately available for connection to the parcels created. Water main extensions and related facilities (except wells) may be bonded for, subject to the approval of County Public Works and Environmental Health.

Wastewater Disposal

Individual wastewater disposal systems are considered an acceptable method of disposal, provided County and State installation requirements can be met. This office is responsible for certifying that field investigations show that ground slopes and soil conditions will allow for satisfactory disposal by on-site septic systems for feasibility purposes. Soil testing, to include three percolation tests and one deep soil boring, shall be performed on the undeveloped lot prior to recordation of the final map. Be advised that all septic system leach fields (and expansion areas) shall be installed at a minimum of 100 feet away from any domestic water wells or watercourse, 200 feet away from reservoir, shall be located in areas free from bedrock, and shall not be placed on natural slopes that exceed 30%. Should a wastewater disposal system be installed in an area with greater than 20% slope it must be designed and the installation certified by a registered civil engineer. Soil testing should be performed during wet weather months, and as early as reasonable during the project. Please provide documentation of any maintenance or problems that have occurred on existing systems prior to hearing.

Tract 3027 is approved for Health Agency subdivision map processing.

LESLIE TERRY, R.E.H.S.
Environmental Health Specialist
Land Use Section

c: Stephanie Fuhs, County Planning
Tim Crawford
Sweet Springs Water System

CAL FIRE
San Luis Obispo
County Fire Department

635 N. Santa Rosa • San Luis Obispo, CA 93405
Phone: 805-543 -4244 • Fax: 805-543-4248
www.calfireslo.org

Robert Lewin, Fire Chief

March 6, 2015

Tim Crawford

Fire & Life Safety Clearance for **Project: SUB#2014**-00023

The following information is provided relative to the fire protection of 311 Sweet Springs inArroyo Grande, CA. This geographic location **is** located in a **High** Fire Hazard Severity Zone within State Responsibility Area Lands. The Agency Having Jurisdiction (AHJ) is CAL FIRE/San Luis Obispo County Fire Department. This is a full time paid department that utilizes Paid Call Firefighters (PCF) to augment fulltime staff.

The nearest CAL FIRE/County Fire Station (#64-Pismo Beach) is located at 990 Bello st. with a 7 mile driving distance and an approximately 10 minute response time. An additional CAL FIRE/County Fire engine with a 12road miles distance and an approximate 18 minute response time would respond from station (#21-Airport) located at 4671 Broad st. San Luis Obispo, CA.

An on-site fire/life safety inspection was conducted at 311 Sweet Springs on 2/19/15 by **Tony Gomes**.

The inspection was made in accordance with "Conditions of Approval" for compliance with the California Fire Code. The Department finds that all fire/life safety improvements have been satisfied.

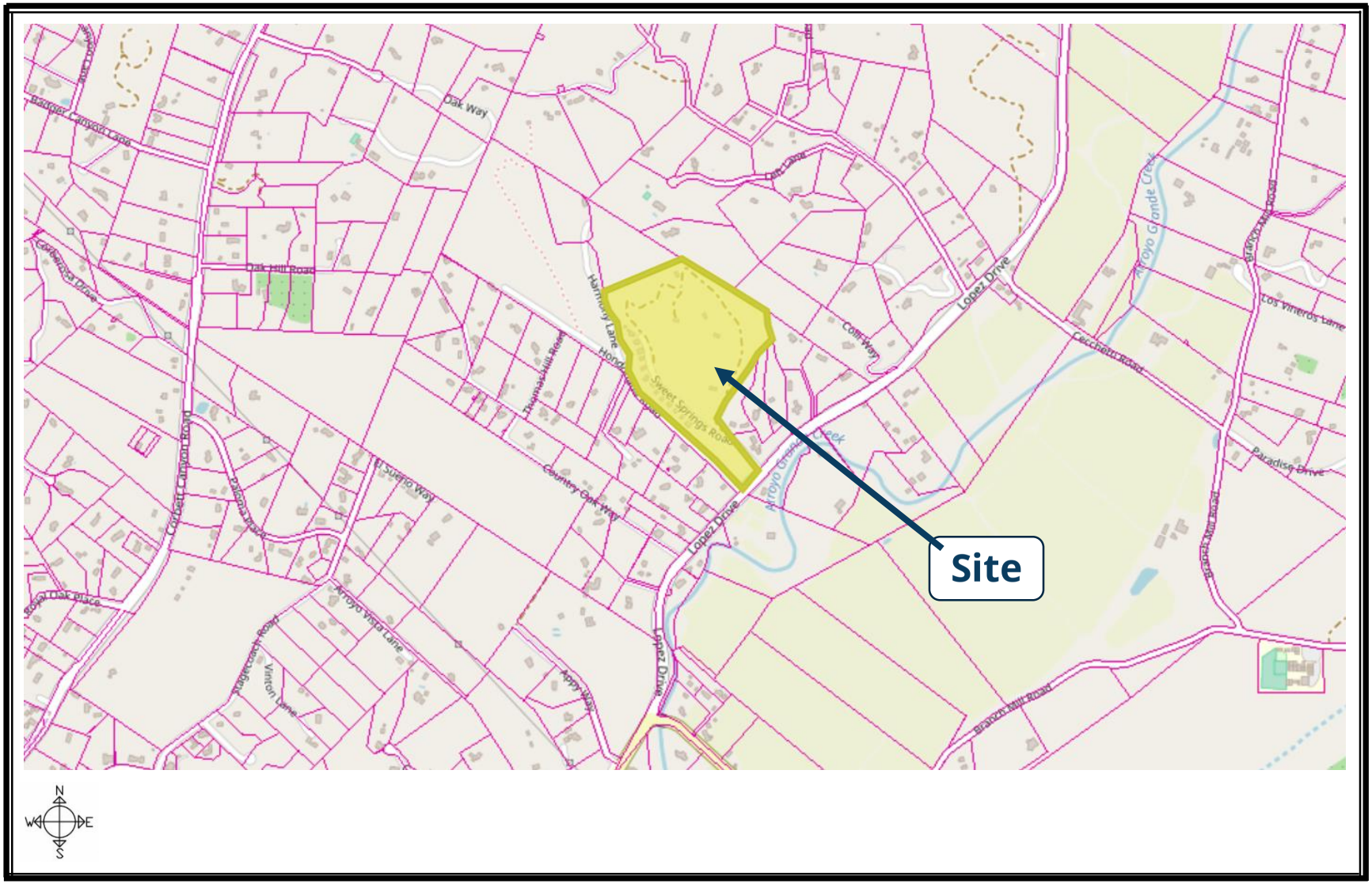
If I can provide additional information, please don't hesitate to contact me at (805) 543-4244.

Sincerely,

Tony Gomes

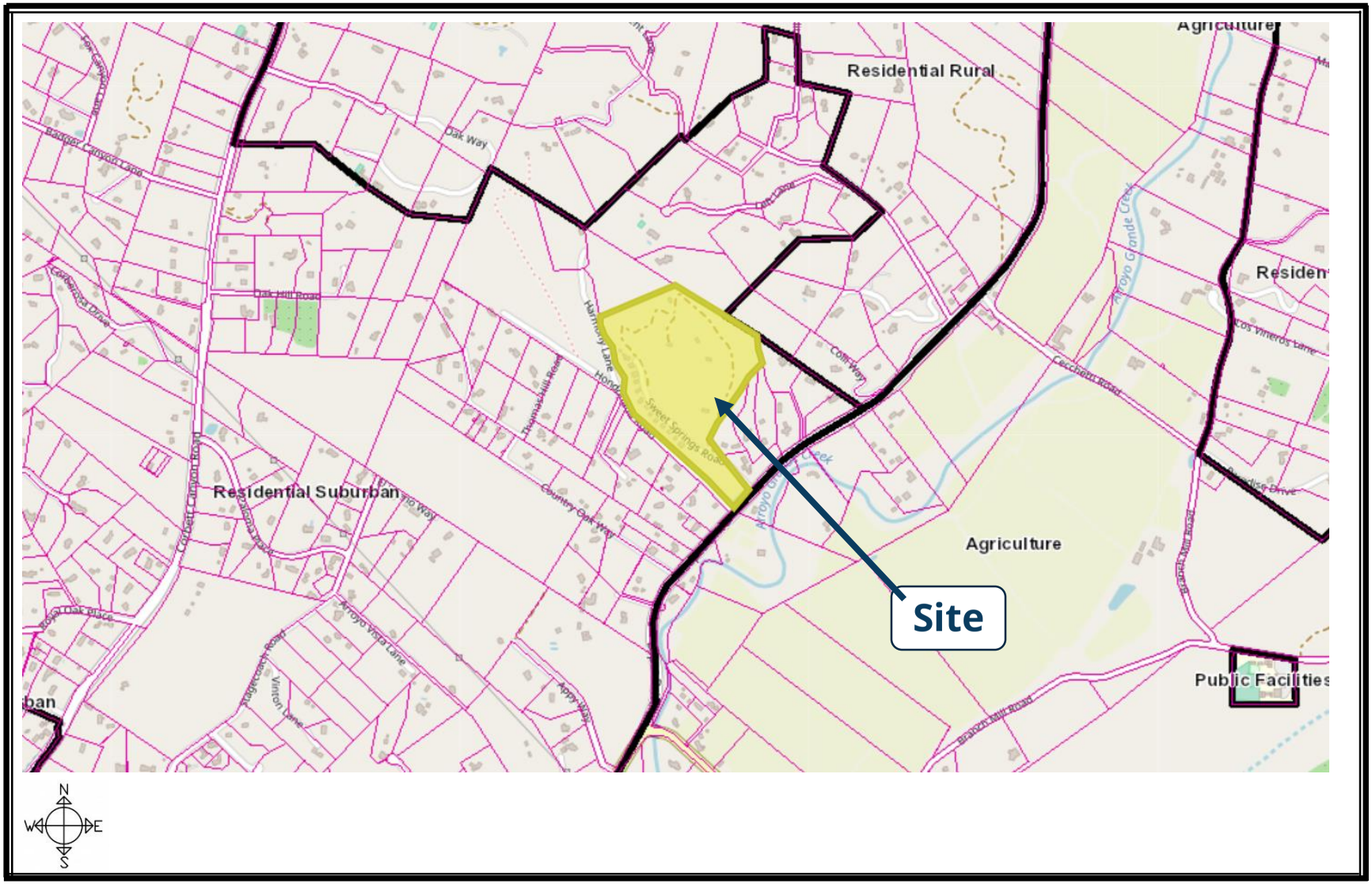
Inspector
Fire Captain

cc:



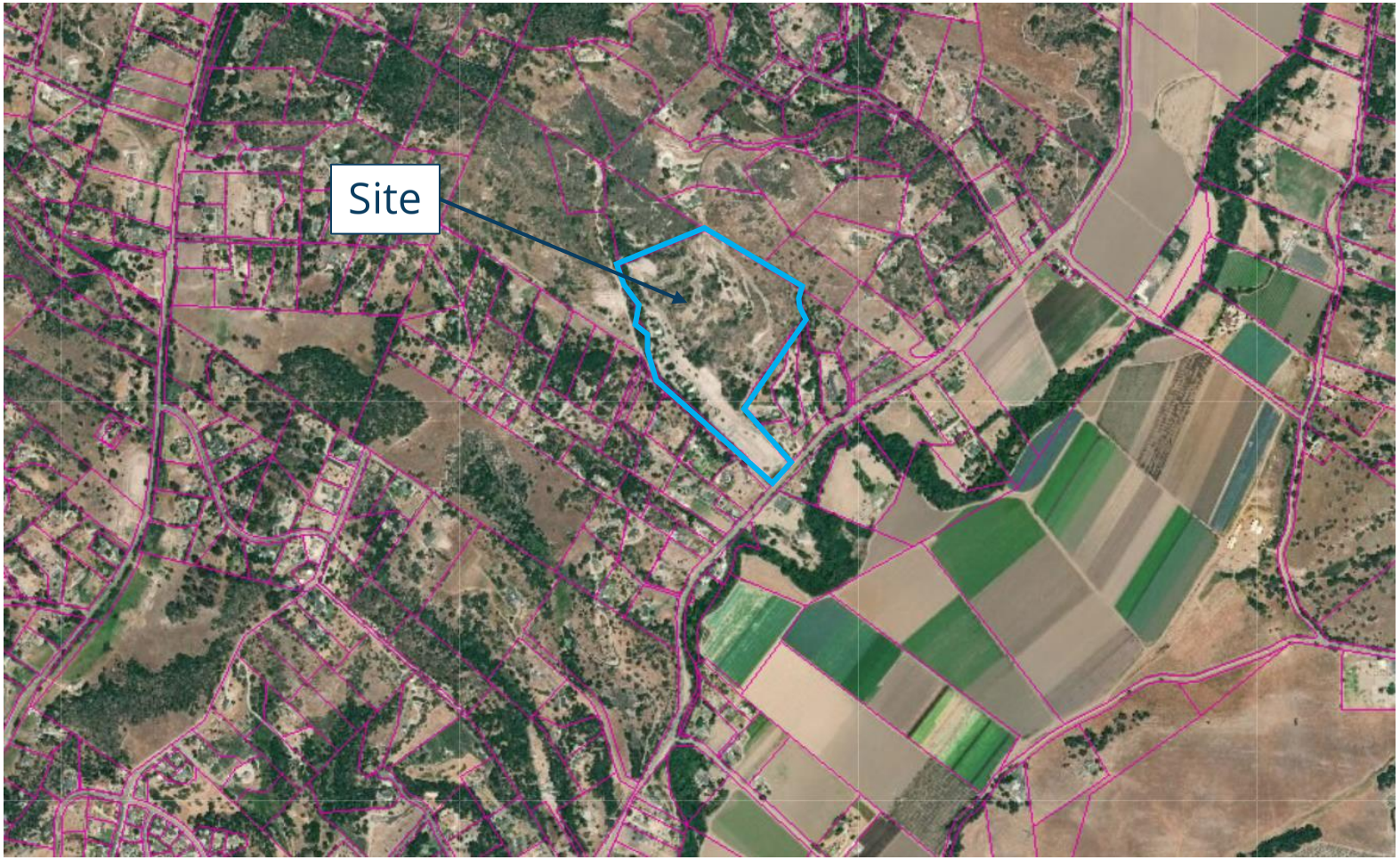
COUNTY OF SAN LUIS OBISPO

Vicinity Map
SUB2014-00023



COUNTY OF SAN LUIS OBISPO

Land Use Category Map
SUB2014-00023

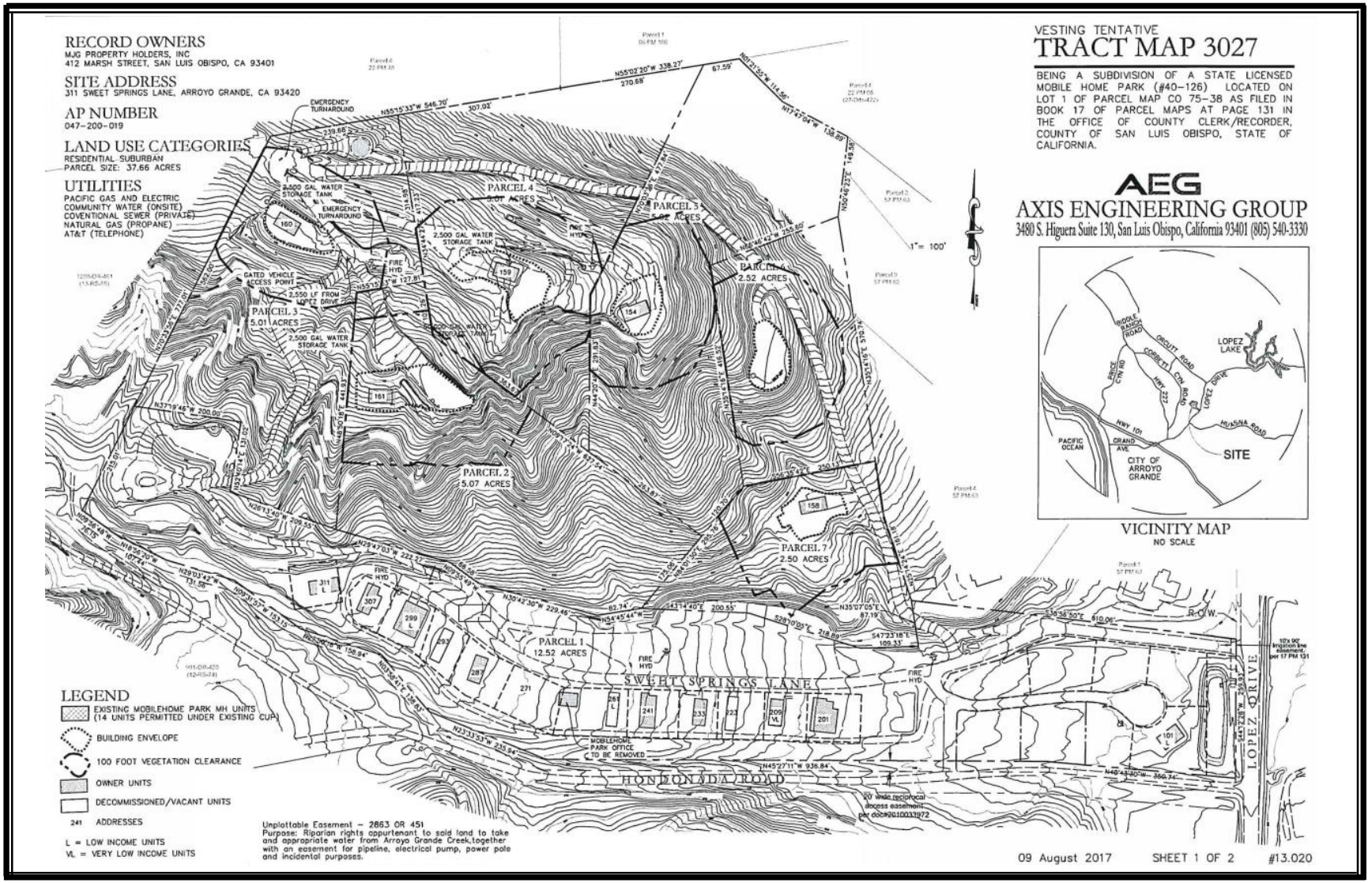


COUNTY OF SAN LUIS OBISPO

Aerial
SUB2014-00023

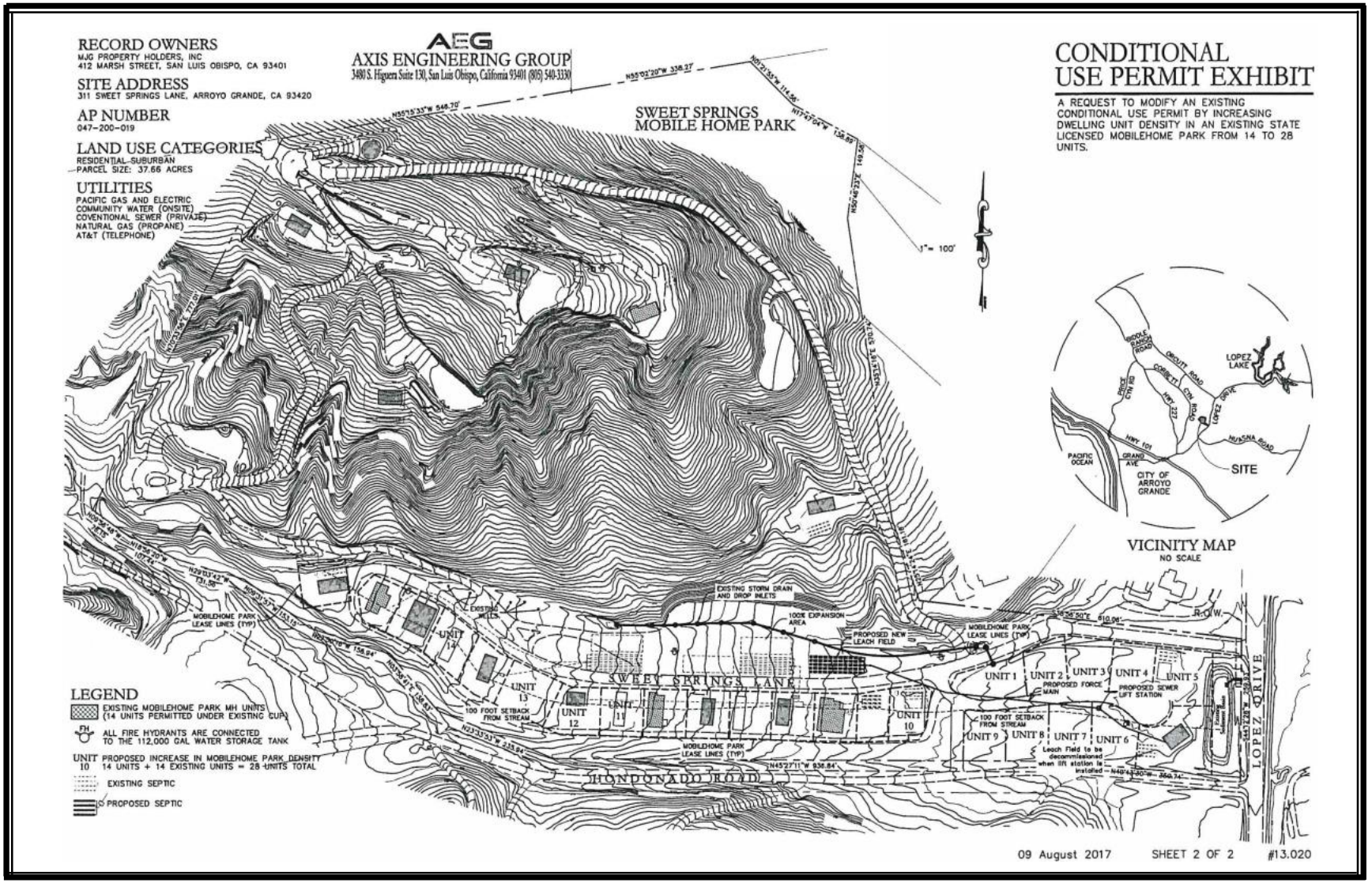
COUNTY OF SAN LUIS OBISPO

Aerial
SUB2014-00023



COUNTY OF SAN LUIS OBISPO

Tentative Tract Map
SUB2014-00023



COUNTY OF SAN LUIS OBISPO

Conditional Use Permit Exhibit
SUB2014-00023